

California Public  
Utilities Commission  
**Sycamore-Peñasquitos**  
**230-kV Transmission**  
**Line Project**

Mitigation Monitoring,  
Compliance, and  
Reporting Program

DECEMBER 2016



**PANORAMA**  
ENVIRONMENTAL, INC.

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**Transmission Line Project**  
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**DECEMBER 2016**

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## ACRONYMS AND ABBREVIATIONS

### ACRONYMS AND ABBREVIATIONS

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AB	Assembly Bill
AC	alternating current
ANSI	American National Standards Institute
APLIC	Avian Power Line Interaction Committee
APM	Applicant Proposed Measure
ARMR	Archaeological Resources Management Reports
BMP	Best Management Practice
BOMMP	Burrowing Owl Monitoring and Mitigation Plan
BSA	Biological Survey Area
CA	Contract Administrator
Cal Fire	California Department of Forestry and Fire Protection
CalOSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAP	Congested Area Plan
CARB	California Air Resources Board
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CLAMP	Committee for Land and Airspace Management Policy
CM	Construction Manager
County	San Diego County
CPCN	Certificate of Public Convenience and Necessity
CPUC	California Public Utilities Commission
CTMP	Construction Transportation Management Plan
dBA	A-weighted decibels
DTSC	Department of Toxic Substances Control
ECL	Environmental Compliance Lead
EI	Environmental Inspector

## ACRONYMS AND ABBREVIATIONS

EIR	Environmental Impact Report
EM	Environmental Monitor
EPM	Environmental Project Manager
ESA	Endangered Species Act
ETP	Environmental Training Program
FAA	Federal Aviation Administration
FCA	Field Construction Advisor
Fire Plan	Final Fire Prevention Plan
FUDS	Formerly Used Defense Sites
GIS	geographic information system
HCP	Habitat Conservation Plan
HSCERP	Hazardous Substance Control and Emergency Response Plan
HWCL	Hazardous Waste Control Law
I-15	Interstate 15
IEEE	Institute of Electrical and Electronics Engineers
KOP	key observation point
kV	kilovolt
LEI	Lead Environmental Inspector
LOS	level-of-service
MCAS	Marine Corps Air Station
MHPA	Multi-Habitat Planning Area
MLD	most likely descendant
MM	mitigation measure
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MMRP	Mitigation Monitoring and Reporting Plan
MPR	Minor Project Refinement
MSCP	Multiple Species Conservation Program
NAHC	California Native American Heritage Commission
NAVSEA	Naval Sea Systems Command
NCCP	Natural Communities Conservation Plan
NCR	Non-Compliance Report
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
OSHA	Occupational Safety and Health Administration
PCA	Pest Control Advisor
PCR	Post-Construction Report



## ACRONYMS AND ABBREVIATIONS

PM	Project Manager
PM10	coarse dust particles 2.5 to 10 micrometers in diameter
PRC	Public Resources Code
Project	Sycamore to Peñasquitos 230-kilovolt Transmission Line Project
PSR	Pre-Activity Study Report
PTC	Permit to Construct
PVC	polyvinyl chloride
QCB	Quino Checkerspot Butterfly
RCRA	Resource Conservation and Recovery Act
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SCIC	South Coastal Information Center
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas and Electric Company
SEAP	Safety and Environmental Awareness Program
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Road
STC	Sound Transmission Class
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TEWS	Temporary Extra Work Space
TSP	tubular steel pole
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VOC	volatile organic compound

## ACRONYMS AND ABBREVIATIONS

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# 1 INTRODUCTION

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## 1.1 PROJECT OVERVIEW

On April 7, 2014, San Diego Gas and Electric Company (SDG&E; the Applicant) submitted Application 14-04-011 seeking a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for its proposed Sycamore-Peñasquitos 230-Kilovolt (kV) Transmission Line Project (Project). SDG&E seeks to construct, operate, and maintain a new 16.7-mile-long 230-kV transmission line between the existing Sycamore Canyon Substation and the existing Peñasquitos Substation between the City of San Diego and the City of Poway in San Diego County (County), California.

### 1.1.1 Description of Alternative 5

The CPUC adopted the Final Environmental Impact Report (EIR) (State Clearinghouse No. 2014081031) and selected Alternative 5 of the project on October 13, 2016, in accordance with California Environmental Quality Act (CEQA) Public Resources Code (PRC) §21080.

Alternative 5: Pomerado Road to Miramar Area North Combination Underground/Overhead, identified in the Final EIR as the Environmentally Superior Alternative, is a routing alternative located within an entirely new alignment from the originally proposed Project. For construction purposes, Alternative 5 has been divided into three segments (A, B, and C) and eight sections. Segments and sections are described below. See Appendix A for maps depicting the Alternative 5 alignment, segments, and sections.

#### 1.1.1.1 Segment A

Segment A of Alternative 5 is an overhead alignment running between Sycamore Canyon Substation and Stonecroft Trail within existing SDG&E right-of-way (ROW). A 230-kV steel cable pole will be constructed at pole structure P5 near Stonecroft Trail, and the existing wooden 138-kV H-frame structure will be replaced with steel H-frame dead end structure P6. Cable pole P5 will be approximately 159.5 feet tall and will require a 155-foot-long retaining wall.

#### Section 1

Section 1 of Segment A includes the overhead transmission alignment from the Sycamore Canyon Substation to the Marine Corps Air Station (MCAS) Miramar Boundary.

#### Section 2

Section 2 of Segment A includes the overhead transmission alignment from the MCAS Miramar Boundary to dead end structure P6.

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### 1.1.1.2 Segment B

In Segment B of Alternative 5, the 230-kV transmission line transitions at cable pole P5 from an overhead position into an underground duct bank and continues west within Stonebridge Parkway. Segment B follows Stonebridge Parkway underground to its terminus with Pomerado Road, where the route turns south on Pomerado Road, and follows Pomerado Road to Interstate 15 (I-15).

There are three potential options for the Alternative 5 crossing of I-15:

- Option 1: Requires four poles (one cable pole and one interset pole on each side of the highway) to transition the transmission line from underground to overhead position and across I-15.
- Option 2: Involves two cable poles to transition the transmission line to an overhead position and across I-15. No interset poles are required in Option 2.
- Option 3: Installs the transmission line in vacant bridge cells in the Pomerado Road/ Miramar Road Bridge that spans over I-15. The transmission line remains underground in Option 3.

The two I-15 cable poles will be between approximately 159 and 185 feet tall, and the two I-15 interset poles will be approximately 120 feet tall, if required.

West of I-15, Segment B continues westward under Miramar Road, turns north on Kearny Villa Road, south on Black Mountain Road, and west on Activity Road to Camino Ruiz. Alternative 5 Segment B continues underground north under Camino Ruiz, west on Miralani Drive, west on Arjons Drive, south on Trade Place, west on Trade Street, south on Camino Santa Fe, and west on Carroll Road/Carroll Canyon Road to an existing SDG&E ROW on the west side of Interstate Highway 805. Here, a 230-kV steel cable pole (labelled CC MM) will be installed to transition the transmission line back to an overhead position.

#### **Section 1**

Section 1 of Segment B includes the underground transmission alignment from cable pole P5 to the east side of I-15.

#### **Section 2**

Section 2 of Segment B consists of the I-15 crossing utilizing Option 1, 2, or 3.

#### **Section 3**

Section 3 of Segment B includes the underground transmission alignment from the west side of I-15 to Cable Pole CC MM CP.

### 1.1.1.3 Segment C

In Segment C of Alternative 5, the 230-kV transmission line transitions at cable pole CC MM from the underground duct bank to an overhead position on existing 230-kV tubular steel poles

## 1 INTRODUCTION

(TSPs) within existing ROW heading northward into the Peñasquitos Substation. Cable pole CC MM will be approximately 159.5 feet tall.

### Section 1

Section 1 of Segment C includes the overhead transmission alignment from cable pole CC MM to Structure E45.

### Section 2

Section 2 of Segment C includes the overhead transmission alignment from Structure E45 to Structure E41 (within the Coastal Zone).

### Section 3

Section 3 of Segment C includes the overhead transmission alignment from Structure E41 to the Peñasquitos Substation.

Approximately 2.8 miles of the transmission line will be overhead within existing SDG&E ROW (0.7 mile between the Sycamore Canyon Substation and cable pole P5, and 2.1 miles from cable pole CC MM to Peñasquitos Substation) and 11.5 miles will be underground for a total length of 14.3 miles.

SDG&E will also implement one of the following strategies to avoid N-2 contingencies required with the adoption of Alternative 5:

Strategy #1: Limiting import and adjusting San Diego generation to prevent the post-contingency overload of TL13810 following the N-2 contingency, or

Strategy #2: Installing a system protection scheme to shed load following the N-2 contingency until the Mission—Peñasquitos 230-kV transmission line project is in service.

### 1.1.2 Alternative 5 Staging Yards and Materials Storage

The Alternative 5 staging yards locations are shown in the Appendix A maps. The Alternative 5 staging yards will be used for pole assemblage, temporary stockpile of material, refueling and maintenance/repair of vehicles and equipment, storage of materials and equipment, portable restrooms, parking, lighting, generator use, worker meet-up, construction trailers, and temporary water and fuel storage for construction activities. Staging yards where helicopter activities (i.e., short term operations and landing, refueling, maintenance and repair) will be permitted are also identified in the Appendix A maps. Spare underground polyvinyl chloride (PVC) conduit may be temporarily stored along roadways during construction.

# 1 INTRODUCTION

## 1.2 MONITORING PROGRAM

### 1.2.1 Authority

SDG&E is required to implement Applicant Proposed Measures (APMs) and mitigation measures (MMs) adopted in the Final EIR, as well as to obtain and implement various agency permits applicable to the project, as described in the CPUC's Final Decision adopted on October 13, 2016. The CPUC is the lead agency under CEQA and responsible for monitoring and enforcing compliance with these requirements. The CPUC is required to adopt a reporting and/or monitoring program to ensure adequate implementation of and compliance with mitigations adopted in the Final EIR pursuant to PRC §21081.6 and Section 15097 of the CEQA Guidelines. Chapter 9 of the Final EIR included a Mitigation Monitoring and Reporting Plan (MMRP) that describes a recommended framework for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) prior to construction of the project. In 2013, the CPUC established a CEQA Citation Program authorizing staff to fine public utilities for non-compliance with Permits to Construct (PTCs) and CPCNs. MMCRPs are adopted as part of PTCs and CPCNs and are enforced as such. The MMCRP was prepared pursuant to the framework described in Chapter 9 of the Final EIR, and in accordance with PRC §21081.6 and Section 15097 of the CEQA Guidelines. The MMCRP shall be implemented until the final monitoring and reporting procedures identified in the following sections have been completed to the satisfaction of the CPUC.

### 1.2.2 Purpose

The purpose of the MMCRP is to:

- Summarize the applicable mitigation and reporting requirements identified in the Final EIR
- Organize the requirements by category and implementation phase
- Describe procedures for SDG&E, CPUC and the contractors to follow
- Ensure impacts to the environment addressed in the Final EIR are adequately mitigated as required by CEQA

### 1.2.3 MMCRP Implementation

Implementation of the MMCRP will end when CPUC determines there is no further need for CPUC monitoring of the Project. SDG&E is required to perform post-construction monitoring for the project to satisfy APM and MM requirements that are listed in the implementation tracking tables found in Appendices B, C, and D. It is expected that post-construction monitoring and implementation of the MMCRP will continue for an appropriate amount of time (estimated at 3 to 5 years) to verify that post-construction requirements (i.e., revegetation) have been met.

# 1 INTRODUCTION

## 1.3 CONSTRUCTION SCHEDULE

The estimated overall construction schedule for the project and duration of work for key construction activities is presented in Table 1.3-1. The estimated start date for construction is November 2016 with transmission line energization by June 2018, following an estimated 21-month construction period.

**Table 1.3-1 Estimated Overall Construction Schedule**

Construction Activity	Estimated Duration	Preliminary Schedule <sup>a</sup>
Staging Yard Preparation and Mobilization	1-2 months	Nov-December 2016
Site Preparation and Road Construction	1 month	Jan 2017
Wire and Structure Removal	1 month	Feb 2017
Foundation Construction	1 month	Mar 2017
Structure Assembly and Erection	1 month	April 2017
Wire Stringing	1 month	May 2017
Mark Out, Excavate and Install Vaults	6-7 months	Jan-July 2017
Trench and Duct	8-9 months	April 2017-Dec 2017
Cabling	9-10 months	July 2017-April 2018
Cable Testing and Commissioning	2 months	May-June 2018
Cleanup and Restoration	1 month	June 2018
Total Construction Period	21 months	

<sup>a</sup> Some construction activities will occur concurrently. The actual construction schedule may vary based upon many factors, including the timeline for additional agency approvals and ROW acquisition, environmental conditions, and any necessary changes to the project design due to unexpected physical conditions.

Project-related construction activities (beyond pre-construction activities such as engineering, design, studies, and permitting) will not begin until the CPUC's Project Manager (PM) has issued one or more Notices to Proceed (NTPs) covering the planned activities.

Table 1.3-2 provides a detailed construction schedule by overhead and underground segment and sections location.

## 1 INTRODUCTION

**Table 1.3-2 Detailed Construction Schedule by Segment and Location**

Location Description	Activity Name	Estimated Start	Estimated Finish
Overhead Segment A: Sycamore Canyon Substation to Structure P6	Total Construction Period for Segment A	January-17	March-17
	Site Preparation and Mobilization	January-17	January-17
	Wire and Structure Removals	January-17	February-17
	Foundation Construction	January-17	February-17
	Structure Assembly and Erection	January-17	February-17
	Wire Stringing	February-17	March-17
	Cleanup and Restoration	February-17	March-17
Underground Segment B: Cable Pole P5 to east of I-15 Crossing to West of I- 15 Crossing to Cable Pole CC MM	Total Construction Period for Segment B	January-17	June-18
	Site Preparation and Mobilization	January-17	February-17
	Mark Out, Excavate and Install Vaults	January-17	July-17
	Trench and Duct	April-17	December-17
	Cabling	July-17	April-18
	Testing and Commissioning	May-18	June-18
	Cleanup and Restoration	March-18	June-18
Overhead Segment C: Structure CC MM CP to Peñasquitos Substation	Total Construction Period for Segment C	January-17	April-17
	Site Preparation and Mobilization	January-17	January-17
	Foundation Construction	January-17	February-17
	Structure Assembly & Erection	January-17	March-17
	Wire Stringing	February-17	March-17
	Testing and Commissioning	April-17	April-17
	Cleanup and Restoration	April-17	May-17
Staging Yards	Set-up and Mobilization	November-16	January-17
Cleanup and Restoration	NA	June-18	November-18



## 2 SCOPE OF THE PROGRAM

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### 2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT MITIGATION

The project is subject to APMs and MMs identified in the Final EIR that are collectively referred to as CEQA mitigation. Appendices B, C, D, and E list all APMs and MMs that are applicable to the approved project. These appendices are modified versions of the table included in Chapter 9 of the Final EIR and are the core components of the MMCRP<sup>1</sup>. Appendices B, C, D, and E represent different implementation phases (B: pre-construction, C: construction, D: post-construction, and E: operation and maintenance) and include the following information:

- Full text of the APMs and MMs
- SDG&E's implementation requirements
- CPUC's verification and enforcement responsibilities
- Effectiveness criteria for determining the success of implementation
- Applicable timing and location for implementation

### 2.2 PERMITS AND AUTHORIZATIONS

Federal, state, and local agencies have jurisdiction over lands and resources in the project area. Potentially applicable permits for the Project were addressed in the Final EIR Project Description and are listed in Table 2.2-1. In addition to the APM and MM requirements, SDG&E is required to obtain permits and/or agency authorizations from federal, state, and local agencies. Table 2.2-2 lists the contacts information for the jurisdictional agencies associated with the project.

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<sup>1</sup> The Chapter 9 MMRP Table 9.1-1 published with the Final EIR included 9 MMs that do not apply to Alternative 5: MM Aesthetics-1, MM Air-5, MM Biology-2, MM Biology-4, MM Hydrology-3, MM Recreation-2, MM Traffic-9, MM Traffic-10, and MM Utilities-2 as well as two APMs that do not apply to Alternative 5: BIO-4, and TR-1. These measures were omitted from Table 6.3-1 and Appendices B, C, D, and E.

## 2 SCOPE OF THE PROGRAM

**Table 2.2-1 Potentially Required Permits and Approvals**

Permit/Authorization	Agency	When is Permit Required?
<b>Federal</b>		
Tier 1 Approval and National Environmental Policy Act (NEPA) Compliance	MCAS Miramar Committee for Land and Airspace Management Policy (CLAMP)	Construction on MCAS Miramar and NEPA review
Federal Endangered Species Act Incidental Take Permit or Authorization under Natural Communities Conservation Plan (NCCP)	United States Fish and Wildlife Service (USFWS)	Impacts to federally listed species during installation of new facilities
Clean Water Act Section 404	United States Army Corps of Engineers (USACE)	Impacts to Waters of the U.S.
Lighting and Aerial Marking	Federal Aviation Administration (FAA) and MCAS Miramar	Construction of overhead materials potentially requiring aerial marking
Congested Area Plan	FAA	Use of helicopters with external load over congested areas
<b>State</b>		
CPCN	CPUC	Overall project approval and CEQA review
National Pollution Discharge Elimination System (NPDES)—Construction General Permit and Implementation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP)	State Water Resources Control Board (SWRCB)	Stormwater discharges associated with construction activities disturbing more than 1 acre of land
Order R9-2015-0091 Master Recycling Permit for the City of San Diego North City Water Reclamation Plant, San Diego County	Regional Water Quality Control Board (RWQCB)	Use of reclaimed water during construction
Order R9-2014-0041 Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region	RWQCB	Construction discharges from construction dewatering
Clean Water Act Section 401 Water Quality Certification	RWQCB	Certification that the project is consistent with state water quality standards
Coastal Development Permit/Waiver	California Coastal Commission (CCC)	Construction of facilities within California Coastal Zone
California Endangered Species Act Incidental Take Permit or Authorization under NCCP	California Department of Fish and Wildlife (CDFW)	Impacts to listed species during installation of new facilities
California Fish and Game Code Section 1602 Lake and Streambed Alteration Agreement	CDFW	Impacts to Waters of the State of California

## 2 SCOPE OF THE PROGRAM

Permit/Authorization	Agency	When is Permit Required?
Encroachment Permit	California Department of Transportation (Caltrans)	Construction, operation, and maintenance within, under, or over State highway ROW
<b>Local</b>		
Encroachment or Public Right-of-Way Permit(s) and Traffic Control Plan(s)	City of San Diego	Construction within, under, or over city roadways
Coastal Development Permit (CDP)	City of San Diego	Construction of facilities within California Coastal Zone under Local Coastal Program (CDP will be a consolidated permit with the CCC)
Building Permit(s) (ministerial)	City of San Diego	Disturbance of soil and vegetation in environmentally sensitive areas and grading on hill slopes
Recycled Water Permit	City of San Diego	Use of recycled water during construction
Temporary Use Permit	City of Poway	Use of Stowe staging yard
Construction Noise Permit	City of San Diego and City of Poway	Construction outside of approved hours
Hauling Permit	Local Jurisdictions	Transport of oversized loads over public roadways

## 2 SCOPE OF THE PROGRAM

**Table 2.2-2 Jurisdictional Agencies Associated with the Sycamore-Peñasquitos Project**

Agency	Address	Contact Person	Phone	Email Address
<b>Lead Agencies</b>				
CPUC	505 Van Ness Ave, 4th Floor San Francisco, CA 94102	Billie Blanchard – Project Manager	(415) 703-2068	bcg@cpuc.ca.gov
<b>Federal Agencies</b>				
United States Fish and Wildlife Service	2177 Salk Avenue, Suite 250 Carlsbad, CA 92008	Patrick Gower	(760)431-9440 x352	Patrick_Gower@fws.gov
Federal Aviation Administration	San Diego Flight Standards District Office 8525 Gibbs Drive, Suite 120 San Diego, CA 92123	William Sapp	(858) 502-9882	William.d.sapp@faa.gov
United States Army Corps of Engineers	5900 La Place Court, Suite 100 Carlsbad, CA 92008	TBD	(760)602-4829	TBD
Department of the Navy (MCAS Miramar)	TBD <sup>2</sup>	TBD	TBD	TBD
<b>State Agencies</b>				
California Department of Fish and Wildlife	South Coast Region 5 3883 Ruffin Road San Diego, CA 92123	Eric Hollenbeck	(858) 467-2720	Eric.Hollenbeck@ wildlife.ca.gov
California Department of Transportation	4050 Taylor Street San Diego CA 92110	Kimberly Dodson	(619) 688-2510	Kimberly.dodson@ dot.ca.gov
State Water Resources Control Board	1001 I Street, 15th Floor Sacramento CA 95814	File online via Storm Water Multiple Application and Report Tracking System	(866) 563-3107	stormwater@ waterboards.ca.gov

<sup>2</sup> Contact information for MCAS Miramar will be added once the Tier 1 CLAMP package has been submitted and MCAS Miramar assigns a designated Point of Contact for the Project.

## 2 SCOPE OF THE PROGRAM

Agency	Address	Contact Person	Phone	Email Address
CA Coastal Commission	45 Fremont St. Suite 2000 San Francisco, CA 94105	Joseph Street	(415) 904-5249	<a href="mailto:joseph.street@coastal.ca.gov">joseph.street@coastal.ca.gov</a>
<b>Local and Regional</b>				
City of San Diego Public Utilities Department	9192 Topaz Way San Diego, CA 92123	Eric Rubalcava Mike Faramarzi	(858) 654-4284 (858) 614-4518	Erubalcava@sandiego.gov MFaramarzi@sandiego.gov
City of San Diego Engineering	9485 Aero Drive San Diego, CA 92123	George Gazallo	(619) 533-3183	GGazallo@sandiego.gov
City of San Diego Recreation	202 C Street San Diego CA, 92101	Gina Washington	(858) 538-8006	GWashington@sandiego.gov
San Diego Regional Water Quality Control Board	2375 Northside Drive, Suite 100 San Diego, CA 92108	Alan Monji	(619) 521-3968	Alan.Monji@waterboards.ca.gov
San Diego Air Pollution Control District	10124 Old Grove San Diego, CA 92131	Robert Kard – Director	(858) 586-2600	Robert.Kard@sdcounty.ca.gov
<b>Other Utilities</b>				
San Diego County Water Authority	4677 Overland Ave San Diego, CA 92123	General Contact	(858) 522-6600	info@sdcwa.org

## 2 SCOPE OF THE PROGRAM

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### 3 ROLES AND RESPONSIBILITIES

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SDG&E, including their contractors, are collectively responsible for ensuring environmental impacts addressed in the Final EIR are adequately mitigated. SDG&E is responsible for implementing and maintaining all MMs and APMs, and for obtaining and complying with all required permits. The CPUC is responsible for monitoring SDG&E's compliance by verifying that implementation is completed adequately, and enforcing appropriate corrective actions if the project is not in compliance.

This section describes specific SDG&E and CPUC roles and responsibilities for the project, and titles that will be assigned to personnel in these roles.

A list of designated personnel who will perform these roles, including their organization and contact information, will be located in Appendix F. The contact information shall be updated as needed throughout implementation of the MMCRP to reflect personnel changes.

#### 3.1 SDG&E COMPLIANCE PERSONNEL

SDG&E project personnel and SDG&E's contractors are responsible for implementing all applicable project MMs, APMs, permit conditions, and the MMCRP. It is SDG&E's responsibility to comply with project requirements, plan construction activities in a manner that meets these requirements, document compliance activities and the results of mitigation, and implement the MMCRP.

##### 3.1.1 SDG&E Project Manager

SDG&E is responsible for designating the PM who will provide overall direction, management, leadership, and corporate coordination for the project. The SDG&E PM's responsibilities shall include:

- Coordinating construction, engineering, and SDG&E's environmental personnel
- Integrating environmental responsibilities into all levels of the project organization
- Ensuring compliance with all APMs, MMs, permit conditions, plan requirements, and the MMCRP
- Communicating project activities, schedules, and public relations issues to the project teams

##### 3.1.2 SDG&E Environmental Department Manager

SDG&E is responsible for designating personnel to oversee the overall compliance effort for the Project. The SDG&E Environmental Department Manager shall be the lead SDG&E representative responsible for assigning personnel responsible for managing compliance with

## 3 ROLES AND RESPONSIBILITIES

the Project's environmental requirements and the MMCRP. The SDG&E Environmental Department Manager's responsibilities shall include:

- Understanding and planning for Project environmental staffing requirements
- Coordinating with SDG&E's Environmental Project Manager (EPM) and ensuring that qualified personnel are available to support the Project
- Providing leadership to correct environmental compliance incidents
- Participating in meetings and communicating with the CPUC Project Manager as needed to support the Project

### 3.1.3 SDG&E Environmental Project Manager

SDG&E is responsible for designating an environmental manager to oversee the overall compliance effort for the Project. The SDG&E (EPM) shall be the lead SDG&E representative responsible for implementing environmental requirements and the MMCRP. The SDG&E EPM's responsibilities shall include:

- Communicating with the SDG&E Environmental Department Manager regarding Project status and compliance
- Understanding and planning for project requirements and construction needs
- Coordinating SDG&E's environmental personnel, and ensuring that qualified monitoring personnel are available and informed of the MMCRP responsibilities, and have been approved by CPUC when applicable
- Communicating environmental requirements to the SDG&E Compliance Personnel<sup>3</sup> and Construction Managers
- Communicating with the CPUC Monitoring Team<sup>4</sup> regarding environmental requirements, construction needs, construction schedule changes, and MMCRP procedures described in Section 4: Procedures
- Reviewing and confirming compliance with project requirements
- Reporting the effectiveness of mitigation and regularly submitting required reports and documentation to CPUC
- Providing leadership to correct any issues with environmental compliance

### 3.1.4 SDG&E Environmental Compliance Lead

SDG&E is responsible for designating at least one person to supervise the day-to-day compliance effort. The SDG&E Environmental Compliance Lead (ECL) shall support the role of

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<sup>3</sup> SDG&E Compliance Personnel, as described in MMCRP Section 3.1, includes the collection of SDG&E internal and contractor staff that will support the environmental compliance effort for the Project.

<sup>4</sup> The CPUC Monitoring Team, as described in MMCRP Section 3.2, includes the collection of CPUC internal and contractor staff that will oversee the CPUC's responsibilities associated with environmental compliance for the Project.



## 3 ROLES AND RESPONSIBILITIES

the SDG&E EPM and may perform any duties that are delegated by the SDG&E PM and the SDG&E EPM.

### 3.1.5 SDG&E Lead Environmental Inspector

SDG&E is responsible for designating at least one lead environmental inspector (LEI) who will be regularly present at the project site to oversee and verify the day-to-day compliance effort. The SDG&E LEI shall work closely with construction personnel and shall be the primary field employee responsible for verifying and documenting environmental compliance. Multiple SDG&E LEIs may be needed to effectively monitor compliance during periods of high construction activity or high monitoring demand. The SDG&E LEI's responsibilities shall include:

- Understanding environmental project requirements and construction needs
- Taking direction from the SDG&E EPM and ECL
- Communicating construction needs and possible conflicts with environmental requirements to the SDG&E EPM and ECL
- Supporting construction staff to promote work being conducted in compliance with environmental requirements
- Overseeing specialty monitoring activities, or performing such duties when appropriate and approved to do so
- Implementing communication procedures described in the MMCRP
- Providing direction to help avoid and/or minimize impacts to resources as specified by all project requirements
- Determining the effectiveness of mitigation and reporting whether adjustments need to be made to the SDG&E EPM and ECL

### 3.1.6 SDG&E Specialty Monitors

SDG&E is responsible for designating personnel to perform required or as needed specialty monitoring requirements. Agency approval is required for several specialty monitoring roles as well as minimum qualifications. EIs may also perform specialty monitoring roles if they possess the appropriate qualifications and experience, and have received applicable agency approval. Appendix F lists the designated specialty monitors, their contact information, and dates of agency approval, if applicable.

### 3.1.7 SDG&E Environmental Inspectors

Several project requirements require environmental inspection. Environmental inspection can be conducted by any personnel if there are no minimum qualifications or agency approval requirements. Personnel performing these roles shall be provided training specific to the monitoring responsibility that is more detailed than the minimum worker training requirements included in the Safety and Environmental Awareness Program (SEAP) Training. The SDG&E EIs may perform environmental inspection tasks in conjunction with their other inspection and monitoring duties if appropriate.

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### 3.1.8 Construction Manager

SDG&E shall identify one or more Construction Managers (CMs) for the Project who are responsible for managing Field Construction Advisors (FCAs) and Contract Administrators (CAs) and providing oversight of SDG&E's Construction Contractor. CMs shall provide support to the SDG&E PM and oversee the activities of construction personnel. CM responsibilities include:

- Implementing contractor compliance with SDG&E specifications, construction contracts, and applicable codes
- Coordinating with SDG&E Compliance Personnel regarding implementation of project APMs and MMs, permit conditions, plan requirements, and MMCRP procedures
- Planning construction activities around environmental requirements and reporting any potentially infeasible requirements and work area constraints to SDG&E Compliance Personnel
- Communicating construction needs and schedule changes to the SDG&E Compliance Personnel
- Regularly facilitating field meetings with construction and environmental staff

### 3.1.9 Field Construction Advisor/Contract Administrator

At SDG&E's discretion, on-site responsibilities for CMs may be delegated to FCAs and CAs. FCAs and CAs provide support to CMs and shall be responsible for communicating with CMs, the SDG&E LEI and EIs to ensure day-to-day construction activities are conducted in compliance with all project requirements.

### 3.1.10 Construction Workers

Construction workers who enter the project site are responsible for following all environmental project requirements. Construction workers are responsible for attending required environmental trainings addressed in the SEAP that are applicable to their position. Any questions regarding project requirements shall be directed towards SDG&E CMs, SDG&E FCAs and CAs, and/or SDG&E LEI and EIs.

## 3.2 CPUC MONITORING TEAM

### 3.2.1 CPUC Project Manager

The CPUC PM is the lead representative for the CPUC and the sole CPUC employee on the CPUC Monitoring Team. The CPUC PM shall oversee the mitigation monitoring effort and is responsible for making final determinations regarding MMCRP procedures, requirement clarifications, and compliance issues.

## 3 ROLES AND RESPONSIBILITIES

### 3.2.2 CPUC Monitoring Manager

CPUC is responsible for designating a Monitoring Manager who will support the CPUC PM and provide oversight to the mitigation monitoring effort. The CPUC Monitoring Manager's responsibilities shall include:

- Reviewing CPUC monitoring reports and discussing non-compliance issues with the CPUC PM
- Reviewing reports and other documentation provided by SDG&E for MM compliance
- Reviewing NTPs, MPRs and Temporary Extra Work Space (TEWS) requests and submitting to CPUC PM for approval and sign-off
- Acting as a project liaison on the CPUC's behalf to work with SDG&E public affairs staff and address community issues and concerns when they arise
- Working with the SDG&E Compliance Personnel to resolve any issues and incidents
- Coordinating with other jurisdictional agencies as needed

### 3.2.3 CPUC Monitoring Supervisor

CPUC is responsible for designating a Monitoring Supervisor who will support the CPUC PM and CPUC Monitoring Manager by overseeing the day-to-day mitigation monitoring effort. The CPUC Monitoring Supervisor shall perform the delegated duties of the CPUC Monitoring Manager. The responsibilities of the CPUC Monitoring Supervisor include:

- Providing oversight of the CPUC Monitoring Team and conducting routine monitoring activities described in the MMCRP on behalf of the CPUC
- Implementing CPUC's responsibilities for MMCRP procedures, and verifying SDG&E fulfills their responsibilities
- Reviewing all pre-construction mitigation plans and preparing draft review memoranda for the CPUC PM, and keeping a record of MMCRP procedures
- Coordinating field personnel for the CPUC Monitoring Team to inspect the project site(s)
- Determining the appropriate frequency of site visits for CPUC environmental monitors (EMs)
- Conducting regular site visits at beginning of construction, with frequency adjusted as appropriate
- Verifying and documenting SDG&E's compliance with all project requirements prior to, during, and following construction, and creating an independent record of project compliance
- Documenting any incidents with compliance, reporting them to the CPUC PM, and tracking the project compliance record
- Reviewing all CPUC and SDG&E daily and weekly monitoring reports
- Preparing MMCRP weekly compliance reports and submitting to the CPUC
- Preparing NTPs for Monitoring Manager's review and CPUC's review and sign-off
- Reviewing and processing MPRs and TEWS requests.

### 3 ROLES AND RESPONSIBILITIES

- Reviewing SDG&E's compliance reports for consistency with field observations and identifying and reconciling any inconsistencies.
- Coordinating all aspects of the project with the SDG&E Compliance Personnel
- Communicating directly with SDG&E Compliance Management personnel regarding notification of CPUC site visits, schedule updates, MMCRP procedures, and any compliance incidents observed during site inspections
- Working with the CPUC Monitoring Team and SDG&E Compliance Personnel to resolve any compliance incidents

#### 3.2.4 CPUC Environmental Monitors

CPUC EMs shall be identified for the project. CPUC EMs shall be the primary field personnel for CPUC and responsible for verifying compliance with project requirements at the project site as directed by the CPUC Monitoring Team. Additional monitors may be used as needed depending on concurrent construction activities and specific monitoring needs. The responsibilities of the CPUC EMs are:

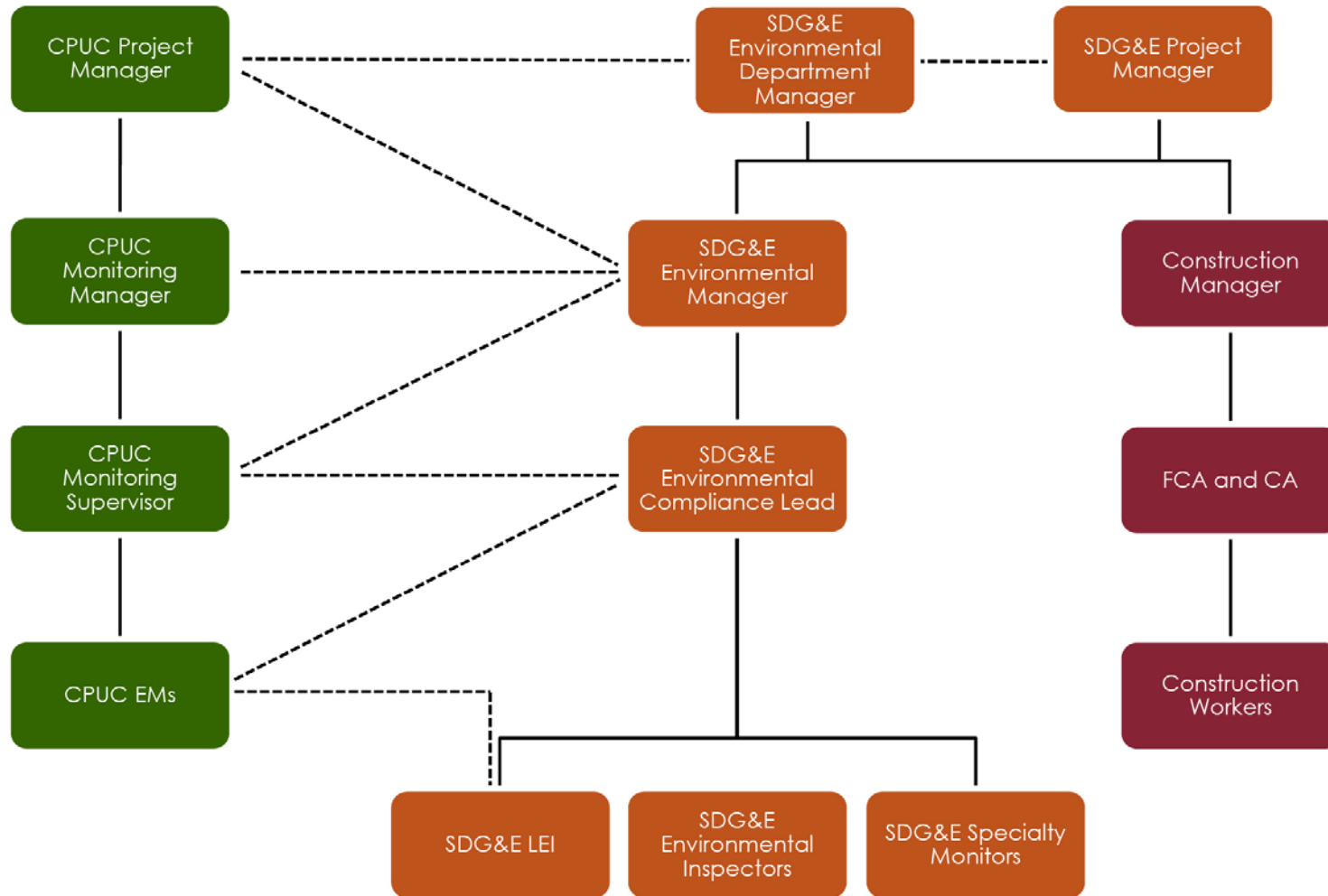
- Inspecting the project site(s), documenting construction and compliance activities, and reporting any potential compliance incidents
- Preparing and submitting daily monitoring reports to the CPUC Monitoring Supervisor, and relaying any important information about the project delivered in the field

### 3.3 ORGANIZATION CHART

An organizational chart of CPUC and SDG&E project personnel is shown on Figure 3.3-1. The organization chart illustrates preliminary lines of communication between project team members. The names of individuals performing the rolls shown on Figure 3.3-1 and their contact information will be listed in Appendix F. Both CPUC and SDG&E are responsible for keeping one another informed of staffing changes and providing contact information.

### 3 ROLES AND RESPONSIBILITIES

Figure 3.3-1 MMCRP Organization and Communication Chart



## 3 ROLES AND RESPONSIBILITIES

### 3.4 JURISDICTIONAL AGENCIES

Personnel from jurisdictional agencies identified in Section 2.2 may periodically visit the project site to verify compliance or to request information from SDG&E regarding compliance with laws, regulations, and project permits identified in Table 2.2-1. SDG&E is responsible for responding to requests from jurisdictional agencies and submitting the permits and authorizations to CPUC per Project requirements such as MMs, APMs, and Project Plans. SDG&E shall provide CPUC with documentation (i.e., email correspondence, letters, and/or memoranda) related to final agency approvals for the Project if CPUC is not directly involved with the coordination effort and the agency approval is tied to MMs, APMs, or Project Plans. SDG&E shall also provide any copies of permit amendments or modifications to the CPUC and notify the CPUC of any proposed changes in permit conditions. In addition, CPUC may contact jurisdictional agencies at any time regarding the project and to clarify agency requirements, permit conditions, or approvals relating to their jurisdiction, as needed. Prior to CPUC communicating with jurisdictional agencies, CPUC will notify the SDG&E PM or SDG&E EPM of the CPUC's questions regarding the jurisdictional agency's requirements, permit or approval and the intention to contact the agency. If appropriate, the CPUC may request that SDG&E seek the requested clarification or invite SDG&E to participate in the discussion in a manner that is mutually convenient with all parties; however, the CPUC retains the authority to coordinate directly with other agencies regarding the project and permit conditions or plan review comments.

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This section addresses MMCRP procedures for personnel identified in Section 3 that shall be implemented prior to, during, and following construction to facilitate successful implementation and documentation of project requirements. Procedures in this section include general communication guidelines, standard CPUC practices, and documentation tools developed from experience with past CPUC projects that involved mitigation monitoring oversight.

### 4.1 COMMUNICATION GUIDELINES

Clear communication will be critical for successful implementation of the MMCRP and will reduce the likelihood of issues that may arise, such as project delays and compliance violations. Environmental and construction personnel must regularly communicate and maintain professional and responsive communications at all times. The SDG&E Compliance Personnel and CPUC Monitoring Team must coordinate closely to clarify questions regarding implementation of the MMCRP before issues occur, to develop expectations regarding compliance documentation, and to resolve any issues that may arise in a timely manner. This section addresses general communication procedures for the project.

#### 4.1.1 Pre-Construction Compliance Coordination

SDG&E is required by the terms of the MMs and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. During this pre-construction process, SDG&E will conduct meetings, conference calls, and site visits with technical representatives of the CPUC and other agencies, and SDG&E's environmental representatives as appropriate. The purpose of the pre-construction coordination process is to discuss document submittal status, document the findings of data reviews and jurisdictional agency approvals, review SDG&E submittals, and document the status of MMs as they apply to the project or phased project segment. The goal of the pre-construction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue NTP authorizations.

#### 4.1.2 Communication Protocol During Construction

Many MMs were derived from agency input. The CPUC Monitoring Manager along with SDG&E, will be responsible for contacting resource agencies and immediately notifying them of compliance incidents arising regarding matters under their jurisdiction. CPUC shall be provided copies of all relevant correspondence, approvals, or authorizations from the resource agencies that facilitate resolution of the compliance incident. If an unresolved compliance conflict with a MM, APM, or Project Plan affects a permit requirement under the jurisdiction of

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a resource agency, the CPUC Monitoring Manager will contact the agency to discuss resolution in conformance with the procedures set forth in Section 3.4.

### 4.1.2.1 Daily Communication During Construction

Many of the problems that come up during construction can be resolved in the field through regular communication between CPUC EMs, SDG&E, and construction contractors. Field staff will be equipped with cell phones and will be available to receive phone calls at all times during regular construction hours. A project contact list has been included in Appendix F. The organization chart depicted in Section 3.3 illustrate the lines of communication to be used during construction.

The following provides additional guidelines to ensure effective communication in the field.

#### **CPUC Environmental Monitors**

The CPUC EM's primary point of contact in the field is SDG&E's LEI. The CPUC EMs will contact SDG&E's LEI if an activity is observed that conflicts with one or more of the MMs, so that the situation can be corrected. If the CPUC EM cannot immediately reach SDG&E's LEI, then SDG&E's ECL will be contacted to address the problem. Similarly, the CPUC EM will contact SDG&E's LEI for information on where construction crews are working, the status of MMs, and schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors as long as a representative from SDG&E's Compliance Personnel is present during the discussion. The CPUC EM will contact the designated SDG&E representative if a problem is noted that requires action from the contractor. The CPUC EM will not direct the contractor; however, the CPUC EM has the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat to resources or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area).

#### **SDG&E**

SDG&E will provide the CPUC Monitoring Supervisor and EM with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance incidents. The contact list will include each person's title, responsibility, contact information, and whether their position is segment-specific. The contact list will be updated as new project personnel are assigned to the project and redistributed as necessary. SDG&E will prepare and distribute a Weekly Compliance Report for distribution to key project members, including the CPUC (see Section 4.4.1 below). The CPUC Monitoring Supervisor will review the weekly report to ensure that the status of MMs is consistent with observations in the field. Any questions regarding the status of MMs will be directed to the SDG&E ECL. The Weekly Compliance Report will also be a tool to keep all parties informed of construction progress.

Note that Daily Compliance Reports will be prepared by CPUC EMs and Weekly Compliance Reports will be prepared by the CPUC Monitoring Supervisor as described in Section 4.4.2.



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### 4.1.2.2 Weekly Progress Meetings During Construction

The SDG&E PM, EPM, ECL, CPUC PM, CPUC Monitoring Manager, CPUC Monitoring Supervisor, and other parties may participate in a weekly teleconference call or as otherwise agreed-upon schedule. The teleconference calls will be scheduled for an agreed date and time and will be used to identify actual or potential compliance risks and discuss solutions. The conference calls will focus on the MMCRP and project progress generally. The status of any pending NTP, MPR, or TEWS requests or corresponding pending approvals will also be discussed.

### 4.1.2.3 Site Visit Coordination

Field personnel from both SDG&E and CPUC shall coordinate site visits with a designated SDG&E EI or LEI who is familiar with authorized construction activities, project requirements, and any restricted areas (i.e., dangerous conditions, unauthorized work areas or work areas within private properties, or the presence of sensitive resources). Conditions in the field may change rapidly and SDG&E field personnel must ensure that all field personnel are adequately informed of restricted areas, parking locations, communication procedures, and site-specific safety risks on an ongoing basis.

CPUC EMs and the Monitoring Supervisor shall conduct routine site inspections. At a minimum, CPUC EMs will notify a designated SDG&E EI or the LEI prior to visiting the site. If contact cannot be made, CPUC monitoring personnel will inspect open areas of the project site on foot. CPUC field personnel shall at no time enter active construction project boundaries unless authorized or escorted by a member of the SDG&E Compliance Team.

### 4.1.3 Questions and Clarifications

Questions and the need to clarify project requirements will periodically arise throughout the implementation process. Both SDG&E and CPUC shall submit important questions and clarifications in writing via email. Resolutions and any CPUC determinations shall be documented in compliance and monitoring reports, and/or in email correspondence. Questions and clarifications that take an extended period of time to resolve shall be tracked by the CPUC Monitoring Team until a resolution has been reached.

### 4.1.4 Requests for Documentation

The CPUC Monitoring Team may periodically request written documentation and confirmations from the SDG&E Compliance Personnel that will be entered into the project record. Requests for documentation and confirmations shall be submitted via email. If the information will take an extended period of time to gather, both SDG&E and CPUC shall agree upon a timeframe to respond, and the request shall be tracked by the CPUC Monitoring Personnel until a resolution has been reached.

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### 4.1.5 Construction Schedule

SDG&E shall inform the CPUC Monitoring Team immediately of any delays in the construction schedule as laid out in the MMCRP that may affect the Project and implementation of the MMCRP.

### 4.1.6 Dispute Resolution

Disputes or complaints may develop between SDG&E and CPUC if there are conflicting interpretations of Project requirements and procedures. It is expected that the MMCRP will reduce or eliminate the potential for disputes; however, disputes may occur even with the best preparation.

Any disputes or complaints shall first be addressed informally at the field level between the CPUC EM and SDG&E EI or LEI, or during Project progress meetings. Questions may be directed to other members of the SDG&E Compliance Personnel and the CPUC Monitoring Team as needed. If the dispute cannot be resolved informally in the field, the following procedures shall be implemented:

- **Step 1: Informal Escalation.** An unresolved dispute, including those from the public, shall be directed to the CPUC PM for resolution. The CPUC PM in coordination with the CPUC Monitoring Manager shall attempt to resolve the dispute informally. If the informal process fails, the CPUC PM shall inform SDG&E prior to initiating Step 2.
- **Step 2: Formal Letter.** Should the informal resolution process fail (Step 1), the CPUC PM may issue a formal letter requiring corrective actions.
- **Step 3: Notice of Dispute.** If a dispute cannot be resolved through Steps 1 and 2, any affected participant may file a written Notice of Dispute with the CPUC's Executive Director. This notice shall be filed in order to resolve the dispute in a timely manner, with copies concurrently served to other affected participants. The Executive Director or designee(s) shall meet or confer within 10 days of receiving the letter with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an Executive Resolution describing his or her decision, and serve it to the filer and other affected participants.
- **Step 4: Executive Resolution.** If one or more of the affected parties is not satisfied with the decision as described in the Executive Resolution, the affected parties may appeal to CPUC through a procedure to be specified by CPUC.

Affected parties may also seek CPUC review through existing procedures specified CPUC's Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

## 4.2 PRE-CONSTRUCTION COMPLIANCE VERIFICATION

SDG&E is required by the terms of the MMs and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to

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performing various surveys and studies prior to construction. The plans, surveys, studies, and other documentation required to be completed by SDG&E before construction are listed in the MM and APM table in Section 6.

Other agencies may review documents prior to or concurrent with the CPUC if required by the MMs or permitting requirements. Compliance with all pre-construction MMs and APMs presented will be verified prior to construction.

The CPUC third-party monitors, Monitoring Manager, Monitoring Supervisor, and technical experts will review all mitigation plans and reports and provide comments, as applicable. As required by the MMs and APMs, resource agencies will also be involved in the review of applicable plans and reports and will provide comments. Comments on these documents will be provided to CPUC to ensure that they adequately accomplish the intended mitigation for impacts and meet the MM or permit requirements. For required local and State agency permitting/consultations, the CPUC third-party monitors will track SDG&E's progress as it relates to SDG&E's construction plans and project mitigation and permitting requirements. Based on SDG&E's construction plans, CPUC may authorize construction to begin on a phased basis and the CPUC third-party monitors will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

### 4.3 NOTICE TO PROCEED PROCESS

SDG&E is required to obtain CPUC authorization prior to initiating project activities through the NTP process. The NTP process involves the SDG&E Compliance Personnel submitting an NTP request package to the CPUC Monitoring Team, and the CPUC PM issuing a NTP Authorization Letter. The CPUC will not authorize construction to begin until all pre-construction requirements have been fulfilled for a given phase. To save time, SDG&E should identify extra work space needs required for each phase of construction prior to the start of active construction, so that the locations and their use can be included in the NTP.

Project activities may be authorized through one or more NTPs for separate project phases as determined necessary by the SDG&E Compliance Personnel and the CPUC Monitoring Team. At a minimum, NTP request packages shall include the following information:

- NTP request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions
- A detailed description of the proposed actions requested in the NTP
- A summary list of any previously authorized actions (if applicable) as detailed in NTP Authorization Letters
- A summary list of any known actions that have not been proposed or authorized that must be included with future NTP requests

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- A summary list of any outstanding requirements and documentation not included with the NTP package, and the anticipated dates they will be provided
- Any known Minor Project Refinements or TEWS related to the proposed actions (addressed in Section 4.6)

The CPUC Monitoring Team shall review NTP requests to ensure the proposed actions are consistent with the Final EIR and final CPUC decision, and to verify compliance with all pre-construction requirements applicable to a given NTP request. The CPUC Monitoring Team may request additional information during the NTP review process as needed. Once it has been determined that all applicable pre-construction requirements have been completed and documented to the satisfaction of CPUC, the CPUC PM will submit an NTP Authorization Letter to the SDG&E Compliance Personnel. The NTP Authorization Letter will address any conditions of approval, and include applicable documentation as necessary for the authorized actions.

### 4.4 COMPLIANCE REPORTING DURING CONSTRUCTION

#### 4.4.1 SDG&E Weekly Compliance Reports and Checklists

SDG&E is required to prepare a Weekly Compliance Report and Checklist during construction. The Weekly Compliance Report and Checklist will serve as the core method for SDG&E to communicate Project activities to the CPUC and to document the Final EIR compliance effort.

A compliance checklist PDF form is located in Appendix G. A checklist form will be submitted with the Weekly Compliance Reports for each weekly reporting period. The checklist form will serve to reduce the written reporting effort and give credit to SDG&E for complying with day-to-day compliance activities that frequently are not described in the Weekly Compliance Report. The Weekly Compliance Report will elaborate on important details described in the checklist but does not need to address every construction or compliance activity, especially if activities are proceeding in an ongoing and continuous manner.

The original checklist PDF form provided with the MMCRP should be copied and updated without changing the format of the PDF (rasterizing or any other conversions) in order to maintain the form's data processing functions.

In addition, day-to-day compliance will be tracked and summarized in daily monitoring reports prepared by the SDG&E EI(s) and/or LEI for the Project. These daily monitoring reports will include specific details on construction and compliance activities specific to each applicable requirement. The Weekly Compliance Report will include a summary of the construction and compliance activity details captured in the daily reports. SDG&E will post and make available to the CPUC Monitoring Team the daily monitoring reports prepared by the EI or LEI through a link on Sharepoint.

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### 4.4.2 CPUC Compliance Reporting

The CPUC EMs will perform compliance inspections throughout construction to ensure compliance with all applicable MMs, APMs, plans, permits, and conditions of approval from CPUC and other agencies. The CPUC EM will document observations in the project area through field notes and digital photography. The photographs will be incorporated in weekly reports and related to a discussion of specific construction or compliance activity. In addition, daily field logs documenting compliance of specific crews, construction activities, or resource protection measures will be maintained. Field logs will be used to prepare weekly reports and to track and update the status of MMs listed in Section 6.

Supplemental information provided by SDG&E, including pre-construction submittals, survey reports, weekly reports, and agency correspondence also will be used to verify compliance.

### 4.4.3 Incident Reports

Incident Reports for Level 1-3 Incidents shall be prepared by the observing party (either SDG&E or CPUC) and submitted to the alternate party within one business day of the observation. Level 1 Incidents will be reported through a brief email from the observing party. Level 2 Incidents will be reported through a Project Memorandum. Level 3 Incidents require preparation of a Non-Compliance Report (NCR). At a minimum, Incident Reports must include the following information:

- Incident Category
- Compliance Level (if applicable)
- Incident Start Date (i.e., date event began, if known, or initial observation date)
- Summary of Incident (i.e., description of the event or observation, personnel present, and actions taken to resolve the issue)
- Resolution Date (if known)

All incidents (Levels 1-3) shall be addressed in MMCRP reports prepared by both SDG&E and CPUC (e.g., Daily, Weekly, and Post-Construction Reports), and Incident Reports shall be attached to the MMCRP reports for the applicable period.

In addition to Incident Reports, incidents rising to the level of Noncompliance may require preparation of memoranda describing the event in greater detail and corrective actions necessary to bring the project back into compliance.

## 4.5 INCIDENTS AND STOP WORK ORDERS

The goal of this MMCRP is to plan for and avoid any non-compliance incidents that could occur during implementation; nonetheless, there is a potential for compliance incidents to arise due to a variety of factors. For the purposes of this MMCRP, compliance incident levels are defined in Table 4.5-1 below. This section addresses incidents that may occur and procedures that shall be followed to document them.

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### 4.5.1 Incident Categories

Incident categories for the project include compliance level incidents, Occupational Safety and Health Administration (OSHA)-recordable health and safety incidents, vehicle accidents that are related to Project traffic closures, and public complaints.

#### 4.5.1.1 Compliance Level Incidents

SDG&E and CPUC are responsible for evaluating compliance and addressing any implementation inadequacies throughout implementation of the MMCRP. Compliance incidents will be documented by assigning one of three severity levels and associated terms. If all project requirements are observed being followed adequately, then the project will be at an acceptable compliance level (Level 0: Acceptable) and no further actions are required. A description of compliance levels that will be used for the project and examples of compliance level incidents are listed in Table 4.5-1.

When documenting compliance level incidents, the reporting party shall assign an initial compliance level that appropriately represents the severity of the incident based on factors including, but not limited to the following:

- Scope of the deviation or violation
- Risk of impact to resources
- Actual impact to resources
- Number of repeated incidents
- How the incident could have been prevented

The need to change initially reported compliance levels may arise if the incident level was over- or under-reported. The CPUC PM shall make final determinations regarding the appropriate compliance level for each incident as needed, and the CPUC Monitoring Team shall maintain a record of all incidents for the Project that will be analyzed in the CPUC Post-Construction and Final Monitoring Reports. In addition to the levels of compliance described in Table 4.5-1, the CPUC may note events or observations that, if left unaddressed, could have the potential to affect compliance and become a compliance incident. The CPUC will typically inform SDG&E Compliance Personnel of such observations in the field. If such events or observations continue to occur following CPUC's field notification to the SDG&E Compliance Personnel, and corrective action is not taken within the stated period, a Project Memorandum (written warning) may be issued by the CPUC. For example, if CPUC observes construction personnel stepping away from their vehicles while idling, but not for more than five minutes, the CPUC may note that if this practice continues, a Compliance Deviation or Non-Compliance could result.

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**Table 4.5-1 Compliance Levels**

Incident Level, Reporting Term, and Severity	Examples	Action	Follow-Up
<b>Non-Incident</b>			
<b>Level 0: Acceptable Compliant</b>	All project requirements were followed adequately.	None	None
<b>Definition:</b> An event or observation where the project was compliant with all project requirements.	No issues were observed.		
<b>Incident</b>			
<b>Level 1: Minor Problem</b> <i>Out of compliance (low to moderate severity)</i>	Project personnel used an unauthorized turnaround area or access road, but the site was previously disturbed and the action did not put a sensitive resource at risk.	An oral warning shall be provided by the CPUC Monitoring Supervisor to SDG&E's EPM (or assigned designee). Corrective action shall begin by the next construction day. CPUC Monitoring Supervisor will also briefly document the incident in a follow-up email. A Minor Problem will be documented in the daily report and included in the Weekly Compliance Report.	If corrective action is not begun by the next construction day, the CPUC Monitoring Supervisor will elevate the incident to the CPUC Monitoring Manager who will review courses of action available and will notify the CPUC PM if necessary. If allowed to continue, this non-compliance could result in a significant impact over time.
<b>Definition:</b> An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk.	Soil or construction material was placed outside of an approved work area in a non-sensitive area, but the material was removed at the end of the day.		
<b>Level 2: Compliance Deviation</b> <i>Out of compliance (moderate to high severity)</i>	A fuel tank was stored overnight within specified limits of a water body without secondary containment, but did not result in the release of hazardous materials.	A verbal notice shall be given to the SDG&E LEI or EI, followed immediately by written documentation of the incident in a Project Memorandum sent by the CPUC Monitoring Supervisor to SDG&E's EM (or assigned designee). Corrective action shall begin immediately if feasible.	If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Monitoring Manager, and Monitoring Supervisor, who will review courses of action available, potentially including issuance of an NCR, a Project stop work order and/or action under the CPUC's CEQA Citation Program.
<b>Definition:</b> An event or observation that deviates from project requirements and puts a resource at risk, but is corrected without	Mobilization of equipment or materials to a previously disturbed work site prior to receiving NTP authorization from CPUC.  Project personnel used an unauthorized overland travel route and previously undisturbed turnaround area or access road, but		

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Incident Level, Reporting Term, and Severity	Examples	Action	Follow-Up
impacting the resource.	the action did not impact a sensitive resource.  A diesel-powered vehicle not in use was observed idling for more than 5 minutes.		
<b>Level 3: Non-Compliance</b> <i>Out of compliance (high severity)</i>	Vegetation clearing and grading of a work site prior to receiving NTP authorization from CPUC.  Soil or construction material was placed outside of an approved work area in an environmentally sensitive area.  Erosion control BMPs failed during a storm and sediment was discharged into a sensitive area.  Project vehicles entered a sensitive resource exclusion area and damaged a resource.	A verbal notice shall be given to the SDG&E LEI or EI, followed immediately by a written NCR from the CPUC Monitoring Manager to SDG&E's EPM (or assigned designee). Corrective action shall begin immediately. Based on the severity of a given infraction or pattern of non-compliant activity, the CPUC may direct that all or some portion of the work be stopped. The CPUC may also exercise the CEQA Citation Program.	If a shutdown of construction or an activity is ordered, the construction or activity shall not resume until authorized by the CPUC PM in writing. If corrective action is not taken immediately or the corrective action is insufficient, the CPUC EM shall notify the CPUC PM, Monitoring Manager, and Monitoring Supervisor, who will review courses of action available, potentially including a Project stop work order and/or action under the CPUC's CEQA Citation Program.
<b>Definition:</b> An event or observation that violates project requirements and impacts a resource. Repeated Compliance Deviations left unaddressed may also rise to a Level 3 Incident.			

### 4.5.1.2 Health and Safety Incidents

SDG&E and CPUC's most important responsibility is maintaining safe working conditions and protecting the public, including workers from exposure to hazards related to the Project.

Accordingly, health and safety incident reporting by SDG&E will be conducted consistent with the "self-identified potential violation" requirements of the CPUC's Safety Citation Program<sup>5</sup> and the Accident Reporting Requirements<sup>6</sup>. Specific types of health and safety incidents to be reported under these programs are described below:

<sup>5</sup> See D.16-09-055, Appendix A at p. 8, Section G.3.b. criteria 1 and 3, <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M167/K781/167781364.PDF>

<sup>6</sup> See [http://docs.cpuc.ca.gov/PUBLISHED/FINAL\\_DECISION/55906-05.htm#TopOfpage](http://docs.cpuc.ca.gov/PUBLISHED/FINAL_DECISION/55906-05.htm#TopOfpage)



## 4 PROCEDURES

- A potential violation that poses a significant safety threat to the public and/or utility staff, contractors, or subcontractors; (See D.16-09-055, Appendix A at p. 8, Section G.3.b.criteria 1)<sup>7</sup>.
- Any instances of fraud, sabotage, falsification of records and/or any other instances of deception by SDG&E's personnel, contractors, or subcontractors, that caused or could have caused a potential violation, regardless of the outcome. (See Appendix A at p. 8, Section G.3.b. criteria 3, <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M167/K781/167781364.PDF>)
- Incidents that (a) result in fatality or personal injury rising to the level of in-patient hospitalization and attributable or allegedly attributable to utility owned facilities; or (b) are the subject of significant public attention or media coverage and are attributable or allegedly attributable to utility facilities; (c) involve damage to property of the utility or others estimated to exceed \$20,000 that are attributable or allegedly attributable to utility owned facilities.

SDG&E will notify the CPUC PM of these types of health and safety incidents within one business day of learning about the incident and provide an incident report with the Weekly Compliance Report for the Project unless additional time is needed and the CPUC agrees to an extension for submitting the final incident report. SDG&E will also notify the CPUC about traffic accidents within construction traffic control areas<sup>8</sup>. In addition to the incidents describe above, the CPUC may request that SDG&E report on other health and safety incidents that don't fall into one of the above-listed categories if the CPUC determines that such reporting is necessary to ensure construction is completed in a safe manner.

Health and safety incidents will not reflect negatively on SDG&E's environmental compliance record unless a specific project requirement, permit, or plan requirement was violated.

### 4.5.1.3 Public Complaints

The public may take issue with one or more aspects of the Project. MM Noise-1 includes specific requirements for processing noise complaints from the public. All other public complaints that do not relate to noise shall be documented and reported to the CPUC. SDG&E will maintain a

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<sup>7</sup> The intention of this criterion is to include any self-identified potential violation that presents such an obvious, immediate, and significant threat to life or limb of the public or utility workers that industry best practice dictates that any responsible utility would correct the condition immediately or as soon as possible. (This footnote is included in the SED Report.)" (Decision, footnote 29 on page 53). This would **not** include near misses. (Decision, page 84 under Findings of Fact, no. 19).

<sup>8</sup> Traffic Control Areas will be identified in Traffic Control Plans that will be submitted to the appropriate jurisdictional agency as required by APM TR-3: Traffic Control.

## 4 PROCEDURES

Project Information Line during construction and will assign a dedicated Public Affairs Manager to the Project that will be responsible for tracking and handling public complaints. Public complaints may be submitted formally to SDG&E or CPUC through email or the Project Information Line. Members of the public that have questions, concerns, or complaints on the Project will be directed to the SDG&E Public Affairs Manager and Project Information Line, and contact information will be supplied as requested. Complainants who approach field personnel at the Project site will be referred to the Project Information Line or, if available, the SDG&E LEI will record the complaint and direct the complainant to the Project Information Line to formally submit their complaint. SDG&E shall work with the CPUC on best practices for handling public complaints that are received. SDG&E will maintain an electronic complaint log and will allow the CPUC to have real-time access to this electronic complaint log, so CPUC can track public complaints received by SDG&E. SDG&E will respond to public complaints within 24 hours upon receipt. CPUC shall notify SDG&E of public complaints received by the CPUC to facilitate SDG&E's timely response to these complaints and SDG&E will add these to the electronic complaint log. SDG&E shall make every reasonable effort to work with members of the public and correct actions leading to complaints, as feasible.

SDG&E shall also provide weekly summaries of the public complaints and how each complaint was addressed within the Weekly Compliance Report. The CPUC PM will coordinate with the SDG&E Public Affairs Manager on the adequacy of corrective actions or additional measures to be implemented, as needed.

Public complaints will not reflect negatively on SDG&E's environmental compliance record unless a specific Project requirement, permit, or plan requirement was violated.

### 4.5.2 Identifying Incidents

The SDG&E EI and CPUC EM are primarily responsible for identifying and initially reporting incidents during inspection of the Project site; however, compliance incidents may also be observed by other personnel in the field or during review of project reports. The CPUC Monitoring Team may also identify compliance incidents through review of SDG&E's compliance reporting.

SDG&E shall make every attempt to self-report any compliance incidents that occur. Self-reporting compliance incidents and preventing them from repeating demonstrates a commitment to compliance and will foster a relationship of trust between SDG&E and CPUC.

### 4.5.3 Notification

SDG&E and CPUC shall notify one another of compliance incidents within one business day of the initial observation so compliance can be adequately addressed. Response procedures do not need to be finalized when initial notification is provided.

Jurisdictional agencies may also require notification if incidents are documented that relate to their jurisdiction over the Project. SDG&E shall make all such notifications to each jurisdictional agency and will provide copies to the CPUC of official notifications and submittals provided to

## 4 PROCEDURES

other agencies or advise CPUC of notifications that were made to other agencies, as necessary. If CPUC believes additional notifications are required, the CPUC may direct SDG&E to provide those notifications or make those notifications in coordination with SDG&E Compliance Personnel.

### 4.5.4 Stop Work Orders

When it is safe to do so, any SDG&E Compliance Personnel or the CPUC Monitoring Team has the authority to issue Stop Work Orders to temporarily halt or redirect project activities if a sensitive resource is put in undue risk beyond previously authorized or permitted levels. In addition, the CPUC Monitoring Team may also stop or redirect work if unauthorized project activities are observed, such as use of work area that has not been approved or if significant compliance risks remain unresolved. The CPUC PM will make any final determinations regarding Stop Work Orders for the project.

### 4.5.5 CEQA Citation Program

CPUC may exercise the CEQA Citation Program adopted by the Commission in Resolution E-4550. The program delegates authority to Commission staff to draft and issue citations and levy fines for non-compliance with a PTC or CPCN. The Resolution allows Commission staff to efficiently issue fines when needed to quickly address non-compliance incidents that are occurring in the field.

## 4.6 PROJECT CHANGES

### 4.6.1 Minor Project Refinements

SDG&E may identify a need to refine one or more aspects of the project following the CPUC's final decision due to final engineering specifications. In such cases, SDG&E is required to submit Minor Project Refinement (MPR) requests to the CPUC Monitoring Team and obtain authorization from the CPUC PM through the process described in this section.

Approval for MPR requests will only be granted if the proposed refinements are consistent with CEQA requirements, and comply with the APMs and MMs identified in the Final Decision. Requests for project refinements that do not fall within the authority delegated to the CPUC PM as defined in the CPUC's final decision must be sought through a Petition for Modification pursuant to Rule 16.4 of CPUC's Rules of Practice and Procedure. Proposed project refinements will not be authorized by the CPUC PM through the MPR process if they meet one or more of the following criteria:

- Involves modifications that would be outside the geographic boundary of the study area utilized in the Final EIR
- Would create a new significant impact or substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the Final EIR

## 4 PROCEDURES

- Trigger additional permit requirements that are not defined in the Final EIR or MMCRP
- Conflict with any APM or MM, or result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the Final EIR
- Require new conditions for approval, without which the modifications would result in a new significant impact or substantially increase the severity of a previously identified significant impact

At a minimum, MPR requests must include the following information (see Appendix H for form):

- MPR request number
- Date submitted to CPUC
- Requested approval date
- Anticipated start and end date for the proposed actions associated with the refinements
- A detailed description of the proposed refinements, including an explanation of why the refinements are necessary
- A summary list of applicable project requirements (e.g., APMs, MMs, project parameters, or other project stipulations) for which the refinements are being requested
- Supporting photos, maps, and other documentation illustrating the difference between the existing conditions in the area, the approved project, and the proposed refinements
- The dimensions and area of any additional work areas and land disturbance associated with the proposed refinements
- A detailed description of potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there will be no substantial increase in the severity of significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted MM or APM
- A statement describing if the proposed refinements would conflict with any APM, MM, applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy
- Evidence of SDG&E's consultation with other governmental or nation states, to the extent applicable

The CPUC Monitoring Team shall review MPR requests to ensure the proposed refinements are consistent with the Final EIR and final CPUC decision. The CPUC Monitoring Team may request additional information during the MPR review process as needed. If it is determined that the MPR request includes sufficient evidence that the proposed refinements are necessary, and the refinements will not meet one or more of the exclusionary triggers, then the CPUC PM

## 4 PROCEDURES

will authorize the refinements by issuing a MPR Authorization Letter at their discretion. MPR Authorization Letters will address any conditions of approval, and include applicable documentation as necessary.

Examples of potential MPRs, depending on their location, may include the following:

- Substituting or replacing a previously authorized work area with an alternate work area that is in a previously disturbed area with no impacts to adjacent sensitive resources or land uses
- Adjusting the alignment of a project to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact
- Adjusting the alignment of a project to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact

### 4.6.2 Temporary Extra Work Space

For the purposes of this MMCRP, TEWS is defined as a preexisting developed space (i.e., no site preparation is required) that would be used by SDG&E during construction for a period of up to 60 days, and that was not specifically identified and evaluated during the CEQA process. Anything required to be utilized for a period longer than 60 days will require an MPR approval (see Section 4.6.1). If SDG&E determines a need for a construction TEWS, it must submit such a request to the CPUC, consistent with the communication protocol. SDG&E will not be permitted to use a TEWS prior to receiving written authorization from the CPUC. If appropriate, SDG&E will also send a copy of the TEWS to affected jurisdictional agencies.

SDG&E must demonstrate that:

1. The TEWS is located in a disturbed area with no sensitive resources or land uses onsite or within proximity of the proposed work space such that they may be significantly impacted by the work,
2. SDG&E has the permission of the applicable landowner (e.g., municipality or private) to use the work space, and
3. Use of the TEWS will not result in any new significant environmental impacts.

Following is a list of the specific information that SDG&E will be required to submit with its TEWS request (see Appendix I for form):

- Date of request
- Location of the TEWS (detailed description, including maps if required)
- Property owner of TEWS
- An explanation of the need for the TEWS

## 4 PROCEDURES

- An analysis that demonstrates no new significant impacts will result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as the presence of potentially hazardous or polluting substances that could pose a risk to Project personnel or the public; abandoned vehicles, equipment, or other materials; or other sensitive resources
- Biological and botanical surveys if appropriate
- Cultural resource survey if appropriate
- Duration and dates of expected use of the TEWS
- Details of the expected condition of the site after use

### 4.7 COMPLIANCE TRACKING

Compliance with mitigation requirements will be tracked by the CPUC. Important project procedures, such as formal requests and approvals, as well as incidents, will also be tracked throughout the project for record keeping and post-project analysis.

CPUC will track other important information for the project record as part of the CPUC-prepared Monthly Monitoring Summary Report, including NTP and MPR requests and approvals, resolutions to important compliance risks that require follow-up, and documented incidents.

### 5 RECORDS MANAGEMENT

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Daily Inspection and Weekly Compliance Reports will be filed and used by the CPUC Monitoring Supervisor to prepare a Final Environmental Compliance Report following the completion of construction. The Final Report will provide a discussion on how each MM was implemented and include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects. The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available by the CPUC for public inspection on request. In order to facilitate the public's awareness, the CPUC will post this MMCRP document, and also will make Weekly Reports and other pertinent Project documents available on the Project, accessible at:

[http://www.cpuc.ca.gov/environment/info/panoramaenv/sycamore\\_penasquitos/index.html](http://www.cpuc.ca.gov/environment/info/panoramaenv/sycamore_penasquitos/index.html)

## 5 RECORDS MANAGEMENT

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# 6 MITIGATION MONITORING PROGRAM TABLES

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## 6.1 TRACKING TABLES

Section 6.3 below lists the MMs and APMs included in the Final EIR that are applicable to implementation of Alternative 5. The CPUC will use expanded versions of the MM/APM tables in Appendices B, C, D, and E to accurately track the status of MMs during the pre-construction planning, construction monitoring, post-construction monitoring, and operation and maintenance phases of the project. Similarly, separate tables listing measures that require CPUC approval may be generated. During construction, a copy of the MM/APM tables with measures to be implemented during construction (Appendix C) will be maintained by the LEI, and all supervisory staff working on the project should be familiar with its contents. In addition, copies of all applicable plans and permits compiled prior to construction as a result of the pre-construction measures (e.g., Stormwater Pollution Prevention Plan, Hazardous Substance Treatment Plan, United States Fish and Wildlife Service Biological Opinion, etc.) shall also be kept on-site (SDG&E construction trailer) and all supervisory staff working on the project should be familiar with their contents.

## 6.2 EFFECTIVENESS REVIEW

The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating significant impacts identified in the Final EIR or pose extraordinary implementation feasibility challenges at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section 4.1.6. If in review the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, then the CPUC, in coordination with the jurisdictional agency(ies) may impose additional reasonable conditions to effectively mitigate these significant impacts. These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

## 6.3 MITIGATION MEASURES AND APPLICANT PROPOSED MEASURES

Table 6.3-1 lists the MMs and APMs from the EIR that apply to Alternative 5 and the phase of implementation for each measure. The tables in Appendices B, C, D, and E include the full text of each measure, the monitoring requirement, when the measure will be implemented, where the measure applies, how the measure will be verified, and the performance criteria. Table 6.3-1 also notes where MMs and APMs have been superseded by other MMs. In such cases, the superseded MM or APM is not carried forward in Appendices B, C, D, or E.

## 6 MITIGATION MONITORING PROGRAM TABLES

**Table 6.3-1 Implementation Phases Applicable to Each APM and MM**

Measure Title	Pre-Construction	Construction	Post-Construction	O&M
<b>Aesthetics</b>				
MM Aesthetics-2: Retaining Wall Screening	✓	✓	✓	
MM Aesthetics-3: Facilities Color Treatment Plan	✓	✓		
MM Aesthetics-4: Cable Pole Screening	✓	✓	✓	
MM Aesthetics-5: Nighttime Lighting		✓		
APM AES-1: Visual Screening		✓		
APM AES-2: Restore Temporarily Disturbed Areas			✓	
<b>Agriculture</b>				
MM Agriculture-1: Coordinate with Evergreen Nursery Property Management	✓			
<b>Air Quality</b>				
MM Air-1: RAQS Architectural Coating Standards		✓		
MM Air-2: Tier 3 Exhaust Emissions Standards		<b>Superseded by MM Air-4</b>		
MM Air-3: Dust Control Management Plan	✓	✓		
MM Air-4: Use of Tier 3 Equipment		✓		
APM AIR-1: Fugitive Dust Control		<b>Superseded by MM Air-3</b>		
APM AIR-2: Vehicle and Equipment Exhaust Controls		✓		
APM AIR-3: Low- and Non-VOC Architectural Coatings		<b>Superseded by MM Air-1</b>		
APM AIR-4: Equipment Emissions Standards		<b>Superseded by MM Air-4</b>		
<b>Biological Resources</b>				
MM Biology-1a: General Field Personnel Behavior Requirements		✓		✓

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre- Construction	Construction	Post- Construction	O&M
MM Biology-1b: Environmental Training Program	✓	✓		
MM Biology-1c: Pre-Activity Surveys	✓	✓		
MM Biology-1d: Maintenance, Repair, and Construction of Facilities	✓	✓		✓
MM Biology-1e: Maintenance of Access Roads		✓		✓
MM Biology-1g: Survey Work Protocols	✓	✓		✓
MM Biology-3: Weed Control Plan	✓	✓	✓	✓
MM Biology-5: Pre-Activity Surveys for QCB	✓			
MM Biology-6: Compensatory Mitigation for Impacts to Habitat	✓		✓	
MM Biology-7: Mitigation for Bird Species	✓	✓		✓
MM Biology-8: Burrowing Owl Monitoring and Mitigation Plan	✓			
MM Biology-9: San Diego Desert Woodrat Mitigation	✓			
MM Biology-10: Mitigation for Special-Status Bat Species	✓	✓		
MM Biology-11: Reseeding for Fires		✓	✓	✓
APM BIO-1: Minimize impacts to special-status plant species	✓	✓		
APM BIO-2: SDG&E Subregional NCCP	✓	✓	✓	✓
APM BIO-3: SDG&E QCB HCP		✓		
<b>Cultural Resources</b>				
MM Cultural Resources-1: Cultural Resources Monitoring, Evaluation, and Treatment of Resources		✓		
MM Cultural Resources-2: Worker Training	✓	✓		

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre-Construction	Construction	Post-Construction	O&M
MM Cultural Resources-3: Monitoring Report			✓	
MM Cultural Resources-4: Procedures for Discovery of Human Remains		✓		
APM CUL-1: Archaeological Monitoring	✓			
APM CUL-2: Avoidance of Environmentally Sensitive Areas	✓	✓		
APM CUL-3: Procedure upon Discovery of Resources		<b>Superseded by MM Cultural Resources-1</b>		
APM CUL-4: Analysis of Cultural Remains	<b>Superseded by MMs Cultural Resources-1 and Cultural Resources-3</b>			
APM CUL-5: Monitoring Report		<b>Superseded by MM Cultural Resources-3</b>		
APM CUL-6: Native American Monitoring		✓		
APM CUL-7: Discovery of Human Remains		<b>Superseded by MM Cultural Resources-4</b>		
<b>Fire and Fuels Management</b>				
MM Fire-1: Final Fire Prevention Plan	✓	✓		
MM Fire-2: Maintain Emergency Access	✓	✓		
MM Fire-3: Water Tanks	✓	✓		
MM Fire-4: Conductor Clearance		✓		✓
APM FIRE-1: Wildland Fire Prevention and Fire Safety Practices		<b>Superseded by MM Fire-1</b>		
APM PS-6: Fire Prevention Plan and Monitoring		✓		
<b>Geology, Soils, and Mineral Resources</b>				
MM Geology-1: Geotechnical Investigation for Liquefaction	✓			
MM Geology -2: Geotechnical Investigation for Landslides	✓			
MM Geology-3: Assess Potential for Collapsible and Expansive Soils	✓			

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre- Construction	Construction	Post- Construction	O&M
APM GEO-1: Seismic Standards	✓			
APM GEO-2: Geotechnical Recommendations	<b>Superseded by MMs Geology 1, Geology, 2, and Geology-3</b>			
APM GEO-3: Minimize Soil Disturbance		✓		
<b>Greenhouse Gas Emissions</b>				
MM GHG-1: Disposal of Organic Matter	✓	✓		
APM AIR-4: Equipment Emissions Standards	<b>Superseded by MM Air-4</b>			
APM AIR-5: Consistency with AB 32		✓		
<b>Hazards and Hazardous Materials</b>				
MM Hazards-1: Site Specific Blasting Plan		✓	✓	
MM Hazards-2: Spill Prevention, Control, and Countermeasure Plan	✓	✓		
MM Hazards-3: HSCERP	✓	✓		
MM Hazards-4: Uncover Existing Utility Pipelines	✓	✓		
MM Hazards-5: Soil and Groundwater Testing	✓	✓		
MM Hazards-6: Unexploded Ordnance Investigation	✓	✓		
MM Hazards-7: Induced Current Touch Study	✓			
APM HAZ-1: Safety and Environmental Awareness Program	✓			
APM HAZ-2: Consistency with State and Federal Regulations		✓		
APM HAZ-3: SDG&E Compliance Management Programs		✓		
APM HAZ-4: SDG&E Protocol for Herbicide Application				✓

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre- Construction	Construction	Post- Construction	O&M
<b>Hydrology and Water Resources</b>				
MM Hydrology-1: SWPPP and Treatment of Shallow Groundwater Discharge	✓	✓		
MM Hydrology-2: Restrict Dust Control Water Usage		✓		
MM Hydrology-4: Underground Construction Only During Dry Conditions		✓		
MM Hydrology-5: Protection from Scour	✓			
APM HYDRO-1: Temporary BMPs		<b>Superseded by MM Hydrology-1</b>		
APM HYDRO-2: Permanent BMPs		<b>Superseded by MMs Hydrology-1 and Biology-6</b>		
APM HYDRO-3: Avoid Jurisdictional Drainages		✓		
<b>Noise</b>				
MM Noise-1: Resident Notification and Complaints	✓	✓		
MM Noise-2: Noise-suppression Techniques		✓		
MM Noise-3: Helicopter Take-off and Landing Areas		✓		
MM Noise-4: Corona Rings		✓		
MM Noise-5: Corona Noise Complaints				✓
MM Noise-6: Coordinate Construction Activity with Schools		✓		
<b>Paleontological Resources</b>				
MM Paleontology-1: Paleontological Monitoring		✓		
MM Paleontology-2: Note Monitoring Areas on Plans	✓			
MM Paleontology-3: Avoidance of Resources or Other Methods of Mitigation		✓		
APM PAL-2: Paleontological Screen-Washing		<b>Superseded by MM Paleontology-3</b>		

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre- Construction	Construction	Post- Construction	O&M
<b>Recreation</b>				
MM Recreation-1: Pre- and Post-Construction Report	✓		✓	
MM Recreation-3: Maintain Access to Recreational Facilities	✓	✓		
MM Recreation-4: Flag Person at Trail Crossings		✓		
APM REC-1: Coordination with Parks and Preserves, and Buffer Between Active Work Areas and Trails		✓		
APM REC-2: Temporary Trail Detours		✓		
APM PS-1: Temporary Access		✓		
APM PS-2: Notification of Construction	✓	✓		
APM PS-3: Coordination with Recreation Facilities		✓		
APM PS-4: Signage		✓		
APM PS-5: Recreational Facility Repair			✓	
<b>Traffic and Transportation</b>				
MM Traffic-1: Construction Transportation Management Plan	✓	✓		
MM Traffic-2: Congested Area Plan	✓			
MM Traffic-3: Post-Construction Road Repair	✓		✓	
MM Traffic-4: Temporary Traffic Control Measures	✓	✓		
MM Traffic-5: Highway Closure Plans	✓	✓		
MM Traffic-6: Restrict Road Closures and Maintain Access		✓		
MM Traffic-7: Closure Notification and Detours		✓		

## 6 MITIGATION MONITORING PROGRAM TABLES

Measure Title	Pre- Construction	Construction	Post- Construction	O&M
MM Traffic-8: Notify Emergency Personnel of Road Closures		✓		
MM Traffic-11: Close Roadside Parking During Vault Installation		✓		
MM Traffic-12: Consult with Bus and Transit Services	✓	✓		
APM TR-2: Comply with Relevant Helicopter Use Restrictions		✓		
APM TR-3: Traffic Control	<b>Superseded by MM Traffic-1</b>			
APM TR-4: Encroachment Permits	✓			
<b>Utilities and Public Services</b>				
MM Utilities-1: Reclaimed Water Use for Dust Control	✓	✓		
MM Utilities-3: Notify Utility Companies and Adjust Underground Work Locations	✓			
MM Utilities-4: Cathodic Protection	✓			