

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 15, 2010

Mr. Alan F. Colton
Manager – Environmental Services
Sunrise Powerlink Transmission Project
8315 Century Park Court, CP21G
San Diego, CA 92123-1550

RE: SDG&E Sunrise Powerlink Transmission Line Project - Notice to Proceed (NTP # 11)

Dear Mr. Colton,

On October 20, 2010 San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence with construction of Link 3, Suncrest Substation and the Wilson Construction Yard, Segment 13 of the Sunrise Powerlink Project.

The SDG&E Sunrise Powerlink Transmission Line Project was evaluated in accordance with the National Environmental Policy Act and California Environmental Quality Act. The mitigation measures and applicant-proposed measures (APMs) described in the Final Environmental Impact Report/Statement were adopted by the CPUC and BLM as conditions of project approvals. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during implementation. The CPUC voted on December 18, 2008 to approve the Final Environmentally Superior Southern Route ([Decision D.08-12-058](#)) and a [Notice of Determination](#) was submitted to the State Clearinghouse (SCH#2006091071). The BLM issued a [Record of Decision](#) approving the same route on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture; and Forest Service on the Cleveland National Forest; the Forest Service issued its Record of Decision and Supplemental Information report on July 9, 2010. The area requested under this NTP does not fall under Forest Service jurisdiction.

The Sunrise Powerlink Project will be constructed in 26 segments, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/sunrise.htm>). It is anticipated that, even within the 26 project segments, SDG&E will submit multiple separate requests for Notice to Proceed (NTPs) during the construction process. This is a typical process for transmission line projects. Given that the Sunrise Powerlink Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SDG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter and the attached Compliance Status Table document the CPUC's thorough evaluation of all activities covered in this NTP. The evaluation process ensures that all mitigation measures and Biological Opinion conditions applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision and in BLM's Record of Decision.

NTP # 11 for Link 3, which includes the Suncrest Substation, Wilson Construction Yard, and associated access road, is granted by CPUC for the proposed activities based on the factors described below.

SDG&E NTP Request. Excerpts from the October 20, 2010 SDG&E NTP request and updates are presented below with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**:

SDG&E is formally requesting authorization from the CPUC to begin construction of Link 3, which includes the Suncrest Substation, Wilson Construction Yard, and associated access road (Bell Bluff Truck Trail [BBTT]). The substation site and yard are located south of BBTT approximately 2.8 miles west of Japatul Valley Road, southwest of the U.S. Interstate 8 and Japatul Valley Road intersection, and east of the City of Alpine, California in San Diego County. The substation, yard, and access road are located entirely on private land.

The Suncrest Substation is contiguous to the Project right-of-way (ROW) and is needed to accommodate the termination of one 500 kilovolt (kV) and two 230 kV overhead transmission lines. In addition to the terminals, transformer banks, capacitor banks, switches, and relays required for termination of the transmission lines, a diesel-powered emergency generator, fire prevention system, one single-story relay/control shelter, a single-story maintenance shelter, and an oil containment system would be installed as part of construction. Construction of the overhead lines into the Suncrest Substation and wire-stringing activities are not included in this request; these activities will be included during overhead construction on Links 2 and 5.

Grading and Disturbance Areas – As described in the Project Modification Report, grading and ground disturbance at the Suncrest Substation site has been reduced to minimize impacts and to accommodate requests of two adjacent landowners. The total permanent footprint has been reduced to 75.07 acres for construction of the substation and BBTT improvements, but the total temporary disturbance area has increased to 32.54 acres in order to construct the substation pad, perform BBTT improvements, and use of the Wilson Construction Yard. These impacts are described in detail on pages 4-111 through 4-114 of the Project Modification Report.

Wilson Construction Yard and Field Offices – Development of the Suncrest Substation includes use of the existing 10.78 acre Wilson Construction Yard, located approximately three-quarters of a mile to the east of the substation along BBTT. A 2.2 acre portion of the Wilson Construction Yard will be used to facilitate construction of the Suncrest Substation; with the remaining 8.58 acres used for material staging and storage associated with construction of the overhead transmission line. In addition, field offices and parking areas have been designated along BBTT as shown in the Project Modification Report Map Book (MS-106 and 107). **(Helicopter transport will be utilized at the Wilson Yard.)**

Construction Water Source (please note that the following water source information is being analyzed and permitted separately.) – Beta Engineering (Beta) is currently working with the California Department of Fish and Game (CDFG) and the State Water Resources Control Board (SWRCB) to use two existing ponds located on the Wilson Property, a privately owned property adjacent to the BBTT, as a source of water and for storage of potable water. The Wilson ponds are manmade, earthen stock ponds fed by rainfall and surface runoff. The project involves transporting potable water by tanker trucks from local municipal sources to supplement the water naturally in the ponds, as well as installing a system of temporary aboveground pipes and pumps to transport the water from the ponds to the BBTT.

Beta has informed SDG&E that they submitted an Application to Appropriate Water for Temporary Use to the SWRCB and a 1600 Notification of Lake or Streambed Alteration Application to the CDFG. If water becomes available from the ponds prior to or during construction of the substation, SDG&E would obtain water from a source-point at the BBTT and either truck the water to the substation or install a below ground pipe within the access road to transport the water.

Access Road Improvements – Improvements to approximately 2.6 miles of BBTT include widening the existing roadbed from 15 feet to 30 feet and upgrading the surface to pavement (asphalt) to provide a permanent access road to the substation. Some sections of BBTT will be relocated to minimize impacts to oak trees and to address access to adjacent properties (see PMR 29). The existing crossing of Peterson Creek will be improved to accommodate construction equipment deliveries.

Bell Bluff Truck Trail modification plans have been submitted to the County of San Diego for consultation and review; however, no permit is required. During construction, an electrical permit will be obtained from San Diego County for

temporary power during construction. No activities associated with temporary power at the construction site will occur until this permit has been obtained.

Resource Agency Permitting– Revised 401, 404 and 1602 permit applications were submitted for review and approval on March 30, 2010. SDG&E received the signed 401 Water Quality Certification on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010 (**the Final SAA was issued by CDFG on November 29, 2010.**). Impacts to streambeds will not occur until SDG&E receives the remaining ACOE 404 permit.

To the extent feasible, structures were not designed to be located within streambeds and drainage features. Construction areas are shown in the Project Modification Report Map Book which was submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM in the Determination Memorandum on September 22, 2010. Construction activities at the Suncrest Substation will include construction of a box culvert at the Bell Bluff Truck Trail and Peterson Creek crossing.

A project specific Fire Prevention and Response Plan (FPRP) was acknowledged* by CAL Fire Chief (the plan has been CPUC approved). A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP. (*In regard to the FPRP the Cal Fire Chief provided "The signatory reviewing officials are acknowledging that SDG&E has a Construction Fire Prevention Plan that is appropriate and necessary to mitigate fire hazard and risk for the SRPL construction and maintenance activities. They do not accept any responsibility for SDG&E interpretation or implementation of this Plan during the construction and maintenance of the SRPL or for any resulting actions associated with these activities.")

CPUC Evaluation of Mitigation Implementation

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological and cultural resources, those additional conditions are defined in this section.

Please see also the attached Compliance Status Table documenting pre-construction requirements identified in the Final EIR/EIS. Note that entries shaded in yellow are outstanding and must be completed prior to the start of construction. Entries shaded in purple are to be conducted during construction. Entries shaded in green have been fulfilled. Entries that have not been shaded are not applicable to this Link.

Following the discussion of biological, cultural, and paleontological resources, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SDG&E. In these cases, the conditions will not also appear in the Compliance Status Table.

Biological Resources

This section presents background on biological resources that occur at or near the site. This summary of biological issues was provided by SDG&E in the NTP request.

On-the-ground protocol surveys have been conducted for sensitive plant and animal species in Link 3. SDG&E has submitted survey reports for the 2009 survey season. All 2010 surveys are complete and SDG&E is in the process of providing 2010 survey reports. The 2010 Riparian Bird Survey Report was submitted to the agencies on October 28, 2010 and the 2010 Quino Checkerspot Butterfly Survey was submitted to the agencies on December 3, 2010. The following reports will be submitted as soon as they are complete; the 2010 Arroyo Toad Survey, the 2010 Coastal California Gnatcatcher Survey, and the

2010 Rare Plant Survey. As described in G-CM-32 of the revised Biological Opinion dated November 10, 2010, the Wildlife Agencies state that surveys for federally listed species have been completed.

CPUC Review. The CPUC biological consultant conducted reviews of the initial NTP request and follow-up materials for completeness and compliance with Project mitigation requirements. In 2009, protocol surveys for rare plants and Quino checkerspot butterfly were completed and habitat assessments for coastal California gnatcatcher and arroyo toad were conducted. Protocol surveys for coastal California gnatcatcher were not conducted on the substation site because no suitable habitat was present. Protocol surveys for arroyo toads were not conducted because surface water was not present in 2009; however, the 2009 survey report stated “Survey recommended when water is present.” No Quino checkerspot butterfly were documented on the substation site in 2009 or in 2010. Survey results were accepted by the U.S. Fish and Wildlife Service as described in the Reinitiated Biological Opinion issued on November 10, 2010.

Four non-listed, sensitive plant species were documented on the substation site in 2009 (*Chorizanthe leptotheca*, *Monardella hypoleuca* spp. *lanata*, *Quercus engelmannii*, and *Xanthisma juncea*). SDG&E has submitted a Restoration Plan for Special Status Plants (dated November 29, 2010), which addresses the restoration details for the project’s impacts on *Monardella hypoleuca* spp. *lanata* (the other 3 species would either not be impacted or are low sensitivity that do not need to be addressed by the plan). The CPUC biological consultant is currently reviewing the Restoration Plan for Special Status Plants.

Cultural Resources

The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010 by BLM and CPUC. Two cultural resources sites (CA-SDI-19036 and CA-SDI-19779) were identified within the Suncrest Substation boundaries. These sites have been tested and evaluated, and a report of findings will be submitted to the agencies. While the sites have been recommended as ineligible for inclusion in the National Register of Historic Places (NRHP), the BLM must formally make this determination and the State Historic Preservation Officer (SHPO) must concur with this determination of eligibility before construction work within the Suncrest Substation site can begin. However, no cultural resources are located within the associated access road (Bell Bluff Truck Trail) or the Wilson Construction Yard. Therefore, work can proceed on those elements of Link 3.

Paleontological Resources

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, there is no potential to encounter paleontological resources within Link 3.

Conditions of NTP Approval

The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Green entries have been fulfilled. Entries that are not shaded are

not applicable to this Link. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.

2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. Use of the two existing ponds on the Wilson property as a water source shall not commence until SWRCB and CDFG authorizations are provided to the CPUC.
4. No work shall occur within Army Corp of Engineers (USACOE) jurisdiction until the USACOE Section 404 Nationwide Permit 12 is obtained, in accordance with MM B-2a and WQ-APM-15.
5. CPUC is currently reviewing the Restoration Plan for Special Status Plants. No removal of special status plants shall occur until the subject plan is approved by CPUC. Per SDG&E, the felt-leaved monardella populations along the Bell Bluff Trail will be fenced immediately prior to construction. In addition as provided in the Restoration Plan for Sensitive Plant Species, impacts to approximately 55 plants will be mitigated through conservation of 857 plants at the Lightner mitigation site. The HAP/HMP provides for the permanent preservation and management of the Lightner site.
6. In compliance with Mitigation Measure B-3a, the Weed Control Plan shall be implemented immediately prior to, during and post construction as appropriate for the weed species being treated at the sites being covered by NTP #11.
7. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and September 15.
8. "Survey sweeps" shall occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, a biological monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC.
9. Per the mitigation measures (B-01a, LU-APM-6), limits of construction and environmentally sensitive areas shall be delineated with orange construction fencing or flagging prior to the start of construction to alert construction personnel that those areas should be avoided.
10. All construction areas and access roads identified in the NTP request submitted by SDG&E shall be flagged prior to construction. Flagging of construction areas and access roads shall be field verified by the CPUC EM prior to site use.
11. No work or other construction related activities shall occur outside of approved work areas.
12. Wildlife found to be trapped shall be removed by a qualified biological Monitor. If the biological resource monitor is not qualified to remove entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.

13. There shall be no earth disturbance allowed within the foot print of the Suncrest Substation until the evaluation report is finalized by the BLM in consultation with the CA SHPO.
14. Work on the Bell Bluff Truck Trail and the Wilson Construction Yard will be allowed after the installation and inspection of identified ESAs by the CPUC EM. These ESAs will be inspected and maintained over the duration of work.
15. Verification that BLM has approved the proposed archeological monitor résumés shall be submitted to the CPUC prior to any work requiring archaeological monitoring at the site.
16. If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
17. As determined by the Traffic Study approved by San Diego County on September 29, 2010 (Permit No. 0910-77), neither detours nor lane closures along public transportation routes to the Substation are anticipated. However, if during construction, detours and or temporary lane closures are necessary, SDG&E shall obtain required permits from the County of San Diego and CALTRANS.
18. As determined by the Traffic Study approved by San Diego County on September 29, 2010, it is not anticipated that construction activities will restrict movements of emergency service providers. However, if necessary, during construction SDG&E shall coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
19. Bell Bluff Truck Trail modification plans have been submitted to the County of San Diego for consultation and review; however, no permit is required. During construction, an electrical permit will be obtained from San Diego County for temporary power during construction. No activities associated with temporary power at the construction site shall occur until this permit has been obtained.
20. Per SDG&E, Hazardous Material Business Plan (HMBP) and Spill Prevention Countermeasure and Control (SPCC) Plans will be developed during construction. The HMBP and SPCC plans shall be submitted to the CPUC and implemented (i. e., installation of secondary containment, construction of drainage basins etc.) prior to transformer oils or any other materials as covered by the plans are brought on-site.
21. In compliance with Mitigation Measure H-1a, a Grading and Drainage Plan was prepared and submitted to the CPUC. Prior to construction at the substation site, verification of RWQCB receipt and approval of the Grading and Drainage Plan shall be provided to the CPUC.
22. An NPDES storm water discharge permit for construction activities has been obtained. A SWPPP applicable to the Link 3 construction has been submitted to the CPUC. The SWPPP shall be implemented where appropriate prior to and during construction.
23. If blasting is required, a site-specific blasting plan shall be submitted to the CPUC prior to blasting.
24. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.

25. As provided in the NTP request, construction work will be conducted between the hours of 7:00 a.m. to 7:00 p.m. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC. SDG&E shall comply with local noise rules, standards, and/or ordinances by implementing the noise-suppression techniques and variance standards as outlined in Mitigation Measure N-1a.
26. As proposed, the SDG&E Environmental Monitoring Program will be implemented during construction which will include implementation of the applicable environmental plans (as defined in HS-APM-1, HS-APM-2, HS-APM 3, HS-APM-8 and HS-APM-10). SDG&E has designated an Environmental Field Representative for Link 3 construction. The Representative will be on site to observe and document adherence to the applicable environmental plans.
27. In regard to the Hazard Communication Plan, to fully satisfy the intent of Mitigation Measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.
28. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor shall be notified immediately.
29. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes or changes in technique and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.
30. If the application of water is needed to abate dust in construction areas and on dirt roads, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan shall be implemented and enforced throughout Link 3 construction activities.
31. All temporary facilities (i.e., portable toilets, fencing, etc.) shall be removed from the construction disturbance area at the completion of construction.
32. All complaints received by SDG&E in regard to Link 3 shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting, noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, activities may need to be modified depending on the nature of the complaint.
33. When significant precipitation events are anticipated, or have occurred, access on project roads may be suspended in order to maintain the integrity of access roads and provide for personnel safety. Access will be suspended for 24 hours following a rain event in order to allow for a dry out period. The parameters for suspending access include, but are not limited to:
 - a. Rutting occurring in excess of 2 inches over a distance of 50 feet
 - b. Rutting and/or soil mixing occurring on 10% of the road
 - c. Rills more than 10 feet in length develop
 - d. Significant soil compaction
 - e. Significant soil adhesion to vehicles and construction equipment

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard

Billie Blanchard
CPUC Environmental Project Manager
Sunrise Powerlink Transmission Project

cc: Mary Jo Borak, CPUC CEQA Unit
Nicholas Sher, CPUC Legal Division
Daniel Steward, BLM El Centro Field Office
Tom Zale, BLM El Centro Field Office
Susan Lee, Aspen Environmental Group
Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group
Don Haines, San Diego Gas and Electric Company
Tina Carter, San Diego Gas and Electric Company
Robert Hawkins, U.S. Forest Service
Michael Bennett, BLM Palm Spring South Coast Field Office
Cliff Harvey, State Water Resources Control Board
Eric Porter, USFWS
Doreen Stadtlander, USFWS
Paul Schlitt, CDFG
Heather Pert, CDFG
Kelly Fisher, CDFG
Erin Wilson, CDFG

Attachment A: Preconstruction Status Report

Wednesday, December 08, 2010

12:15:00 PM

Report Criteria:

AGENCY: CPUC

LOCATION: Link 3

TIMING: Design; During; During and Post; Pre; Pre and During; Pre and Post; Pre, During, and Post

 -To Be Implemented During Construction

 -Complete

 -Pending OR To Be Implemented Immediately Prior to Construction

 -Not Applicable

Note: This table contains U.S. Fish and Wildlife Service Conservation Measures in addition to the mitigation measures and applicant proposed mitigation measures from the Final EIS/EIR. The conservation measures are denoted in the table as G-CM-# or SS-G-#.

The mitigation measure and APM numbers listed in this table reference the actual measures in the MMCRP. The text after the measure number provides a summary of specific tasks within each measure, but is not intended to provide the entire language contained within the MMCRP. Please note that several measures include multiple entries in this table. These multiple entries break out the various requirements or tasks contained within that measure. Please reference the MMCRP for the actual requirements for each measure or visit www.cpuc.ca.gov/Environment/info/asp/sunrise.

Mitigation Measure and APM	Status
B-01a: Locate surface disturbing components in previously disturbed areas	The preconstruction portion of this measure is complete. Sensitive resources were mapped using GIS and project structures and work areas were designed to avoid these resources, to the extent possible. The Project Modification Report Mapbook submitted on May 14, 2010 and approved on September 22, 2010, shows both sensitive resources and the location of areas that may be disturbed. During construction, vegetation and soil impacts will be minimized.
B-01a: Use construction mats to minimize disturbance	This mitigation measure will be fulfilled during construction.
B-01a: Double mitigation ratios on lands already in mitigation	The Suncrest Substation lands are SDG&E owned and are not in use as mitigation for other projects; therefore, this portion of the mitigation measure is not applicable.
B-01a: Delineate all limits of construction	The limits of construction will be delineated with orange construction fencing or flagging prior to the start of construction.
B-01a: Coordinate gate installation 60 days prior to construction	Construction of the substation will occur on privately held property. SDG&E has consulted with private property owners regarding gate installation and will be relocating one gate on Bell Bluff Truck Trail in accordance with the property owner's request. SDG&E consulted with the County of San Diego on August 25, 2010 regarding the County owned portion of Bell Bluff Truck Trail; no requests for additional gates were made. A copy of the meeting minutes with the County of San Diego was submitted to the CPUC on October 1, 2010.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	A copy of the meeting minutes from the meeting with the County of San Diego regarding installation of gates on Bell Bluff Truck Trail was submitted on October 1, 2010.
B-01a: Post signs on access road gates prohibiting unauthorized users	Signs prohibiting unauthorized use of the Bell Bluff Truck Trail will be posted on the installed gates during construction.
B-01a: Provide funding for off-road vehicle patrols	This mitigation measure is not applicable to Link 3. New off-road access is not a concern for the portion of Bell Bluff Truck Trail owned by the County of San Diego. SDG&E met with the County of San Diego on August 25, 2010 and meeting minutes summarizing the discussions were submitted to CPUC on October 1, 2010.
B-01a: Mitigate for impacts by unauthorized activity (e.g., exceeding approved construction footprints)	This mitigation measure will be fulfilled during construction. The mitigation ratios for unauthorized impacts have been eliminated as described in the reinitiated Biological Opinion, dated November 10, 2010, G-CM-6.
B-01a: Submit a Habitat Restoration Plan	SDG&E submitted a Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas for review and approval to the CPUC, BLM, USFS and wildlife agencies that addresses restoration of temporarily impacted areas on September 24, 2010 and a revised plan incorporating comments was resubmitted on October 25, 2010. This plan was approved by the CPUC on November 3, 2010 and by the Wildlife Agencies in the revised Biological Opinion dated November 10, 2010 (see G-CM-16 of the BO).

Mitigation Measure and APM	Status
B-01a: Mitigate for impacted habitat	In coordination with the appropriate agencies, off-site purchase and dedication of habitat will be provided for areas where habitat restoration cannot meet mitigation requirements as outlined in this measure. This will be determined during and post construction during restoration activities.
B-01a: Mitigate for the loss of native trees and tree trimming	The Wildlife Agencies have agreed that conservation of woodland areas on mitigation lands included in the Habitat Acquisition Plan/Habitat Management Plan is acceptable mitigation for impacts to native trees. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion.
B-01a: Submit a Habitat Acquisition Plan 120 days prior to construction	The Habitat Acquisition Plan was submitted for review and approval on February 4, 2010. The HAP was further refined and provided to the CPUC on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP/HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
B-01a: Submit a Habitat Management Plan	The Habitat Management Plan was submitted for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP/HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
B-01a: Include legal descriptions of all legal parcels	The HMP, prepared by a qualified biologist, was submitted to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service on September 22, 2010 for review and approval. All the components in this mitigation measure have been included in the HMP. This plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010.
B-01c: Provide biological monitoring and perform periodic inspections once or twice a week	A qualified biological monitor with the authority to issue stop work orders will be on-site during construction activities and weekly monitoring reports will be prepared. This mitigation measure will be fulfilled during construction.
B-01c: Send weekly monitoring reports	A qualified biological monitor with the authority to issue stop work orders will be on-site during construction activities and weekly monitoring reports will be prepared. This mitigation measure will be fulfilled during construction.
B-01c: Qualified biologists shall handle all environmental issues and have the authority to issue stop work orders	A qualified biological monitor with the authority to issue stop work orders will be on-site during construction activities and weekly monitoring reports will be prepared. This mitigation measure will be fulfilled during construction.
B-01k: Re-seed all public and private natural areas burned due to project-caused fire	This mitigation measure will be fulfilled during and post construction, as needed.
B-01k: Develop re-seeding plan	This mitigation measure will be fulfilled during and post construction, as needed.
B-02a: Avoid impacts to jurisdictional areas	Impacts to jurisdictional features were considered during the design of the project and have been avoided, to the extent feasible. The location of each jurisdictional drainage and potential impact was described in the Preliminary Jurisdictional Determination report that was approved by the Army Corps of Engineers.
B-02a: Mitigate impacted areas as required by wetland permitting	Where avoidance of jurisdictional areas is not feasible, SDG&E shall provide the necessary mitigation required as part of wetland permitting as outlined in this measure. SDG&E submitted a Habitat Mitigation and Monitoring Plan (HMMP) on July 14, 2010 and a revision to the HMMP on October 7, 2010. The HMMP has been accepted by the ACOE, CDFG and SWRCB in concept; however the agencies have asked that the report be reformatted to break out each mitigation property separately.
B-02a: Prepare jurisdictional delineation and impact assessment	The project area was surveyed and impacts to resources under the jurisdiction of the ACOE, Regional Water Boards, State Water Board, and CDFG were determined. A revised Preliminary Jurisdictional Determination was submitted on February 24, 2010 and accepted as part of the 404 permit application on August 27, 2010. Grading Plans for Suncrest Substation were submitted on March 24, 2010 and June 22, 2010.
B-02a: Mitigate for jurisdictional wetland habitat	Where avoidance of jurisdictional areas is not feasible, SDG&E shall provide the necessary mitigation required as part of wetland permitting as outlined in this measure. SDG&E submitted a HMMP on July 14, 2010 and a revision to the HMMP on October 7, 2010. The HMMP has been accepted by the ACOE, CDFG and SWRCB in concept; however, the agencies have asked that the report be reformatted to break out each mitigation property separately. The 401 Water Quality Certification was issued on November 15, 2010. The CDFG issued a Streambed Alteration Agreement on November 17, 2010. SDG&E will not impact jurisdictional areas prior to approval of the final HMMP and issuance of the 404 permit.

Mitigation Measure and APM	Status
B-02a: Obtain wetland permits prior to construction	Revisions to the 401 and 404 permit applications were submitted to the SWRCB and ACOE on August 18, 2010. Revisions to the 1600 permit were submitted to CDFG and a verbal agreement was reached on August 30, 2010. SDG&E will not impact jurisdictional areas prior to issuance of the 401, 404 and 1600 permits.
B-02a: Delineate all limits of construction	The Project Modification Report and Mapbook submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010, illustrates the limits of construction. Limits of construction will be delineated immediately prior to construction with orange construction fencing, flagging or silt fencing.
B-02a: Install gates and signs at entrances of access roads	SDG&E will relocate one gate on Bell Bluff Truck Trail in accordance with the property owner's request. No other gates will be installed on the access road to the substation. This mitigation measure will be fulfilled during construction. (see B-01a Task 7)
B-02a: Mitigate impacts from unauthorized activity	This mitigation measure will be fulfilled during construction.
B-02a: Submit and implement Wetland Mitigation Plan	SDG&E prepared and submitted an HMMP on July 14, 2010 as outlined in this mitigation measure. This plan was revised and provided to the agencies on October 7, 2010. The HMMP has been accepted by the ACOE, CDFG, and SWRCB in concept; the agencies have asked that the plan be reformatted to break out each mitigation property separately. This plan was prepared by WRA, a qualified habitat restoration specialist. This plan will be implemented by a qualified habitat restoration specialist.
B-02a: Submit a Habitat Management Plan that includes jurisdictional areas	SDG&E submitted a HMMP on July 14, 2010 and a revised HMMP on October 7, 2010 that describes preservation and management of all acquired, offsite mitigation parcels as outlined in this mitigation measure. The ACOE, CDFG and SWRCB have approved the HMMP in concept, but have requested that each mitigation property be broken out separately in the report. This plan will be implemented during construction.
B-03a: Submit and implement a Weed Control Plan	A Final Weed Control Plan was approved by the BLM and CPUC on September 8, 2010. Additional comments from the USFWS, City of San Diego and USFS were incorporated into a final plan that was submitted to all agencies on November 10, 2010. The Weed Control Plan has been approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-20).
B-03a: Conduct pre-construction weed inventory	A Final Weed Control Plan was approved by the BLM and CPUC on September 8, 2010. Additional comments from the USFWS, City of San Diego and USFS were incorporated into a final plan that was submitted to all agencies on November 10, 2010. The Weed Control Plan has been approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-20).
B-03a: Implement weed control treatments	The Weed Control Plan will be implemented immediately prior to, during and following construction as appropriate for the weed species being treated.
B-03a: Annually survey for new invasive weeds for 2 years	The Weed Control Plan addresses surveying for invasive exotic species during construction and annually following construction to monitor previously-identified and treated populations and to identify new invasive weed populations for the life of the Project. Treatment of weeds will occur on a minimum annual basis unless otherwise approved by the PCA, San Diego County Agricultural Commissioner, and Cal-IPC. This mitigation measure will be fulfilled during/post construction.
B-03a: Ensure all seeds and other material are certified weed free	This mitigation measure will be fulfilled during/post construction.
B-03a: Wash vehicles and equipment	During project construction, project vehicles and equipment will be washed as required by the approved Weed Control Plan. This mitigation measure will be fulfilled during/post construction.
B-03a: Submit monthly wash logs during construction and annual logs during operation/maintenance	During project construction, project vehicles and equipment will be washed as required by the approved Weed Control Plan. This mitigation measure will be fulfilled during/post construction.
B-05a: Conduct surveys in the spring and submit a special status plant report	Rare Plant Surveys were completed by qualified biologists in 2009 and 2010. The 2009 survey report was submitted to the CPUC for review, as outlined in this measure, on November 9, 2009. The 2010 rare plant surveys are complete. The 2010 surveys included all project areas as described in the Project Modification Report submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum dated September 22, 2010. The Wildlife Agencies approved SDG&E's surveys for federally listed species as stated in G-CM-32 of the revised Biological Opinion dated November 10, 2010.

Mitigation Measure and APM	Status
B-05a: Stake or flag special status plant populations	Rare Plant Surveys were completed in 2009 by a qualified biologist. The 2009 survey was submitted to the CPUC for review on November 9, 2009. No state or federally listed rare plants were identified in the 2009 surveys along Link 3 or Wilson yard. The felt-leaved monardella population along the Bell Bluff Truck Trail will be fenced immediately prior to construction.
B-05a: Avoid impacts to federal and state listed plant species	Where feasible, impacts to federal or state listed species shall be avoided. The Project Modification Report and Mapbook, which was submitted on May 14, 2010 and approved by the BLM and the CPUC on September 22, 2010 through a Determination Memorandum, shows both sensitive resources and the locations of areas that may be disturbed. As noted in the revised Biological Opinion, dated November 10, 2010, SDG&E will not impact any federal or state listed species during construction activities for this project (see pages 3-4); therefore, this mitigation measure has been satisfied.
B-05a: Submit a Restoration Plan for federal and state listed plants	No federal or state listed plants will be impacted by construction activities on the project, but moderately sensitive plant species will be affected; therefore, SDG&E has prepared a Restoration Plan for Special Status Plants. This plan was submitted to the agencies for review on November 29, 2010. Impacts to special status plants will not occur until this plan is approved by the agencies.
B-05a: Avoid impacts to moderately sensitive plant species	Where feasible, impacts to moderately sensitive plants shall be avoided. The Project Modification Report Mapbook submitted on May 14, 2010, shows the locations of areas that may be disturbed. Where avoidance is not feasible, SDG&E will implement these measures during construction as described in this mitigation measure.
B-05a: Submit a Restoration Plan for special status plant species	A qualified Habitat Restoration Specialist developed the Restoration Plan for Sensitive Vegetation in Temporary Impact Areas. This plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010. Reseeding and salvage will be implemented as determined by the restoration specialist in coordination with the resource agencies.
B-05a: Submit a Habitat Management Plan that addresses offsite mitigation for rare plants	A Habitat Management Plan was submitted to the appropriate agencies for review and approval on September 22, 2010 as outlined in this measure. The Habitat Acquisition Plan and Habitat Management Plan were approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).
B-07a: Cover excavations or install fencing when not in use	Steep-walled trenches or excavations will be covered, fencing will be installed or sloped on one end (i.e., ramped) to prevent the entrapment of wildlife during construction. This mitigation measure will be fulfilled during construction.
B-07a: Inspect excavations 3 times per day and before backfilling	A qualified biological monitor will inspect any open trenches as required. This mitigation measure will be fulfilled during construction.
B-07a: Look under vehicles and equipment before moving for presence of wildlife	Workers will be instructed to look under vehicles for wildlife before movement and to report mortality or injury of a listed species within 48 hours. No vehicles or equipment will be moved until the animal has left or is removed by a qualified biologist. This mitigation measure will be fulfilled during construction.
B-07a: Contact within 48 hours of finding a dead or injured listed species	A qualified biological monitor will submit monitoring reports as required by this measure. This mitigation measure will be fulfilled during construction.
B-07e: Survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work in area	The Riparian Birds Survey Report 2009, which was submitted to the CPUC for review on January 14, 2010 and approved on August 26, 2010 indicates that there is no habitat for least Bell's vireo and southwestern willow flycatcher within 500 feet of Link 3; therefore, this measure does not apply.
B-07e: Survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present	The Riparian Birds Survey Report 2009 submitted to CPUC for review on January 14, 2010 and approved on August 26, 2010 indicates that there is no habitat for least Bell's vireo and southwestern willow flycatcher; therefore, this measure does not apply.
B-07e: Establish 300-foot buffer if active nest found	The Riparian Birds Survey Report 2009 submitted to CPUC for review on January 14, 2010 and approved on August 26, 2010 indicates that there is no habitat for riparian birds; therefore, this measure does not apply.
B-07e: Monitor noise if construction occurs within buffer	The Riparian Birds Survey Report 2009 submitted to CPUC for review on January 14, 2010 and approved on August 26, 2010. indicates that there is no habitat for least Bell's vireo or southwestern willow flycatcher; therefore, this measure does not apply.
B-07e: Provide mitigation for temporary and permanent impacts	The Riparian Birds Survey Report 2009, which was submitted to CPUC for review on January 14, 2010 and approved on August 26, 2010 indicates that there is no habitat for least Bell's vireo or southwestern willow flycatcher within 500 feet of Link 3; therefore, this measure does not apply.

Mitigation Measure and APM	Status
B-07e: Submit a Habitat Management Plan that addresses impacts to least Bell's vireo and southwestern willow flycatcher	The Riparian Birds Survey Report 2009 submitted to CPUC for review on January 14, 2010 and approved on August 26, 2010 indicates that there is no habitat for least Bell's vireo and southwestern willow flycatcher in the vicinity of the substation; therefore, this measure does not apply.
B-07h: No activities within 4,000 ft. of eagle nest during breeding season	Data obtained from the USFS in 2009 indicates that there is an eagle nest within 4000 feet; however, 2010 surveys did not indicate any active nests within 4,000 feet of the Substation. This measure will be further implemented during construction to ensure that no construction activities occur within 4000 feet of an active eagle nest.
B-07i: Determine suitable habitat areas of QCB	Per USFWS QCB protocol, site assessments for suitable QCB habitat were conducted in 2009 and 2010 by USFWS-permitted biologists. The site assessments identified areas requiring protocol surveys. QCB surveys were completed by a USFWS-permitted biologist and a revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. The survey report identifies QCB habitat in the area of the Suncrest Substation, but no QCB were observed during focused surveys. The survey results were accepted by the Wildlife Agencies as described in the revised Biological Opinion dated November 10, 2010.
B-07i: Conduct pre-construction protocol survey for QCB	Per USFWS QCB protocol, QCB surveys were performed in 2009 by a USFWS-permitted biologist and a revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. Survey results indicate QCB were found by MP 116.5, 110, 79 to 80, 74.5, 71, and 36. The survey report identifies QCB habitat in the area of the Suncrest Substation, but no QCB were observed during focused surveys. The survey results were accepted by the Wildlife Agencies as described in the revised Biological Opinion dated November 10, 2010.
B-07i: Mitigation required if survey non-conclusive for determining QCB presence	A revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. The survey report identifies that no QCB are present within the construction area but suitable habitat does exist. Since the protocol surveys were conclusive that QCB does not occur in this area, this mitigation measure is not applicable.
B-07i: Submit a Habitat Management Plan that addresses offsite mitigation for QCB habitat	A revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. The survey report identifies that no QCB are present within the construction area. Neither USFWS critical nor occupied habitat exist at the substation site or in the vicinity of the work area; therefore, this mitigation measure is not applicable.
B-07j: Conduct pre-construction protocol survey for arroyo toad	Per USFWS protocol, arroyo toad surveys were conducted in 2009 by a permitted biologist. A revised 2009 Arroyo Toad Survey Report was submitted to CPUC for review on January 14, 2010. No arroyo toad habitat was found at the Suncrest Substation and access roads. This has been confirmed by the Wildlife Agencies as noted in Table 7 of the revised Biological Opinion dated November 10, 2010 (see page 51).
B-07j: Remove toad riparian breeding habitat October-December	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-07j: Install exclusion fencing if toad is present and monitor daily during construction	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-07j: Conduct pre- and post-exclusion fencing surveys	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-07j: Conduct daily surveys in the morning prior to work activities	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-07j: Mitigate for the loss of occupied arroyo toad habitat	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-07j: Submit a Habitat Management Plan that includes arroyo toad habitat	Based on the 2009 and 2010 protocol-level surveys for arroyo toads, arroyo toad habitat does not exist on Link 3; therefore, this mitigation measure is not applicable.
B-08a: Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
B-08a: Conduct pre-construction avian breeding surveys within 10 days of initiating work January 15-August 15 and submit surveys	Within 10 calendar days prior to construction, a qualified biologist will conduct avian breeding surveys for construction activities occurring within the general avian breeding season. Results of the surveys will be submitted to Wildlife Agencies for review and approval.
B-08a: Conduct pre-construction raptor breeding surveys within 10 days of initiating work January 1-September 15 and submit surveys	Pre-construction surveys for active raptor nests will be conducted by a qualified biologist within 10 days of construction if activities will occur during the raptor breeding season. Results of the surveys will be submitted to wildlife agencies for review and approval.
B-08a: Proceed with construction if no active nests observed	This mitigation measure will be fulfilled during construction.
B-08a: Proceed with construction if active nests found per conditions	If active nests are identified, a buffer as defined in this measure will be established and monitored on a weekly basis to allow construction to proceed. This measure will be implemented during construction.
B-08a: Monitor active nests weekly until fledged	This mitigation measure will be fulfilled during construction.
B-08a: Report survey results and monitoring	Results of surveys will be submitted as required and a qualified biologist will continue to monitor the site as appropriate. Weekly monitoring reports will be submitted.
B-09a: Conduct habitat assessment for bat nursery colonies prior to construction	A CDFG-approved biologist conducted day and night surveys. No bat nursery colonies were observed during the 2009 bat surveys performed along the Sunrise Powerlink alignment. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010 and approved by the CPUC on October 11, 2010.
B-09a: Conduct survey for bat nursery colonies prior to construction	A CDFG-approved biologist conducted a survey for bat nursery colonies. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010 and approved by the CPUC on October 11, 2010.
B-09a: No direct impacts to bat nursery colonies allowed	A CDFG-approved biologist conducted day and night surveys. No bat nursery colonies were observed during the 2009 bat surveys performed along the Sunrise Powerlink alignment. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010 and approved by the CPUC on October 11, 2010. If bat nursery colonies are observed during construction, this mitigation measure will be implemented.
B-09a: Implement methods to minimize indirect impacts to bat nursery colonies	A CDFG-approved biologist conducted day and night surveys. No bat nursery colonies were observed during the 2009 bat surveys performed along the Sunrise Powerlink alignment. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010. The amended report was approved by the CPUC on October 11, 2010. If bat nursery colonies are observed during construction, this mitigation measure will be implemented.
BIO-APM-01: Submit protocol surveys for sensitive plant and wildlife	On-the-ground protocol surveys have been conducted for sensitive plant and animal species as appropriate along the entire alignment. SDG&E has submitted survey reports for the 2009 survey season. All 2010 surveys are complete and SDG&E is in the process of providing 2010 survey reports. The 2010 Riparian Bird Survey Report was submitted to the agencies on October 28, 2010. The following reports will be submitted as soon as they are complete; The 2010 Arroyo Toad Survey, the 2010 Quino Checkerspot Butterfly Survey, the 2010 Coastal California Gnatcatcher Survey, and the 2010 Rare Plant Survey. As described in G-CM-32 of the revised Biological Opinion dated November 10, 2010, the Wildlife Agencies state that surveys for federally listed species have been completed.
BIO-APM-02: Environmental training prior to construction	Project personnel shall receive training as outlined in this measure.
BIO-APM-03: Restrict vehicle movement to existing access roads	Vehicle traffic will be restricted to existing paved and unpaved access roads when feasible. All approved work areas, including access roads, will be delineated immediately prior to construction.
BIO-APM-03: Avoid constructing roads during nesting season and submit surveys if new roads needed during nesting season	SDG&E will perform surveys along the realigned portion of the Bell Bluff Truck Trail and additional areas where vegetation clearing will occur. SDG&E will submit survey results to the USFWS and CDFG.

Mitigation Measure and APM	Status
BIO-APM-03: No parking or driving under oak trees	This mitigation measure will be monitored during construction to ensure parking or driving underneath oak trees does not occur.
BIO-APM-03: Observe a 15 mph speed limit on dirt access roads	This mitigation measure will be fulfilled during construction.
BIO-APM-04: Restrict project activity to disturbance areas	Project and survey activities will be confined to areas noted in final grading plans for Suncrest Substation, which were submitted to the CPUC on June 22, 2010. The grading plans show the limits of grading.
BIO-APM-04: Keep survey vehicles on existing roads	Survey vehicles shall remain on existing roads.
BIO-APM-04: Obtain prior approval for surveying activities in sensitive habitat	A biological monitor shall monitor project surveying activities for conformance with APMs.
BIO-APM-04: Hiking off roads or paths during survey data collection is permitted	SDG&E survey personnel will implement all appropriate APMs.
BIO-APM-04: Do not apply discoloring agents on rocks or vegetation	No paint or permanent discoloring agents shall be applied as outlined in this measure.
BIO-APM-05: Construct roads at right angles to streambeds and washes	SDG&E will improve an existing dirt road to provide access to the Substation; therefore, limiting new impacts to streambeds and washes. The Project Modification Report and Mapbook submitted May 14, 2010 and approved by the CPUC through a Determination Memorandum on September 22, 2010 identified that modifications to the Project result in reduced impacts to "waters of the U.S." or waters of the state.
BIO-APM-05: Obtain permits for streambed crossings and roads constructed parallel to streambeds	Revised 401, 404 and 1602 permit applications were submitted for review and approval on March 30, 2010. SDG&E received the signed 401 Water Quality Certification on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. Impacts to streambeds will not occur until SDG&E receives the remaining ACOE 404 permit.
BIO-APM-05: Minimize disturbance from construction and maintenance activities	This mitigation measure will be fulfilled during and post construction.
BIO-APM-06: Comply with all applicable environmental laws and regulations	This mitigation measure will be fulfilled during and post construction.
BIO-APM-07: Littering is not allowed	Littering will be prohibited on this project. This mitigation measure will be monitored during construction.
BIO-APM-08: Delineate and avoid sensitive plant populations	Prior to construction, the boundaries of any sensitive plant populations will be delineated with flagging and avoided to the extent practicable. The felt-leaved monardella plant population along the Bell Bluff Truck Trail will be fenced prior to construction, refer to mitigation measure B-5a.
BIO-APM-10: Do not harm wildlife	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. This SWEAP will be shown to all project personnel prior to construction and enforced throughout all phases of the Project. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures.
BIO-APM-10: Firearms are prohibited	The SWEAP video was approved by the CPUC on March 15, 2010. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project, and addresses that firearms are prohibited in all project areas, except for security personnel.
BIO-APM-11: Do not feed wildlife	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that feeding wildlife is prohibited. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
BIO-APM-12: No pets permitted	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that pets are prohibited at the Project site. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
BIO-APM-13: Do not collect plants or wildlife	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that prohibit collecting plants or wildlife species for any reason. This SWEAP will be shown to all project personnel prior to construction of the Project and enforced throughout all phases of the Project.

Mitigation Measure and APM	Status
BIO-APM-14: Removal of wildlife by qualified biological monitor or wildlife agency	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Submit report of unavoidable environmental damage	This mitigation measure will be fulfilled during and post construction, as needed.
BIO-APM-16: Schedule tree trimming during non-sensitive times	This mitigation measure will be fulfilled during and post construction. Information regarding sensitive tree trimming locations will be put into the GEARS database.
BIO-APM-16: Vary tree removal widths to maintain edge diversity	This mitigation measure will be fulfilled during construction.
BIO-APM-17: Mow vegetation to use as access road	During construction, it is anticipated that the vegetation in Wilson yard and other temporary impact areas will be crushed or mowed to protect the natural vegetation. Following construction, it is not anticipated that vegetation removal will be required because Bell Bluff Truck Trail will be paved and the substation pad will be gravel filled.
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure BIO-APM-18, on September 1, 2010. The final Project Modification Report (PMR) and Map Book, submitted to the CPUC on May 14, 2010, illustrate changes to the final design of the alignment with an overall reduction of impacts to sensitive features. They also show the redesign and relocation of the alignment to previously disturbed areas when feasible.
BIO-APM-18: Submit site surveys when constructing poles or roads in high value habitats cannot be avoided	Surveys have been performed to determine the presence or absence of endangered species in sensitive habitats along the project route. These surveys were determined to be complete by the Wildlife Agencies as described in G-CM-32 of the revised Biological Opinion. If new areas of disturbance are identified, site specific surveys will be conducted to determine the presence or absence of endangered species; this measure will be implemented during construction.
BIO-APM-18: Construct crossings at right angles to streambeds if access roads cannot avoid sensitive water features	Access roads that impact sensitive water resources shall be constructed as outlined in this mitigation measure, when feasible. SDG&E has submitted a revised 401, 404, and 1602 permit applications to the applicable agencies for review and approval on March 30, 2010 and August 23, 2010.
BIO-APM-19: Implement and comply with BLM mitigation measures	This mitigation measure will be fulfilled during and post construction.
BIO-APM-19: Use Section 7 process to obtain incidental take authorization	SDG&E has obtained an incidental take authorization through the Section 7 process (Refer to Biological Opinion FWS2008BO423-2009F0097).
BIO-APM-20: Leave vegetation in place where re-contouring is not required	This mitigation measure will be fulfilled during construction.
BIO-APM-21: Conform to "Suggested Practices for Raptor Protection on Power Lines"	A memo was submitted to the CPUC for the administrative record on September 15, 2010 describing that the conductor spacing meets recommended suggested practices where feasible and the CPUC confirmed compliance with this measure on September 16, 2010. SDG&E has designed structures in conformance with "Suggested Practices for Raptor Protection on Power Lines."
BIO-APM-22: Salvaging may include removal and stockpiling for replanting	During construction, some of the disturbed soil and vegetation from the substation pad grading will be stockpiled and reused on manufactured slopes to facilitate re-growth of vegetation.
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	During construction, only the minimum amount of vegetation required to develop the substation pad, water tank, access road, and drainage facilities will be removed.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	During construction, some of the disturbed soil and vegetation from the substation pad grading will be stockpiled and reused on manufactured slopes to facilitate re-growth of vegetation.
BIO-APM-24: Secure appropriate covers over excavations	The SWEAP video was approved by the CPUC on March 15, 2010. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions on covering construction holes overnight to prevent harm to wildlife.
BIO-APM-25: Revegetate disturbed soils	During construction, the disturbed areas outside the crush rock capped or paved areas associated with the substation and access roads will be re-vegetated.

Mitigation Measure and APM	Status
BIO-APM-26: Slope excavations on one end	This mitigation measure will be fulfilled during construction.
BIO-APM-27: Remove all raptor nests outside breeding season and prior to construction	SDG&E will remove unoccupied non-threatened/endangered or non-eagle raptor species' nests that would be affected by construction activities outside of the raptor breeding season. Per the USFWS, the golden eagle breeding season is December through June.
BIO-APM-27: Monitor active nests during breeding season	Monitoring of an existing raptor nest during the breeding season shall occur as outlined in this mitigation measure, by an approved biologist.
BIO-APM-28: Survey potential bat roost trees to be removed and follow procedures for felling trees	A CDFG-approved biologist conducted a survey for bat maternity roost trees. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. A 2009 Bat Survey Report Amendment to the 2009 Bat Survey Report was submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. No maternity roosts were observed on the project; therefore, this mitigation measure is not applicable.
BIO-APM-29: Minimize impacts of exterior lighting adjacent to preserved habitat	The final Suncrest Substation Lighting Mitigation Plan was submitted to the CPUC on October 25, 2010; CPUC approved the final plan on October 25, 2010. Measures identified in this plan will be implemented during construction.
BIO-APM-29: Minimize vehicle speed and volume	This mitigation measure will be fulfilled during construction.
G-CM-01: Provide biological monitoring and perform periodic inspections once or twice a week	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site and periodic inspections will be performed. (see B-1c)
G-CM-02: Use SDG&Es Water Quality Construction BMP Manual.	SDG&E will implement erosion control techniques outlined in measure WQ-APM-4 and in accordance with the SWPPP submitted on September 15, 2010.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	The SWPPP and NPDES permit associated with WDID #9 37C357500 was submitted to the CPUC on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during the construction to prevent and avoid water quality impacts. (See WQ-APM-14)
G-CM-04: Training to implement conservation measures.	A log of all personnel that participated in the SWEAP training will be periodically submitted to the CPUC throughout construction. All project personnel will receive the required training before working on the right-of-way or other work areas. Also see BIO-APM-2 for additional information on training.
G-CM-05: Limit vehicle speeds on access roads to minimize fugitive dust.	See BIO-APM-3 and AQ-1a
G-CM-06: Keep all activities within designated temporary and permanent disturbance areas.	Project and survey activities will be confined to areas noted in final engineering drawings. Grading plans for Suncrest Substation were submitted on March 24, 2010 and June 22, 2010 and show the limits of grading. See BIO-APM-4 for additional information.
G-CM-06: Keep survey vehicles on existing roads.	See BIO-APM-4
G-CM-06: No paint or discoloring agents will be applied to rocks or vegetation.	See BIO-APM-4
G-CM-06: Impacts associated unauthorized activity will be mitigated at a 5:1 ratio	This measure will be implemented during construction if unauthorized impacts occur. Also see BIO-APM-4.
G-CM-07: Brush clearing will require prior approval from the biological monitor in conformance with the CMs.	No brush clearing will occur on the project without prior approval from the project biological monitor. This measure will be implemented during construction. Also see BIO-APM-9 for additional brush clearing requirements.
G-CM-08: Wire stringing	This measure will be implemented during construction.
G-CM-09: Disposal of wastes.	See BIO-APM-7
G-CM-10: Emergency repairs will follows the CM's to the extent feasible.	See BIO-APM-15

Mitigation Measure and APM	Status
G-CM-10: Submit written report to agencies having jurisdiction.	See BIO-APM-15
G-CM-10: If required, develop mitigation plan consistent with CMs.	See BIO-APM-15
G-CM-11: Structures and access roads should be designed to minimize impacts to sensitive features.	A memo was submitted to the CPUC documenting compliance with Mitigation Measure BIO-APM-18, on September 1, 2010 for their administrative record. The Project Modification Report (PMR) and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved in a Determination Memorandum on September 22, 2010 illustrates changes to the final design of the alignment to reduce impacts to sensitive features. The USFWS confirmed that this conservation measure has been met through the final project designs (page 32, reinitiated Biological Opinion).
G-CM-12: Leave vegetation in place where re-contouring is not required. Restore disturbed soils based on HRP per G-CM-16.	This mitigation measure will be fulfilled during construction.
G-CM-13: Use lowest illumination allowed for human safety.	See BIO-APM-29
G-CM-13: Vehicle speed limits may not exceed 15 mph to prevent mortality of nocturnal wildlife species.	See BIO-APM-29
G-CM-14: Locate surface-disturbing activities in previously disturbed areas, to the extent practical.	The pre-construction portion of this measure is complete. The project structures and work areas were designed to avoid sensitive vegetation, to the extent possible. During construction, vegetation and soil impacts will be minimized. See B-01-a Task 1 for additional information.
G-CM-15: Use of construction mats.	See B-1a
G-CM-15: Incorporate impact of using mats into HRP (G-CM-16).	See B-1a
G-CM-16: Habitat Restoration Plan approval.	See B-1a. The Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas has been approved as stated in the revised Biological Opinion dated November 10, 2010.
G-CM-16: Impacts, compensation, and a qualified habitat restoration specialist.	See B-1a
G-CM-16: Temporary impacts to desert scrub and dune habitats.	This mitigation measure does not apply to Link 3. No desert scrub or dune habitats exist along Link 3.
G-CM-17: Provide assurances to fund the acquisitions	SDG&E has acquired eight of the nine properties listed in this mitigation measure. SDG&E will continue to work with the Wildlife Agencies, as stated in this mitigation measure, regarding funding and preservation of the identified parcels.
G-CM-17: Off-site compensation and property acquisition.	The HAP/HMP was prepared by an approved biologist and was submitted for review and approval on September 22, 2010 as outlined in this mitigation measure. The HMP/HAP was approved by the wildlife agencies as stated in G-CM-17 of the reinitiated Biological Opinion dated November 10, 2010. The remaining requirements of this mitigation measure will be implemented during construction and within the timeframes described in this measure.
G-CM-18: Re-seeding of disturbed areas after a transmission line-caused fire.	See B-1k
G-CM-20: Develop a Weed Control Plan for pre-construction and long-term invasive weed abatement.	See B-3a
G-CM-21: Implementation of erosion control measures.	See GEO-APM-5
G-CM-22: Restoration where ground disturbance is substantial or where recontouring is required.	See GEO-APM-6

Mitigation Measure and APM	Status
G-CM-23: Use appropriately sized equipment.	This mitigation measure will be implemented during construction.
G-CM-24: Implement Dust Control Plan.	A Dust Control Plan was approved by the CPUC on January 20, 2010 and the Wildlife Agencies on November 10, 2010. Dust Control Plan measures will be implemented during project construction. (See AQ-1a)
G-CM-24: Implement additional dust control measures	See AQ-1a
G-CM-25: Restrict vehicle movement to access roads.	See BIO-APM-3
G-CM-26: Delineate construction limits.	See B-1a
G-CM-27: Build access roads at right-angles to stream crossings.	See BIO-APM-18
G-CM-28: Coordinate with land officer 60 days prior to initiating construction to determine the use of gates and signs at access roads.	The preconstruction component of this measure is complete (see B-1a). Signs will be posted on access roads prohibiting unauthorized users during construction.
G-CM-29: Provide funding for protection from off-road vehicle enthusiasts	This mitigation measure is not applicable to Link 3 .See measure B-1a for additional information.
G-CM-31: Mowing of access roads to maintain access for maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	Surveys for USFWS listed species have been completed. See B-5a for additional information.
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8
G-CM-34: Native Tree Restoration	Tree mitigation will occur as described in the Habitat Acquisition/Habitat Management Plan, which was approved by the Wildlife Agencies in the revised Biological Opinion dated November 10, 2010 (see G-CM-17 of the BO).
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	No federal or state listed plant species will be impacted by construction on Link 3. Felt-leaved monardella, a moderately sensitive plant, that occurs along the Bell Bluff Truck Trail may be salvaged where impacts cannot be avoided. This measure will be implemented during construction.
G-CM-36: Do not harm wildlife, including rattlesnakes.	See BIO-APM-10
G-CM-37: Do not feed wildlife.	See BIO-APM-11
G-CM-38: Do not bring pets to project areas.	See BIO-APM-12
G-CM-39: Cover steep-walled trenches to avoid entrapping wildlife.	See B-7a
G-CM-40: Look under vehicles and around equipment for wildlife prior to use.	See B-7a
G-CM-41: Do not dispose of excess fill, brush, or debris within waters of the U.S.	This measure will be implemented during construction.
G-CM-41: Do not dispose of fuel, oil, coolant, and other wastes within or near waters of the U.S. Do not fuel vehicles near waters of the U.S.	This measure will be implemented during construction. Routine maintenance and refueling will occur within the substation limits and in accordance with the SWPPP for Link 3.
G-CM-42: Maintain riparian buffer construction/staging areas and riparian areas.	This measure will be implemented during construction.

Mitigation Measure and APM	Status
G-CM-45: Purchase/dedicate suitable habitat for preservation.	See G-CM-17
SS-CM-01: Conduct ground- or vegetation disturbance outside of the gnatcatcher breeding season	Coastal California gnatcatcher do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	Coastal California gnatcatcher do not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	Coastal California gnatcatcher do not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-05: Conduct construction and O&M activities outside the vireo breeding season or implement pre-activity surveys	Least Bell's vireo do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-05: Survey for nesting vireos	Least Bell's vireo do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-06: Purchase and manage suitable vireo habitat	Least Bell's vireo do not occur on Link 3; therefore, this mitigation measure is not applicable to this component of the project.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	Designated critical habitat or occupied habitat for Quino does not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Quino habitat does not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-10: Purchase and manage occupied Quino habitat	Quino habitat does not occur on Link 3; therefore, this mitigation measure does not apply to this component of the project.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	See B-7j
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	Arroyo toad breeding habitat does not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-13: No construction activities within arroyo toad breeding habitat.	Arroyo toad breeding habitat does not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-14: Remove all temporary exclusion and construction fencing at conclusion of construction.	Arroyo toad do not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	Arroyo toad do not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-16: Prohibit construction and O&M activities during lambing season	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-17: Restore suitable bighorn sheep habitat	Peninsular bighorn sheep does not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-18: Retain a Project Biologist to oversee and implement the PBS Monitoring Plan	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-19: Purchase habitat to partially offset impacts to PBS population	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-19: Provide funding for protection of PBS and I-8 crossing	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund removal of invasive species and install PBS water sources	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund aerial surveys for PBS	Peninsular bighorn sheep do not occur on Link 3; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
SS-CM-20: Implement avoidance, mitigation and compensation measures	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Designate a field contact representative	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Clearly define the limits of work limits	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Minimize disturbance to soil and vegetation in FTHL habitat	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Use existing roads whenever possible	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Block newly created access routes as required by the lead agency	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Monitor construction activities in FTHL habitat	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Fence areas of permanent or long-term projects in FTHL management areas	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Develop habitat restoration plan.	Flat-tailed horned lizards are restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
V-01a: Screen construction sites if visible from public areas	The preconstruction component of this measure is complete. The Construction Yard Visual Screening Plan, which was approved by the CPUC on October 19, 2010, will be implemented during construction.
V-01a: Submit final construction plans 60 days prior to construction	As shown in the Project Modification Report and Map Book, which as approved September 22, 2010 by the BLM and the CPUC, the Suncrest Substation and Wilson Construction Yard are not located in an area of high public visibility. Final Construction Plans for the Suncrest Substation were submitted on August 4, 2010. Grading plans for the Suncrest Substation were submitted to the CPUC on June 22, 2010 and July 28, 2010. A Surface Treatment Plan was submitted to the CPUC on August 3, 2010, revisions were submitted on October 25, 2010 to address comments received from the CPUC. The CPUC approved the Surface Treatment Plan on October 25, 2010.
V-01b: Design and install lighting to avoid night lighting impacts	SDG&E submitted a Suncrest Lighting Mitigation Plan September 24, 2010 as outlined in this mitigation. Comments were received from the agencies and incorporated into a final plan that was submitted October 25, 2010. The measures in this plan will be implemented during construction.
V-01b: Submit a Construction Lighting Mitigation Plan 90 days prior to construction	SDG&E submitted a Suncrest Lighting Mitigation Plan on September 24, 2010 as outlined in this mitigation. Comments were received from the agencies and incorporated into a final plan that was submitted October 25, 2010. The measures in this plan will be implemented during construction.
V-02a: Construct access and spur roads at appropriate angles	This mitigation measure is not applicable to construction activities at Suncrest Substation or Wilson Yard. Both areas will be accessed by existing roads. Upgrades to the Bell Bluff Truck trail are described in the Project Modification Report (PMR29), which was approved by the BLM and the CPUC on September 22, 2010; no increased visual impacts were identified with the access road upgrades.
V-02a: Consult with visual resources specialist to evaluate access road visibility prior to final design	This mitigation measure is not applicable to construction activities at Suncrest Substation or Wilson Yard. Both areas will be accessed by existing roads. Upgrades to the Bell Bluff Truck trail are described in the Project Modification Report (PMR29), which was approved by the BLM and the CPUC on September 22, 2010; no increased visual impacts were identified with the access road upgrades.
V-02a: Submit table 60 days prior to construction	No new access roads will be constructed; therefore, this mitigation measure is not applicable to construction activities at Suncrest Substation or Wilson Yard.
V-02a: Submit final construction plans 60 days prior to construction	Grading plans illustrating the use and expansion of the existing access road for Suncrest Substation were submitted on June 22, 2010.
V-02b: Create barriers for public access if opened as a construction route	No new public access will be opened by construction; therefore, this measure is not applicable.

Mitigation Measure and APM	Status
V-02b: Submit final construction and restoration plans 60 days prior to construction	The Project Modification Report (PMR) and Mapbook, submitted on May 14, 2010 and approved by the BLM and CPUC through a Determination Memorandum on September 22, 2010, illustrates changes to the final design that would reduce visual contrast from unnatural vegetation lines. Grading plans for Suncrest Substation were submitted on June 22, 2010. Landscape and drainage plans were submitted on June 22, 2010 and July 28, 2010. The Suncrest Surface Treatment Plan was submitted for review on August 3, 2010, the final Suncrest Surface Treatment Plan was approved by the CPUC on October 25, 2010.
V-02c: Treat disturbed soils visible from sensitive public viewing locations	The Surface Treatment Plan for the substation submitted on August 3, 2010 and approved by the CPUC on October 25, 2010, demonstrates that views of land scars will not be visible from sensitive viewing locations.
V-02c: Submit final construction and restoration plans 60 days prior to construction	Grading plans for Suncrest Substation were submitted on June 22, 2010 and July 28, 2010. Landscape and drainage plans were submitted to the CPUC on June 22, 2010. The Surface Treatment Plan was submitted to the CPUC on August 3, 2010 and approved by the CPUC on October 25, 2010.
V-02d: Consult regarding helicopter construction techniques	The Project Modification Report, which was submitted May 14, 2010, acknowledged by a Determination Memorandum from the CPUC dated September 22, 2010, discusses changes to the final design regarding the use of helicopter construction and prohibition of access and spur roads where construction would occur on slopes greater than 15 percent or near public viewing locations. The PMR indicates that the use of helicopters for construction of the substation will not be required. The substation is not located on slopes greater than 15 percent or near sensitive public views.
V-02d: Conduct Agency Consultations 120 days prior to construction	SDG&E has coordinated with the CPUC along with the CPUC's visual consultant regarding the use of helicopters for construction. This is demonstrated in the Project Modification Report submitted May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum dated September 22, 2010. The PMR indicates that the use of helicopters for construction of the substation will not be required.
V-07a: Submit Surface Treatment Plan 90 days prior to construction	SDG&E submitted a Surface Treatment Plan for review and approval to the CPUC on August 3, 2010 and a revised plan on October 25, 2010 to address comments provided by the CPUC. CPUC approved the final plan on October 25, 2010.
V-07a: Receive approval before vendor specification	SDG&E will perform treatment of any buildings or structures as described in the approved Suncrest Surface Treatment Plan. The Suncrest Surface Treatment Plan was approved by the CPUC on October 25, 2010.
V-07b: Submit a Screening Plan 90 days prior to screening installation	The Suncrest Substation Visual Screening Plan was submitted to the CPUC on November 8, 2010. A landscaping plan for the Suncrest Substation was submitted to the CPUC on June 22, 2010.
V-21a: Design and install lighting to avoid night lighting impacts	The Suncrest Lighting Mitigation Plan was submitted to CPUC on September 24, 2010. SDG&E resubmitted this plan on October 25, 2010 to incorporate all changes required by the CPUC. CPUC approved this plan on October 25, 2010.
V-21a: Submit a Lighting Mitigation Plan 90 days prior to construction	The Suncrest Lighting Mitigation Plan was submitted to CPUC on September 24, 2010. SDG&E resubmitted this plan on October 25, 2010 to incorporate all changes required by the CPUC. CPUC approved this plan on October 25, 2010.
VR-APM-04: Do not paint or discolor rocks or vegetation	The SWEAP video was approved by the CPUC on March 15, 2010. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project. The video includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-05: Do not install structures in front or in line-of-sight of residences	The PMR Map Book (pages MS-105 and 106), which was submitted on May 24, 2010 and approved by the BLM and the CPUC on September 22, 2010, shows that the structures associated with the Suncrest Substation are not in direct line-of-sight with residences. A Surface Treatment Plan also shows that structures will not be constructed directly in front of residences or in direct line-of-sight from a residence and was submitted to the CPUC on August 3, 2010. The CPUC approved this plan on October 25, 2010.
L-01a: Submit Construction Notification Plan 45 days prior to construction	The Construction Notification Plan was approved by the CPUC on March 1, 2010.
L-01a: Mail a public notice 15 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses mailing public notifications. Proof of Notification will be submitted to CPUC prior to start of construction.
L-01a: Advertise in newspapers and bulletins 15 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses newspaper advertisement notifications. Proof of Notification will be submitted to CPUC prior to start of construction.

Mitigation Measure and APM	Status
L-01a: Post notices of construction at public venues 30 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses posting of notices of construction at public venues. Proof of Notification will be submitted to CPUC prior to start of construction.
L-01a: Provide a public liaison person and toll-free hotline number before and during construction	The Construction Notification Plan identifies the public liaison person assigned to the project and the toll-free hotline. The Plan was approved by the CPUC on March 1, 2010.
L-02b: Notify landowners 90 days prior to completing final design of route	A memorandum submitted to CPUC on October 5, 2010 summarizes the landowner notification process. CPUC approved this memo on October 12, 2010. All landowners have been notified within 1000 feet of the project alignment. Landowners not directly affected by project facilities were sent a letter through certified mail in spring 2009 and given the opportunity to request changes. Landowners already in easement acquisition negotiations were notified through the acquisition process and provided the opportunity to request changes. These changes are also addressed in the Project Modification Report and Mapbook, which was submitted to CPUC on May 14, 2010 and approved by BLM and CPUC through a Determination Memorandum dated September 22, 2010.
L-02b: Provide notified parties 30 days to identify conflicts and potential reroutes	SDG&E provided affected landowners 30 days in which to respond to the project notification and discuss changes to the project to accommodate landowner requests. The L-2b Mitigation Measure memorandum (dated October 5, 2010) summarizes the criteria used to evaluate these requests. A summary of each landowner request received is also included with this memo. CPUC approved this memo on October 12, 2010. In addition, the PMR submitted on May 14, 2010 and approved by CPUC and BLM through a Determination Memorandum dated September 22, 2010 addresses several of these changes.
L-02b: Provide written report at or before the time property owners are identified	On March 18, 2009, SDG&E met with CPUC representatives to discuss the interpretation and notification requirements for mitigation measure L-2b. The notification and landowner requests processes were developed based on those discussions. SDG&E did not provide CPUC and BLM with a written report identifying properties that were suspected of having a land use conflict as described in the mitigation measures at or before the time property owners were notified, but SDG&E did consider these impacts in their initial evaluation of the project and with subsequent route changes as described in the Project Modification Report submitted to CPUC on May 14, 2010 and approved by BLM and CPUC through a Determination Memorandum dated September 22, 2010.
L-02b: Provide written report within 30 days of the public notice closing date for responses	A memorandum submitted to CPUC and BLM on October 5, 2010 summarizes the landowner notification process. CPUC approved this memorandum on October 12, 2010. All landowners have been notified within 1000 feet of the project alignment. Landowners not directly affected by project facilities were sent a letter through certified mail in spring 2009 and given the opportunity to request changes. Landowners already in easement acquisition negotiations were notified through the acquisition process and provided the opportunity to request changes. These changes are also addressed in the Project Modification Report and Mapbook submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum dated September 22, 2010.
L-02b: Develop specific reroute modifications	The modifications required by this task are located on Links 4 and 5. They are not applicable to Links 1,2 and 3.
LU-APM-01: Provide advance notice within 300 feet of construction activities	SDG&E will provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and will appoint a public affairs officer to address public concerns or questions.
LU-APM-02: Place new structures more than 330 feet from residences	There are no residences within 330 feet of the substation; therefore, this mitigation measure is not applicable.
LU-APM-04: Provide notification prior to construction	To facilitate access to properties obstructed by construction activities, SDG&E will notify property owners and tenants in advance of construction activities and provide alternative access if feasible.
LU-APM-05: Coordinate construction activities with water management representatives	There are no irrigation canals or flood management structures impacted by construction activities at the Suncrest Substation or Wilson Yard; therefore, this mitigation measure is not applicable.
LU-APM-06: Restrict and confine activity within limits of construction	Grading plans were submitted to the CPUC on June 22, 2010 and July 28, 2010 describing the limits of construction. Activity will be restricted to and confined within those limits.
LU-APM-06: Provide flagging for environmentally sensitive areas	The ROW boundary and limits of construction activity inside and outside the ROW will be flagged in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided.

Mitigation Measure and APM	Status
LU-APM-07: Install project facilities outside of private properties, parks, and other recreational areas	SDG&E designed project facilities to be located along the edges or borders of private property, open space parks, and recreation areas. When this was not possible, SDG&E consulted with affected property owners to reduce impacts and has paid just compensation to the property owners. SDG&E submitted a memo summarizing compliance with Mitigation Measure L-2b to the CPUC on October 5, 2010 documenting landowner consultation and coordination. This memo was approved by CPUC on October 12, 2010. The final alignment is shown on the PMR Mapbook, which was submitted May 14, 2010 and acknowledged by a Determination Memo from CPUC dated September 22, 2010.
LU-APM-08: Coordinate to include Project in General Plans	SDG&E has been coordinating with the County of San Diego and Imperial County to determine whether there are any General Plan updates anticipated during the life of the project that could conflict with construction or operation of the transmission line. SDG&E spoke with LeAnn Carmichael (858-694-3739) at the County of San Diego and Andy Home, Deputy County Executive Officer for Natural Resources Development (760) 482-4727 at Imperial County. No General Plan updates are planned for Imperial County or the City of San Diego in the near future.
LU-APM-09: Obtain ministerial land use permits	Bell Bluff Truck Trail modification plans have been submitted to the County of San Diego for consultation and review; however, no permit is required. During construction, an electrical permit will be obtained from San Diego County for temporary power during construction. No activities associated with temporary power at the construction site will occur until this permit has been obtained.
R-APM-02c: Coordinate construction activities affecting parkland and trails prior to construction	SDG&E consulted with the County of San Diego on August 25, 2010 regarding the County-owned portion of Bell Bluff Truck Trail; no requests for additional gates or signage were made. A copy of the meeting minutes with the County of San Diego was submitted on October 1, 2010.
R-APM-03a: Restrict construction-related traffic to approved routes	This mitigation measure will be monitored during construction. The project no longer crosses ABDSP lands; therefore, this portion of the mitigation measure is no longer applicable.
AG-01c: Coordinate with grazing operators 60 days prior to construction and 30 days after construction	SDG&E has coordinated with landowners to discuss construction activities and address concerns related to agricultural productivity and animal welfare. A memo summarizing this coordination was submitted to CPUC on October 15, 2010. On Link 3, SDG&E coordinated with a private landowner on August 17 and 26, 2010 to discuss construction activities and requirements to minimize impacts to horses on his property. SDG&E also met with another private landowner on August 26, 2009 to discuss impacts to cattle operations and requirements during construction to minimize impacts to grazing operations.
C-01a: Submit cultural resources inventory prior to construction	A Final Class III Inventory was approved by the CPUC and BLM on June 2, 2010.
C-01a: Stake tower locations prior to cultural resource field surveys	The substation project area was staked and surveyed prior to conducting cultural resource field surveys.
C-01b: Protect potential and register-eligible resources from direct project impacts	The Project Modification Report and Mapbook, submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum on September 22, 2010, illustrates that the final design of the alignment incorporates changes to avoid impacts to potentially register-eligible and register-eligible resources based on preliminary National Register of Historic Places and consultation with the SHPO. A Final Class III Inventory was completed and approved by the CPUC and BLM on June 2, 2010. Two sites, one pre-historic and one historic, were documented on Link 3 within the substation pad work area. The cultural resources sites on Link 3 have been evaluated by SDG&E's cultural resources consultant for eligibility and both have been determined to be ineligible. A draft eligibility report with a Treatment Plan section presenting this information was submitted to the BLM, the CPUC, the SHPO and Native American Tribes for concurrence. Recommendations for treatment of features were developed in consultation with the interested Native American Tribes. There will be no earth disturbance allowed within the foot print of the Suncrest Substation until the evaluation report is finalized by the BLM in consultation with the CA SHPO. Work on the Bull Bluff Truck Trail and the Wilson Construction Yard will be allowed after the installation and inspection of identified ESAs.

Mitigation Measure and APM	Status
C-01b: Undertake additional studies if resources cannot be protected from direct impacts	<p>The Project Modification Report and Mapbook, submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum on September 22, 2010, illustrates that the final design of the alignment incorporates changes to avoid impacts to potentially register-eligible and register-eligible resources based on preliminary National Register of Historic Places and consultation with the SHPO.</p> <p>A Final Class III Inventory was completed and approved by the CPUC and BLM on June 2, 2010. Two sites, one pre-historic and one historic, were documented on Link 3 within the substation pad work area. The cultural resources sites on Link 3 have been evaluated for eligibility by SDG&E's cultural resources consultant and both have been determined to be ineligible. A draft eligibility report with a Treatment Plan section presenting this information was submitted to the BLM, the CPUC, the SHPO and Native American Tribes for concurrence. Recommendations for treatment of features were developed in consultation with the interested Native American Tribes.</p> <p>Additional studies are not required for proposed actions along the Bell Bluff Truck Trail or the Wilson Construction Yard. If the need for additional studies for the cultural resource sites within the footprint of the Suncrest Substation, is identified by the BLM in consultation with the CA SHPO or interested Tribes, these studies will be completed before ground disturbance can occur within the Suncrest Substation work area.</p>
C-01b: Incorporate results of studies in HPTP	<p>The two cultural sites identified on Link 3 have been determined to be ineligible by SDG&E's cultural resources consultant and therefore would not be included in the Historic Properties Treatment Plan (HPTP). If the SHPO or Native American Tribes do not concur that these sites are ineligible, these sites will be included in the HPTP. No cultural sites are located along Bell Bluff Truck Trail or in the Wilson Yard.</p> <p>If additional studies are required and completed for the cultural resource sites within the Suncrest Substation, the results of those studies will be incorporated into the project HPTP.</p>
C-01b: Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	<p>If the SHPO or Native American Tribes determine that the two sites identified on Link 3 are NRHP- and/or CRHR-eligible, SDG&E will designate NRHP and/or CRHR-eligible resources within 50 feet of direct impact areas as an ESA if the resource can be avoided. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.</p> <p>If the prehistoric or historic resource areas within the Substation footprint are determined to be eligible for the NRHP or CRHR, these sites will be subjected to data recovery efforts, as they can't be protected from direct impact from the development of the Suncrest Substation. The data recovery efforts will be detailed in a Historic Properties Treatment Plan that is reviewed and accepted prior to initiation of data recovery efforts or any other mitigation directed at these two cultural resources. There are no NRHP or CRHR eligible resources within the work areas for the Bull Bluff Truck Trail or the Wilson Construction Yard. The resources that are within 50 feet of work on these segments will be protected in established ESAs that will be in place prior to the initiation of ground disturbance.</p>
C-01b: Erect protective flagging or other markers for ESA	<p>The two sites in the Suncrest Substation development area will be protected during work on the Bell Bluff Truck Trail and the Wilson Construction Yard. The Suncrest Substation work area will be off limits to all ground disturbance until the evaluation report for these two sites has been approved by the BLM in consultation with the SHPO and interested Tribes. Work on the Bell Bluff Truck Trail and the Wilson Construction Yard will not be initiated until ESAs are established at the two cultural resource sites that have been identified to be present within 50 feet of the proposed work areas.</p>
C-01b: Develop and implement monitoring program as part of HPTP	<p>A monitoring program was incorporated into the Historic Properties Management Plan. The HPMP was submitted to the CPUC, BLM, USFS, ACOE and Native American Tribes on May 3, 2010. As required under the Programmatic Agreement, this plan was approved by the CPUC, BLM and USFS on July 13, 2010. This plan will be implemented during construction.</p>
C-01c: Submit Historic Properties Treatment Plan	<p>A Final Class III Inventory was completed and approved by the CPUC and BLM on June 2, 2010. Two sites, one pre-historic and one historic, were documented on Link 3 within the substation pad work area. The cultural resources sites on Link 3 have been evaluated for eligibility by SDG&E's cultural resources consultant and both have been determined to be ineligible. A draft eligibility report with a Treatment Plan section presenting this information was submitted to the BLM, the CPUC, the SHPO and Native American Tribes for concurrence. Recommendations for treatment of features were developed in consultation with the interested Native American Tribes. If the SHPO or the Native American Tribes determine that either of these sites are NRHP- and/or CRHR-eligible, they will be included in the HPTP.</p>

Mitigation Measure and APM	Status
C-01d: Conduct data recovery investigations to reduce adverse effects	<p>A Final Class III Inventory was completed and approved by the CPUC and BLM on June 2, 2010. Two sites, one pre-historic and one historic, were documented on Link 3 within the substation pad work area. The cultural resources sites on Link 3 have been evaluated for eligibility by SDG&E's cultural resources consultant and both have been determined to be ineligible. A draft eligibility report with a Treatment Plan section presenting this information was submitted to the BLM, the CPUC, the SHPO and Native American Tribes for concurrence. Recommendations for treatment of features were developed in consultation with the interested Native American Tribes. If the SHPO or the Native American Tribes determine that either of these sites are NRHP- and/or CRHR-eligible, they will be included in the HPTP and data recovery will be conducted as recommended in the HPTP.</p> <p>There is no data recovery required for sites that will be avoided and protected within or adjacent to the Bell Bluff Truck Trail or the Wilson Construction Yard.</p>
C-01d: Submit field closure report prior to construction within 100 feet of affected resource	<p>A Final Class III Inventory was completed and approved by the CPUC and BLM on June 2, 2010. Two sites, one pre-historic and one historic, were documented on Link 3 within the substation pad work area. The cultural resources sites on Link 3 have been evaluated for eligibility by SDG&E's cultural resources consultant and both have been determined to be ineligible. A draft eligibility report with a Treatment Plan section presenting this information was submitted to the BLM, the CPUC, the SHPO and Native American Tribes for concurrence. Recommendations for treatment of features were developed in consultation with the interested Native American Tribes. If the SHPO or the Native American Tribes determine that either of these sites are NRHP- and/or CRHR-eligible, and data recovery is required, a field closure report will be submitted.</p> <p>There is no data recovery required for sites that will be avoided and protected within or adjacent to the Bell Bluff Truck Trail or the Wilson Construction Yard.</p>
C-01d: Submit final report of data-recovery investigations within 1 year of completing fieldwork	<p>A final report is being prepared and will be submitted once available. This mitigation measure will be fulfilled during or after construction.</p>
C-01e: Implement archaeological monitoring at cultural ESAs	<p>A Historic Properties Treatment Plan (HPTP) is being prepared that will include locations of ESAs and protection boundaries. The HPTP will provide recommendations for further management and monitoring during construction. Construction at the substation pad will not commence until the HPTP is approved.</p> <p>Archeological monitors will be present during the establishment of the ESAs at sites within 50 feet of the Bell Bluff Truck Trail and Wilson Construction Yard. These ESAs will be inspected and maintained over the duration of work on either of these aspects of the project. An ESA will be established around the Suncrest Substation until the evaluation report for the two sites within the Suncrest Substation work area is approved by the BLM in consultation with the BLM and interested Tribes. No work will be allowed in the Suncrest Substation work area until the evaluation report is approved and after approval the entire Suncrest Substation work area will be monitored by a qualified cultural resource and Native American monitor beginning with vegetation removal and concluded when rough grading has been completed.</p>
C-01e: Qualification of archaeologists must be approved	<p>The qualifications of the principal archaeologist and archaeological monitors were submitted to the BLM and CPUC for approval on July 20, 2010. Cultural monitor resumes have been approved by the BLM on September 30, 2010. Only monitors approved by the CPUC and BLM will work on the project. A list of all approved monitors will be updated throughout the project. A qualified Native American monitor will be present for all ground disturbance within the Suncrest Substation work area.</p>
C-01e: Retain and schedule any required Native American monitoring	<p>A Historic Properties Management Plan (HPMP) was approved by the CPUC and BLM on July 15, 2010. The HPMP includes locations where Native American monitoring will be required. The Historic Properties Treatment Plan, which is under development, will provide recommendations for further management and monitoring during construction.</p>
C-01e: Submit cultural resources monitoring monthly reports during construction	<p>This mitigation measure will be fulfilled during construction.</p>
C-01e: Notify if any damage to cultural resource ESAs and divert work to a buffer distance	<p>This mitigation measure will be fulfilled during construction.</p>

Mitigation Measure and APM	Status
C-01f: Train construction personnel to recognize and protect cultural resources	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
C-02a: Avoid known Native American remains and protect with ESA designation	Government-to-government consultations have been ongoing. SDG&E has avoided direct impacts to known locations of Native American human remains and will continue to avoid direct impacts to Native American human remains. Records of consultations are being held with the BLM. No known locations of Native American remains occur along Link 3. If Native American remains are encountered during construction, this mitigation measure will be implemented.
C-02a: Contact agencies if sites will be affected	SDG&E has avoided direct impacts to known locations of Native American human remains and will continue to avoid direct impacts to Native American human remains.
C-02a: Assist and support MLD with reinterment location	SDG&E will provide all necessary support to the MLD if Native American human remains are encountered during construction.
C-02a: Follow laws that govern treatment of human remains	SDG&E will follow all laws, statues and regulations as appropriate if Native American human remains are encountered during construction.
C-02a: Support in consultations with Native Americans and implement required actions and studies	Government-to-government consultations are ongoing. Records of consultations are being held with the BLM.
C-02a: Divert work if human remains are discovered and inform officer	This measure will be implemented as defined if human remains are discovered during construction.
C-03a: Implement archaeological monitoring	Archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified for buried archaeological deposits. The Historic Properties Management Plan, approved by the CPUC and BLM on July 15, 2010, states that monitoring will be at highly sensitive areas defined during Buried Site Testing (BST). It also states that if BST is not feasible in areas classified as high sensitivity for buried sites, those areas will be monitored during ground-disturbing construction activities. No work will be allowed at the Suncrest Substation work area until the evaluation report for the two identified cultural resource sites is approved. After approval, the entire Suncrest Substation work area will be monitored by qualified cultural resource and Native American monitors beginning with vegetation removal and concluding when rough grading has been completed. Monitoring observations will be summarized and submitted to the CPUC in the weekly report.
C-03a: Divert work if buried cultural material discovered and notify archaeologist	This mitigation measure will be fulfilled during construction.
C-04a: Assist and support BLM in consultations with Native Americans to assess impacts	The preconstruction component of this measure is complete; however, government-to-government consultations are ongoing. Records of consultations are being held with the BLM.
C-04a: Submit documentation of all pre-construction actions 30 days prior to construction	Written documentation of all preconstruction consultation actions completed to date was included in the HPMP, approved on July 15, 2010, and the Final Class III Inventory. The written documentation required for work on the Bell Bluff Truck Trail and the Wilson Construction yard was presented in the HPMP. The additional documentation related to Native American consultation for the Suncrest Substation will be included as an Attachment to the approved Final Eligibility Evaluation Report. The preconstruction component of this mitigation measure is complete. Additional information will be provided to the BLM as the consultation process continues prior to and during construction. Actions that are required during or after construction will be defined, detailed, and scheduled in the Historic Properties Treatment Plan and implemented by the Applicant, consistent with Mitigation Measure C-1c.
C-05a: Design a long-term plan to protect NRHP and/or CRHR eligible sites 30 days prior to project operation	There are no NRHP- and/or CRHR-eligible sites on Link 3; therefore, no direct or indirect impacts will occur during project operation and maintenance.

Mitigation Measure and APM	Status
CR-APM-01: Instruct and provide a contract addressing protection and avoidance of cultural resources	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. A construction contract addressing state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them will be signed by each individual. Records of these contracts will be kept with the monitor. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
CR-APM-02: Flag archaeological sites eligible for National Register	<p>The Project Modification Report and Mapbook, submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum on September 22, 2010, illustrates that the final design of the alignment incorporates changes, to the extent feasible, to avoid impacts to potentially register-eligible and register-eligible resources based on preliminary National Register of Historic Places and consultation with the SHPO. The two cultural resources sites identified on Link 3 are assumed to be ineligible based the field surveys, but SHPO and the Native American Tribes concurrence is pending. If these sites are determined to be eligible, they will be flagged for avoidance if possible.</p> <p>A protective ESA will be established around the Suncrest Substation work area and will remain in place until the Final Eligibility Evaluation Report is final. ESAs will be established at the two sites that are within 50 feet of the Bull Bluff Truck Trail and the Wilson construction yard before ground disturbance can occur in these areas of the project.</p>
CR-APM-02: Implement impact avoidance and APMs during construction	<p>SDG&E consulted with the appropriate land management agencies to avoid impacts to cultural resources where feasible. The Project Modification Report and Mapbook, submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum on September 22, 2010, illustrates that the final design of the alignment incorporates changes based on these consultations. Impact avoidance and APMs described in the approved HPMP and HPTP, which is under development, will be implemented during construction, if the two cultural resources sites on the substation pad work area are determined to be eligible by SHPO or the Native American Tribes.</p> <p>A protective ESA will be established around the Suncrest Substation work area and will remain in place until the Final Eligibility Evaluation Report is final. ESAs will be established at the two sites that are within 50 feet of the Bull Bluff Truck Trail and the Wilson construction yard before ground disturbance can occur in these areas of the project.</p>
CR-APM-04: Conduct maintenance and other activities in conformance with national standards	This mitigation measure will be fulfilled during construction.
CR-APM-05: Follow guidelines for cultural resources	The Historic Properties Management Plan approved on July 15, 2010 incorporates the guidance provided in this measure. SDG&E will continue to comply with cultural resources mitigation measures as outlined in the MMCRP.
CR-APM-06: Avoid historic properties by fencing or barricading	A Historic Properties Management Plan (HPMP) was approved by the CPUC on July 15, 2010. The HPMP identifies historic properties along the Project route. No historic properties were identified within the construction area for the Suncrest Substation or Wilson Yard.
CR-APM-06: Implement a plan if historic properties cannot be avoided	A Historic Properties Management Plan (HPMP) was approved by the CPUC on July 15, 2010 and identifies historic properties along the Project route. No historic properties were identified within the construction area for the Suncrest Substation or Wilson Yard.
CR-APM-07: Control impacts that can deteriorate historic	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-07: Implement protective measures to minimize erosion and weeds	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-07: Implement control measures to minimize vibration, dust, and fumes	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-07: Minimize deterioration to buildings and structures	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-07: Implement a plan if deterioration cannot be avoided	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.

Mitigation Measure and APM	Status
CR-APM-08: Avoid and protect landscaping essential to historic property	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-08: Minimize intrusion to the historic setting	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-09: Restrict construction and operation access	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-09: Instruct construction and maintenance personnel to protect sensitive properties	There are no historic properties that will be affected by construction activities at Suncrest Substation or use of the Wilson Yard; therefore, this measure is not applicable.
CR-APM-10: Span conductors over historic property	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-10: Boring shall avoid disturbance to historic property	No historic properties have been identified on Link 3; therefore this mitigation measure is not applicable.
CR-APM-11: Implement standard practices on private land	A memo was submitted to the CPUC on September 13, 2010 documenting compliance with this mitigation measure.
CR-APM-12: Conduct cultural surveys for staging areas not yet identified	SDG&E has conducted cultural surveys for staging areas not identified in the FEIR/EIS, including the Wilson Yard. The PMR and Mapbook, submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum on September 22, 2010, illustrates changes to the final design of the alignment based on these surveys.
PAL-01a: Submit an inventory of significant paleontological resources	SDG&E submitted the Paleontological Records Report, dated February 25, 2010 and the Sunrise Powerlink Paleontological Monitoring and Discovery Treatment Plan, dated April 7, 2010. These documents were approved by the CPUC, BLM and other involved land-managing agencies on July 30, 2010.
PAL-01b: Submit a Paleontological Monitoring Treatment Plan	The Paleontological Monitoring and Treatment Plan was developed by a qualified paleontologist and based on Society of Vertebrate Paleontology guidelines. The plan was approved by the BLM, CPUC and other agencies with jurisdiction on July 20, 2010. The approved plan indicates that no paleontological monitoring will be needed on Link 3 because the geology at the site is non-paleo producing.
PAL-01c: Conduct full-time paleontological construction monitoring	The Paleontological Monitoring and Treatment Plan, approved on July 20, 2010, indicates that no paleontological monitoring will be required on Link 3 because the geology at the site is non-paleo producing.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	The Paleontological Monitoring and Treatment Plan, approved on July 20, 2010, indicates that no paleontological monitoring will be required on Link 3 because the geology at the site is non-paleo producing.
PAL-01c: Divert construction activities when significant fossils are recovered	The Paleontological Monitoring and Treatment Plan, approved on July 20, 2010, indicates that no paleontological monitoring will be required on Link 3 because the geology at the site is non-paleo producing.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	The Paleontological Monitoring and Treatment Plan, approved on July 20, 2010, indicates that paleontological resources are unlikely to occur on Link 3 because the geology at the site is non-paleo producing. Therefore, the approved Treatment Plan for paleontological resources is not applicable to Link 3.
PAL-01e: Train construction personnel on paleontological resources	The SWEAP video, which was approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project. The SWEAP video includes instructions on the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction.
N-01a: Obtain a variance for night construction or 200 feet from sensitive receptors 45 days prior to construction	Limited construction activities may be required to occur outside of daytime hours at the Suncrest Substation. Construction activities along the access road and at the Wilson yard will occur in accordance with the local noise ordinance. If during construction an activity is required that would deviate from the local noise ordinance, SDG&E will obtain a variance from the local noise officer prior to initiating the activity.
N-01a: Employ noise suppression techniques	This measure will be implemented during construction.
N-02a: Manage blasting with a plan for each site 45 days prior to construction	There are no vulnerable structures that could be damaged by blasting at the site; however, if blasting is required, a site-specific blasting plan will be prepared during construction as required by H-4b.

Mitigation Measure and APM	Status
N-02a: Restore damaged structure and compensate owner	There are no vulnerable structures that could be damaged by construction vibration at the substation; however if a structure is inadvertently adversely affected, SDG&E shall then fairly compensate the owner.
NOI-APM-01: Provide notice to sensitive receptors and residences within 300 feet of construction	The Construction Notification Plan addresses providing notice to sensitive receptors within 300 feet of construction sites, staging areas, and access roads. The Plan was approved by the CPUC on March 1, 2010. SDG&E will provide verification that notifications were made prior to start of construction.
NOI-APM-01: Provide a public liaison person before and during construction.	The Construction Notification Plan approved by the CPUC on March 1, 2010 identifies a public liaison person that can respond to concerns of neighboring receptors about noise disturbances.
NOI-APM-01: Establish a toll free number for questions and complaints	The Construction Notification Plan, which was approved by the CPUC on March 1, 2010, identifies the toll free telephone number established by SDG&E for receiving questions or complaints during construction. The Construction Notification Plan also identifies procedures for responding to callers.
T-05a: Coordinate road repairs with public agencies	This measure will be implemented post construction.
T-05a: Protect drainage structures and incorporate measures into access agreement/easement	The Landscaping and Drainage plans were submitted to the CPUC on June 22, 2010. The Suncrest Substation Drainage Study was approved on October 13, 2010. This plan illustrates how road drainage features will be protected. Consultations with the County of San Diego regarding protecting drainage features has been ongoing. As noted in LU-APM-9, an access agreement/easement with San Diego County is not required for Link 3 activities.
T-09a: Prepare a Construction Transportation Management Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by San Diego County on September 29, 2010. The Study revealed that there are no significant traffic impacts at the Suncrest Substation site as a result of project activities. Therefore, a CTMP will not be required.
T-11b: Provide notification when and where the line will be erected prior to construction	Construction at the substation and yard does not involve installation of new transmission lines and towers over 200 feet in height; however, SDG&E has consulted with U.S. Customs and Border Patrol regarding the location of the alignment. SDG&E met with U.S. Customs and Border Patrol representatives on December 17, 2009, February 8, 2010, and April 20, 2010. A memo documenting this coordination was provided to CPUC for the administrative record on October 15, 2010.
T-11b: Provide maps of the alignment near the U.S./Mexico border	The April 30, 2010 Mapbook includes aerial images that clearly show the new lines and towers in relation to the U.S./Mexico border within San Diego and Imperial Counties. SDG&E provided a copy of this Mapbook to border patrol aircraft, the U.S. Customs and Border Patrol, and the CPUC on May 14, 2010. SDG&E consulted with the U.S. Customs and Border Patrol on December 17, 2009, February 8, 2010, and April 20, 2010.
T-APM-02a: Obtain permits for temporary lane closures	As determined by the Traffic Study approved by San Diego County on September 29, 2010, lane closures along public transportation routes to the Substation are not anticipated. However, if during construction, temporary lane closures are necessary, SDG&E will obtain required permits from the County of San Diego and CALTRANS for any temporary lane closures.
T-APM-02b: Submit Detour Plans	As determined by the Traffic Study approved by San Diego County on September 29, 2010, it is not anticipated that detours along public transportation routes will be necessary. During construction, if detours are required, SDG&E will submit detour plans to the County of San Diego and CALTRANS.
T-APM-02b: Right-of-Entry permit required for construction and maintenance activities outside of easements in the ABDSP	No project activities will occur within ABDSP; therefore, this measure is not applicable.
T-APM-02b: Provide a request for maintenance or other earth-disturbing activities within California State Parks	No project activities will occur on California State Park land; therefore, this measure is not applicable.
T-APM-04a: Coordinate in advance with emergency service providers	As determined by the Traffic Study approved by San Diego County on September 29, 2010, it is not anticipated that construction activities will restrict movements of emergency service providers. However, if necessary, during construction SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.

Mitigation Measure and APM	Status
T-APM-04a: Notify cities and counties regarding construction activities	As determined by the Traffic Study approved by San Diego County on September 29, 2010, it is not anticipated that construction activities will impact police, fire, ambulance and paramedic services. However, if necessary, during construction SDG&E shall notify and provide required information to counties and cities prior to initiation of construction activities that could impact local authorities.
T-APM-05a: Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	SDG&E met with the Alpine Unified School District regarding impacts to school bus stops on August 26, 2010 at 1:00 pm and with Jamul-Dulzura School District on September 1, 2010 at 3:00 pm. No concerns were raised regarding construction areas associated with the Suncrest Substation or Wilson Yard.
T-APM-05a: Consult with transit authorities 1 month prior to construction	SDG&E met with Metropolitan Transit System representatives Mike Daney and Devin Braun on September 2, 2010. No concerns were raised regarding construction activities associated with the Suncrest Substation or Wilson Yard.
T-APM-06b: Parking in San Diego County shall comply with County regulations and per an approved traffic control plan	A CTMP is not required for the Suncrest Substation or the Wilson Yard, as described in measure T-09a. Therefore, this measure is not applicable to Link 3.
T-APM-09a: Underground utility facilities within 1,000 feet of an Officially Designated Scenic Highway	Link 3 does not include any new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway; therefore, this mitigation measure is not applicable.
T-APM-10a: Ensure continuous access to properties	Underground cable alignment installation is not part of construction at the Suncrest Substation or Wilson yard; therefore, this measure is not applicable.
HS-APM-01: Train personnel using hazardous materials	The SWEAP video that was approved by the CPUC on March 15, 2010 includes training on hazardous materials management procedures. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
HS-APM-01: Develop a Hazardous Communication Plan	The Sunrise Powerlink Hazard Communication (HazCom) Plan was approved by the CPUC on April 2, 2010. The HazCom Plan includes site-specific information and the location of MSDS.
HS-APM-02: Trained personnel to perform refueling	Refueling will only be performed by operators trained in refueling of vehicles or equipment.
HS-APM-02: Conduct refueling in designated areas or by assigned vehicles	Refueling will be performed in designated areas or by a mobile refueling tanker with appropriate secondary containment.
HS-APM-03: Develop applicable safety plans	The Sunrise Powerlink Hazard Communication (HazCom) Plan was approved by the CPUC on April 2, 2010. The HazCom Plan includes site-specific information and the location of MSDSs. The SWPPP was submitted on September 15, 2010. The HMBP and SPCC Plan will be developed during construction as required by applicable regulations.
HS-APM-05: Investigate impacts of all contaminated sites	The Soil Management Plan was approved by the CPUC on September 9, 2010 and addresses the requirements of this measure. The Suncrest Substation site is not a Section 65962.5 site or known contamination site.
HS-APM-07: Train personnel to recognize UXO	The SWEAP video was approved by the CPUC on March 15, 2010 and discusses training of personnel involved in excavation regarding recognition of UXO.
HS-APM-08: Assign Environmental or Health & Safety Representative	SDG&E has assigned Steve Riggs, Field Monitoring Manager with Burns & McDonnell, as the Environmental Field Representative project-wide.
HS-APM-09: Contact airport representatives within 2 miles	There are no structures over 200 feet in height that trigger FAA review associated with construction activities at the substation; therefore, this measure is not applicable.
HS-APM-10: Store and dispose of hazardous waste per regulations	If hazardous wastes are generated, they will be properly disposed of and stored in accordance with all applicable federal and state regulations. Hazardous material minimization measures shall be employed whenever possible.
HS-APM-11: Develop Fire Prevention and Response Plan	The Fire Plan, signed by the CAL Fire Chief, was approved by the CPUC on February 2, 2010.
HS-APM-11: Assign Fire Marshal to enforce fire prevention provisions	The Fire Plan, acknowledged by the CAL Fire Chief, was submitted to the CPUC on December 14, 2009 and approved by the CPUC on February 2, 2010. A project Fire Marshall was hired onto the project and is assigned to enforce the FPRP.

Mitigation Measure and APM	Status
HS-APM-12: Develop a Traffic Control Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by San Diego County on September 29, 2010. The Study revealed that there are no significant traffic impacts at the Suncrest Substation site as a result of project activities. Roadway crossings are not part of construction activities at the Suncrest Substation or Wilson Yard. All measures required in any required encroachment permit will be implemented during construction.
HS-APM-14: Conduct environmental training to construction workers	The SWEAP video, which was approved by the CPUC on March 15, 2010, provides environmental training to construction workers regarding potential exposure. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
HS-APM-15: Stop work if soil or groundwater contamination is suspected	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.
HS-APM-16: Terminate work and implement health and safety procedures if contamination is suspected	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.
HS-APM-16: Take preliminary samples and send to lab for testing	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.
HS-APM-17: Work may proceed if no contamination	This mitigation measure will be fulfilled during construction.
HS-APM-17: Notify agencies if contamination is above regulatory limits	This mitigation measure will be fulfilled during construction.
P-01a: Implement an environmental monitoring plan	The Environmental Monitoring Plan was submitted to the CPUC on May 10, 2010. In addition, the SWEAP video, approved by the CPUC on March 15, 2010, discusses implementation of the Environmental Monitoring Program; maintenance of emergency spill supplies and equipment; the proper use of hazardous materials, development of a Hazardous Communication Plan; development of applicable environmental safety plans associated with hazardous materials; assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project; proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations; and environmental training regarding potential exposure. The SWEAP video will be shown to all project personnel and enforced throughout all phases of the Project.
P-01a: Designate an Environmental Field Representative	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. The Plan states that the Environmental Field Representative/ Lead Monitoring Manager for this Project is Steve Riggs.
P-01b: Maintain hazardous material spill kits onsite	This measure will be implemented during construction.
P-03a: Collect soil or groundwater samples if contaminated	This measure will be implemented during construction.
P-03a: Coordinate with regulatory agencies if contaminated soil or groundwater confirmed by laboratory data	This measure will be implemented during construction.
P-03b: Submit report to agencies of contaminated soil within 30 days of laboratory data receipt	This measure will be implemented during construction.
PS-01a: Limit conductor surface gradient	Following current industry substation design practices, the Suncrest Substation 500 and 230kV buses were designed to meet the conductor surface voltage gradients as specified in the "IEEE Guide for design of substation rigid bus structures" (IEEE standard 605-1998) and calculated following the procedures outlined in "Electric Power Connection for Substations" (ANSI/NEMA CC1-2009). The calculated maximum conductor surface voltage gradients for both the 500 and 230 kV conductors for Suncrest Substation are below the maximum allowable voltage gradients as defined by these current standards. In addition, the calculated maximum conductor surface voltage gradients for both the 500 and 230kV conductors for Suncrest Substation were compared to the maximum gradient values presented in Figure 4 of the IEEE Radio Noise Design Guide – 1971 as "good engineering design practices." The calculated maximum surface voltage gradients for Suncrest were below the values presented in the 1971 design guide.

Mitigation Measure and APM	Status
PS-02a: Identify objects within and near ROW for induced voltages and implement electrical grounding	A grounding study was performed to ensure that the substation and the area immediately outside of the proposed substation fence line meets all applicable standards for step and touch voltage potential. The Ground Grid study, dated June 30, 2010, did not identify any objects near the substation with the potential for induced voltages. The entire substation will be fenced and all equipment, including the fence, will be grounded to the substation ground grid in accordance with SDG&E's standards. A memorandum addressing completion of this measure was submitted to the CPUC on October 6, 2010.
AQ-01a: Pave, apply water 3 times daily, or apply soil stabilizers	A Dust Control Plan was approved by the CPUC on January 20, 2010. The Dust Control Plan will be implemented during project construction.
AQ-01a: Pre-water sites 48 hours prior to clearing	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Reduce amount of disturbed area	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Spray stock-piles daily or as needed	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Cover loads in trucks or maintain 6 inches of free-board	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Pre-moisten import and export dirt prior to transport	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Sweep public streets daily if soil tracking visible	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: Apply soil stabilizers or water on inactive work areas	This mitigation measure will be fulfilled during construction pursuant to the approved Dust Control Plan.
AQ-01a: File a Dust Control Plan 30 days prior to construction	The Dust Control Plan was submitted to the CPUC and approved on January 20, 2010 and the Wildlife Agencies on November 10, 2010.
AQ-01b: Maintain construction equipment and use low-emission equipment	SDG&E will use available Tier 3 equipment, minimizing the use of Tier 2 equipment. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board as required by applicable regulations. Equipment run logs will be maintained on a daily basis and periodically submitted to the CPUC.
AQ-01h: Obtain NOx emission reduction credits or fund incentive programs prior to construction	Mitigation measure AQ-01h, which was required to achieve emission reductions to levels below the federal thresholds is no longer applicable. The emissions expected based on the PMR are less than the federal General Conformity de minimus thresholds for San Diego Air Basin as determined in the Memorandum of Determination issued by the CPUC in September 2010. For additional information refer to page 9 of the memorandum.
AQ-04a: Report quarterly the status of carbon credits	SDG&E sent an email regarding greenhouse gas emissions off-sets to the CPUC on August 27, 2009. The emissions off-sets approach was conditionally approved on September 7, 2009. The CPUC sent an email approving the proposed off-set purchases on November 9, 2009 and SDG&E purchased CRTs to satisfy this measure. SDG&E will report the quarterly status of efforts to create reductions or obtain banked credit and the quantity of construction-phase greenhouse gas emissions offset by credits. The preconstruction component of this measure is complete. The other requirements will be implemented during construction.
AQ-04c: Submit SF6 leak detection and repair program 90 days prior to construction	On April 2, 2010, the CPUC approved the submittals provided by SDG&E that documented its partnership with the U.S. EPA and development of a SF6 Leak Detection and Repair Program, which addressed the requirements included in this measure. The CPUC approval acknowledged satisfaction of this measure.
AQ-04c: Become a Partner in EPA's SF6 Partnership prior to construction.	The Partnership MOU between SDG&E and the U.S. EPA was established on February 24, 2010.
AQ-04c: Report SF6 emissions to CCAR	A SF6 Leak Detection and Repair Program was approved on March 12, 2010 and discusses the reporting procedures to the CCAR. SDG&E will implement the program and submit reports as required,
AQ-APM-02: Prohibit grading when wind exceeds 25 mph	This mitigation measure will be fulfilled during construction. SDG&E will prohibit construction grading on days when the wind gusts exceed 25 mph.
AQ-APM-02: Cover loads in trucks or maintain 2 feet of freeboard	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
AQ-APM-02: Install snow fence-type windbreaks	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Limit vehicle speeds to 15 mph on unpaved roads	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Water unpaved roads	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Apply soil stabilizers	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Contain exposed stockpiles of soil and other material	This mitigation measure will be fulfilled during construction.
AQ-APM-03: Use methods to minimize mud and dust tracking on paved roads	This mitigation measure will be fulfilled during construction. The Dust Control Plan approved by the CPUC on January 20, 2010 will be implemented and enforced during construction.
AQ-APM-04: Encourage carpooling to job sites	The SWEAP video, approved by the CPUC on March 15, 2010, encourages carpooling. This video will be shown to all Project Personnel and enforced throughout all phases of the Project.
AQ-APM-05: Minimize vehicle idling time with common sense approach	The SWEAP video was approved by the CPUC on March 15, 2010. The video addresses vehicle idling. The video will be shown to all Project personnel and enforced throughout all phases of the Project.
AQ-APM-05: Conduct briefings on common sense vehicle use	This mitigation measure will be implemented during construction.
H-01a: Submit a grading and drainage plan prior to construction	Grading, drainage and landscaping plans for the Suncrest Substation were submitted on June 22, 2010. The SWPPP for the substation was submitted on September 15, 2010. CPUC approved the the Suncrest Substation Drainage Study on October 13, 2010.
H-01a: Grade at substations during dry season months	This mitigation measure will be fulfilled during construction as per the SWPPP submitted on September 15, 2010.
H-01a: Cease construction during rainfall when rutting occurs	This mitigation measure will be fulfilled during construction as per the SWPPP submitted on September 15, 2010.
H-01a: Install drainage and erosion control BMPs prior to winter rains	This mitigation measure will be fulfilled during construction as per the SWPPP submitted on September 15, 2010.
H-02d: Provide vehicle and equipment maintenance log monthly	This mitigation measure will be implemented during construction. A vehicle and equipment maintenance log will be provided to the CPUC and BLM once monthly during project construction.
H-04b: Manage blasting near wells or springs with a Blasting Plan for each site	Two existing water wells occur on Link 3. Protection of these wells will be addressed in site-specific blasting plan that will be developed during construction as needed. Blasting plans will be submitted to the CPUC prior to blasting at the site.
H-05a: Construct substation pads with pervious surfaces	The substation pad will be constructed with a gravel surface in appropriate areas as depicted in the approved grading plans to ensure maximum percolation of rainfall after construction.
H-05a: Install detention/retention basins	Detention/retention basins shall be installed as shown in the landscaping and drainage plans submitted to the CPUC on June 22, 2010 and approved on October 13, 2010.
H-05a: Provide erosion protection to downstream drainage discharge points	Erosion protection for downstream drainage points will be installed as shown in the landscaping and drainage plans submitted to the CPUC on June 22, 2010. These plans were approved by CPUC on October 13, 2010.
H-05a: Submit drainage design hydrologic and hydraulic analysis prior to construction	Grading plans for Suncrest Substation were submitted on June 22, 2010. Landscape and drainage plans were submitted on June 22, 2010. SDG&E submitted a copy of the Drainage Study to the CPUC in response to comments regarding the hydrologic and hydraulic analysis on October 5, 2010. CPUC approved the Suncrest Substation Drainage Study on October 13, 2010.
H-07a: Submit a Hazardous Substance Control and Emergency Response Plan 60 days prior to construction	A memo was submitted to the CPUC on Wednesday September 15, 2010 documenting compliance with this mitigation measure and Waste Discharge Identification numbers assigned by the California State Water Resources Control Board. Compliance with this mitigation measure was fulfilled by development of the SWPPP submitted to the CPUC on September 15, 2010. WDID#937C357500 was assigned to the Suncrest Substation.

Mitigation Measure and APM	Status
WQ-APM-01: Minimize disturbance to water resources	This mitigation measure will be fulfilled during construction. Grading plans for Suncrest Substation were submitted on June 22, 2010. Landscape and drainage plans were submitted on June 22, 2010. The Suncrest Drainage Study was approved by the CPUC on October 13, 2010. These plans demonstrate how disturbance to water resources will be minimized.
WQ-APM-02: Avoid sensitive water features	A memo was submitted to the CPUC documenting compliance with Mitigation Measure WQ-APM-2, Task 1, on August 30, 2010. The April 30, 2010 Mapbook illustrates changes to the final design incorporating relocation of structures to avoid sensitive features to the maximum extent possible. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010.
WQ-APM-03: Clearly mark restricted sites prior to construction	Specific sites as identified by authorized agencies will be staked and flagged by a qualified biologist prior to construction and documented in the weekly monitoring report.
WQ-APM-03: Train construction personnel to recognize markers	The SWEAP video, which was approved by the CPUC on March 15, 2010, includes recognition of markers and equipment movement restrictions. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
WQ-APM-04: Maintain adequate distance from stream banks	This mitigation measure will be fulfilled during construction.
WQ-APM-04: Use existing bridges to cross major streams	This mitigation measure will be fulfilled during construction.
WQ-APM-04: Span riparian areas where feasible	Impacts to surface water, riparian areas, and floodplains, were considered during design of the project and have been avoided or will be spanned, to the extent feasible. The Project Modification Report, which was submitted on May 14, 2010 and acknowledged by a Determination Memorandum from the CPUC dated September 22, 2010, describes changes to the Suncrest Substation (PMR29). A small intermittent drainage crosses the northern portion of the substation footprint. This area is addressed in the Suncrest Substation Drainage Study approved by the CPUC on October 13, 2010.
WQ-APM-04: Prepare and implement erosion control BMPs per the SWPPP	The preconstruction component of this measure is complete. SDG&E has obtained a WDID #937C357500 for Link 3 and the SWPPP was submitted to the CPUC on September 15, 2010 for the administrative record. Implementation of the SWPPP will be performed during construction. Qualified Stormwater monitors will be on-site during construction monitoring erosion control. This will be documented in the weekly monitoring report.
WQ-APM-04: Select upland pull sites to minimize disturbance to water resources	There are no pull sites included as part of construction activities for the substation; therefore, this measure does not apply.
WQ-APM-04: Do not place structures in streambeds or drainage channels	To the extent feasible, structures were not designed to be located within streambeds and drainage features. Construction areas are shown in the Project Modification Report Map Book which was submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM in the Determination Memorandum on September 22, 2010. Construction activities at the Suncrest Station will include construction of a box culvert at the Bell Bluff Truck Trail and Peterson Creek crossing.
WQ-APM-05: Construct stream crossings and develop a mitigation and restoration plan	Stream crossings will be constructed at low flow periods when feasible. The Habitat Mitigation and Monitoring Plan (HMMP) addresses mitigation and restoration associated with construction activities that affect stream crossings. The HMMP was submitted on July 14, 2010 and resubmitted on October 8, 2010 to address agency comments. The HMMP has been accepted by the ACOE, CDFG and SWRCB in concept; however, the agencies have asked that the report be reformatted to break out each mitigation property separately. SDG&E will not impact jurisdictional areas prior to approval of the final HMMP.
WQ-APM-06: Avoid designated surface water protection areas	The final project alignment is in the vicinity of the following source water; Lake Morena, Barrett Lake, El Capitan Reservoir, and San Vicente Reservoir. All these source waters will be avoided. The nearest source water to a project facility is the El Capitan Reservoir (Link 5). Structure CP72-2 (PMR mapbook page MS-119) is within 350 feet of the reservoir. The pullsite adjacent to the structure is approximately 100 feet from the reservoir. The next nearest source water to a project facility is the San Vicente Reservoir (Link 5), which is approximately 1650 feet from structure CP39 (PMR mapbook page MS-132). All other source waters are at least 1 mile from a project facility.
WQ-APM-06: No diversions, detention, retention, or consumption of surface waters	No diversions, detention, retention or consumption of surface waters will be performed unless specifically authorized by appropriate agencies and necessary permits are obtained.

Mitigation Measure and APM	Status
WQ-APM-06: Conduct interviews with affected landowners prior to construction	Consultations with affected landowners have taken place and water wells have been identified.
WQ-APM-06: Negotiate with landowners to provide alternative water supplies	SDG&E has consulted with affected landowners regarding protection of groundwater supplies; no groundwater supplies will be used during construction therefore this mitigation measure is not applicable.
WQ-APM-08: Obtain permits prior to discharging groundwater into storm drains	Groundwater supplies will not be discharged into storm drains during project construction; therefore this mitigation measure is not applicable.
WQ-APM-08: Contain and sample if dewatering and then release water according to test results	Discharge of groundwater will not be required during construction. If dewatering is necessary during construction, the requirements of this measure will be implemented.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	Two wells have been identified on Link 3. The well located within the 200-foot buffer along the road will be closed and the well in the center of the substation will be appropriately protected to prevent fuels and hazardous materials from entering it. The well in the center of the substation will be used post construction for fire protection and irrigation. This mitigation measure will be fulfilled during construction.
WQ-APM-10: Minimize stream bank erosion	Substation equipment would not be installed in areas that cross below or pass adjacent to streams with erodible bed or banks; therefore, this measure is not applicable.
WQ-APM-13: Dispose trash into enclosed containment	A trash enclosure will be provided during construction.
WQ-APM-13: Remove hazardous materials to a hazardous waste facility and promptly clean up if released onto ground	This mitigation measure will be fulfilled during construction.
WQ-APM-14: Obtain NPDES permit and implement a SWPPP	The SWPPP and NPDES permits associated with WDID #937C357500 were submitted to the CPUC on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during the Project to prevent and avoid hydrologic impacts.
WQ-APM-15: Adjust route of access roads to avoid sensitive features	To the extent possible, access roads were designed to be constructed as outlined in this mitigation measure. The Project Modification Report and Mapbook, which was submitted May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010, identified modifications to the Project that reduce impacts to "waters of the U.S." or waters of the state. Revised 401, 404 and 1602 permit applications were submitted for review and approval on August 18, 2010 and March 30, 2010. SDG&E received the signed 401 Water Quality Certification on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. SDG&E will not impact streambeds until the remaining permit is issued. (see BIO-APM-05)
WQ-APM-15: Use existing roads or cross-country access routes	Construction and maintenance traffic will use existing roads where feasible. This mitigation measure will be fulfilled during construction.
WQ-APM-15: Clearly mark approved construction traffic routes	Construction traffic routes associated with Link 3 have been identified as Japutal Valley Road to Bell Bluff Truck Trail. These construction routes were approved by the County of San Diego during the August 24, 2010 meeting and with affected landowners.
WQ-APM-16: Conduct site-specific assessment where sensitive water resources cannot be avoided	Biological, hydrology and cultural resource assessments were completed in accordance with the ACOE and CDFG guidelines. Permit applications for ACOE 404 Nationwide 12, CDFG 1600 Streambed Alteration Agreement and Regional Water Quality Control Board 401 Water Quality Certification were submitted on March 30, 2010.
WQ-APM-16: Locate staging/storage areas outside of riparian areas	Staging and storage areas for equipment and materials have been located outside of riparian areas.
WQ-APM-16: Obtain a Streambed Alteration Agreement when constructing new access through streambeds	The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. A copy of the SAA will be maintained onsite during construction.
G-03a: Submit design-level geotechnical studies 60 day prior to final project design	A Geotechnical Investigation Report for Suncrest Substation dated December 21, 2009 was approved by the CPUC on September 2, 2010. The final project design is based on the findings of this report.

Mitigation Measure and APM	Status
GEO-APM-01: No widening or grading of existing access roads if soil is sensitive to disturbance	The FEIR/EIS identified sensitive soils as "natural sand sources that supply the material for sand dune systems throughout the ABDSP." The project no longer impacts ABDSP and there are no sand dune systems along the project route; therefore, this mitigation measure does not apply.
GEO-APM-02: Minimize soil disturbance or return to pre-construction contours and condition	This mitigation measure will be fulfilled during and post construction.
GEO-APM-03: Avoid placing structures in areas of high shrink/swell potential	A report titled, "Geotechnical and Geologic Hazards Investigation Report" was submitted to CPUC for review and approval on April 19, 2010. The report determined that no areas of high shrink/swell are present. The CPUC geotechnical consultant issued a memorandum on June 18, 2010 confirming concurrence with this finding. Therefore, this measure does not apply.
GEO-APM-04: Place structures in geologically stable areas	A Geotechnical Investigation Report for the Suncrest Substation dated December 21, 2009 was submitted on April 19, 2010 and approved by the CPUC on September 2, 2010. The final project design is based on the findings of this report.
GEO-APM-05: Implement construction to avoid or minimize new soil disturbance	Project construction activities have been designed to avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation. During construction, impacts from accelerated sedimentation will also be minimized through implementation of the SWPPP.
GEO-APM-05: Maintain cut and fill slopes with erosion control and repair	This mitigation measure will be fulfilled during construction.
GEO-APM-06: Perform surface restoration for erosion control and re-vegetation	This mitigation measure will be fulfilled during construction as per the Grading and Landscaping and Draining plans submitted to the CPUC on March 24, 2010 and June 22, 2010.
GEO-APM-08: Remove or stabilize boulders and span structures over landslide areas	This mitigation measure will be fulfilled during construction.
GEO-APM-09: Implement field mitigation efforts if paleontological resources are encountered	If paleontological resources are encountered during construction, this mitigation measure will be implemented.
GEO-APM-09: Consult with agencies if paleontological resources cannot be avoided	If paleontological resources are encountered during construction, this mitigation measure will be implemented.
PSU-APM-01: Coordinate with utility providers	There are no third party utilities that will be affected by the project; therefore, this mitigation measure does not apply.
PSU-APM-02: Notify Underground Service Alert 48 hours prior to earth-disturbing activities	This mitigation measure will be implemented immediately prior to construction.
PSU-APM-03: Minimize disruption to response times and access for emergency and police services	The FEIR/EIS and a Traffic Impact Analysis performed by SDG&E indicated that construction of the substation should not cause lane closures or impact emergency and police services. However, SDG&E will coordinate activities with emergency responders during construction.
S-03a: Provide documentation to show amount of waste recycled	This mitigation measure will be implemented during and following the completion of construction.
S-03b: Coordinate with water districts	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. Potable water will be used during construction until approval is received to use reclaimed water.
S-03b: Provide letter 60 days prior to construction describing availability of reclaimed water and efforts to obtain for use	A Water Use Study describing the availability of reclaimed water was submitted on February 22, 2010. In addition, the Project Modification Report submitted to CPUC on May 14, 2010 and approved September 22, 2010 addressed the use of reclaimed water for the project.
F-01a: Submit draft Construction Fire Prevention Plan 90 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on February 2, 2010. Coordination with Cal FIRE will continue during construction to assess and mitigate any additional fire hazards associated with substation construction activities.

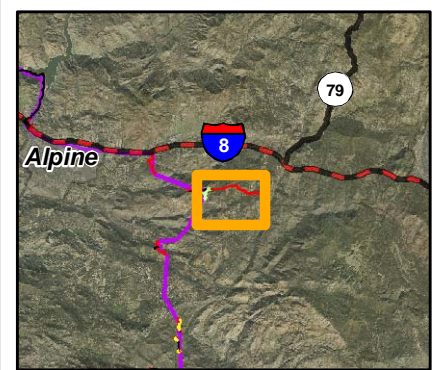
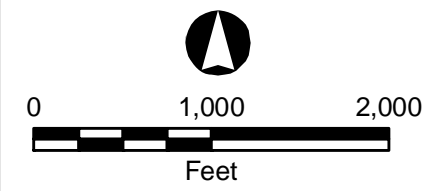
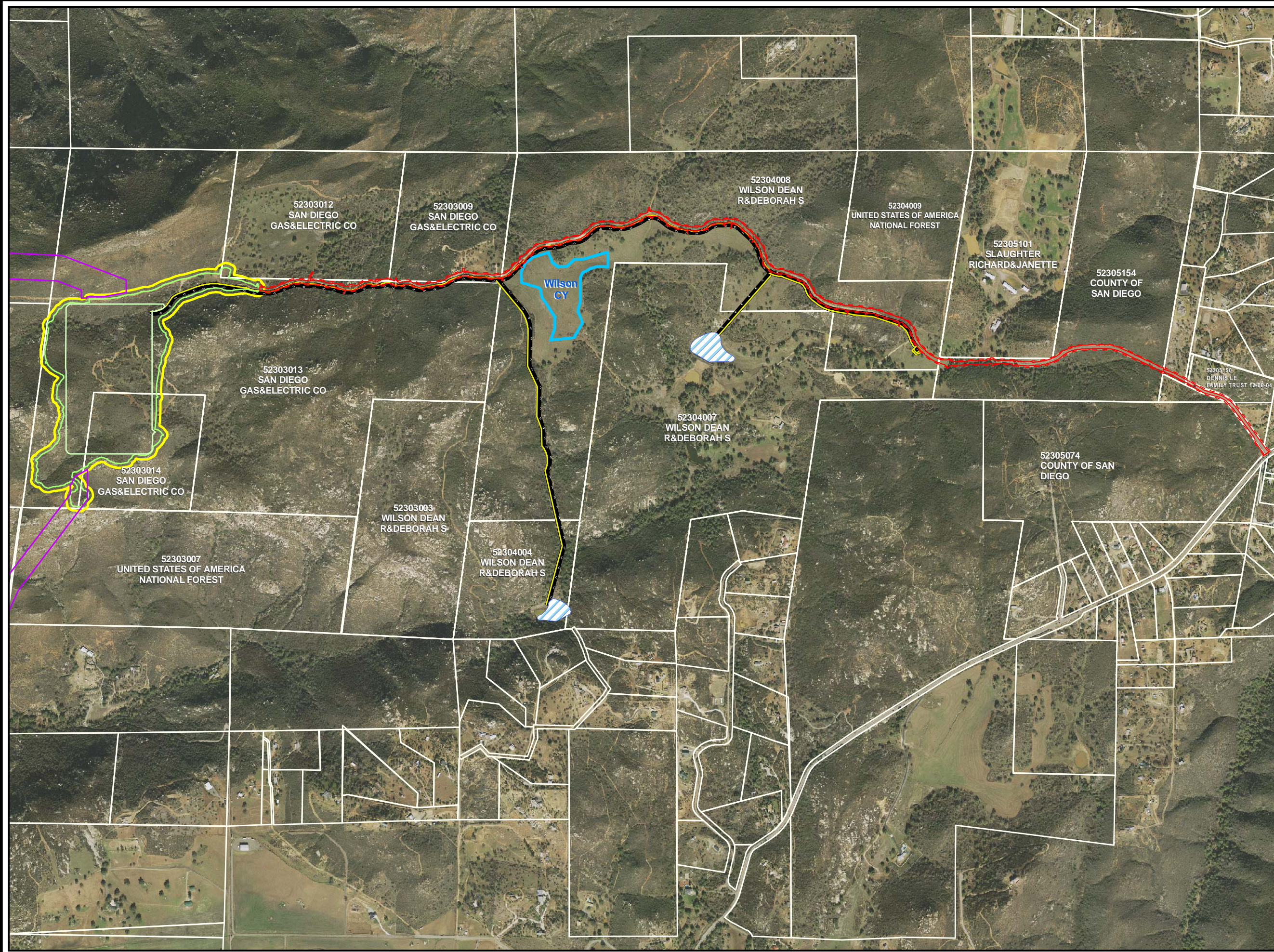
Mitigation Measure and APM	Status
F-01a: Receive approval of final Plan 30 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on February 2, 2010. Coordination with Cal FIRE will continue during construction to assess and mitigate any additional fire hazards associated with substation construction activities.
F-01a: Implement Fire Plan during construction and maintenance	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on February 2, 2010. Coordination with Cal FIRE will continue during construction to assess and mitigate any additional fire hazards associated with substation construction activities.
F-01c: Do not obstruct firefighting equipment or crews	The Traffic Study, which was approved by San Diego County on September 29, 2010, illustrated that construction will not obstruct emergency response operations. During construction, SDG&E will ensure that construction does not obstruct firefighting operations.
F-01c: Coordinate fire suppression activities and unobstruct access roads at all times	This measure will be implemented during construction.
F-01c: Cease construction in work areas if fire within 1,000 feet	This measure will be implemented during construction.
F-01c: Contact dispatch centers 2 days prior to helicopter use	Helicopters will not be used during construction at the Suncrest Substation. This mitigation measure will be implemented regarding helicopter operations at Wilson Yard.
F-01d: Clear and spread onsite dead and decaying vegetation prior to construction and maintenance	SDG&E will clear dead and decaying vegetation from work areas prior to initiating grading activities and/or maintenance work. Clearing of dead and decaying vegetation will be monitored during construction and observations will be summarized and submitted to the CPUC in the weekly report.



SUNRISE POWERLINKSM

Legend

-  HPDE "Highline"
-  Pond
-  Right of Way
-  Suncrest Substation
-  Substation Impact Area
-  Construction Limit Buffer
-  Proposed Road - Permanent Impact
-  Proposed Road - Temporary Impact
-  Construction Yard



Disturbance Areas
Suncrest Substation
Link 3

12-14-10



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