ATTACHMENT

Mitigation Implementation and Monitoring Plan

6.0 MITIGATION IMPLEMENTATION AND MONITORING PLAN

This Initial Study/Mitigated Negative Declaration (IS/MND) includes a mitigation monitoring, compliance, and reporting program (MMCRP) for the mitigation measures proposed for the project. This section provides the recommended framework for effective implementation of the MMCRP by the California Environmental Quality Act (CEQA) lead agency, the California Public Utilities Commission (CPUC), and it describes the roles of responsible parties in carrying out and enforcing adopted mitigation measures.

6.1 AUTHORITY FOR THE MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

The California Public Utilities Code confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility, to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, and monitored and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the California Public Resources Code (PRC) (CEQA). Section 21081.6 requires a public agency to adopt an MMCRP when it approves a project that is subject to preparation of an IS/MND and where the IS/MND for the project identifies significant adverse environmental effects. CEQA Guidelines Section 15097 (14 CCR 15000 et seq.) was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The purpose of an MMCRP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMCRP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

6.2 ORGANIZATION OF THE FINAL MITIGATION MONITORING PROGRAM

If the project is approved, the MMCRP should serve as a self-contained general reference for the mitigation monitoring program adopted by the CPUC for the project. To accomplish this, the final mitigation monitoring program (final plan) should contain the following elements. If and when a project has been approved by the CPUC, it will compile the final plan from the mitigation monitoring program in the final IS/MND, as adopted. The elements of the mitigation monitoring program are as follows:

MMCRP Introduction

- Authority and purpose of the program
- Program adoption process
- Organization of the MMCRP

Roles and Responsibilities

- Monitoring responsibility
- Enforcement responsibility
- Mitigation compliance responsibility
- Dispute resolution

General Monitoring Procedures

- Environmental monitor
- Construction personnel
- General reporting requirements
- Public access to records.

Project Description

In the final plan, this section will contain a concise overview and reference description of the approved project and will clearly outline its physical locations and timetable, including construction segments. This section will also specify the "master" reference(s) that the monitors and San Diego Gas & Electric (SDG&E) will use in carrying out the program (e.g., the final IS/MND, but also more detailed working maps and plans). The applicant proposed measures (APMs) to which SDG&E has committed to reduce potential impacts will also be listed in this section. This section will also include requirements for the submittal of plans/documentation to be prepared by SDG&E as outlined in the project description.

Agency Jurisdictions

In the final plan, this section will include the list of agencies with jurisdiction over the project (Section 1, Initial Study Environmental Checklist Form, Table 1-1) and a description of where their respective jurisdictions exist. For example, for a given construction segment, information about each jurisdictional agency's contact person (including name, address, and telephone and fax numbers) should be provided.

Mitigation Monitoring Programs

The final plan will incorporate the organization and display of the individual issue area mitigation measures presented in the final IS/MND, as well as all APMs applicable to the project. Each mitigation measure will be numbered and described briefly. The final IS/MND should be consulted for an in-depth discussion of each mitigation measure. The final plan will also include the following information:

- Responsible parties, schedule, and reporting requirements for carrying out the monitoring activity for each mitigation measure
- Effectiveness criteria for evaluating implementation of the mitigation measure.

6.3 ROLES AND RESPONSIBILITIES

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this monitoring program and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures required by the CPUC are implemented and that mitigated environmental impacts are reduced to the level identified in the program.

The CPUC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies (such as affected jurisdictions). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. However, the CPUC will ensure that each person who is assigned monitoring duties or responsibilities is qualified to monitor compliance.

Any mitigation measure study or plan that requires approval from the CPUC must allow for adequate review time, as stipulated in MMCRP. Other agencies and jurisdictions may require longer review periods. It is the responsibility of the environmental monitors assigned to the project to ensure that appropriate agency reviews and approvals are obtained.

The CPUC and its environmental monitors will also ensure that any variance process or deviation from the procedures identified under the monitoring program is consistent with CEQA requirements; no project variance will be approved by the CPUC if it creates new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements; the changes must neither increase the severity of an impact nor create a new impact, and they must clearly and strictly comply with the intent of the mitigation measure. A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, and APMs, and correction of such deviation, shall be reported immediately to the CPUC and the environmental monitors assigned to the project for their review and approval. In some cases, a variance may also require approval by a CEQA-responsible agency.

6.4 ENFORCEMENT RESPONSIBILITY

The CPUC is responsible for enforcing the procedures adopted for monitoring through the environmental monitors assigned to the project. The environmental monitors shall note problems in the field, notify appropriate agencies or individuals about issues, and report compliance status to the CPUC project manager.

The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the project if the activity is determined to be a deviation from the approved project, adopted mitigation measures, or APMs. The CPUC may delegate this authority to third-party environmental monitors assigned to the project.

6.5 MITIGATION COMPLIANCE RESPONSIBILITY

The applicant, SDG&E, is responsible for successfully implementing all the adopted mitigation measures in the MMCRP. The MMCRP will contain criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include requirements such as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include success criteria that are listed in the mitigation measure. Additional mitigation success thresholds may be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

6.6 DISPUTE RESOLUTION

It is expected that the final MMCRP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such event, these procedures will be followed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated project manager for resolution. The project manager will attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC project manager may initiate enforcement or compliance action to address deviations from the proposed project or adopted mitigation monitoring program.
- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the program or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's executive director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the executive director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The executive director shall issue an executive resolution describing his/her decision and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the resolution, such party/parties may appeal to the CPUC via a procedure to be specified by the CPUC.

Parties may also seek review by the CPUC through existing procedures specified in the 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 procedures.

6.7 GENERAL MONITORING PROCEDURES

6.7.1 Environmental Monitors

The CPUC and the environmental monitors are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SDG&E. To oversee the monitoring procedures and to ensure success, the environmental monitors assigned to the project must be on site during construction activities that have the greatest potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitors are responsible for ensuring that all procedures specified in the monitoring program are followed.

6.7.2 Construction Personnel

A key component of a successful mitigation monitoring program will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in the final plan, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between SDG&E and any construction contractors. Procedures to be followed by construction crews will be written into a separate agreement that all construction personnel will be asked to sign, denoting agreement.

- One or more preconstruction meetings will be held to inform and train construction personnel about the requirements of the monitoring program (as detailed in the final plan).
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

6.7.3 General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitors assigned to the relevant construction segment. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress traced by the environmental monitors. A checklist will be developed and maintained by the environmental monitors to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitors will note any issues that may occur and take appropriate measures to bring a situation back into compliance. SDG&E shall provide the CPUC with written weekly reports of the project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the project. Weekly reports shall be required as long as mitigation measures are applicable.

6.7.4 Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CPUC on request. The CPUC and SDG&E will develop a filing and tracking system. For additional information about mitigation monitoring and reporting for the proposed project, the Energy Division of the CPUC will maintain an Internet website, accessible at:

http://www.cpuc.ca.gov/environment/info/dudek/MiraSorrento/MiraSorrentoSub.htm.

To facilitate public awareness, the CPUC will make weekly reports available on the website.

6.8 CONDITION EFFECTIVENESS REVIEW

To fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a mitigation monitoring program that will ensure compliance during project implementation (PRC 21081.6), the CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate, including as a result of the dispute resolution procedure outlined in Section 6.6.

If in either review the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

6.9 MITIGATION MONITORING PROGRAM TABLE

Table 6-1, along with the full text of the mitigation measures themselves, will form the basis for implementation of the mitigation monitoring program.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			Aesthetics			
Operation of the proposed project could result in long-term visual impacts.		APM-AES-1	PEA Figure 3-8: Conceptual Landscape Plan (IS/MND, Figure 4-4) provides the conceptual landscape mitigation plan for the Mira Sorrento Substation. The landscape plan would be implemented as part of the proposed project following construction of the substation components. The conceptual landscape plan would provide partial screening of views of the substation site from view locations to the west, south, and east. Landscaping would include plantings within the retaining walls and small, informal groupings of small shrubs and trees on the flatter areas created by the walls. The Conceptual Landscape Plan includes a list of recommended plant species. All suggested trees appear on the City of San Diego Street Tree Selection Guide. Drought-tolerant plants, including California native species, are suggested. Proposed project landscaping would receive regular watering during the initial two years following installation in order to ensure the establishment of the plants. All planting would be consistent with SDG&E operational requirements for landscaping in proximity to electric transmission facilities. The Mira Mesa Community Planning Group will review any changes made to the conceptual landscaping plan prior to approval.	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	CPUC to verify proposed shrub and tree planting locations through review of preconstruction plans. CPUC to verify measure implementation in the field. Effectiveness measure is that the visibility of the substation is partially screened by surrounding landscaping.	During and following construction. Measure applies to landscaping installed at the Mira Sorrento Substation.
Operation of the proposed project could result in long-term visual impacts.		APM-AES-2	The color of the substation perimeter wall would be chosen to blend with the existing site features (i.e., a dull grey, light brown, or dull green) in order to minimize visual contrast with the landscape setting.	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	CPUC to verify proposed color palette of substation perimeter wall through review of preconstruction plans. CPUC to verify in the field. Effectiveness criteria	During and following construction. Measure applies to Mira Sorrento perimeter wall.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
					– wall color blends with the existing site features and is consistent with the existing landscape setting.	
			Biological Resources			
Construction of the proposed project could result in temporary and/or permanent loss of native vegetation, direct or indirect loss of listed/ sensitive plants or habitat for sensitive plants, and direct or indirect loss of listed/sensitive wildlife or habitat of sensitive wildlife.		APM-BIO-1	SDG&E will conduct activities in accordance with NCCP Operational Protocols to avoid, minimize, or mitigate impacts to biological resources. See APM-BIO-2.	SDG&E to implement NCCP Operational Protocols as defined and incorporate commitments into construction contracts.	CPUC to inspect periodically during construction to ensure SDG&E is conducting activities in accordance with NCCP Operational Protocols.	Prior to and during construction at the Mira Sorrento Substation project site.
Construction of the proposed project could result in direct or indirect loss of listed/sensitive plants or habitat for sensitive plants and direct or indirect loss of listed/sensitive wildlife or habitat for sensitive wildlife.		APM-BIO-2	In accordance with the NCCP, SDG&E will conduct the following: • Whenever practicable, all grading or brushing occurring within occupied CAGN habitat shall be conducted from September 1st through February 28, which is outside of the CAGN breeding season. • When conducting all other project construction activities during the CAGN breeding season of March 1 through August 31 within habitat in which CAGN are known to or have a high potential to occur, the following avoidance measures shall apply: o A qualified biologist will conduct a preconstruction survey for CAGN within 1	SDG&E to implement measure as defined and incorporate commitments into the construction contracts.	SDG&E to provide survey report documentation to CPUC regarding avoidance and USFWS/CDFG concurrence as necessary. CPUC to inspect periodically during construction in order to ensure successful avoidance if possible/or if not possible	Prior to and during construction for all areas identified as having CAGN.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			week prior to initiating project construction activities in an area. If CAGN are present but not nesting, a qualified biologist will survey for nesting CAGN approximately once per week in the vicinity of project activities for the duration of the activity in that area. ○ If an active CAGN nest is located in the vicinity of project activities, a biologist qualified for CAGN nest monitoring will monitor the nest daily until: (1) Project activities are no longer in the vicinity of the nest, or (2) the fledglings become independent of their nest. ○ If the CAGN nest monitor determines that the project activities are disturbing or disrupting the nesting activities, the monitor will make practicable recommendations to reduce the noise or disturbance in the vicinity. This may include recommendations such as (1) turning off vehicle engines and other equipment whenever possible to reduce noise, and (2) working in other areas until the young have fledged. With these avoidance and minimization measures in place, any incidental take of coastal California gnatcatcher is covered by the SDG&E NCCP.		implementation of USFWS/CDFG-approved measures deemed necessary.	
Construction activities could impact rare plants species.	BIO-1		Prior to construction, SDG&E shall retain a qualified biologist to conduct a focused rare plant survey for the entire proposed impact area within the project area during the time period when the special-status plant species are detectable. Locations of rare/special-status plants shall be identified and inventoried. If special-status plants are identified during surveys, then SDG&E shall retain a qualified biologist to supervise construction activities within the vicinity of the special-status plant species. If impacts to special-status plant species are unavoidable, the biologists shall recommend	SDG&E to implement measure as defined.	CPUC to review and verify completion of rare plant survey. If rare plants are identified, CPUC to inspect periodically during construction to ensure on-site monitor presence and successful avoidance of sensitive species.	CPUC to review survey prior to construction and if rare plants are identified and a monitor is required, CPUC to inspect site periodically during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			avoidance or mitigation approaches. Alternatively, if the special-status plant species in question is a covered species within the SDG&E Subregional NCCP, mitigation consistent with measures established in the NCCP shall be provided. The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified on site shall be provided to CPUC prior to any construction activities including clearing, staging, grading, etc.		Alternatively, if special-status plant in question is a covered species within the SDG&E Subregional NCCP, CPUC to inspect periodically during construction to ensure SDG&E is conducting activities in accordance with NCCP Operational Protocols.	
Construction activities could impact sensitive wildlife species.	BIO-2		SDG&E shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor project construction. Monitors shall be hired and trained prior to construction and shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.), on-site monitoring, documentation of violations and compliance, coordination with construction inspectors, and post-construction documentation. The SDG&E on-site biological monitors shall prepare weekly reports during ground-disturbance activities and send them to the CPUC and the CPUC monitors. The SDG&E on-site biological monitors shall prepare a post-construction compliance report within 60 days of the end of ground-disturbance activities and send it to the CPUC. SDG&E's monitors shall be responsible for obtaining clearance from the CPUC and, if necessary, resource agencies for project modifications. All project modifications variances will be documented and none will be allowed with verbal approval only. Project modifications that are considered minor with little risk to sensitive resources by the SDG&E on-site biological monitors and the CPUC biological monitors	SDG&E to implement measure as defined.	CPUC to inspect periodically during construction to ensure on-site monitor presence and successful avoidance of sensitive species. SDG&E to provide weekly reports to CPUC and CPUC monitors regarding avoidance of sensitive species. SDG&E to provide post-construction compliance report to CPUC within 60 days of end of ground-disturbing activities.	Prior to and during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			may be approved on the site but will be documented. Project modifications that could affect sensitive resources but are required to ensure the health and safety of work crews shall also be documented.			
Construction of the proposed project could impact sensitive wildlife species.	BIO-3		SDG&E shall conduct Worker Environmental Awareness Program (WEAP) training for construction crews (primarily crew and construction foremen) before construction activities begin within any of the sensitive habitat areas. The WEAP shall include a brief review of the special-status species and other sensitive resources that could occur in the proposed project area (including their habitat requirements and an identification of portions of the project site and adjacent areas where they might be found) and their legal status and protection. The program shall cover all mitigation measures; environmental permits and proposed project plans, such as best management practices (BMPs); erosion control and sediment plan; reclamation plan; and any other required plans. The designated biological monitor shall be responsible for ensuring that construction personnel adhere to the guidelines and restrictions. WEAP training sessions shall be conducted as needed for new personnel brought onto the job during the construction period. A list of all personnel who have attended the WEAP training shall be kept by the biological monitor and shall be available for CPUC review in the field at all times, and a copy shall be submitted to the CPUC. During WEAP training, construction personnel shall be informed of the importance of avoiding ground-disturbing activities outside of the designated work area.	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	SDG&E to provide a copy of the worker training program for review and approval at least 30 days prior to start of construction. SDG&E to provide verification to CPUC of implementation of worker training program and compliance with measure as defined through providing sign-in sheets from each scheduled training session. All construction personnel that have been trained shall receive a sticker for their hard hat indicating they have completed environmental awareness training.	Prior to and during construction.
Construction of the proposed project could result in the potential for wildlife to be trapped in	BIO-4		At the end of each workday, any open holes shall be fully covered, after they have been inspected by the on-site biologist, with steel plates or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is	SDG&E to implement measure as defined and incorporate commitments into	SDG&E to provide verification to CPUC of measure including submittal of construction	Prior to and during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
ditches during trenching activities.			impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. SDG&E shall specify this requirement in its agreements with all construction contractors.	construction contracts.	contract. Survey efforts will be documented by the biologist in the daily log and reported to the CPUC at the end of each week.	
Construction of the proposed project could impact nesting birds.	BIO-5		If construction activities including but not limited to grading or site disturbance are to occur between March 1 and September 1, a nesting bird survey shall be conducted by a qualified biologist to determine the presence of nests or nesting birds within 100 feet of the construction activities. The nesting bird surveys shall be completed no more than 72 hours prior to any construction activities. The survey will focus on special-status species known to use the area as well as other nesting birds that are protected under the MBTA. If an active nest (defined by the presence of eggs or young) is identified, grading or site disturbance within a 100-foot buffer of the nest shall be monitored by a qualified biologist daily until project activities are no longer occurring within 100 feet of the nest or until fledglings become independent of the nest. The monitoring biologist may increase the buffer radius if he or she determines it is necessary. The monitoring biologist may decrease the buffer radius if he or she determines that the construction activities are not disturbing the nesting activities and a smaller buffer is more appropriate. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing the	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	SDG&E to provide survey report documentation to CPUC regarding avoidance and CDFG concurrence as necessary. CPUC to inspect periodically during construction in order to ensure successful avoidance if possible/or if not possible, implementation of additional mitigation shall occur.	Prior to and during construction for all areas within 200 feet of construction activities.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			nesting activities. The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as (1) turning off vehicle engines and other equipment whenever possible to reduce noise, (2) working in other areas until the young have fledged, or (3) placing noise barriers to maintain the noise at the nest to 60 dBA leq hourly or less or to the preconstruction ambient noise level if that exceeds 60 dBA leq hourly. The on-site biologist will review and verify compliance with these nesting boundaries and will verify that the nesting effort has finished. Unrestricted construction activities can resume when no other active nests are found. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the California Public Utilities Commission.			
Construction of the proposed project could impact sensitive habitat.	BIO-6		Where impacts to Diegan coastal sage scrub and native grasslands cannot be avoided, SDG&E shall restore temporarily disturbed areas to preconstruction conditions following construction and deduct credits from the SDG&E Mitigation Credits for permanent impacts to sensitive communities, as stated in the SDG&E NCCP. Where on-site restoration is planned for mitigation of temporary impacts to sensitive vegetation communities, the applicant shall identify a habitat restoration specialist to be approved by the CPUC or that the resource agencies have indicated is acceptable to determine the most appropriate method of restoration. Restoration techniques can include hydroseeding, handseeding, imprinting, and soil and plant salvage, as discussed in Section 7.2.1 of the NCCP. Monitoring will include visual inspection of restored areas after 1 year. A second application may be made. If, after the second year, restoration is deemed unsuccessful, the USFWS and CDFG, in	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	SDG&E to provide documentation of habitat credit deductions to CPUC. CPUC to ensure that commitments have been incorporated into contract specifications. CPUC to inspect periodically to ensure that disturbed areas have been restored to preconstruction conditions. SDG&E to provide documentation to CPUC regarding	Prior to, during, and following construction. This measure applies to all areas where impacts to sensitive natural communities are unavoidable and to all areas where habitat restoration is proposed.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			cooperation with SDG&E, shall determine whether the remaining loss shall be mitigated through a deduction from the SDG&E Mitigation Credits, or whether a third application would better achieve the intended purpose. The mitigation objective for impacted sensitive vegetation communities shall be restoration to preconstruction conditions as measured by species cover, species diversity, and exotic species cover. The cover of native species should increase while the cover of non-native or invasive species should decrease. Success criteria shall be established by comparison with reference sites. If, however, roots are not grubbed during temporary impacts, restoration/hydroseeding may not be necessary. This applies to impacts greater than 500 square feet, and only where grubbing occurred. For all temporary impacts greater than 500 square feet, acreage not meeting success criteria shall be deducted from SDG&E's mitigation credits at a 1:1 ratio. In addition, SDG&E shall mitigate for permanent impacts to Diegan coastal sage scrub (all subtypes) and native grassland at a ratio of 1:1 for all permanent impacts that would result from construction activities. Evidence shall be provided to the CPUC that 0.9 acre of coastal sage scrub and 0.1 acre of native grasslands have been deducted from NCCP credits.		revegetation status and USFWS/CDFG concurrence as necessary. Effectiveness criteria: temporarily disturbed areas are revegetated and meet identified success criteria. Permanent impacts to sensitive natural communities are mitigated through deduction of habitat credits.	
			Cultural Resources			
Construction of the proposed project could affect paleontological resources.		APM-CUL-1	A qualified paleontologist shall attend preconstruction meetings, as needed, to consult with the excavation contractor concerning excavation schedules, paleontological field techniques, and safety issues. A qualified paleontologist is defined as an individual with a Master of Science or Doctor of Philosophy in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology	SDG&E to provide a qualified paleontologist and incorporate monitoring requirements into construction plans.	SDG&E to provide CPUC documentation demonstrating qualifications of identified paleontologist.	Prior to and during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			and paleontology of Southern California, and who has worked as a paleontological mitigation project supervisor in the region for at least one year. The requirements for paleontological monitoring shall be noted on the construction plans.			
Construction of the proposed project could affect paleontological resources.		APM-CUL-2	A paleontological monitor shall work under the direction of the qualified project paleontologist and shall be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits with high or moderate paleontological resource sensitivity. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	SDG&E to provide a qualified paleontologist and incorporate monitoring requirements into construction plans.	CPUC to inspect periodically during construction to ensure on-site monitor presence.	Prior to and during construction.
Construction of the proposed project could affect paleontological resources.		APM-CUL-3	In the event that fossils are encountered, the project paleontologist shall have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist shall contact SDG&E's cultural resource specialist and environmental project manager at the time of discovery. The paleontologist, in consultation with SDG&E's cultural resource specialist, shall determine the significance of the discovered resources. SDG&E's cultural resource specialist and environmental project manager shall concur with the evaluation procedures to be performed before construction activities are allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. When fossils are discovered, the paleontologist (or paleontological monitor) shall recover them along with pertinent stratigraphic data. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth, recovery of bulk-sedimentary-matrix samples for off-site wet screening from specific	SDG&E to provide a qualified paleontologist and incorporate monitoring requirements into construction plans.	CPUC and SDG&E monitor to ensure work is diverted/temporarily suspended upon discovery of resources to allow timely recovery of fossil remains. CPUC to review the evaluation of significance and ensure implementation of evaluation procedures. SDG&E to provide summary report of mitigation program to CPUC.	During construction in all work areas where fossils are encountered.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, cataloged, and deposited in a scientific institution with permanent paleontological collections.			
Construction of the proposed project could affect undiscovered cultural resources.	CUL-1		In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or human bones, all work within 50 feet of the resources shall be halted, and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of SDG&E, California Public Utilities Commission (CPUC), and the qualified archaeologist shall meet to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curation, as necessary; and a report prepared by a specialist according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the CPUC and SDG&E shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out. If the CPUC, in consultation with the qualified archaeologist, determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, SDG&E will:	If necessary during monitoring, SDG&E's archaeologist to prepare Archaeological Data Recovery Program (ADRP) and meet with and submit to CPUC for review within 2 weeks of discovery. SDG&E to implement data recovery as specified in ADRP.	CPUC and SDG&E monitor to ensure work is suspended upon discovery of resources to ensure avoidance of all significant cultural resources. CPUC to review completed ADRP. SDG&E to provide summary report of mitigation program to CPUC. The qualifications of the archaeologist shall be approved by the CPUC.	During construction in all work areas where prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			• Redesign the project to avoid any adverse effect on the significant archaeological resource • If the resource is significant, implement an archaeological data recovery program (ADRP) as mitigation. If the circumstances warrant an ADRP, such a program shall be conducted. The project archaeologist and the CPUC shall meet and consult to determine the scope of the ADRP. The archaeologist shall prepare a draft ADRP that shall be submitted to the CPUC for review and approval. The ADRP shall identify how the proposed ADRP would preserve the significant information the archaeological resource is expected to contain. That is, the ADRP shall identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to portions of the archaeological resource that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.			
Construction of the proposed project could affect undiscovered Native American human remains.	CUL-2		If human remains are discovered, there shall be no further excavation or disturbance of the discovery site or any nearby area reasonably suspected to overlie adjacent human remains until the project applicant has immediately notified the county coroner and otherwise complied with the provisions of State CEQA Guidelines, Section 15064.5(e). If the remains are found to be Native American, the county coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours. The most likely descendant of the deceased Native American shall be notified by the NAHC and given the opportunity to make proper disposition of human remains. If the NAHC is unable to identify the most	SDG&E to provide qualified archaeologist to monitor during ground-disturbing activities. SDG&E to contact county coroner if human remains are found. Coroner to contact NAHC if appropriate.	CPUC and NAHC to review extraction plan if needed. CPUC and SDG&E monitor to ensure work is suspended upon discovery of resources to ensure avoidance of all significant cultural resources. If avoidance is not possible upon conclusion of	During groundbreaking activities in all construction areas.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			likely descendant (MLD), or if no recommendations are made by the MLD within 48 hours, human remains and any associated burial items shall be reinterred with appropriate dignity in a location not subject to further subsurface disturbance. If recommendations for a reburial location are made by SDG&E and not accepted by the MLD, the NAHC will mediate to reach agreement.		evaluations, data recovery research program exhausts potential of site to yield further important information. The qualifications of the qualified archaeologist shall be provided to the CPUC.	
			Geology and Soils			
Construction of the proposed project could expose people or structures to potential substantial adverse seismic effects and the proposed project would be located on unstable and expansive soils.		APM-GEO-1	SDG&E will consider the recommendations and findings of the final Geotechnical Investigation Reports prepared by Kleinfelder Inc. and the contractor's geotechnical engineer in the final design of all project components to ensure that the potential for landslides, expansive soils, and slope instability is compensated for in the final design and construction techniques. In addition, SDG&E will comply with all applicable codes and seismic standards, as appropriate, to minimize the potential for damage from a seismic event. The final project design will be reviewed and approved by a professional engineer registered in the State of California, prior to commencement of construction.	SDG&E to implement measure as defined and incorporate commitments into construction contracts. SDG&E to provide copies of geotechnical investigation reports to the CPUC prior to construction of the proposed project.	CPUC to verify incorporation of recommendations and findings on preconstruction plans (if necessary).	Prior to construction. This measure applies to all components of the proposed project.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			Hazards and Hazardous Materials			
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.		APM-HAZ-1	SDG&E would prepare a project-specific Hazardous Substance Management and Emergency Response Plan during the construction period to reduce or avoid potentially hazardous materials, for the purposes of worker safety, protection from groundwater contamination, and proper disposal of hazardous materials.	Plans to be submitted to CPUC, County of San Diego Department of Environmental Health, and City of San Diego Fire Department – Hazardous Materials Division.	CPUC to verify submittal of plans. CPUC to verify and ensure that potential exposure of workers, the public, or the environment to hazardous materials in contaminated soil and/or groundwater has been minimized.	Prior to and during construction.
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.	HAZ-1a		Prior to construction, all SDG&E, contractor, and subcontractor project personnel would receive training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures. A sign-in sheet of contractor and subcontractor project personnel who have received training shall be provided to California Public Utilities Commission on a regular basis depending on the level of construction activity.	SDG&E to conduct training program as described and incorporate measure into construction contracts. SDG&E to provide documentation of contractor and subcontractor training to the CPUC.	SDG&E to submit evidence of training in order for CPUC to verify.	Prior to construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.	HAZ-1b		The hazardous substance management and emergency response plan proposed by APM-HAZ-1 shall be reviewed and approved by the California Public Utilities Commission (CPUC) and San Diego County Department of Environmental Health (DEH), Hazardous Materials Division. The plan shall meet the requirements identified in California Health and Safety Code §25503.4, §25503.5, and §25504 and specifically addressed for the County of San Diego in the County of San Diego DEH, Hazardous Material Division, guidance on Hazardous Materials Business Plans.	Plans to be submitted to CPUC and San Diego County Department of Environmental Health.	SDG&E to submit plans in order for CPUC and San Diego County DEH to verify.	Prior to construction.
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.	HAZ-1c		SDG&E shall prepare and submit a copy of the Spill Prevention, Control, and Countermeasure plan, as required by Title 40 CFR, Section 112.7, to the California Public Utilities Commission for review and approval at least 60 days before the start of operation of the Mira Sorrento Substation.	Plan to be submitted to CPUC and San Diego County DEH.	SDG&E to prepare plan and submit in order for CPUC and San Diego County DEH to verify.	Plan submitted 60 days prior to the start of operation of the Mira Sorrento Substation.
Construction of the proposed project could result in significant risk of loss, injury, or death involving wildland fires.	HAZ-2		Wildfires shall be prevented or minimized by exercising care when operating utility vehicles within the right-of-way and access roads and by parking vehicles away from dry vegetation where hot catalytic converters can ignite a fire. In times of high fire hazard, it may be necessary for construction vehicles to carry water and shovels or fires extinguishers. Fire protective mats or shields would be used during grinding or welding to prevent or minimize the potential for fire.	SDG&E to implement measure as defined and incorporate compliance requirements into construction contracts.	CPUC to verify through review of preconstruction plans. CPUC to verify in the field.	Prior to and during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			Hydrology and Water Quality			
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.		HYD-1	SDG&E will prepare an SWPPP under the State General Construction Permit, and implement BMPs from the SDG&E Water Quality Construction Best Management Practices Manual in order to avoid and minimize potential impacts to water quality.	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	CPUC to ensure that commitments have been incorporated into construction contracts. CPUC to inspect periodically to ensure minimization of disturbance and erosion. SDG&E to submit SWPPP to CPUC in order to verify.	Prior to and during construction. This measure applies to grading activities and substation operations.
Potential dewatering activities during construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.	HY-1		SDG&E shall consult with the San Diego Regional Water Quality Control Board (RWQCB) to determine whether an individual discharge permit is required for dewatering all of the project areas anticipated to encounter groundwater. A copy of the permit or a waiver from the RWQCB, if required, shall be provided to the California Public Utilities Commission prior to dewatering activities.	SDG&E to implement measure as defined.	CPUC to review documentation of coordination with RWQCB. If necessary, SDG&E to provide applicable permit/waiver to CPUC to verify.	Prior to construction.
Potential dewatering activities during construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.	HY-2		SDG&E shall submit to California Public Utilities Commission prior to construction a typical dewatering drawing that shall be implemented during dewatering activities. The drawing shall include the location of pumps within secondary containment, fuel storage areas, anticipated discharge point, scour protection measures, intake hose screening, and monitoring procedures to ensure that hazardous materials spills are addressed in a timely manner and discharge hoses are frequently inspected for leaks.	SDG&E to implement measure as defined and incorporate into construction plans. Monitoring procedure to be incorporated into construction contracts.	SDG&E to provide dewatering drawing to CPUC in order to verify.	Prior to construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
			Noise			
Construction of the proposed project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity.	NOI-1		SDG&E or its construction contractor shall provide advance notice, between 2 and 4 weeks prior to construction, by mail to all property owners within 300 feet of construction. The announcement shall state specifically the construction start date, anticipated completion date, and hours of construction.	SDG&E shall conduct public notification as defined.	SDG&E to provide CPUC with construction notices for review and approval to ensure advance notice has been given.	Notification provided prior to construction to all property owners within 300 feet of construction.
Construction of the proposed project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity.	NOI-2		SDG&E shall identify and provide a public liaison person before and during construction to respond to concerns of neighborhood receptors, including residents, about construction noise disturbance. Procedures for reaching the public liaison office via telephone or in person shall be included in notices distributed to the public in accordance with MM NOI-1. SDG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers (procedures to be approved by the California Public Utilities Commission).	SDG&E to implement measure as defined.	CPUC to verify SDG&E employ of public liaison person and ensure procedures for reaching the public liaison are in place. SDG&E to provide CPUC with construction notices for review and approval to ensure advance notice has been given.	Prior to and during construction. Notification provided to CPUC prior to construction.
			Transportation/Traffic			
Construction of the proposed project could conflict with an applicable plan, ordinance, or policy regarding the performance of the circulation system, and construction activities could	TT-1		Prior to the start of construction, SDG&E shall submit traffic management plans (TMPs) to the City of San Diego as part of the required traffic encroachment permits. Input and approval from the City shall be obtained, and copies of an approval letter from the City must be provided to the California Public Utilities Commission (CPUC) prior to the start of construction. The TMPs shall define the use of flag persons, warning signs, lights, barricades, cones, etc., according to standard guidelines outlined in the California Department of	SDG&E to prepare TMPs as defined.	SDG&E to provide documentation of coordination with the City of San Diego as stipulated in the measure and SDG&E confirmation with all required conditions to ensure traffic flows would be generally maintained	Prior to construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
increase hazards due to a design feature or incompatible use.			Transportation (Caltrans) *Traffic Manual for Construction and Maintenance Work Zones* (Caltrans 1996), the *Standard Specifications for Public Works Construction* (Caltrans 2009a), and the *Work Area Traffic Control Handbook (WATCH)* (Caltrans 2009b). Measures identified in the TMPs to include but not be limited to: • The proposed gates must be located and operated so there will not be traffic backed up onto Mira Sorrento Place during peak times. • No lane closure will be allowed to occur on Mira Sorrento Place or Vista Sorrento Parkway during the AM and PM peak hours to minimize disruption from construction traffic. • The traffic control plan shall ensure that access remains available to all private properties at all times. Documentation of the approval of these plans, consistency with SDG&E's utility franchise agreements, and issuance of encroachment permits (if applicable) shall be provided to CPUC prior to the start of construction activities that require temporary closure of a public roadway.		without severe congestion. Documentation of plan consistency, consistency with SDG&E franchise agreements, as well as documentation of encroachment permit issuance (if applicable) provided to CPUC in order to verify.	
Construction of the proposed project could conflict with an applicable plan, ordinance, or policy regarding the performance of the circulation system.	TT-2		SDG&E shall stagger work shifts during the peak period of construction activity, and construction shifts shall be staggered to the degree possible, such that employee arrivals and departures from the site will avoid the project area peak hours (7:30–8:30 a.m. and 4:30–5:30 p.m.). Construction-related truck traffic shall also be scheduled to avoid travel during peak periods of traffic on the surrounding roadways.	SDG&E to implement measure as defined and incorporate commitments into construction contracts.	CPUC to verify commitments have been incorporated into construction contracts. CPUC to inspect periodically to ensure truck traffic avoids peak traffic periods on surrounding roadways.	Prior to and during construction.

Table 6-1: Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing of Action and Location
Construction of the proposed project could conflict with an applicable plan, ordinance, or policy regarding the performance of the circulation system.	TT-3		Construction workers shall be encouraged to carpool to the job site to the extent feasible.	SDG&E to implement measure as defined.	CPUC to verify.	During construction.

MM = Agency Mitigation Measure

APM = Applicant Proposed Measure

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