



United States Department of the Interior BUREAU OF LAND MANAGEMENT

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April 4, 2011

In Reply Refer to:
CA 670.20
CACA-47658

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 (BLM NTP # 2)

Dear Mr. Colton,

On March 25, 2011, San Diego Gas and Electric (SDG&E) requested authorization from the Bureau of Land Management (BLM) to commence with overhead transmission line construction on BLM lands within Links 1, 2 and 5 of the Sunrise Powerlink Project. We received the request on March 28, 2011.

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 Bureau of Land Management (BLM) and California Public Utilities Commission (CPUC) and as conditions of project approvals. The BLM and 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. Forest Service on the Cleveland National Forest. The Forest Service issued its Record of Decision and Supplemental Information report on July 9, 2010.

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 BLM, CPUC, and Forest Service, 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 Tables (Attachment A) document the BLM'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 BLM's Record of Decision and in the CPUC's Decision.

BLM NTP #2 for Links 1 (Segments 2 to 6), 2 (Segments 7 to 12) and 5 (Segments 16 to 18) overhead transmission line construction on BLM lands is granted by BLM based on the factors described below.

SDG&E NTP Request. Excerpts from the March 25, SDG&E NTP request are presented below with BLM clarifications based on discussions and/or correspondence with SDG&E inserted (**in parenthesis and in bold**):

The following summarizes the overhead construction activities that SDG&E is requesting to begin on BLM lands on Link 1, 2, and 5 (**The transmission line alignment for Links 1, 2 and 5 crosses over a checkerboard of non-federal, BLM, USFS, and Miramar Marine Corps Air Station (MCAS) lands. This NTP approval is for Links 1, 2 and 5 on BLM lands only. SDG&E received a separate authorization to proceed with construction on Links 1, 2 and 5 non-federal lands from the CPUC on January 14, 2011. SDG&E is working with USFS and MCAS and will obtain separate authorizations from those agencies prior to conducting work on those federal lands.**)

Project boundaries and work areas for Links 1, 2, and 5 are detailed in the April 30, 2010 Project Modification Report (PMR) Map Book, which was submitted to the BLM on May 14, 2010 and approved on September 22, 2010. In addition, the Plan of Development (POD) (dated September 23, 2010) includes a description of project activities that will occur on BLM-administered land. Revisions to the project since the approval of the PMR were provided to the BLM and a Determination of NEPA Adequacy was issued on April 1, 2011 (**Please see the "Variance Overview" section on the following page for details.**)

The following provides a brief summary of Links 1, 2, and 5. Link 1 consists of approximately 54 miles of single-circuit 500 kilovolt (kV) transmission line construction, beginning in the El Centro area of Imperial County and traversing west through eastern San Diego County to the Cleveland National Forest (CNF) boundary, where it terminates at milepost (MP) 53.9. The Link 1 alignment crosses federal, state and private land (refer to pages MS-01 through MS-62 of the Project Modification Report [PMR] Map Book). Link 2 includes approximately 46 miles of single circuit 500-kV transmission line construction beginning at MP 53.9 at the CNF and ending east of the City of Alpine at MP 90.0. Link 2 crosses federal, local agency and private lands. The majority of Link 2 is located on the CNF, but portions cross BLM, City of San Diego and private lands (refer to pages MS-62 through MS-107 of the PMR Map Book). Link 5 includes approximately 27 miles of double-circuit 230 kV transmission line construction from MP 90.0 to MP 92.0 and MP 98.0 to MP 117.0 (refer to pages MS-107 through MS-109 and MS-116 through MS-137 of the PMR Map Book). Link 5 crosses federal, local agency and private land.

In addition to the installation of overhead transmission line structures, construction on the overhead Links will include ancillary facilities such as Tower Staging and Access Pads (TSAPs), pull sites, and guard structures. Development of new access roads and upgrades to existing access roads will also be conducted on the overhead Links. Material staging and storage will occur at construction yards located on BLM land, including Imperial Valley Substation, Dunaway Road, Plaster City, McCain Valley, and Barrett Canyon. Hazardous waste, including soil removed during spill clean-up and response, may be stored temporarily in any of these construction yards. Contaminated materials will be stored in 55-gallon drums or other appropriately-sized enclosed containment. The POD was updated on February 23, 2011 to reflect the potential storage and handling of hazardous waste within construction yards located on BLM-administered land. (**Some additional modifications have been made and are covered in the "Variance Overview" section on the following page. Maps have been provided to the BLM for all new areas.**)

A project-wide Traffic Study revealed that there is only one area, Highway 67 on Link 5, where a CTMP will be required. Documentation of coordination with Imperial County was submitted to BLM/CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010.

Storm Water Pollution Prevention Plans (SWPPP) and NPDES Permit Waste Discharge Identification (WDID) Numbers have been submitted which cover the entire Links 1, 2 and 5 alignment and associated facilities. For Link 1, the following WDID numbers have been assigned: 737C358239, 737C358304, 713C358250, 713C358305, and 713C358275. For Link 2 the following WDID numbers have been assigned: 937C357500, 937C358169, and 937C358216. For Link 5 the following

WDID numbers have been assigned: 937C358184 and 937C358217. These SWPPPs contain procedures to reduce the potential of spills and emergency response information to ensure quick and safe clean-up of spills. The conditions of the permit and SWPPP will be implemented and enforced during the construction to prevent and avoid hydrologic impacts. **(Depending on construction activities, Hazardous Materials Business Plans will be developed for the Project and submitted to the BLM/CPUC as needed.)**

A project specific Fire Prevention and Response Plan (FPRP) was signed by the CAL Fire Unit Chief December 4, 2009, thereby 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. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP.

Access across jurisdictional areas. The access roads on USFS lands are permitted through the Special Use Permit and ROW Grant and would not be used until authorization has been given by USFS as provided by SDG&E. **(Where it has been found that access through USFS jurisdictional areas are needed, prior to utilizing these areas, specific authorization from USFS shall be submitted to the BLM and CPUC.)**

[end of SDG&E language]

Variance Overview

The Project Modifications Report (PMR) was approved by the CPUC and BLM through a determination memorandum dated September 22, 2010. The Project Modifications Report (PMR) was addressed in BLM's Determination of NEPA Adequacy and supporting memoranda for the PMR dated September 22, 2010. The DNA concludes that proposed modifications to the approved project including Links 1, 2 and 5, conform to the applicable land use plans and that the existing NEPA EIS documentation fully covers the modified project.

A number of minor project modifications have taken place since the PMR approval as a result of efforts to reduce impacts to resources including visual, cultural and biological. SDG&E has provided tables and mapbooks of all modifications for all properties. For the purpose of this NTP, only modifications to BLM are being considered. The Variance Table for proposed Links 1, 2 and 5 construction on BLM lands is provided in Attachment B.

As defined in the Mitigation Monitoring, Compliance and Reporting Plan (MMCRP) for the Sunrise Powerlink Project, it was anticipated that at various times throughout project construction, the need for extra workspace or additional access roads would be identified. Similarly, changes to the project requirements (e.g., mitigation measures, engineering specifications, etc.) were expected to be needed to facilitate construction (e.g., nighttime construction in response to a planned power outage) or provide more effective protection of resources (e.g., installation of additional erosion control outside of approved disturbance areas).

The variances requested by SDG&E under this NTP have been evaluated for their potential to create significant environmental effects and a subsequent DNA for changes to the approved project was prepared, dated April 1, 2011. The DNA concludes that proposed modifications conform to the applicable land use plans and that the existing NEPA EIS documentation fully covers the requested variances.

All of the new areas identified in Attachment B have been surveyed for both cultural and biological resources (please note that certain seasonal surveys for rare plants and Quino checkerspot butterfly are outstanding for locations not previously surveyed as part of the 2009 and 2010 Project surveys). In regard to any modifications to access roads, as required under Mitigation Measure V-2a, SDG&E shall provide documentation of consultation with the BLM/CPUC visual resources specialist regarding access road visibility prior to construction.

Revisions to the POD to reflect the potential storage and handling of hazardous waste within construction yards located on BLM-administered land are also detailed in the DNA.

Resource Agency Permitting and Approvals

SDG&E received the signed 401 Water Quality Certification on November 15, 2010. The CDFG issued a Final Streambed Alteration Agreement (SAA) on November 29, 2010. On November 11, 2010, the USFWS Reinitiated the Project Biological Opinion (BO). On January 7, 2011, the Army Corps of Engineers 404 Nation Wide Permit 12 was issued.

On December 12, 2010 a joint letter was received from the USFWS and CDFG approving the Project Habitat Acquisition Plan, Habitat Management Plan (HMP), Habitat Restoration Plan, Habitat Mitigation Monitoring Plan, Weed Management Plan, Bighorn Sheep Monitoring Plan, Arroyo Toad Relocation Plan and the Raven Control Plan.

A proffer of monetary contribution form and check in the amount of \$348,450 was provided by SDG&E to BLM on November 13, 2009 for impacts to Flat Tail Horned Lizard (FTHL) habitat. Applicable measures from the FTHL Rangewide Strategy will be implemented during construction.

BLM 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, cultural and paleontological resources, environmental site assessments, and geotechnical investigations those additional conditions are defined in this section.

Please see also the attached Compliance Status Tables (Attachment A) documenting pre-construction requirements identified in the Final EIR/EIS. Separate tables are provided for each Link 1, 2 and 5. 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 Links 1, 2 and 5.

The three Attachment A tables for Links 1, 2 and 5 address all proposed activities within each link, including the construction yards, pull sites, etc. For measures that are shaded yellow (compliance required prior to construction), unless there is a qualifier specifying a particular location, then documentation of compliance with the measure is pending for each component/segment within the link.

Following the discussion of biological, cultural, and paleontological resources, environmental site assessments, and geotechnical investigations, 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. 2009 and 2010 protocol surveys have been conducted for sensitive plant and animal species for areas covered by this NTP, as well as the post-PMR variance areas discussed above (please note that seasonal surveys for rare plants and Quino checkerspot butterfly are outstanding for a number of post-PMR variance areas not previously surveyed and shall be submitted to the BLM/CPUC

for review and approval prior to work in those areas.). As described in G-CM-32 of the BO dated November 10, 2010, the USFWS states that surveys for federally listed species have been completed.

The BLM/CPUC biological resource consultants have thoroughly reviewed all project biological plans, survey reports and Attachment A tables.

Active golden eagle nests are located in proximity of Link 2 (two nest sites) and Link 5 (one nest site). To protect eagles and other birds, SDG&E will implement and comply with the Avian Monitoring and Mitigation Plan which has been approved by the BLM/CPUC biological resource consultants.

SDG&E will implement the Arroyo Toad Translocation and Monitoring Program during construction. On Link 2, arroyo toad (ARTO) were observed along access roads near mileposts 68, 71 and 74. ARTO presence will be assumed in suitable habitat near milepost 91. To avoid impacting ARTO during construction, construction areas will be fenced with exclusion fencing to keep toads out, where applicable. Access road construction and use during construction activities, with the exception of emergency situations, will occur during daylight hours (from 2 hours after sunrise to 2 hours before sunset) when amphibian movement is less frequent. Any approved removal of toad riparian breeding habitat shall occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles (MM B-7j, SS-CM-11, 12, 13, 14).

FTHL surveys were not conducted because the presence of the species is assumed in the FTHL Management Area (MA). FTHL protection measures include covering and inspecting trenches, looking under vehicles and equipment before moving (MM B-7a), and following the applicable measures of the FTHL Rangewide Management Strategy.

Cultural Resources. Identification and evaluation efforts for the Sunrise Powerlink project are described in the report titled *Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* prepared by ASM Affiliates (Arlene Garcia-Herbst et al, June 2010).

Pursuant to the Sunrise Powerlink Section 106 Programmatic Agreement (PA) executed in December 2008 and Chapter 7 of the *Final Historic Properties Management Plan for the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* (HPMP) (approved July 2010) which provides for issuance of clearances to begin construction and documentation of compliance with Section 106, BLM professional cultural resources staff have reviewed this NTP request (see attached Agency Findings and Determinations Memoranda approved April 1, 2011). Based on the above inventory documentation, the PA, the HPMP and the BLM Record of Decision, the following actions are required as part of issuance of this NTP:

- **MM C-03a: Implement Archeological Monitoring** - Archeological and Native American Monitors will be on-site during subsurface construction disturbance. Work will be diverted if buried cultural material is discovered and the BLM archaeologist will be notified.
- **CR-APM-05: Follow Procedures for Inadvertent Discoveries** - The HPMP documents these procedures and requirements. SDG&E will also continue to comply with cultural resource mitigation measures as outlined in the MMCRP.

The BLM/CPUC's cultural resource consultant conducted extensive reviews of the project cultural materials. A detailed summary by link is provided in Attachment C of this NTP. An abbreviated review of Attachment C is provided below.

The final inventory report of the cultural resources provided that eighteen cultural resources sites were identified within the Area of Potential Effects (APE) on BLM land for Link 1, and two sites span both BLM and private lands for Link 1; all known cultural resources identified within the Area of Potential Effects (APE) for Link 2 will be avoided; and all known cultural resources identified within the Area of Potential Effects (APE) for Link 5 will be avoided. Archaeological testing to enable formal eligibility determinations of these resources has been initiated. An Evaluation Report and a Historic Properties Treatment Plan (HPTP) describing the results of these studies will be prepared and submitted to BLM for review and approval. National Register of Historic Places (NRHP) eligibility recommendations have not been made; the BLM must formally make these determinations and the State Historic Preservation Officer (SHPO) must have an opportunity to review the determinations of eligibility before construction work within the boundaries of the above-mentioned sites can begin. Please note that no construction shall be allowed within the Link 1 APEs until BLM/CPUC notifies SDG&E that these areas are cleared for access (i.e., SHPO concurrence has been provided). The following mitigation measures (MM) will be implemented to protect the unevaluated sites:

- **MM C-01b: Erect protective flagging or other markers for ESA** - Sites will be flagged off with temporary orange fencing and designated as Environmentally Sensitive Areas (ESA). ESA buffers around each site will be established and these sites will be protected as exclusionary zones.
- **MM C-01e: Implement archaeological monitoring at cultural ESAs** - Project-wide Archaeological and Native American Monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an Archaeologist and Native American Monitor.

As stated in the Final HPMP for the Sunrise Powerlink Project, approved on July 15, 2010, sites that can be protected from direct impacts, but are within close proximity (within 50 feet) of proposed construction activities will be identified and labeled as ESAs. These sites may include those determined eligible for NRHP listing by the BLM, or others that have not had formal eligibility evaluations. Forty-eight cultural resources sites within Link 1, two cultural resources sites within Link 2, and one cultural resource site within Link 5 will be flagged off with temporary orange fencing and designated as ESAs. Project-wide Archaeological and Native American Monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an Archaeologist and Native American Monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required.

The Final HPMP states that monitoring will be conducted 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. The Buried Site Sensitivity Model and Testing Plan has not been finalized or implemented. In accordance with Mitigation Measure C-03a, Implement Archaeological Monitoring, Archaeological and Native American Monitors will be on-site during subsurface construction disturbance at all locations identified as sensitive for buried archaeological deposits.

In the event of an unanticipated discovery of archaeological materials within a work area during construction, the following mitigation measures will be implemented:

- **MM C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties,**
- **MM C-1e: Monitor construction at known ESAs, and**
- **MM C-3a: Monitor construction in areas of high sensitivity for buried resources.**

In addition, any new discoveries shall be managed in compliance with the procedures and guidelines for Treatment for Unanticipated Discoveries, set forth in the Final HPMP.

Paleontological Resources. The BLM/CPUC's cultural resource consultant conducted extensive reviews of the project paleontological materials. A detailed summary by link is provided in Attachment C of this NTP. Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, the potential to encounter paleontological resources along Link 1 varies from no potential to high potential, the potential to encounter paleontological resources along Link 2 varies from no potential to low potential, and the potential to encounter paleontological resources along Link 5 varies from no potential to high potential. The following monitoring shall be implemented during construction as required by mitigation measure PAL-01:

- **Conduct full-time paleontological construction monitoring:** Full-time construction monitoring will be conducted by a qualified paleontologist in areas determined to have a moderate to high paleontological sensitivity.
- **Conduct part-time monitoring of sediments with low, marginal, undetermined sensitivity:** Construction work in areas determined to have a low, marginal, and/or undetermined paleontological resource sensitivity will be monitored on a part-time basis as determined by a qualified paleontologist.

Environmental Site Assessment. A Phase I Environmental Site Assessment (ESA) was submitted to the BLM/CPUC on August 28, 2009. Addenda reports and additional assessments have been provided for any areas not covered in the August 28 document.

Geotechnical Investigations. As provided in the Overhead Geotechnical Investigation supplied by SDG&E: "Additional geotechnical investigation will be performed prior to or during the early phases of construction to confirm that the recommendations presented in this report are appropriate and to revise foundation recommendations as necessary. This investigation could not be performed during the design phase due to access and environmental constraints. Investigation activities to evaluate subsurface conditions are planned to include additional seismic refractions surveys at locations not accessed as part of this investigation, geotechnical borings and cone penetration tests (CPT), and fault trenching to confirm that the proposed structures are not constructed over active earthquake faults."

On June 18, 2010, the BLM/CPUC geotechnical consultant found that the Overhead Geotechnical Investigation Report adequately covered the requirements of Mitigation Measures G-3a and G-4a, and APM GEO-APM-3 and the associated potential geologic impacts related to construction of the overhead transmission line as discussed in the EIR/EIS. However, completion of several mitigation measures was postponed to the beginning of the construction phase, including:

- Detailed geotechnical investigations to verify liquefaction conditions (MM G-4b),

- Fault trenching investigations (MM G-5a and GEO-APM-4) along the alignment where the Yuha Wells and Jacume Faults cross the alignment (approximately between P335 to P340, and P257, respectively), and
- Additional investigation to evaluate landslide hazard ((MM G-6a and GEO-APM-4) near location P20 in Section 4A and additional surveys to further evaluate rock fall hazards in some locations [Section 5 (P47 to P49), Section 8A (P19) and Section 9B (P147)]).

Therefore these mitigation measures (G-4a, G-5a, G-6a, and APM GEO-APM-4) have not been fully satisfied and additional reports will need to be submitted verifying completion of these additional investigations, and subsequent conclusions and recommendations.

URS, on behalf of SDG&E, subsequently submitted a memorandum on July 6, 2010 which summarized the locations of additional investigations (please see Attachment D). As proposed by SDG&E, once the data is collected and analyzed, SDG&E will prepare and submit a report covering the geotechnical investigations at the 16 sites to the regulatory agencies for review and approval within two weeks of the completion of the field investigation activities. Please note that the above areas fall on both federal and non-federal lands. For the purpose of this NTP, only investigations on federal lands are being considered. In order to avoid construction delays, SDG&E requested that the BLM provide approval of these submittals within a period of ten (10) business days, which was found to be acceptable by the BLM/CPUC reviewing consultant and shall be implemented in regard to investigations on federal lands as discussed above. No construction at the subject federal locations shall occur until the noted geotechnical studies are reviewed and approved by BLM/CPUC.

Conditions of NTP Approval

The conditions presented below shall be met by SDG&E and its contractors. For clarity, the conditions presented below have been segregated according to whether they apply to all areas covered by this NTP (Links 1, 2 and 5) or solely to Link 1, Link 2 or Link 5 associated areas.

All Links (1, 2, and 5)

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, including Form 2800-15, shall be available on site for the duration of construction activities.
3. All sensitive receptors and residences will be notified at least 15 days prior to initiating construction and verification will be submitted to the BLM and CPUC as per the Construction Notification Plan approved on March 1, 2010. The notice recipient list has been verified by BLM/CPUC.
4. All necessary and/or appropriate ministerial land use permits will be obtained (LU-APM-9), and access agreements/easements will be obtained prior to any road work (T-5a).

5. A supplemental report with the results of any additional geotechnical exploration will be submitted to and approved by the BLM/CPUC prior to installation of associated structures (see Attachment D).
6. Prior to construction, a determination of road usage through USFS jurisdictional areas shall be determined. In addition, where it has been found that access through a USFS jurisdictional area is needed, prior to utilizing the subject area, specific authorization from USFS shall be supplied.
7. In regard to the post-PMR modifications including the tower staging access pad design modifications, any areas not covered under previous surveys including those for rare plants and quino checkerspot butterfly (see Attachment B) shall be surveyed and results shall be submitted to the BLM/CPUC for review and approval prior to any work in those areas.
8. In regard to modified access routes, review and approval by the BLM/CPUC visual resources specialist will be required prior to the road work.
9. All sensitive resource buffers shall be flagged prior to construction/site occupation. Resource flagging shall be field verified by the BLM/CPUC EM prior to site use.
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 BLM/CPUC EM prior to site use.
11. The Weed Control Plan will be implemented immediately prior to, during and following construction as appropriate for the weed species being treated.
12. 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.
13. "Survey sweeps" will 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 BLM/CPUC.
14. If bat nursery colonies or potential bat roosts are observed during construction, a CDFG-approved monitor will be present at construction sites near potential roosts during heavy disturbance (i.e. sound, vibrations from use of explosives or jackhammers). Direct impacts to a nursery colony site shall not be allowed, and appropriate mitigation shall be implemented (Mitigation Measure B-9a).
15. Per G-CM-35, during construction, rare plants shall be salvaged where avoidance is not feasible. Per Bio-APM-08, prior to construction, the boundaries of any sensitive plant populations will be delineated with flagging. Top soil shall be salvaged in locations of sensitive habitat where applicable.

16. Cultural ESAs shall be defined and protective flagging shall be installed prior to construction. Archaeological and Native American Monitors shall be on-site at all locations identified as sensitive for buried archaeological deposits. No work will occur at cultural resource locations within the APE until SHPO eligibility determinations have been completed and until the Historic Properties Treatment Plan (HPTP) has been approved. Please note that BLM/CPUC will send written notice to SDG&E once these areas are cleared for access.
17. If unanticipated biological, cultural or paleontological resources are detected, the BLM/CPUC Environmental Monitor shall be notified immediately and appropriate mitigation shall be implemented.
18. 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.
19. 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.
20. SDG&E shall notify and provide required information to emergency service providers and counties/city prior to initiation of construction activities that could impact police, fire, ambulance and paramedic services.
21. The provisions of the Soil Management Plan shall be implemented during construction. As proposed, the SDG&E Environmental Monitoring Program shall be implemented during construction. SDG&E has designated an Environmental Field Representative for Link 1, 2 and 5 construction activities. The Representative will be on site to observe and document adherence to the applicable environmental plans.
22. 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 BLM/CPUC for review after completion of these training activities.
23. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the BLM/CPUC Environmental Monitor shall be notified immediately.
24. 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 additional DNA analysis and BLM approval.
25. No ground disturbance, including clearing or disturbance to vegetation, shall occur outside of approved work areas.
26. 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 will be implemented and enforced throughout Link 1, 2 and 5 construction activities.

27. NPDES storm water discharge permits for construction activities and SWPPPs have been obtained for the Link 1, 2, and 5 work. The SWPPPs shall be implemented where appropriate prior to and during construction.
28. Underground Service Alert will be notified a minimum of 48-hours in advance of activities in order to identify any subsurface utility lines.
29. If during construction it is determined that dewatering or discharge of groundwater is necessary, SDG&E shall implement WQ-APM-08 which directs crews to contain, sample and acquire appropriate permits prior to discharge.
30. 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
31. A Blasting Preparation and Protection Plan has been approved by the CPUC. If blasting is deemed necessary, a site specific Blasting Plan will be submitted to the BLM/CPUC for review and approval, and shall be implemented during construction. If blasting is determined to be necessary near a surveyed well or spring, a Blasting Plan that addresses protection of the nearby well or spring shall be prepared and submitted to the BLM/CPUC for review and approval.
32. All temporary facilities (i.e., portable toilets, fencing, etc.) shall be removed from the construction disturbance area at the completion of construction.
33. All complaints received by SDG&E in regard to Link 1, 2 or 5 shall be logged and reported immediately to the BLM/CPUC. This includes complaints relevant to lighting, noise and dust, etc. If complaints cannot be resolved, activities may need to be modified depending on the nature of the complaint.
34. Advance notice of restriction or conflicts with access routes to recreational use areas will be provided (R-APM-2a).

Link 1

- 1-1 A preconstruction survey for burrowing owls will be conducted by a qualified biologist within 30 days of starting construction (B-7d) with results submitted to the BLM/CPUC. One burrowing owl has been observed along the project at the Dunaway Yard. The status of this owl is unknown. If owls are found at the site prior to or during construction, passive relocation of burrowing owls will be performed in coordination with the CDFG as outlined in this measure.

- 1-2 A Project Biologist will be present during all construction and Operation and Maintenance (O&M) activities within designated critical habitat and occupied Quino habitat to monitor and assist the construction crews to ensure impacts occur only as allowed (SS-CM-7).
- 1-3 Construction activities and O&M activities (including the use of helicopters) in suitable Peninsular bighorn sheep (PBS) habitat will be prohibited during the lambing season (January 1 through June 30). Construction activities may occur from July 1 through December 31 if the provisions and recommendations of the *Peninsular Bighorn Sheep Construction Monitoring Plan* are adhered to. Exceptions to SS-CM-16 may be approved by the Wildlife Agencies. A Project Biologist(s) will be retained by SDG&E to collect data on PBS movements in the area during the construction phase, supervise and train assisting biologists, and work with representatives of SDG&E to lessen the impacts of project construction on PBS. Helicopter flights and landing sights will the PBS Monitoring Plan (SS-CM-18).
- 1-4 To the extent possible, surface-disturbing projects will be located outside the flat-tailed horned lizard (FTHL) MA and will be timed to minimize mortality. If project activities must be located within an MA, effort will be made to locate the project activity in a previously disturbed area or in an area where habitat quality is poor. Sites of permanent or long-term (greater than 1 year) project activities in the MAs and where FTHL mortality could occur, may be enclosed with FTHL barrier fencing to prevent lizards from wandering onto the SRPL Project site where they may be subject to collection, death, or injury (SS-CM-20).
- 1-5 Three railroad crossings occur on Link 1. SDG&E's contractor will obtain right-of way permits with railroad companies as determined, which shall be submitted to the BLM/CPUC prior to work within the associated crossings.

Link 2

- 2-1 SDG&E shall survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work. SDG&E shall conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season (September 16 - March 14). SDG&E shall survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present (MM B-7e).
- 2-2 SDG&E will implement the Arroyo Toad Translocation and Monitoring Program during construction (B-7j).
- 1-3 SDG&E shall coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department before construction begins in these areas (R-APM-2c). Coordination shall be submitted to the BLM/CPUC.

Link 5

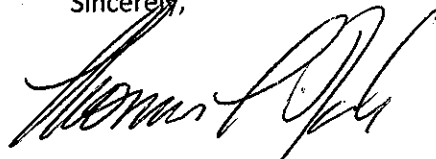
- 5-1 SDG&E shall survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work. SDG&E shall conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season (September 16 - March 14). SDG&E shall survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present (MM B-7e).
- 5-2 Nesting surveys for coastal California gnatcatcher will be conducted by a qualified biologist within 10 days of construction. Results of the surveys will be submitted to USFWS and CDFG for review and approval.

5-3 SDG&E will implement the Arroyo Toad Translocation and Monitoring Program during construction (B-7j).

5-4 Construction on MCAS managed lands will not commence until an authorization to proceed has been received from MCAS. SDG&E will provide the BLM/CPUC with documentation of coordination with MCAS (L-1c).

Thank you for your continuing cooperation with this office. Please contact Associate Field Manager Thomas Zale at (760) 337-4420 or by e-mail at Thomas_Zale@blm.gov if you have any questions or concerns regarding this NTP.

Sincerely,



FOR Margaret L. Goodro
Field Manager

Attachments

Attachment A: Pre-Construction Status Report
Attachment B: BLM Table of Changes
Attachment C: Public Cultural Review Memorandum
Attachment D: Geotech Memorandum
Attachment E: Agency Findings and Determinations Memorandum
Attachment F: Form 2800-15, Right-Of-Way Notice To Proceed
Attachment G: Determination of NEPA Adequacy dated April 1, 2011
Attachment H: BLM – Map Book of Changes since PMR

cc: Daniel Steward, BLM El Centro Field Office
Billie Blanchard, CPUC Project Manager
Mary Jo Borak, CPUC CEQA Unit
Nicholas Sher, CPUC Legal Division
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
Cheryl Martinez, 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 REPORTS

Attachment A: Preconstruction Status Report

Friday, March 25, 2011

10:43:26 AM

Report Criteria:

AGENCY: BLM

LOCATION: Link 1

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

 -To Be Implemented During Construction

 -Pending OR To Be Implemented Immediately Prior to Construction

 -Complete

 -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/aspen/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, which was submitted on May 14, 2010 and approved by the BLM and CPUC in a Determination Memorandum 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 Project will impact sensitive vegetation communities on lands already in use as mitigation. A Habitat Acquisition Plan, which discusses doubled mitigation ratios on lands already in mitigation, was submitted for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies as described in the G-CM-17 of the reinitiated Biological Opinion, dated November 10, 2010.
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	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction.
B-01a: Post signs on access road gates prohibiting unauthorized users	This mitigation measure will be fulfilled during construction.
B-01a: Provide funding for off-road vehicle patrols	SDG&E has coordinated with land managers regarding unauthorized use of access roads by off-road vehicle enthusiasts, including funding of off-road vehicle patrols and gate installation. A memo was submitted to CPUC for the administrative record on October 26, 2010 documenting coordination.
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 Conservation Measure G-CM-6 of the reinitiated Biological Opinion, dated November 10, 2010.
B-01a: Submit a Habitat Restoration Plan	SDG&E submitted the Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas to the CPUC, BLM, USFS and Wildlife Agencies for review and approval on September 24, 2010. A revised plan incorporating agency 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), as noted in Conservation Measure G-CM-16 (page 33 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 shall 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on February 4, 2010. The HAP was further refined and resubmitted on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The 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, should a project-caused fire occur.
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 accepted by the Army Corps of Engineers on August 27, 2010.
B-02a: Mitigate impacted areas as required by wetland permitting	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Attachment 2 of the permit provides a summary of the impacts to wetlands and the required mitigation. Enclosures 4 and 5 of the permit provide detailed lists of the wetlands and their locations.
B-02a: Prepare jurisdictional delineation and impact assessment	The entire 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. Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010 for the administrative record.
B-02a: Mitigate for jurisdictional wetland habitat	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Mitigation requirements and ratios are stipulated on pages 2 through 8 of the permit.
B-02a: Obtain wetland permits prior to construction	The 401 Water Quality Certification was issued on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was issued on January 7, 2011.

Mitigation Measure and APM	Status
B-02a: Delineate all limits of construction	The Project Modification Report and Mapbook, which was 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	This mitigation measure will be fulfilled during construction.
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 submitted a 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 Army Corps of Engineers, California Department of Fish and Game, and State Water Resources Control Board in concept; however, the agencies have asked that the plan be reformatted to break out each mitigation property. The revised plans (one for each of the five mitigation sites) were submitted to the agencies on November 30, 2010 and accepted on December 16, 2010. This plan was prepared by a qualified habitat restoration specialist and will be implemented by a qualified habitat restoration specialist.
B-02a: Submit a Habitat Management Plan that includes jurisdictional areas	The Habitat Management Plan (HMP) was submitted to the CPUC, BLM, Wildlife Agencies, and the USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
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	This mitigation measure will be fulfilled during/post construction.
B-03a: Submit monthly wash logs during construction and annual logs during operation/maintenance	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 2010 rare plant survey, which included all project areas as described in the Project Modification Report, was approved by the USFWS on December 22, 2010 and the CPUC on January 19, 2011.
B-05a: Stake or flag special status plant populations	Special status plant populations will be staked or flagged immediately prior to construction by a qualified biologist.
B-05a: Avoid impacts to federal and state listed plant species	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 sensitive resource areas that may be disturbed. As noted in the revised Biological Opinion, dated November 10, 2010, SDG&E will not impact any listed plant species during construction activities for this project (see pages 3-4 of the Biological Opinion).

Mitigation Measure and APM	Status
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 and approved on January 3, 2011.
B-05a: Avoid impacts to moderately sensitive plant species	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 and approved on January 3, 2011.
B-05a: Submit a Restoration Plan for special status plant species	No federal or state listed plant will be impacted by construction activities on the project; however moderately sensitive plant species will be affected. SDG&E has prepared a Restoration Plan for Special Status Plants. This plan was submitted to the agencies for review on November 29, 2010 and approved on January 3, 2011.
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 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-07b: Mitigate impact by following all applicable measures in the Flat-Tailed Horned Lizard Rangewide Management Strategy	A proffer of monetary contribution form and check in the amount of \$348,450 was provided to the BLM on November 13, 2009 for impacts to FTHL habitat.
B-07b: Submit a Habitat Management Plan	A proffer of monetary contribution form and check in the amount of \$348,450 was provided to the BLM on November 13, 2009. Because no FTHL habitat has been acquired, a Habitat Management Plan for acquired FTHL habitat is not required.
B-07c: Limit activities in PBS critical habitat to October 1 - December 31, unless otherwise approved by the Wildlife Agencies, or maintain 1,500-foot ceiling for flights	After reinitiation of consultation with the USFWS, this mitigation measure has been revised to permit construction during a larger work window in Peninsular bighorn sheep habitat. See Biological Opinion, Sunrise Powerlink Project (2010), Species Specific Conservation Measure 16. BLM has found that the request for an extended work window is consistent with the Final EIR/EIS. Determination of NEPA Adequacy (DNA), Sunrise Powerlink Project: Project Modifications (Sept. 2010). This mitigation measure, as revised, will be fulfilled during construction. SDG&E will have a USFWS-approved bighorn sheep monitor conduct surveys prior to any land survey activities and monitor the land surveyors to minimize impacts to bighorn sheep.
B-07c: Provide compensation for direct loss of critical habitat	Compensation for direct loss of PBS critical habitat is outlined in the Habitat Acquisition Plan/Habitat Management Plan.
B-07c: Submit a Habitat Management Plan	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-07d: Conduct survey within 30 days prior to construction	A burrowing owl survey will be conducted by a qualified biologist within 30 days prior to construction as outlined in this measure.
B-07d: No disturbance shall occur if burrowing owl is present	A survey shall be conducted 30 days prior to initiation of construction by a qualified biologist to ensure that no burrowing owls are present and if a burrowing owl is discovered, this mitigation measure will be followed. This mitigation measure will be fulfilled during construction.
B-07d: Inspect construction material daily	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
B-07d: Passively relocate owls prior to construction and outside of breeding season September 1-January 31	If owls are found at the site prior to or during construction, passive relocation of burrowing owls will be performed in coordination with the CDFG as outlined in this measure.
B-07d: Mitigate for loss of burrowing owl habitat	Preconstruction surveys for burrowing owls will be required 30 days prior to construction. If burrowing owls are encountered, mitigation for loss of occupied burrowing owl habitat shall occur as outlined in this mitigation measure.
B-07d: Submit a Habitat Management Plan	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 Management Plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010.
B-07e: Conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season September 16-March 14	Least Bell's vireo and southwestern willow flycatcher habitat do not occur on Link 1; therefore, this mitigation measure is not applicable.
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 and the 2010 Riparian Bird Survey Report, did not identify any least Bell's vireo on Link 1. Least Bell's vireo and southwestern willow flycatcher do not occur on Link 1; therefore, this mitigation measure is not applicable.
B-07e: Survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present	Least Bell's vireo and southwestern willow flycatcher do not occur on Link 1; therefore, this mitigation measure is not applicable.
B-07h: No activities within 4,000 ft. of eagle nest during breeding season	Data was obtained from the USFS and BLM regarding potential eagle nest locations for 2009. 2010 surveys were performed by SDG&E. This measure will be implemented during and post construction.
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 protocol 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. Survey results indicate QCB were found near milepost 36 on Link 1. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
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 mileposts 116.5, 110, 79 to 80, 74.5, 71, and 36. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
B-07i: Mitigation required if survey non-conclusive for determining QCB presence	QCB surveys have been conducted in 2009 and 2010. Quino checkerspot butterfly occur on Link 1 near MP 36. All QCB surveys have been conclusive for the project.
B-07i: Submit a Habitat Management Plan that addresses offsite mitigation for QCB habitat	QCB surveys have been conducted in 2009 and 2010. Quino checkerspot butterfly occur on Link 1 near MP 36. Mitigation for QCB is addressed in the Habitat Acquisition and Habitat Mitigation Plan submitted on September 22, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion.
B-07j: Conduct pre-construction protocol survey for arroyo toad	USFWS protocol-level arroyo toad (ARTO) surveys were conducted in 2009 and 2010. The 2009 ARTO Survey Report was submitted to the CPUC on October 2, 2009 and re-submitted to CPUC on January 14, 2010 to address their comments. On August 26, 2010, the CPUC advised that their comments were not fully addressed in the January 14, 2010 re-submittal; however, on September 2, 2010 the CPUC advised that these comments could be addressed in the upcoming 2010 ARTO Survey Report. The 2009 and 2010 surveys have concluded that no ARTO have been observed and no critical or proposed habitat exists in Link 1. 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	No arroyo toad habitat exists on Link 1; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
B-07j: Install exclusion fencing if toad is present and monitor daily during construction	No arroyo toad habitat exists on Link 1; therefore, this mitigation measure is not applicable.
B-07j: Conduct pre- and post-exclusion fencing surveys	No arroyo toad habitat exists on Link 1; therefore, this mitigation measure is not applicable.
B-07j: Conduct daily surveys in the morning prior to work activities	No arroyo toad habitat exists on Link 1; therefore, this mitigation measure is not applicable.
B-07j: Mitigate for the loss of occupied arroyo toad habitat	No arroyo toad-occupied or unoccupied habitat exists on Link 1; therefore mitigation for loss of arroyo toad habitat is not required.
B-07j: Submit a Habitat Management Plan that includes arroyo toad habitat	No arroyo toad-occupied or unoccupied habitat exists on Link 1; therefore mitigation for loss of arroyo toad habitat is not required.
B-08a: Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	This mitigation measure will be fulfilled during construction.
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 to the agencies.
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. A 2009 Bat Survey Report Amendment-Report and 2009 Bat Survey Amendment - Appendix 1 were submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. If bat nursery colonies are observed during construction, this mitigation measure will be implemented.

Mitigation Measure and APM	Status
B-10a: Install transmission lines using Avian Power Line Interaction Committee standards	SDG&E will install transmission lines as outlined in this mitigation measure. Where diverters/markers have been installed, a study will be funded as outlined in this measure. SDG&E has submitted an Avian Monitoring and Mitigation Plan to the CPUC, CDFG, BLM, USFWS and USFS for review and approval on November 11, 2010. This plan will be implemented during project operation.
B-11a: Submit a Raven Control Plan	A Raven Control Plan was submitted on July 22, 2010 to the CPUC, BLM and USFWS. A Final Revised Plan was submitted to the agencies on October 25, 2010 and addressed comments received from the U.S. Fish and Wildlife Service. This plan was approved as stated in G-CM-19 of the revised Biological Opinion dated November 10, 2010.
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. Per G-CM-32 of the Revised Biological Opinion dated November 10, 2010, surveys for federally listed species have been deemed complete by the Wildlife Agencies. The following survey reports for the 2010 survey season have been approved: 2010 Riparian Bird Survey Report; 2010 Arroyo Toad Survey; 2010 Rare Plant Survey; 2010 Quino Checkerspot Butterfly Report; and 2010 Coastal California Gnatcatcher Survey Report. The 2010 Bat Survey Report is currently pending and is expected to be submitted in March 2011.
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 and submit survey results the the USFWS and CDFG should access road construction occur during nesting season or if it is not feasible to keep vehicles on existing access roads.
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	Final Grading Plans and Plan and Profiles has been submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings.
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	To the extent possible, access roads shall be constructed as outlined in this mitigation measure.
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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011.
BIO-APM-05: Minimize disturbance from construction and maintenance activities	This mitigation measure will be fulfilled during construction.
BIO-APM-06: Comply with all applicable environmental laws and regulations	This mitigation measure will be fulfilled during construction.
BIO-APM-07: Littering is not allowed	Littering will be prohibited on this project. This mitigation measure will be monitored during construction.

Mitigation Measure and APM	Status
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.
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.
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 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 entered into SDG&E's mitigation measure tracking system and Sempra's system-wide mapping 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	This mitigation measure will be fulfilled during and post construction.
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	During construction, access roads will be constructed as outlined in this measure. In addition, SDG&E has secured required permits for access road construction that will impact sensitive water features. More specifically, the 401 Water Quality Certification was issued on November 15, 2010, the California Department of Fish and Game Streambed Alteration Agreement (SAA) was issued on November 17, 2010, and the ACOE 404 permit was issued on January 7, 2011.
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). The BO was reinitiated and finalized on November 10, 2010.

Mitigation Measure and APM	Status
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	This mitigation measure will be fulfilled during construction.
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	This mitigation measure will be fulfilled during construction.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction.
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-Report and 2009 Bat Survey Amendment were 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	Construction of Link 1 of the Sunrise Powerlink Project will occur during daytime hours, as directed by local county ordinances. No night construction is anticipated and construction night lighting is not anticipated to be needed, therefore, this mitigation measure does not apply. Should night lighting be deemed necessary during construction, SDG&E will comply with this mitigation measure.
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	See B-1c
G-CM-02: Use SDG&Es Water Quality Construction BMP Manual.	See WQ-APM-4. This mitigation measure will be implemented during construction.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	See WQ-APM-14
G-CM-04: Training to implement conservation measures.	See BIO-APM-2

Mitigation Measure and APM	Status
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.	Final Grading Plans and Plan and Profiles has been submitted to the CPUC on September 2, 2010. Project activities will be confined to areas noted in final engineering drawings. Also see BIO-APM-4.
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.
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
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 extend 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-1a 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

Mitigation Measure and APM	Status
G-CM-16: Temporary impacts to desert scrub and dune habitats.	See B-1a
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 reinited 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-19: Prepare and implement a Raven Control Plan.	See B-11a
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
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 and BIO-APM-4
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	See B-1a
G-CM-31: Mowing of access roads to maintain access for maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	See B-5a and BIO-APM-1
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8

Mitigation Measure and APM	Status
G-CM-34: Native Tree Restoration	The Habitat Acquisition Plan discusses mitigation for loss of native trees. A Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. Tree mitigation will occur as described in the Habitat Acquisition/Habitat Management Plan which was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	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. The Project site specific SWPPPs designate where fueling is permitted to occur. Unless otherwise indicated in the SWPPPs, all other areas are considered "No-Fueling Zones".
G-CM-42: Maintain riparian buffer construction/staging areas and riparian areas.	This mitigation measure will be implemented during construction.
G-CM-44: Determine project limits for temporary and permanent disturbance to occur during maintenance activities.	Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings. The preconstruction component of this measure is complete. Adherence to the right-of-way limits and approved work areas will occur during construction.
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	Suitable habitat for coastal California gnatcatcher does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	Suitable habitat for coastal California gnatcatcher does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	Suitable habitat for coastal California gnatcatcher does not occur on Link 1; 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	Suitable habitat for least Bell's vireo does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-05: Survey for nesting vireos	Suitable habitat for least Bell's vireo do not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-06: Purchase and manage suitable vireo habitat	Suitable habitat for least Bell's vireo does not occur on Link 1; therefore, this mitigation measure is not applicable to this component of the project.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	This measure will be implemented during construction.
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Site-specific restoration will be developed during construction and will be based on actual temporary impacts to Quino habitat.

Mitigation Measure and APM	Status
SS-CM-10: Purchase and manage occupied Quino habitat	This mitigation measure will be fulfilled during construction.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	Arroyo toad habitat does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	Arroyo toad habitat does not occur on Link 1; 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 Link 1; therefore, this mitigation measure is not applicable.
SS-CM-14: Remove all temporary exclusion and construction fencing at conclusion of construction.	Arroyo toad habitat does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	Arroyo toad habitat does not occur on Link 1; therefore, this mitigation measure is not applicable.
SS-CM-16: Prohibit construction and O&M activities during lambing season	This mitigation measure will be implemented during construction and O&M activities.
SS-CM-17: Restore suitable bighorn sheep habitat	This measure will be implemented during construction.
SS-CM-18: Retain a Project Biologist to oversee and implement the PBS Monitoring Plan	This mitigation measure will be implemented during construction.
SS-CM-19: Purchase habitat to partially offset impacts to PBS population	This mitigation measure will be implemented during and post construction.
SS-CM-19: Provide funding for protection of PBS and I-8 crossing	This mitigation measure will be implemented along I-8 during and post construction.
SS-CM-19: Fund removal of invasive species and install PBS water sources	This mitigation measure will be implemented during and post construction in PBS areas as directed by the Wildlife Agencies.
SS-CM-19: Fund Monitoring Program for PBS	SDG&E will continue to coordinate with the Wildlife Agencies to implement and fund the long-term monitoring program for PBS.
SS-CM-20: Implement avoidance, mitigation and compensation measures	These measures will be implemented during construction in FTHL habitat.
SS-CM-20: Designate a field contact representative	SDG&E has designated Steve Riggs as the environmental field contact representative.
SS-CM-20: Clearly define the limits of work limits	All approved project work areas will be clearly delineated immediately prior to construction along the project alignment. In addition, a SWEAP training video describes project work limits and restrictions and is shown to all project personnel prior to work on the project. These measures will be implemented immediately prior to construction.
SS-CM-20: Minimize disturbance to soil and vegetation in FTHL habitat	This mitigation measure will be implemented during construction.
SS-CM-20: Use existing roads whenever possible	This mitigation measure will be implemented during construction.
SS-CM-20: Block newly created access routes as required by the lead agency	This mitigation measure will be implemented during and following construction and in coordination with the appropriate land-managing agency.
SS-CM-20: Monitor construction activities in FTHL habitat	This mitigation measure will be implemented during construction.
SS-CM-20: Fence areas of permanent or long-term projects in FTHL management areas	This mitigation measure will be implemented during construction if areas within FTHL habitat will be active for greater than 1 year.

Mitigation Measure and APM	Status
SS-CM-20: Develop habitat restoration plan.	The Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010. This plan addresses habitat restoration in FTHL habitat.
V-01a: Screen construction sites if visible from public areas	The pre-construction component of this measure has been completed. The location of staging, material and equipment storage areas and helicopter fly yards are shown in the Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM on September 22, 2010. The Construction Yard Visual Screening Plan also shows the location of these yards and illustrates how these areas will be visually screened with temporary screening fencing. The Construction Yard Visual Screening Plan submitted to the CPUC, City of San Diego, BLM and USFS on August 4, 2010 and to Helix Water District on August 19, 2010. The Construction Yard Visual Screening Plan was approved by the CPUC on October 19, 2010.
V-01a: Submit final construction plans 60 days prior to construction	Final construction grading plans and Plan and Profile drawings were submitted to the CPUC, BLM, USFS, County of San Diego and Helix Water District on September 2, 2010.
V-01b: Design and install lighting to avoid night lighting impacts	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-01b: Submit a Construction Lighting Mitigation Plan 90 days prior to construction	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-02a: Construct access and spur roads at appropriate angles	Construction of access or spur roads shall occur as outlined in this measure.
V-02a: Consult with visual resources specialist to evaluate access road visibility prior to final design	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010. The final design of access roads was based on coordination with several visual resource specialists.
V-02a: Submit table 60 days prior to construction	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, which showed the location of each structure and the alignment of the access roads. The final design of access roads was based on coordination with several visual resource specialists.
V-02a: Submit final construction plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC for the administrative record on September 2, 2010.
V-02b: Revegetate boundaries of disturbed areas	This mitigation measure will be fulfilled during construction.
V-02b: Return graded roads to pre-construction conditions	This measure will be fulfilled during construction.
V-02b: Create barriers for public access if opened as a construction route	This mitigation measure will be fulfilled during construction.
V-02b: Submit final construction and restoration plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC on September 2, 2010.
V-02c: Treat disturbed soils visible from sensitive public viewing locations	SDG&E submitted a Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas on September 24, 2010. This plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010. During construction, SDG&E will consult with the Authorized Officer regarding the site-by-site use of Eonite.
V-02c: Submit final construction and restoration plans 60 days prior to construction	SDG&E has submitted Final Grading Plans and Plan and Profile drawings on September 2, 2010 for the overhead portion of the project. A Restoration Plan for Temporary Impacts to Sensitive Vegetation Communities was submitted on September 24, 2010; this plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010.

Mitigation Measure and APM	Status
V-02d: Consult regarding helicopter construction techniques	The Project Modification Report, which was submitted May 14, 2010 and 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.
V-02d: Conduct Agency Consultations 120 days prior to construction	SDG&E has coordinated with the appropriate agencies and received approvals 120 days prior to construction. The Project Modification Report and Mapbook, which was submitted on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the alignment based on this coordination.
V-03a: Conductors shall be non-specular	SDG&E submitted a memorandum to the CPUC for the administrative record on September 30, 2010 demonstrating that SDG&E has ordered non-specular conductor in order to reduce conductor visibility and visual contrast of conductors and towers in compliance with this measure.
V-03a: Consult with a visual resources specialist to evaluate new access roads	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.
V-03a: Submit a table 60 days prior to construction	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.
VR-APM-01: Place structures at maximum distance from crossings	The Project Management Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to reduce visual impacts at highway, canyon, and trail crossings.
VR-APM-03: Match structure spacing when parallel to an existing line	The Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment where the line parallels existing transmission lines. SDG&E also submitted a memorandum to the CPUC for the administrative record on September 9, 2010 documenting compliance with this measure.
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	SDG&E did not locate structures directly in front of residences or in direct line-of-sight from residences, where possible. SDG&E consulted with affected property owners on the proposed structure locations to reduce land use and visual impacts. SDG&E has coordinated with affected landowners in accordance with MM L-2b.
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 for site specific areas of the Project.
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 for site specific areas of the Project.
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 for site specific areas of the Project.
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.

Mitigation Measure and APM	Status
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 the CPUC on May 14, 2010 and approved by the BLM and the 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	SDG&E placed new structures more than 330 feet from existing residences to the extent feasible. Only two structures are closer than 330 feet to a residence and were not able to be moved. These structures include CP-7 (located on Link 5) and EP-228 (located on Link 1).
LU-APM-03: Compensate farmers for loss of crops	No agricultural operators will be impacted on Link 1 that require compensation for loss of crops; therefore, this mitigation measure is not applicable. The only agricultural area that is crossed on Link 1 is the Jacumba Valley Ranch (JVR). However, no loss of crop or disruption to agricultural operations will occur during construction or operation of the project. A memo summarizing coordination with agricultural operators was submitted to the CPUC on October 15, 2010. See mitigation measures Ag-1a and Ag-1c.
LU-APM-03: Avoid planting, growing, and harvesting seasons	No agricultural operations involving crop production will be impacted by construction activities on Link 1; 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 necessary.
LU-APM-05: Coordinate construction activities with water management representatives	SDG&E submitted a memorandum on October 14, 2010 to the CPUC for the administrative record that documents coordination efforts with the Imperial Irrigation District. No other irrigation canals or flood management structures will be affected by construction along Link 1; therefore, coordination with additional agencies is not required.
LU-APM-06: Restrict and confine activity within limits of construction	Final construction plans, which were submitted to the CPUC on September 2, 2010, describes the limits of construction. Construction activities will be restricted to and confined within those limits during construction.

Mitigation Measure and APM	Status
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.
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 will pay just compensation to the property owners through contractual agreements with each landowner. SDG&E submitted a memo to CPUC on October 5, 2010 documenting landowner notification and consultation; the CPUC approved this memo on October 12, 2010. The final alignment is shown on the Project Modification Report and Mapbook, which was submitted to CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum 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	A ROW Grant (CACA 47658) for the Project was issued on January 20, 2009. SDG&E's contractor will obtain encroachment permits from each local jurisdiction, if necessary, during construction.
LU-APM-10: Match structure locations with existing transmission facilities	<p>A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure LU-APM-10, on September 1, 2010.</p> <p>Proposed structure locations were matched with existing transmission facilities along the existing 500 kV Southwest Powerlink (SWPL) line and two 69 kV transmission lines. The Sunrise Powerlink parallels SWPL from Imperial Valley Substation to the Jacumba SWPL Breakaway Point Reroute.</p>
R-APM-02a: Provide advance notice if restrictions in access routes to recreational use areas	This mitigation measure will be implemented during construction.
R-APM-02b: No construction on federal holidays that affects trail use	This measure will be implemented during construction.
R-APM-02d: Post signs at alternative park access and parking	This measure will be implemented during construction.
R-APM-02e: Post signs at alternative trails and bikeways	This measure will be implemented during construction.
R-APM-02f: Post signs at equestrian trails during helicopter construction	This measure will be implemented during construction.
R-APM-02f: Regularly check and maintain signs during helicopter construction	This measure will be implemented during construction.
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.
WR-01a: Coordinate construction activities and schedule 60 days prior to construction	SDG&E has been coordinating with the County of San Diego to identify recreational areas that may be impacted by the project and will schedule construction to avoid temporary preclusion of recreational area use. SDG&E will continue its coordination with the County of San Diego and other jurisdictional agencies during construction.
WR-01a: Submit documentation of coordination 30 days prior to construction	SDG&E submitted a memorandum to the CPUC for the administrative record on November 5, 2010 documenting it's coordination efforts related to recreational areas and trails. On Link 1, SDG&E has coordinated with the BLM and County of San Diego. No trails or recreational areas have been identified for Imperial County, but SDG&E will continue to coordinate with Imperial County regarding construction activities.

Mitigation Measure and APM	Status
WR-01b: Coordinate temporary detours of trails 60 days prior to construction	SDG&E began coordination efforts with the Trails Coordinator for San Diego County on June 21, 2010. Coordinating with the County 60-days prior to construction has been fulfilled. No trails have been identified in Imperial County that will be affected by construction. Coordination efforts are on-going and will continue throughout the preconstruction and construction phases of the project. Two memos documenting coordination efforts were submitted to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01b: Site new trail segments to avoid sensitive resources and restore to pre-construction conditions	This measure will be implemented during construction.
WR-01b: Post public notices at trail detours	This measure will be implemented during construction.
WR-01b: Submit documentation of coordination 30 days prior to construction	See WR-1a
WR-01c: Coordinate alternative recreation facilities 60 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01c: Post public notices at recreation facilities	This measure will be implemented during construction.
WR-01c: Submit documentation of coordination 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-02a: Relocate 500kV line along southern boundary of JAM properties	SDG&E relocated the overhead 500 kV transmission line along the southern boundary of JAM properties as required to minimize effects on BLM land, Forest land, and private property. This measure applies to both Links 1 and Link 2.
WR-02a: Submit memo and construction plans 120 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating a reroute of the BCD Alternative Revision to reduce effects on recreation. See page 2-47 of the PMR Determination Memorandum for additional detail and confirmation that this measure has been fulfilled.
WR-03a: Coordinate to determine locations of tower sites and spur roads	SDG&E has made considerable effort to limit access roads and tower locations within recreational areas in coordination with the BLM, Imperial County, and County of San Diego. No access roads are located on trails (e.g. PCT, Trans-County Trail, etc.). The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to avoid recreational areas as much as feasible. Mitigation of impacts have been calculated in the Habitat Acquisition Plan and Habitat Management Plan submitted to the agencies on September 22, 2010 and approved by the Wildlife Agencies on November 10, 2010.
WR-03a: Coordinate 60 days prior to construction and submit documentation 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
AG-01a: Coordinate with property owners and tenants 60 days prior to construction	SDG&E has coordinated with agricultural property owners and tenants in order to ensure avoidance or minimization of interference with agricultural operations. On Link 1, SDG&E has coordinated with Jacumba Valley Ranch (MP 34). A memorandum summarizing this coordination was submitted to CPUC on October 15, 2010 for their administrative record.
AG-01b: Restore disturbed soils 30 days after completion of construction clean-up	This measure will be implemented during construction.
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 1, SDG&E met with the Jacumba Valley Ranch property owners to discuss grazing operations and fencing reconfiguration to reduce impacts to cattle.

Mitigation Measure and APM	Status
AG-03b: Consult and notify 60 days prior to erection of any structure affecting aerial applicator operations	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010 for their administrative record. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
AG-03b: Provide maps of the alignment on or near agricultural lands	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
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 selected ROW and tower locations were staked prior to the cultural resource field surveys.
C-01b: Protect potential and register-eligible resources from direct project impacts	<p>The Project Modification Report and Mapbook, which was 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 review of the National Register of Historic Places and consultation with the SHPO.</p> <p>The Final Class III Inventory, which was approved by the CPUC and BLM on June 2, 2010, identified 25 cultural resource sites within Link 1 where project impacts cannot be avoided. Eligibility evaluations are in progress and an eligibility evaluation report will be submitted to the BLM, CPUC, SHPO, and Native American Tribes when complete.</p>
C-01b: Undertake additional studies if resources cannot be protected from direct impacts	On Link 1, 25 cultural resource sites have been identified where project impacts cannot be avoided. Eligibility evaluations are in progress to determine recommendations for mitigation. An eligibility evaluation report will be developed and submitted when complete. Recommendations and treatment of significant resources will be presented in an Historic Properties Treatment Plan. Field data is being used to refine project design and minimize impacts to these 25 resource areas.
C-01b: Incorporate results of studies in HPTP	A Historic Properties Treatment Plan (HPTP) will be developed as appropriate based on the results of the eligibility evaluation of the archaeological resources identified in the Class III Survey Report. The HPTP is currently pending. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when complete.
C-01b: Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	SDG&E will designate NRHP and/or CRHR resources as an ESA if within 50 feet of direct impact areas. These ESAs will be monitored by archaeological and Native American monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
C-01b: Erect protective flagging or other markers for ESA	If cultural resources sites identified on this link (or within 50 feet of the right-of-way) are determined to be eligible by the SHPO or Native American Tribes, protective fencing and markers will be used to designate areas that can be avoided as an ESA. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
C-01b: Develop and implement monitoring program as part of HPTP	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.
C-01c: Submit Historic Properties Treatment Plan	The Historic Properties Treatment Plan (HPTP) is currently being prepared. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when available.
C-01d: Conduct data recovery investigations to reduce adverse effects	Data gathered during the eligibility evaluation phase will be summarized in the Historic Properties Treatment Plan (HPTP). Data-recovery methods, sample sizes, and recommended procedures will be detailed in the HPTP as appropriate. The proposed mitigation for resource impacts will also be presented in the HPTP. A data recovery report and documentation of other mitigation efforts will be prepared and submitted to the BLM and CPUC for review. Submittal and approval of the HPTP is currently pending.

Mitigation Measure and APM	Status
C-01d: Submit field closure report prior to construction within 100 feet of affected resource	This mitigation measure will be fulfilled for those resource areas to which it applies.
C-01d: Submit final report of data-recovery investigations within 1 year of completing fieldwork	This mitigation measure will be fulfilled within one year of the completion of fieldwork.
C-01e: Implement archaeological monitoring at cultural ESAs	a qualified archaeologist will conduct full-time monitoring during ground-disturbing activities in ESAs. The Historic Properties Treatment Plan (HPTP), which is currently being prepared, will include locations of ESAs and protection boundaries. The HPTP will provide recommendations for further management and monitoring during construction.
C-01e: Qualification of archaeologists must be approved	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 were 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.
C-01e: Retain and schedule any required Native American monitoring	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.
C-01e: Submit cultural resources monitoring monthly reports during construction	This mitigation measure will be fulfilled during construction.
C-01e: Notify if any damage to cultural resource ESAs and divert work to a buffer distance	This mitigation measure will be fulfilled during construction.
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 1. 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. Any discoveries will be processed in the manner described in this measure and detailed in the HPMP and HPTP for this project.
C-02a: Assist and support MLD with reinterment location	SDG&E will provide all necessary support to the Most Likely Deceased (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 have been ongoing. Records of consultations are being held with the BLM. This measure will be satisfied during construction.
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 in the Historic Properties Treatment Plan (HPTP). Monitoring will be conducted per the HPTP and the Historic Properties Management Plan (HPMP). The HPMP was approved by the CPUC and BLM on July 15, 2010. The HPTP will be submitted to the CPUC, BLM, SHPO, and Native American Tribes for review and approval when complete.

Mitigation Measure and APM	Status
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 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	This plan is being prepared by SDG&E and will be submitted for review and approval at least 30 days prior to project operation.
C-06a: Provide inventory to conduct visual analysis of all known and potential historic built environment resources in HPTP	All known historic built environment resources located within 0.5 mile of the project have been inventoried and will be included in the Historic Properties Treatment Plan (HPTP). Historic built environment resources that are eligible for nomination to the National Register were analyzed for visual impacts from the project. The HPTP is currently being prepared and will include mitigation measures for visual impacts. SDG&E will submit the HPTP to the BLM and CPUC for review and approval once it is available.
C-06e: Minimize visual intrusion of aboveground portion on Highway 80	Project design and location has taken this measure into account. An evaluation of visual impacts to National Register eligible properties was completed and are summarized in the Historic Properties Management Plan. Mitigation measures for visual impacts to Old Highway 80 will be provided in the Historic Properties Treatment Plan, which is currently being developed and will be submitted to the BLM and CPUC for review and approval.
C-06e: Include protection plan for Old Highway 80 in HPTP	The Historic Properties Treatment Plan, which is currently being developed, provides mitigation options for impacts to Old Highway 80.
C-06f: Minimize visual intrusion to the Desert View Tower viewshed	SDG&E included an evaluation of protection options for the Desert View Tower viewshed and the final redesign recommended by the CPUC's visual resource consultant in the Project Modification Report (PMR). The PMR was submitted to the CPUC and BLM for review and approval on May 14, 2010 and was approved on September 22, 2010. Information on the Desert View Tower viewshed can be found on pages 4-24 through 4-28 of the PMR.
C-06f: Submit a protection plan for Desert View Tower viewshed 60 days prior to construction	SDG&E has coordinated with visual resource specialists to minimize visual intrusions to the Desert View Tower viewshed. Final construction plans and the Project Modification Report (PMR6, pages 4-24 through 4-28) reflect implementation of avoidance techniques to minimize visual intrusions to the viewshed.
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	Cultural site inventories have been conducted. An HPTP is in preparation. Cultural resource sites have been avoided to the extent feasible and sites that cannot be avoided are being evaluated for National Register eligibility. Cultural resource sites in proximity to the project will be protected using Environmentally Sensitive Area designations.
CR-APM-02: Implement impact avoidance and APMs during construction	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, as appropriate.

Mitigation Measure and APM	Status
CR-APM-03: Report within 24 hours any previously unidentified cultural resource discovered	This mitigation measure will be fulfilled during construction.
CR-APM-03: Suspend operations in the immediate area of the discovered cultural resource	This mitigation measure will be fulfilled during construction as needed.
CR-APM-03: Evaluate the discovered resource and determine appropriate actions.	This mitigation measure will be fulfilled during construction as needed.
CR-APM-03: Develop and implement a treatment plan to mitigate impacts	The HPTP and HPMP provide direction for discovery and mitigation of impacts to cultural resource sites.
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	Historic properties have been surveyed and will be included in the HPTP. The HPTP will be submitted to the BLM and CPUC when available. Properties that cannot be avoided will be flagged as ESAs. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
CR-APM-06: Implement a plan if historic properties cannot be avoided	The Historic Properties Management Plan (HPMP), which was approved by the CPUC on July 15, 2010, identifies historic properties along the Project route. The Historic Properties Treatment Plan, which is currently being developed, will include details regarding the recordation, relocation, and data recovery of historic properties. This plan will be submitted to the CPUC and BLM for review and approval once complete.
CR-APM-07: Control impacts that can deteriorate historic	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement protective measures to minimize erosion and weeds	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement control measures to minimize vibration, dust, and fumes	This mitigation measure will be fulfilled during construction.
CR-APM-07: Minimize deterioration to buildings and structures	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement a plan if deterioration cannot be avoided	This mitigation measure will be fulfilled during construction.
CR-APM-08: Avoid and protect landscaping essential to historic property	SDG&E has consulted with the appropriate property owners to avoid impacts to historic properties. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating re-design of the alignment based on these consultations. The Project Modification Report briefly discusses these reroutes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved by the BLM and CPUC through a Determination Memorandum on September 22, 2010.
CR-APM-08: Minimize intrusion to the historic setting	This mitigation measure will be fulfilled during construction.
CR-APM-09: Install permanent fencing, barriers, or controlled access	This mitigation measure will be fulfilled during construction.
CR-APM-09: Restrict construction and operation access	This mitigation measure will be implemented during construction.

Mitigation Measure and APM	Status
CR-APM-09: Instruct construction and maintenance personnel to protect sensitive properties	Construction and maintenance personnel will be instructed in protection of sensitive properties.
CR-APM-10: Span conductors over historic property	A memo was submitted to the CPUC on September 13, 2010 documenting compliance with this mitigation measure. As part of the final design, SDG&E located project structures so that conductors span linear historic property to the extent feasible.
CR-APM-10: Boring shall avoid disturbance to historic property	Boring is not required to avoid historic properties on the overhead portion of the line; therefore, this mitigation measure is not applicable.
CR-APM-11: Implement standard practices on private land	SDG&E has conducted cultural surveys for areas not identified in the approved FEIR/EIS. The preconstruction component of this measure has been complete and SDG&E's standard practices will be implemented throughout the duration of the project.
CR-APM-12: Conduct cultural surveys for staging areas not yet identified	SDG&E has performed cultural surveys for staging areas not previously identified. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating a redesign of the alignment based on these surveys. The Project Modification report briefly discusses these changes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved through a Determination Memorandum dated September 22, 2010.
PAL-01a: Submit an inventory of significant paleontological resources	SDG&E has conducted and submitted a "Paleontological Records" report dated February 25, 2010 and a "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 based on Society of Vertebrate Paleontology guidelines and was approved by the BLM, CPUC and other agencies with jurisdiction on July 20, 2010.
PAL-01c: Conduct full-time paleontological construction monitoring	The areas that require paleontological monitoring have been identified and monitors will be present during ground disturbance activities.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	This mitigation measure will be fulfilled during construction.
PAL-01c: Divert construction activities when significant fossils are recovered	The approved Monitoring and Treatment plan specifies a process for the discovery of paleontological resources.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction. If it is determined that a variance is needed for construction noise, it will be applied for and obtained prior to construction.
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	The preconstruction component of this measure is complete. A Blasting Preparation and Protection Plan was submitted to the CPUC on July 7, 2010. If blasting is deemed necessary, a site-specific blasting plan will be submitted to the CPUC and implemented during construction.
N-02a: Restore damaged structure and compensate owner	This mitigation measure will be fulfilled post construction, as needed.

Mitigation Measure and APM	Status
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 Construction Notification Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. The preconstruction component of this measure is complete. SDG&E will provide the CPUC with 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, which was approved by the CPUC on March 1, 2010, identifies the public liaison person who will 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-01a: Restrict lane closures or obstructions on major roadways	SDG&E submitted two memos to the CPUC for their administrative record documenting coordination regarding traffic issues. A memo documenting coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010. Lane closures are not anticipated to occur; however, if lane closures are required, this measure will be implemented during construction. Lane closures will be addressed in traffic plans as required by any encroachment permits required by the agencies.
T-04a: Provide temporary pedestrian access	Interference with pedestrian access is not anticipated to occur. However, if temporary closures of sidewalks and other pedestrian facilities do occur during construction, this measure will be implemented.
T-04a: Provide detours and signs for bike route closures	Bike route or path closures are not anticipated to occur. However, if bike route or bike path closures do occur during construction, this measure will be implemented.
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	Access agreements/easements will be obtained prior to any road work. Measures required in the agreement/easement will be implemented during construction.
T-07a: Conform to agency requirements if parking spaces are eliminated or relocated	The Construction Notification Plan addresses notification of the public through local newspapers and on-site postings when parking spaces may be temporarily eliminated or relocated. The Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. Impacts to parking are not anticipated. However, if parking spaces are eliminated or relocated as a result of construction, SDG&E will post "No Parking" signs 48 hours in advance to notify the public of potential short-term elimination of parking spaces.
T-09a: Prepare a Construction Transportation Management Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by Imperial County on August 19, 2010, San Diego County on September 29, 2010 and Caltrans on August 19, 2010. The Study revealed that there is only one area, Highway 67 on Link 5, where a CTMP will be required. Documentation of coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010.
T-11b: Provide notification when and where the line will be erected prior to construction	SDG&E has consulted with U.S. Customs and Border Patrol regarding the location of new transmission lines and towers. 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, which was approved by the CPUC and BLM in a Determination Memorandum on September 22, 2010, 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	In areas where a temporary lane closure is determined to be necessary, SDG&E will obtain required permits from Imperial County, San Diego County, and Caltrans. This measure will be satisfied during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans regarding traffic impacts.

Mitigation Measure and APM	Status
T-APM-02b: Submit Detour Plans	In an area where detours are determined to be necessary, SDG&E will submit detour plans to Imperial County, San Diego County, and Caltrans. No detours will occur until detour plans are submitted to the appropriate agency and permits are obtained. This measure will be implemented during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans related to traffic impacts.
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 mitigation 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	SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
T-APM-04a: Notify cities and counties regarding construction activities	SDG&E shall notify and provide required information to counties and cities prior to initiation of construction activities that could impact police, fire, ambulance and paramedic services.
T-APM-05a: Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	SDG&E has coordinated with school districts project-wide to discuss construction activities adjacent to school bus stops. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-05a: Consult with transit authorities 1 month prior to construction	SDG&E has coordinated with the Imperial Valley Transit District and the Metropolitan Transit District to discuss construction activities and potential impacts to transit services. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-06a: Parking in Imperial County shall comply with County regulations and per an approved traffic control plan	This measure will be implemented during construction.
T-APM-06b: Parking in San Diego County shall comply with County regulations and per an approved traffic control plan	This measure will be implemented during construction.
T-APM-08a: Obtain permit(s) if entering railroad right-of-way	SDG&E's contractor will obtain right-of way permits with railroad companies as determined. Three railroad crossings occur on Link 1.
T-APM-09a: Underground utility facilities within 1,000 feet of an Officially Designated Scenic Highway	There will be no new or relocated utility facilities on Links 1, 2, or 5 within 1,000 feet of an Officially Designated Scenic Highway. Therefore, this measure is not applicable to Links 1, 2, or 5.
T-APM-10a: Ensure continuous access to properties	During construction, SDG&E will ensure that the construction contractor provides driveway access to businesses and residences.
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 secondary containment.
HS-APM-03: Develop applicable safety plans	The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS. Appropriate safety plans, such as a HMBP and/or SPCC Plan will be developed as the project progresses and storage locations are identified. Plans will be updated during construction as needed.

Mitigation Measure and APM	Status
HS-APM-05: Investigate impacts of all contaminated sites	The Soil Management Plan was submitted to the CPUC on July 2, 2010 and approved on September 9, 2010. The Soil Management Plan addresses the requirements stipulated in this measure. The Phase 1 Environmental Site Assessment was submitted to CPUC on December 3, 2009 and provides additional information, as well as the results of the investigation.
HS-APM-06: Investigate UXO by trained contractor	An investigation of the project ROW has been conducted by In Depth Corporation, a trained contractor. A memo summarizing these results was submitted to the CPUC on October 7, 2010. A revised memo was submitted on October 26, 2010 to address comments received from CPUC.
HS-APM-06: Remove UXO by trained personnel	An investigation of the project ROW was conducted by a UXO trained contractor. No UXO were located; however, if potential UXO is found during construction, construction will be temporarily halted until a trained contractor can assess the situation.
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	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure HS-APM-9, Task 1, on September 10, 2010. SDG&E has provided notice to the FAA of all structures on the line, and the FAA has published notice and request for comment of structures within 2 miles of the Jacumba airstrip. There are no other airports within 2 miles of Link 1.
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, acknowledged by the CAL Fire Chief, was submitted to the CPUC on December 14, 2009 and approved 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 approved by the CPUC on February 2, 2010. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP.
HS-APM-12: Develop a Traffic Control Plan	See T-9a
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.

Mitigation Measure and APM	Status
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 Environmental Monitoring Plan identifies Steve Riggs as the Environmental Field Representative/Lead Monitoring Manager for this Project.
P-01b: Maintain hazardous material spill kits onsite	This measure will be implemented during construction.
P-02a: Test farmed soil samples and submit sampling and testing plan 60 days prior to construction	The Sampling and Testing Plan was approved by the CPUC on May 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010.
P-02a: Submit laboratory results 30 days prior to construction	The Sampling and Testing Plan was approved on March 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010. The Soil Management Plan was approved by the CPUC on September 9, 2010. This measure is complete for all project areas with the exception of one property in Link 5 associated with structures CP63 and CP64.
P-02a: Follow regulatory procedures for handling and disposal of contaminated soil	Excavated materials containing elevated levels of pesticide or herbicide will be managed in compliance with the Soil Management Plan approved by the CPUC on September 9, 2010.
P-02a: Use effective dust suppression procedures	During construction, effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public.
P-02a: Consult regulatory agencies for handling, treatment, and/or disposal	Regulatory agencies for the State of California (DTSC or RWQCB) and the appropriate County (San Diego or Imperial) will be contacted by SDG&E or its contractor to plan handling, treatment, and/or disposal options.
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.
P-07a: Implement steps 60 days prior to construction if excavation will occur	The Soil Management Plan was approved by the CPUC on September 9, 2010 as fully addressing the requirements of this measure. A Phase 1 Environmental Site Assessment was submitted to the CPUC for review on December 2, 2009. In the event that new areas requiring ground disturbance are identified during construction, a Phase 1 will be conducted and submitted to the CPUC prior to ground disturbance in those areas.
PS-01a: Limit conductor surface gradient	SDG&E submitted a memorandum to the CPUC on September 30, 2010 demonstrating that SDG&E has limited the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.
PS-02a: Identify objects within and near ROW for induced voltages and implement electrical grounding	A memorandum addressing completion of this measure was submitted to the CPUC on September 30, 2010 and approved on October 6, 2010.
AQ-01a: Pavement, apply water 3 times daily, or apply soil stabilizers	A Dust Control Plan was submitted to the CPUC and approved on January 20, 2010. This measure will be implemented during construction, as well as the measures specified in the Dust Control Plan.
AQ-01a: Pre-water sites 48 hours prior to clearing	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
AQ-01a: Reduce amount of disturbed area	This mitigation measure will be fulfilled during construction.
AQ-01a: Spray stock-piles daily or as needed	This mitigation measure will be fulfilled during construction.
AQ-01a: Cover loads in trucks or maintain 6 inches of free-board	This mitigation measure will be fulfilled during construction.
AQ-01a: Pre-moisten import and export dirt prior to transport	This mitigation measure will be fulfilled during construction.
AQ-01a: Sweep public streets daily if soil tracking visible	This mitigation measure will be fulfilled during construction.
AQ-01a: Plant vegetative ground cover following construction	This mitigation measure will be implemented immediately following construction.
AQ-01a: Apply soil stabilizers or water on inactive work areas	This mitigation measure will be fulfilled during construction.
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 at the yard. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. 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-01: Comply with ICAPCD Rule 800 for work in Imperial County	The Dust Control Plan, which was filed with the ICAPCD and approved by the CPUC on January 20, 2010, addresses compliance with ICAPCD Rule 800.
AQ-APM-01: File a Dust Control Plan with ICAPCD for work in Imperial County	The Dust Control Plan was filed with the ICAPCD and approved by the CPUC on January 20, 2010.
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.
AQ-APM-02: Install snow fence-type windbreaks	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
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. A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout the Project.
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-01k: File hazardous substance plan within 1 year of license issuance	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and receive authorization from the USFS prior to starting work on USFS lands.
H-01k: Confine vehicles to roads identified in a Road and Traffic Management Plan	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and implement the approved Road and Transportation Management Plan.
H-01k: File an Erosion Control Measure Plan prior to construction	The SWPPP and NPDES permit associated with WDID #937C357500 was submitted to the CPUC and USFS on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts. This measure is only applicable to USFS-managed lands.
H-01k: Submit NEPA analysis prior to ground disturbing work	The Final Environmental Impact Report/Environmental Impact Statement was submitted to the USFS for analysis. The Project Modification Report and Mapbook, was submitted to the USFS on May 14, 2010. This measure is only applicable to USFS-managed lands.
H-01k: Enter into a cost recovery agreement with the Forest Service	A cost recovery agreement with USFS will be determined before ground disturbing activities may proceed on USFS-managed lands. This measure is only applicable to USFS-managed lands.
H-01k: File a Water Resources Management Plan within 6 months of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. The SWPPPs and NPDES permits associated with the following WDID #s 937C358169 and 937C358216 were submitted to the CPUC on September 15, 2010. Qualified Stormwater monitors will be on-site during construction monitoring erosion control. This results will be documented in the weekly monitoring report. This measure is only applicable to USFS-managed lands.
H-01k: File a plan for ground and surface water management within 1 year of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. Groundwater supplies will not be used during project construction; therefore, this component of H-01k is not applicable. This measure is only applicable to USFS-managed lands.
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	A Wells and Springs Survey was submitted to CPUC on July 7, 2010 to address this mitigation measure prior to construction. This report was approved by CPUC on September 2, 2010. During construction, if blasting is determined to be necessary near a surveyed well or spring, SDG&E's contractor will prepare a blasting plan that addresses protection of the nearby well or spring.
H-06a: Determine which towers require scour protection during design phase	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.

Mitigation Measure and APM	Status
H-06a: Submit evaluation and design plans 60 prior to constructing towers	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.
H-07a: Submit a Hazardous Substance Control and Emergency Response Plan 60 days prior to construction	<p>A memo was submitted to the CPUC for their administrative record on September 15, 2010 documenting compliance with this mitigation measure and providing the Waste Discharge Identification numbers assigned by the California State Water Resources Control Board. For Link 1, the following WDID numbers have been assigned: 737C358239, 737C358304, 713C358250, 713C358305, 713C358275.</p> <p>Five site-specific SWPPPs have been developed for Link 1. These SWPPPs contain procedures (Section 8.0) to reduce the potential of spills and emergency response information to ensure quick and safe clean-up of spills. In addition, hazardous materials management is addressed in the Spill Prevention, Control and Countermeasure (SPCC) plans and Hazardous Materials Business Plans developed for the Project.</p>
WQ-APM-01: Minimize disturbance to water resources	This mitigation measure will be implemented during construction. Grading plans, which were submitted to the CPUC on September 2, 2010, demonstrate how disturbance to water resources will be minimized. In addition, the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, addressed changes to the final alignment to reduce impacts to water resources.
WQ-APM-02: Avoid sensitive water features	<p>A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-2, on August 30, 2010.</p> <p>Impacts to jurisdictional features were considered during design of the project and have been avoided, to the extent feasible. The locations of the structures are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved through a Determination Memorandum dated September 22, 2010.</p>
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. Surface disturbing activities will not be allowed to begin until the sites have been clearly marked, fenced or flagged to delineate those areas specifically allowed for use and those areas that are restricted.
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 locations of the structures are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by CPUC and BLM through a Determination Memorandum dated September 22, 2010.
WQ-APM-04: Prepare and implement erosion control BMPs per the SWPPP	The SWPPPs and NPDES permits associated with the following WDID #s 737C358239, 737C358304, 713C358250, 713C358305 and 713C358275 were submitted to the CPUC on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts.
WQ-APM-04: Select upland pull sites to minimize disturbance to water resources	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.

Mitigation Measure and APM	Status
WQ-APM-04: Do not place structures in streambeds or drainage channels	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.
WQ-APM-05: Construct stream crossings and develop a mitigation and restoration plan	Stream crossings will be constructed at low flow periods. A mitigation and restoration plan has been developed as part of the HMMP and was submitted to the agencies on July 14, 2010. A revised plan was submitted on October 8, 2010 to address agency comments. This mitigation measure will be implemented during construction.
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	This mitigation measure will be fulfilled during construction.
WQ-APM-06: Conduct interviews with affected landowners prior to construction	Groundwater supplies will not be used during project construction; therefore this mitigation measure is not applicable.
WQ-APM-06: Negotiate with landowners to provide alternative water supplies	Groundwater supplies will not be used during project 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 used 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 and dewatering is not anticipated during construction. If it is later determined that dewatering is necessary, SDG&E will implement this measure as described.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	This mitigation measure will be fulfilled during construction.
WQ-APM-10: Minimize stream bank erosion	See H-06a
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 SWPPPs and NPDES permits associated with the following WDID #s 737C358239, 737C358304, 713C358250, 713C358305 and 713C358275 were submitted to the CPUC on September 15, 2010. The conditions of the permits and SWPPPs will be implemented and enforced during the construction to prevent and avoid hydrologic impacts.
WQ-APM-15: Adjust route of access roads to avoid sensitive features	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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011. Also see BIO-APM-05.
WQ-APM-15: Use existing roads or cross-country access routes	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
WQ-APM-15: Clearly mark approved construction traffic routes	This mitigation measure will be fulfilled during construction.
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	SDG&E has located staging/storage areas for equipment and materials outside of riparian areas. This is demonstrated in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010.
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-02a: Avoid or minimize desert pavement grading	SDG&E prepared a Desert Pavement Protection Plan that identifies areas of desert pavement and discusses protection of desert pavement. This Plan was approved by the CPUC and BLM on September 10, 2010. SDG&E will implement the plan during construction to minimize impacts to desert pavement.
G-02a: Submit a plan to identify and protect desert pavement 60 days prior to construction	SDG&E prepared a Desert Pavement Protection Plan that identifies areas of desert pavement and discusses protection of desert pavement. This Plan was approved by the CPUC and BLM on September 10, 2010.
G-03a: Submit design-level geotechnical studies 60 days prior to final project design	A Geotechnical Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. CPUC issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04a: Submit site-specific seismic analyses 60 days prior to final project design	A Geotechnical Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. An explanation of structure design based on windloading instead of seismic loading is included in the Executive Summary. The final project design is based on the findings of this report. CPUC's geotechnical consultant issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04b: Submit liquefaction studies 60 days prior to final project design	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. SDG&E will conduct additional geotechnical exploration, including borings, as soon as authorization is received from the appropriate land-managing agency. A supplemental report will be provided prior to installation of structures.
G-05a: Submit a report with studies of active and potential active faults 60 days prior to construction	A Geotechnical Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. SDG&E will conduct additional geotechnical exploration to confirm the location of mapped traces of active and potentially active faults and will submit a report to the CPUC that addresses any required modifications based on the results of these investigations. SDG&E will provide this supplemental report prior to installation of structures.
G-06a: Submit slope stability analyses 60 days prior to construction	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. The Geotechnical Evaluation, Access Roads and Structure Pads (dated October 16, 2009) was submitted to CPUC for review and approval on May 28, 2010. These reports included slope stability analyses as described in this measure. The final project design is based on the findings of these reports. As required by the CPUC memo dated June 18, 2010, additional investigations for landslide and rock fall hazards will occur in areas along Segment 9A of Link 1 during construction.
G-09a: Coordinate to determine status and plans of active quarries	SDG&E has coordinated with Pyramid Quarry personnel and BLM to determine the status of and plans for active quarries adjacent to or crossed by project alignments. Coordination efforts were included in the Project Modification Report submitted to the CPUC on May 14, 2010. The Determination Memorandum and BLM Determination of NEPA Adequacy dated September 22, 2010 acknowledged coordination efforts and noted that SDG&E will continue to coordinate with Pyramid during construction.

Mitigation Measure and APM	Status
G-09a: Submit plan to avoid impacts to mining operations 60 days prior to construction	SDG&E has coordinated with Pyramid Quarry personnel and BLM to determine the status of and plans for active quarries adjacent to or crossed by project alignments. Coordination efforts and a plan to minimize interference with operations were included in the Project Modification Report submitted to the CPUC on May 14, 2010. The Determination Memorandum and BLM Determination of NEPA Adequacy dated September 22, 2010 acknowledged coordination efforts and noted that SDG&E will continue to coordinate with Pyramid during construction.
G-09a: Provide map of reroute and summary of impacts to mining areas	Neither the SWPL or the Interstate 8 Alternative require a reroute due to quarry operations; therefore, this mitigation measure is not applicable.
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 implemented during construction.
GEO-APM-03: Avoid placing structures in areas of high shrink/swell potential	The 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	See G-6a
GEO-APM-05: Implement construction to avoid or minimize new soil disturbance	The preconstruction portion of this measure is complete. Final grading and plan and profiles were submitted to the CPUC on September 2, 2010. Project construction activities were designed to avoid or minimize new disturbance and erosion on manufactured slopes. SDG&E will adhere to the grading plans and the SWPPP during construction.
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	Erosion control will be implemented under Project site-specific SWPPPs and shall include areas where re-contouring and substantial ground disturbance will be required. This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction.
GEO-APM-09: Consult with agencies if paleontological resources cannot be avoided	This mitigation measure will be fulfilled during construction.
PSU-APM-01: Coordinate with utility providers	A memo was submitted to the CPUC documenting compliance with Mitigation Measure PSU-APM-1 on October 14, 2010. The memo was approved by November 5, 2010 and satisfies the preconstruction component of this measure. SDG&E will continue to coordinate with the Imperial Irrigation District (IID) during construction on the locations and times where work will be in close proximity to IID utility lines. Additionally, SDG&E will notify the DigAlert service immediately prior to construction in areas to identify conflicts with utility providers and avoid/provide adequate operational and safety buffering.
PSU-APM-02: Notify Underground Service Alert 48 hours prior to earth-disturbing activities	This mitigation measure will be implemented during construction.
PSU-APM-03: Minimize disruption to response times and access for emergency and police services	This mitigation measure will be implemented during construction.

Mitigation Measure and APM	Status
S-02a: Provide copies of posted public notices of planned outages	This measure will be implemented during construction. Copies of notices and dates of public notification shall be provided to the CPUC and BLM prior to any planned outage.
S-02b: Submit documentation prior to construction of the underground transmission line	Link 1 does not include underground transmission line construction; therefore, this mitigation measure is not applicable.
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. In addition, an Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011. SDG&E will obtain a variance for the use of reclaimed water outside of the Padre Dam and City of San Diego jurisdictions. Potable water will be used until the variance is obtained. Copies of variances will be submitted to the CPUC prior to use of 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, and Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011.
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 January 20, 2010.
F-01a: Receive approval of final Plan 30 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and approved by the CPUC on January 20, 2010.
F-01a: Implement Fire Plan during construction and maintenance	The preconstruction component of this measure has been completed. A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on January 20, 2010. The Construction Fire Plan includes the requirements of this mitigation measure and will be implemented and enforced during construction.
F-01c: Do not obstruct firefighting equipment or crews	This measure will be implemented during construction.
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	This measure will be implemented during construction.
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.
F-03a: Contribute annually to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. This mitigation measure will be implemented during and following construction.
F-03b: Create and implement a Multi-agency Fire Prevention MOU	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU.

Attachment A: Preconstruction Status Report

Friday, March 25, 2011

10:44:19 AM

Report Criteria:

AGENCY: BLM

LOCATION: Link 2

TIMING: Design; Design and During; 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 |

Location: Link 2

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, which was submitted on May 14, 2010 and approved by the BLM and CPUC in a Determination Memorandum 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 Project will impact sensitive vegetation communities on lands already in use as mitigation. A Habitat Acquisition Plan, which discusses doubled mitigation ratios on lands already in mitigation, was submitted for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies as described in the G-CM-17 of the reinitiated Biological Opinion, dated November 10, 2010.
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	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction. A new cattle gate was requested by Tulloch to address the containment and management of his cattle. The gate will be installed during construction of the access road. SDG&E met with USFS representatives, Tim Cardoza and Steve Eastwood on September 13, 2010 to discuss gate installation on USFS property.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction.
B-01a: Post signs on access road gates prohibiting unauthorized users	This mitigation measure will be fulfilled during construction.
B-01a: Provide funding for off-road vehicle patrols	SDG&E has coordinated with land managers regarding unauthorized use of access roads by off-road vehicle enthusiasts, including funding of off-road vehicle patrols and gate installation. A memo was submitted to CPUC for the administrative record on October 26, 2010 documenting coordination.

Mitigation Measure and APM	Status
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 Conservation Measure G-CM-6 of the reinitiated Biological Opinion, dated November 10, 2010.
B-01a: Submit a Habitat Restoration Plan	SDG&E submitted the Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas to the CPUC, BLM, USFS and Wildlife Agencies for review and approval on September 24, 2010. A revised plan incorporating agency 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), as noted in Conservation Measure G-CM-16 (page 33 of the BO).
B-01a: Mitigate for impacted habitat	In coordination with the appropriate agencies, off-site purchase and dedication of habitat shall 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on February 4, 2010. The HAP was further refined and resubmitted on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The 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, should a project-caused fire occur.
B-01k: Develop re-seeding plan	This mitigation measure will be fulfilled during and post construction, as needed.
B-01l: Minimize impacts to the RCA between Structures 184 and 187 of the BCD South Option.	SDG&E has coordinated with the USFS to minimize impacts to RCAs. The Project Modification Report (PMR) and Mapbook illustrate modifications that were made to the alignment to reduce overall impacts to RCAs. The PMR and Mapbook were approved by the CPUC and BLM through a Determination Memorandum dated September 22, 2010.
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 accepted by the Army Corps of Engineers on August 27, 2010.

Mitigation Measure and APM	Status
B-02a: Mitigate impacted areas as required by wetland permitting	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Attachment 2 of the permit provides a summary of the impacts to wetlands and the required mitigation. Enclosures 4 and 5 of the permit provide detailed lists of the wetlands and their locations.
B-02a: Prepare jurisdictional delineation and impact assessment	The entire 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. Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010 for the administrative record.
B-02a: Mitigate for jurisdictional wetland habitat	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Mitigation requirements and ratios are stipulated on pages 2 through 8 of the permit.
B-02a: Obtain wetland permits prior to construction	The 401 Water Quality Certification was issued on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was issued on January 7, 2011.
B-02a: Delineate all limits of construction	The Project Modification Report and Mapbook, which was 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	This mitigation measure will be fulfilled during construction.
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 submitted a 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 Army Corps of Engineers, California Department of Fish and Game, and State Water Resources Control Board in concept; however, the agencies have asked that the plan be reformatted to break out each mitigation property. The revised plans (one for each of the five mitigation sites) were submitted to the agencies on November 30, 2010 and accepted on December 17, 2010. This plan was prepared by a qualified habitat restoration specialist and will be implemented by a qualified habitat restoration specialist.
B-02a: Submit a Habitat Management Plan that includes jurisdictional areas	The Habitat Management Plan (HMP) was submitted to the CPUC, BLM, Wildlife Agencies, and the USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
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.

Mitigation Measure and APM	Status
B-03a: Wash vehicles and equipment	This mitigation measure will be fulfilled during/post construction.
B-03a: Submit monthly wash logs during construction and annual logs during operation/maintenance	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 2010 rare plant survey, which included all project areas as described in the Project Modification Report, was approved by the USFWS on December 22, 2010 and the CPUC on January 19, 2011.
B-05a: Stake or flag special status plant populations	Special status plant populations will be staked or flagged immediately prior to construction by a qualified biologist.
B-05a: Avoid impacts to federal and state listed plant species	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 sensitive resource areas that may be disturbed. As noted in the revised Biological Opinion, dated November 10, 2010, SDG&E will not impact any listed plant species during construction activities for this project (see pages 3-4 of the Biological Opinion).
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 and approved on January 3, 2011.
B-05a: Avoid impacts to moderately sensitive plant species	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 and approved on January 3, 2011.
B-05a: Submit a Restoration Plan for special status plant species	No federal or state listed plant will be impacted by construction activities on the project; however moderately sensitive plant species will be affected. SDG&E has prepared a Restoration Plan for Special Status Plants. This plan was submitted to the agencies for review on November 29, 2010 and approved on January 3, 2011.
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: Conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season September 16-March 14	Grading and brushing in least Bell's vireo and southwestern willow flycatcher habitat will occur as outlined in this mitigation measure.

Mitigation Measure and APM	Status
B-07e: Survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work in area	The Riparian Bird Survey Report for 2009 which was submitted to the CPUC for review on January 10, 2010, indicated a breeding pair of least Bell's vireo was observed along an existing access road near milepost 68. As shown on page MS-80 of the PMR Mapbook, no upgrades are proposed for this portion of the access road. Another least Bell's vireo sighting was recorded during the 2010 surveys near milepost 77 (page MS-89). The 2010 Riparian Bird Survey report was submitted to the agencies on October 28, 2010 and approved by the CPUC on November 2, 2010 and the Wildlife Agencies on November 10, 2010. Construction activities will not occur within 500 feet of least Bell's vireo habitat in this area. Four southwestern willow flycatchers were observed on Link 2, but were determined to constitute migratory observations. As described in the revised Biological Opinion dated November 10, 2010, southwestern willow flycatcher are not likely to be adversely affected by the project (page 4). Preconstruction surveys will be conducted as required by this mitigation measure.
B-07e: Survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present	This mitigation measure will be fulfilled during construction.
B-07e: Establish 300-foot buffer if active nest found	This mitigation measure will be fulfilled during construction.
B-07e: Monitor noise if construction occurs within buffer	This mitigation measure will be fulfilled during construction.
B-07e: Provide mitigation for temporary and permanent impacts	A Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion. The Habitat Acquisition Plan discusses mitigation for impacts to least Bell's vireo occupied habitat, although no permanent impacts are expected to occur to occupied or critical habitat on Link 2.
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 was submitted to CPUC for review on January 14, 2010. The 2010 Riparian Bird Survey Report was submitted to CPUC on October 28, 2010. A Habitat Management Plan was submitted to the CPUC on September 22, 2010. The plan was approved by the Wildlife Agencies as described in G-CM-17 of the reinstituted Biological Opinion, dated November 10, 2010.
B-07h: No activities within 4,000 ft. of eagle nest during breeding season	Data was obtained from the USFS and BLM regarding potential eagle nest locations for 2009. 2010 surveys were performed by SDG&E. This measure will be implemented during and post construction.
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 protocol 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. Survey results indicate QCB were found near mileposts 71, 74.5, and between 79 and 80 on Link 2. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
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 mileposts 116.5, 110, 79 to 80, 74.5, 71, and 36. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
B-07i: Mitigation required if survey non-conclusive for determining QCB presence	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 protocol 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. Survey results indicate QCB were found near mileposts 71, 74.5 and between 79 and 80 on Link 2. All QCB surveys have been conclusive for the project.
B-07i: Submit a Habitat Management Plan that addresses offsite mitigation for QCB habitat	Survey results indicate QCB were found near mileposts 71, 74.5 and between 79 and 80 on Link 2. A Habitat Management Plan has been submitted to the agencies for approval on September 22, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion.

Mitigation Measure and APM	Status
B-07j: Conduct pre-construction protocol survey for arroyo toad	<p>USFWS protocol-level arroyo toad (ARTO) surveys were conducted in 2009 and 2010. The 2009 ARTO Survey Report was submitted to the CPUC on October 2, 2009 and re-submitted to CPUC on January 14, 2010 to address their comments. On August 26, 2010, the CPUC advised that their comments were not fully addressed in the January 14, 2010 re-submittal; however, on September 2, 2010 the CPUC advised that these comments could be addressed in the upcoming 2010 ARTO Survey Report.</p> <p>Based on the 2009 and 2010 survey results, ARTO occur in three locations along Link 2 and will be assumed present in suitable habitat that was inaccessible to the surveyors. On Link 2, ARTO were observed along access roads near mileposts 68, 71 and 74. ARTO presence will be assumed in suitable habitat near milepost 91.</p> <p>To avoid impacting ARTO during construction, construction areas will be fenced with exclusion fencing to keep toads out, where applicable. The fence locations will be identified by a USFWS permitted biologist and fencing will be monitored on a daily basis by a qualified biologist. To minimize impacts to ARTO habitat, construction will be limited to the temporary and permanent impact areas. The limits of construction will be flagged to identify impact areas. To compensate for unavoidable impacts to ARTO, off-site property supporting ARTO habitat has been identified and will be acquired and managed. This is documented in the Project habitat Acquisition Plan and Habitat Management Plan. These plans were approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).</p>
B-07j: Remove toad riparian breeding habitat October-December	This mitigation measure will be fulfilled during construction.
B-07j: Install exclusion fencing if toad is present and monitor daily during construction	If arroyo toads are present, or assumed to be present, exclusion fencing will be installed as outlined in this measure. Exclusion fencing will be monitored during construction and observations will be summarized and submitted to the CPUC in the weekly report.
B-07j: Conduct pre- and post-exclusion fencing surveys	Clearance surveys shall occur as outlined in this measure.
B-07j: Conduct daily surveys in the morning prior to work activities	This measure will be implemented during and post construction.
B-07j: Mitigate for the loss of occupied arroyo toad habitat	Loss of arroyo toad-occupied habitat shall be mitigated as outlined in this measure.
B-07j: Submit a Habitat Management Plan that includes arroyo toad habitat	A Habitat Management Plan was submitted to the appropriate agencies for review and approval on September 22, 2010. This plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion (G-CM-17).
B-07l: Conduct brushing or grading in occupied gnatcatcher habitat outside breeding season February 15-August 30	Occupied coastal California gnatcatcher habitat does not occur on this portion of the project; therefore, this mitigation measure is not applicable.
B-07l: Conduct gnatcatcher survey within 10 days of initiating other activities in area and submit to agencies	Coastal California gnatcatcher does not occur on this portion of the project; therefore, this mitigation measure is not applicable.
B-07l: Establish 300-foot buffer if active nest found	Coastal California gnatcatcher does not occur on this portion of the project; therefore, this mitigation measure is not applicable.
B-07l: Mitigate the loss of occupied habitat and unoccupied designated critical habitat	Coastal California gnatcatcher will not be impacted by construction activities on this portion of the project; therefore, this mitigation measure is not applicable.
B-07l: Submit a Habitat Management Plan that addresses the coastal California gnatcatcher and its habitat	Coastal California gnatcatcher habitat does not occur on this portion of the project; 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 to the agencies.
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. A 2009 Bat Survey Report Amendment-Report and 2009 Bat Survey Amendment - Appendix 1 were submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. If bat nursery colonies are observed during construction, this mitigation measure will be implemented.
B-10a: Install transmission lines using Avian Power Line Interaction Committee standards	SDG&E will install transmission lines as outlined in this mitigation measure. Where diverters/markers have been installed, a study will be funded as outlined in this measure. SDG&E has submitted an Avian Monitoring and Mitigation Plan to the CPUC, CDFG, BLM, USFWS and USFS for review and approval on November 11, 2010. This plan will be implemented during project operation.
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. Per G-CM-32 of the Revised Biological Opinion dated November 10, 2010, surveys for federally listed species have been deemed complete by the Wildlife Agencies. The following survey reports for the 2010 survey season have been approved: 2010 Riparian Bird Survey Report; 2010 Arroyo Toad Survey; 2010 Rare Plant Survey; 2010 Quino Checkerspot Butterfly Report; and 2010 Coastal California Gnatcatcher Survey Report. The 2010 Bat Survey Report is currently pending and is expected to be submitted in March 2011.
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.

Mitigation Measure and APM	Status
BIO-APM-03: Avoid constructing roads during nesting season and submit surveys if new roads needed during nesting season	SDG&E will perform surveys and submit survey results the the USFWS and CDFG should access road construction occur during nesting season or if it is not feasible to keep vehicles on existing access roads.
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	Final Grading Plans and Plan and Profiles has been submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings.
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	To the extent possible, access roads shall be constructed as outlined in this mitigation measure.
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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011.
BIO-APM-05: Minimize disturbance from construction and maintenance activities	This mitigation measure will be fulfilled during construction.
BIO-APM-06: Comply with all applicable environmental laws and regulations	This mitigation measure will be fulfilled during 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.
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 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 entered into SDG&E's mitigation measure tracking system and Sempra's system-wide mapping 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	This mitigation measure will be fulfilled during and post construction.
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	During construction, access roads will be constructed as outlined in this measure. In addition, SDG&E has secured required permits for access road construction that will impact sensitive water features. More specifically, the 401 Water Quality Certification was issued on November 15, 2010, the California Department of Fish and Game Streambed Alteration Agreement (SAA) was issued on November 17, 2010, and the ACOE 404 permit was issued on January 7, 2011.
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). The BO was reinitiated and finalized on November 10, 2010.
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	This mitigation measure will be fulfilled during construction.
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	This mitigation measure will be fulfilled during construction.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	This mitigation measure will be fulfilled during construction.
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.

Mitigation Measure and APM	Status
BIO-APM-25: Revegetate disturbed soils	This mitigation measure will be fulfilled during construction.
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-Report and 2009 Bat Survey Amendment were 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	Construction of Link 2 of the Sunrise Powerlink Project will occur during daytime hours, as directed by local county ordinances. No night construction is anticipated and construction night lighting is not anticipated to be needed, therefore, this mitigation measure does not apply. Should night lighting be deemed necessary during construction, SDG&E will comply with this mitigation measure.
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	See B-1c
G-CM-02: Use SDG&E's Water Quality Construction BMP Manual.	See WQ-APM-4. This mitigation measure will be implemented during construction.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	See WQ-APM-14
G-CM-04: Training to implement conservation measures.	See BIO-APM-2
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.	Final Grading Plans and Plan and Profiles has been submitted to the CPUC on September 2, 2010. Project activities will be confined to areas noted in final engineering drawings. Also see BIO-APM-4.
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 with 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.
G-CM-08: Wire stringing	This measure will be implemented during construction.
G-CM-09: Disposal of wastes.	See BIO-APM-7

Mitigation Measure and APM	Status
G-CM-10: Emergency repairs will follow the CM's to the extent feasible.	See BIO-APM-15
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-1a 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 2. No desert scrub or dune habitats exist along Link 2.
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

Mitigation Measure and APM	Status
G-CM-22: Restoration where ground disturbance is substantial or where recontouring is required.	See GEO-APM-6
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 and BIO-APM-4
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	See B-1a
G-CM-31: Mowing of access roads to maintain access for maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	See B-5a and BIO-APM-1
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8
G-CM-34: Native Tree Restoration	The Habitat Acquisition Plan discusses mitigation for loss of native trees. A Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. Tree mitigation will occur as described in the Habitat Acquisition/Habitat Management Plan which was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	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. The Project site specific SWPPPs designate where fueling is permitted to occur. Unless otherwise indicated in the SWPPPs, all other areas are considered "No-Fueling Zones".

Mitigation Measure and APM	Status
G-CM-42: Maintain riparian buffer construction/staging areas and riparian areas.	This mitigation measure will be implemented during construction.
G-CM-44: Determine project limits for temporary and permanent disturbance to occur during maintenance activities.	Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings. The preconstruction component of this measure is complete. Adherence to the right-of-way limits and approved work areas will occur during construction.
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	Suitable habitat for coastal California gnatcatcher does not occur on Link 2; therefore, this mitigation measure is not applicable.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	Suitable habitat for coastal California gnatcatcher does not occur on Link 2; therefore, this mitigation measure is not applicable.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	Suitable habitat for coastal California gnatcatcher does not occur on Link 2; 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	This mitigation measure will be implemented immediately prior to construction during the vireo breeding season.
SS-CM-05: Survey for nesting vireos	This mitigation measure will be implemented immediately prior to construction if vireos are present.
SS-CM-06: Purchase and manage suitable vireo habitat	This measure will be implemented during construction.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	This measure will be implemented during construction.
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Site-specific restoration will be developed during construction and will be based on actual temporary impacts to Quino habitat.
SS-CM-10: Purchase and manage occupied Quino habitat	This mitigation measure will be fulfilled during construction.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	This plan will be implemented during construction.
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	This mitigation measure will be implemented during construction.
SS-CM-13: No construction activities within arroyo toad breeding habitat.	This measure will be implemented during construction.
SS-CM-14: Remove all temporary exclusion and construction fencing at conclusion of construction.	All temporary exclusion fencing installed during construction will be removed, during or following construction, once protection measures are no longer required.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	This mitigation measure will be implemented during construction to compensate for habitat impacts to arroyo toad habitat along Link 2.
SS-CM-16: Prohibit construction and O&M activities during lambing season	Peninsular bighorn sheep do not occur on Link 2; therefore, this mitigation measure is not applicable.
SS-CM-17: Restore suitable bighorn sheep habitat	Peninsular bighorn sheep do not occur on Link 2; 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 2; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
SS-CM-19: Purchase habitat to partially offset impacts to PBS population	Peninsular bighorn sheep do not occur on Link 2; 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 2; 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 2; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund Monitoring Program for PBS	Peninsular bighorn sheep do not occur on Link 2; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund aerial surveys for PBS	Peninsular bighorn sheep do not occur on Link 2; therefore, this mitigation measure is not applicable.
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 pre-construction component of this measure has been completed. The location of staging, material and equipment storage areas and helicopter fly yards are shown in the Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM on September 22, 2010. The Construction Yard Visual Screening Plan also shows the location of these yards and illustrates how these areas will be visually screened with temporary screening fencing. The Construction Yard Visual Screening Plan submitted to the CPUC, City of San Diego, BLM and USFS on August 4, 2010 and to Helix Water District on August 19, 2010. The Construction Yard Visual Screening Plan was approved by the CPUC on October 19, 2010.
V-01a: Submit final construction plans 60 days prior to construction	Final construction grading plans and Plan and Profile drawings were submitted to the CPUC, BLM, USFS, County of San Diego and Helix Water District on September 2, 2010.
V-01b: Design and install lighting to avoid night lighting impacts	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-01b: Submit a Construction Lighting Mitigation Plan 90 days prior to construction	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-02a: Construct access and spur roads at appropriate angles	Construction of access or spur roads shall occur as outlined in this measure.
V-02a: Consult with visual resources specialist to evaluate access road visibility prior to final design	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010. The final design of access roads was based on coordination with several visual resource specialists.

Mitigation Measure and APM	Status
V-02a: Submit table 60 days prior to construction	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, which showed the location of each structure and the alignment of the access roads. The final design of access roads was based on coordination with several visual resource specialists.
V-02a: Submit final construction plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC for the administrative record on September 2, 2010.
V-02b: Revegetate boundaries of disturbed areas	This mitigation measure will be fulfilled during construction.
V-02b: Return graded roads to pre-construction conditions	This measure will be fulfilled during construction.
V-02b: Create barriers for public access if opened as a construction route	This mitigation measure will be fulfilled during construction.
V-02b: Submit final construction and restoration plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC on September 2, 2010.
V-02c: Treat disturbed soils visible from sensitive public viewing locations	SDG&E submitted a Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas on September 24, 2010. This plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010. During construction, SDG&E will consult with the Authorized Officer regarding the site-by-site use of Eonite. This measure is only applicable to non-Forest lands.
V-02c: Submit final construction and restoration plans 60 days prior to construction	SDG&E has submitted Final Grading Plans and Plan and Profile drawings on September 2, 2010 for the overhead portion of the project. A Restoration Plan for Temporary Impacts to Sensitive Vegetation Communities was submitted on September 24, 2010; this plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 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.
V-02d: Conduct Agency Consultations 120 days prior to construction	SDG&E has coordinated with the appropriate agencies and received approvals 120 days prior to construction. The Project Modification Report and Mapbook, which was submitted on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the alignment based on this coordination.
V-02f: Limit vegetation clearing	This measure will be implemented during construction on USFS-managed lands.
V-02f: Incorporate mitigation to reduce total visual impact	The Scenery Conservation Plan, which was approved by the USFS in March 2011, discusses mitigation to reduce the total visual impact of vegetation clearing on USFS-managed lands. The preconstruction component of this measure is complete.
V-02f: Submit Scenery Conservation Plan at least 120 days prior to construction	The Scenery Conservation Plan was approved by the USFS in March 2011. The preconstruction component of this measure is complete.
V-03a: Conductors shall be non-specular	SDG&E submitted a memorandum to the CPUC on September 30, 2010 demonstrating that SDG&E has ordered non-specular conductor in order to reduce conductor visibility and visual contrast of conductors and towers in compliance with this measure.
V-03a: Consult with a visual resources specialist to evaluate new access roads	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.

Mitigation Measure and APM	Status
V-03a: Submit a table 60 days prior to construction	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.
V-45a: File Scenery Conservation Plan within 1 year after license is issued for USFS	The Scenery Conservation Plan was submitted to the USFS for review in December 2010. The USFS approved the Plan in March 2011. SDG&E prepared a Scenery Conservation Plan, which was submitted to the USFS for review in December 2010. The USFS approved the plan in March 2011.
VR-APM-01: Place structures at maximum distance from crossings	The Project Management Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to reduce visual impacts at highway, canyon, and trail crossings.
VR-APM-03: Match structure spacing when parallel to an existing line	The Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment where the line parallels existing transmission lines. SDG&E also submitted a memorandum to the CPUC for the administrative record on September 9, 2010 documenting compliance with this measure.
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	SDG&E did not locate structures directly in front of residences or in direct line-of-sight from residences, where possible. The majority of Link 2 is on Forest Service lands and residences are not present. SDG&E consulted with affected property owners on the proposed structure locations to reduce land use and visual impacts. SDG&E has coordinated with affected landowners in accordance with MM L-2b.
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 for site specific areas of the Project.
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 for site specific areas of the Project.
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 for site specific areas of the Project.
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.

Mitigation Measure and APM	Status
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 the CPUC on May 14, 2010 and approved by the BLM and the 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	SDG&E placed new structures more than 330 feet from existing residences to the extent feasible. Only two structures are closer than 330 feet to a residence and were not able to be moved. These structures include CP-7 (located on Link 5) and EP-228 (located on Link 1).
LU-APM-03: Compensate farmers for loss of crops	No agricultural operators will be impacted on Link 2 that require compensation for loss of crops; therefore, this mitigation measure is not applicable. SDG&E has met with a vineyard owner on Link 2 to confirm that there will be no loss of crops as a result from construction activities. A memo summarizing coordination with agricultural operators was submitted to the CPUC on October 15, 2010. See mitigation measures Ag-1a and Ag-1c.
LU-APM-03: Avoid planting, growing, and harvesting seasons	No agricultural operations involving crop production will be impacted by construction activities on Link 2; 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 necessary.
LU-APM-05: Coordinate construction activities with water management representatives	There are no irrigation canals or flood management structures impacted by construction activities on Link 2; therefore, this mitigation measure is not applicable.
LU-APM-06: Restrict and confine activity within limits of construction	Final construction plans, which were submitted to the CPUC on September 2, 2010, illustrates the limits of construction. Construction activities will be restricted to and confined within those limits during construction.
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 will pay just compensation to the property owners through contractual agreements with each landowner. SDG&E submitted a memo to CPUC on October 5, 2010 documenting landowner notification and consultation; the CPUC approved this memo on October 12, 2010. The final alignment is shown on the Project Modification Report and Mapbook, which was submitted to CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum 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	A ROW Grant (CACA 47658) for the Project was issued on January 20, 2009. SDG&E's contractor will obtain encroachment permits from each local jurisdiction, if necessary, during construction.
LU-APM-10: Match structure locations with existing transmission facilities	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure LU-APM-10, on September 1, 2010. Proposed structure locations were matched with existing transmission facilities along the existing 500 kV Southwest Powerlink (SWPL) line and two 69 kV transmission lines. The Sunrise Powerlink parallels SWPL from Imperial Valley Substation to the Jacumba SWPL Breakaway Point Reroute.
R-APM-02a: Provide advance notice if restrictions in access routes to recreational use areas	This mitigation measure will be implemented during construction.
R-APM-02b: No construction on federal holidays that affects trail use	This measure will be implemented during construction.
R-APM-02c: Coordinate construction activities affecting parkland and trails prior to construction	SDG&E has coordinated with the appropriate land management agencies, as required. During construction, advance notice of restrictions to recreational use areas will be provided to the agencies.
R-APM-02d: Post signs at alternative park access and parking	This measure will be implemented during construction.
R-APM-02e: Post signs at alternative trails and bikeways	This measure will be implemented during construction.
R-APM-02f: Post signs at equestrian trails during helicopter construction	This measure will be implemented during construction.
R-APM-02f: Regularly check and maintain signs during helicopter construction	This measure will be implemented during construction.
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.
WR-01a: Coordinate construction activities and schedule 60 days prior to construction	SDG&E has been coordinating with the County of San Diego to identify recreational areas that may be impacted by the project and will schedule construction to avoid temporary preclusion of recreational area use. SDG&E will continue its coordination with the County of San Diego and other jurisdictional agencies during construction.
WR-01a: Submit documentation of coordination 30 days prior to construction	SDG&E submitted a memorandum to the CPUC for the administrative record on November 5, 2010 documenting its coordination efforts related to recreational areas and trails. SDG&E has coordinated with the USFS, BLM and County of San Diego regarding recreational areas and trails.

Mitigation Measure and APM	Status
WR-01b: Coordinate temporary detours of trails 60 days prior to construction	SDG&E began coordination efforts with the Trails Coordinator for San Diego County on June 21, 2010. Coordinating with the County 60-days prior to construction has been fulfilled. Coordination efforts are on-going and will continue throughout the preconstruction and construction phases of the project. Two memos documenting coordination efforts were submitted to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01b: Site new trail segments to avoid sensitive resources and restore to pre-construction conditions	This measure will be implemented during construction.
WR-01b: Post public notices at trail detours	This measure will be implemented during construction.
WR-01b: Submit documentation of coordination 30 days prior to construction	See WR-1a
WR-01c: Coordinate alternative recreation facilities 60 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01c: Post public notices at recreation facilities	This measure will be implemented during construction.
WR-01c: Submit documentation of coordination 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-02a: Relocate 500kV line along southern boundary of JAM properties	SDG&E relocated the overhead 500 kV transmission line along the southern boundary of JAM properties as required to minimize effects on BLM land, Forest Service land, and private property. This measure applies to both Links 1 and Link 2.
WR-02a: Submit memo and construction plans 120 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating a reroute of the BCD Alternative Revision to reduce effects on recreation. See page 2-47 of the PMR Determination Memorandum for additional detail and confirmation that this measure has been fulfilled.
WR-02b: Coordinate and submit route options for revising the Pacific Crest Trail	SDG&E began consultations and coordination efforts with the U.S. Forest Service (USFS), BLM, and Pacific Crest Trail Association (PCTA) in early May 2010 to develop route options to minimize the number of times the Pacific Crest Trail crosses the Modified Route D Alternative alignment. The Project Modification Report addresses the Pacific Crest Trail in PMR21, pages 4-81 through 4-84.
WR-03a: Coordinate to determine locations of tower sites and spur roads	SDG&E has made considerable effort to limit access roads and tower locations within recreational areas in coordination with the BLM, USFS, and County of San Diego. No access roads are located on trails (e.g. PCT, Trans-County Trail, etc.). The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to avoid recreational areas as much as feasible. Mitigation of impacts have been calculated in the Habitat Acquisition Plan and Habitat Management Plan submitted to the agencies on September 22, 2010 and approved by the Wildlife Agencies on November 10, 2010.
WR-03a: Coordinate 60 days prior to construction and submit documentation 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
AG-01a: Coordinate with property owners and tenants 60 days prior to construction	SDG&E has coordinated with agricultural property owners and tenants in order to ensure avoidance or minimization of interference with agricultural operations. On Link 2, SDG&E coordinated with the property owner regarding access to structure locations to minimize impacts to vineyards. SDG&E met with Mr. Westfall on October 21, 2009. A memorandum summarizing this coordination was submitted to CPUC on October 15, 2010 for their administrative record.
AG-01b: Restore disturbed soils 30 days after completion of construction clean-up	This measure will be implemented during construction.

Mitigation Measure and APM	Status
AG-01c: Coordinate with grazing operators 60 days prior to construction and 30 days after construction	<p>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.</p> <p>SDG&E has acquired a road easement (Cameron Truck Trail) from Tulloch landowners that crosses grazing lands. A new cattle gate was requested by Tulloch to address the containment and management of his cattle. The gate will be installed during construction of the access road.</p>
AG-03b: Consult and notify 60 days prior to erection of any structure affecting aerial applicator operations	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010 for their administrative record. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
AG-03b: Provide maps of the alignment on or near agricultural lands	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
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 selected ROW and tower locations were staked prior to the cultural resource field surveys.
C-01b: Protect potential and register-eligible resources from direct project impacts	<p>The Project Modification Report and Mapbook, which was 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 review of the National Register of Historic Places and consultation with the SHPO.</p> <p>The Final Class III Inventory, which was approved by the CPUC and BLM on June 2, 2010, identified one cultural resource site within Link 2 where project impacts cannot be avoided. An eligibility evaluation is in progress and an eligibility evaluation report will be submitted to the BLM, CPUC, SHPO, and Native American Tribes when complete.</p>
C-01b: Undertake additional studies if resources cannot be protected from direct impacts	One cultural resource site has been identified where impacts cannot be avoided. Where potentially NRHP- and/or CRHR-eligible cultural resources cannot be protected or avoided, additional studies will be completed and recommendations for mitigation will be made. An eligibility evaluation report will be developed and submitted when complete. This information will be provided in the project Historic Properties Treatment Plan.
C-01b: Incorporate results of studies in HPTP	A Historic Properties Treatment Plan (HPTP) will be developed as appropriate based on the results of the eligibility evaluation of the archaeological resources identified in the Class III Survey Report. The HPTP is currently pending. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when complete.
C-01b: Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	SDG&E will designate NRHP and/or CRHR resources as an ESA if within 50 feet of direct impact areas. These ESAs will be monitored by archaeological and Native American monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
C-01b: Erect protective flagging or other markers for ESA	If cultural resources sites identified on this link (or within 50 feet of the right-of-way) are determined to be eligible by the SHPO or Native American Tribes, protective fencing and markers will be used to designate areas that can be avoided as an ESA. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
C-01b: Develop and implement monitoring program as part of HPTP	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.
C-01c: Submit Historic Properties Treatment Plan	The Historic Properties Treatment Plan (HPTP) is currently being prepared. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when available.

Mitigation Measure and APM	Status
C-01d: Conduct data recovery investigations to reduce adverse effects	Data gathered during the eligibility evaluation phase will be summarized in the Historic Properties Treatment Plan (HPTP). Data-recovery methods, sample sizes, and recommended procedures will be detailed in the HPTP as appropriate. The proposed mitigation for resource impacts will also be presented in the HPTP. A data recovery report and documentation of other mitigation efforts will be prepared and submitted to the BLM and CPUC for review. Submittal and approval of the HPTP is currently pending.
C-01d: Submit field closure report prior to construction within 100 feet of affected resource	This mitigation measure will be fulfilled for those resource areas to which it applies.
C-01d: Submit final report of data-recovery investigations within 1 year of completing fieldwork	This mitigation measure will be fulfilled within one year of the completion of fieldwork.
C-01e: Implement archaeological monitoring at cultural ESAs	a qualified archaeologist will conduct full-time monitoring during ground-disturbing activities in ESAs. The Historic Properties Treatment Plan (HPTP), which is currently being prepared, will include locations of ESAs and protection boundaries. The HPTP will provide recommendations for further management and monitoring during construction.
C-01e: Qualification of archaeologists must be approved	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 were 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.
C-01e: Retain and schedule any required Native American monitoring	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.
C-01e: Submit cultural resources monitoring monthly reports during construction	This mitigation measure will be fulfilled during construction.
C-01e: Notify if any damage to cultural resource ESAs and divert work to a buffer distance	This mitigation measure will be fulfilled during construction.
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 2. 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. Any discoveries will be processed in the manner described in this measure and detailed in the HPMP and HPTP for this project.
C-02a: Assist and support MLD with reinterment location	SDG&E will provide all necessary support to the Most Likely Deceased (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, statutes 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 have been ongoing. Records of consultations are being held with the BLM. This measure will be satisfied during construction.
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.

Mitigation Measure and APM	Status
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 in the Historic Properties Treatment Plan (HPTP). Monitoring will be conducted per the HPTP and the Historic Properties Management Plan (HPMP). The HPMP was approved by the CPUC and BLM on July 15, 2010. The HPTP will be submitted to the CPUC, BLM, SHPO, and Native American Tribes for review and approval when complete.
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 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	This plan is being prepared by SDG&E and will be submitted for review and approval at least 30 days prior to project operation.
C-06a: Provide inventory to conduct visual analysis of all known and potential historic built environment resources in HPTP	All known historic built environment resources located within 0.5 mile of the project have been inventoried and will be included in the Historic Properties Treatment Plan (HPTP). Historic built environment resources that are eligible for nomination to the National Register were analyzed for visual impacts from the project. The HPTP is currently being prepared and will include mitigation measures for visual impacts. SDG&E will submit the HPTP to the BLM and CPUC for review and approval once it is available.
C-06e: Minimize visual intrusion of aboveground portion on Highway 80	Project design and location has taken this measure into account. There were no impacts to Old Highway 80 identified in this portion of the Project; therefore this measure is not applicable.
C-06e: Include protection plan for Old Highway 80 in HPTP	There are no portions of Old Highway 80 within Link 2 that require protection; therefore this mitigation measure is not applicable.
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	Cultural site inventories have been conducted. An HPTP is in preparation. Cultural resource sites have been avoided to the extent feasible and sites that cannot be avoided are being evaluated for National Register eligibility. Cultural resource sites in proximity to the project will be protected using Environmentally Sensitive Area designations.
CR-APM-02: Implement impact avoidance and APMs during construction	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, as appropriate.
CR-APM-03: Report within 24 hours any previously unidentified cultural resource discovered	This mitigation measure will be fulfilled during construction.
CR-APM-03: Suspend operations in the immediate area of the discovered cultural resource	This mitigation measure will be fulfilled during construction as needed.

Mitigation Measure and APM	Status
CR-APM-03: Evaluate the discovered resource and determine appropriate actions.	This mitigation measure will be fulfilled during construction as needed.
CR-APM-03: Develop and implement a treatment plan to mitigate impacts	The HPTP and HPMP provide direction for discovery and mitigation of impacts to cultural resource sites.
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	Historic properties have been surveyed and will be included in the HPTP. The HPTP will be submitted to the BLM and CPUC when available. Properties that cannot be avoided will be flagged as ESAs. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
CR-APM-06: Implement a plan if historic properties cannot be avoided	The Historic Properties Management Plan (HPMP), which was approved by the CPUC on July 15, 2010, identifies historic properties along the Project route. The Historic Properties Treatment Plan, which is currently being developed, will include details regarding the recordation, relocation, and data recovery of historic properties. This plan will be submitted to the CPUC and BLM for review and approval once complete.
CR-APM-07: Control impacts that can deteriorate historic	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement protective measures to minimize erosion and weeds	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement control measures to minimize vibration, dust, and fumes	This mitigation measure will be fulfilled during construction.
CR-APM-07: Minimize deterioration to buildings and structures	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement a plan if deterioration cannot be avoided	This mitigation measure will be fulfilled during construction.
CR-APM-08: Avoid and protect landscaping essential to historic property	SDG&E has consulted with the appropriate property owners to avoid impacts to historic properties. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating re-design of the alignment based on these consultations. The Project Modification report briefly discusses these reroutes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved by the BLM and CPUC through a Determination Memorandum on September 22, 2010.
CR-APM-08: Minimize intrusion to the historic setting	This mitigation measure will be fulfilled during construction.
CR-APM-09: Install permanent fencing, barriers, or controlled access	This mitigation measure will be fulfilled during construction.
CR-APM-09: Restrict construction and operation access	This mitigation measure will be implemented during construction.
CR-APM-09: Instruct construction and maintenance personnel to protect sensitive properties	Construction and maintenance personnel will be instructed in protection of sensitive properties.
CR-APM-10: Span conductors over historic property	A memo was submitted to the CPUC on September 13, 2010 documenting compliance with this mitigation measure. As part of the final design, SDG&E located project structures so that conductors span linear historic property to the extent feasible.
CR-APM-10: Boring shall avoid disturbance to historic property	Boring is not required to avoid historic properties on the overhead portion of the line; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
CR-APM-11: Implement standard practices on private land	SDG&E has conducted cultural surveys for areas not identified in the approved FEIR/EIS. The preconstruction component of this measure has been complete and SDG&E's standard practices will be implemented throughout the duration of the project.
CR-APM-12: Conduct cultural surveys for staging areas not yet identified	SDG&E has performed cultural surveys for staging areas not previously identified. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating a redesign of the alignment based on these surveys. The Project Modification report briefly discusses these changes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved by a Determination Memorandum dated September 22, 2010.
PAL-01a: Submit an inventory of significant paleontological resources	SDG&E has conducted and submitted a "Paleontological Records" report dated February 25, 2010 and a "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 based on Society of Vertebrate Paleontology guidelines and was approved by the BLM, CPUC and other agencies with jurisdiction on July 20, 2010.
PAL-01c: Conduct full-time paleontological construction monitoring	The areas that require paleontological monitoring have been identified and monitors will be present during ground disturbance activities.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	This mitigation measure will be fulfilled during construction.
PAL-01c: Divert construction activities when significant fossils are recovered	The approved Monitoring and Treatment plan specifies a process for the discovery of paleontological resources.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction. If it is determined that a variance is needed for construction noise, it will be applied for and obtained prior to construction.
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	The preconstruction component of this measure is complete. A Blasting Preparation and Protection Plan was submitted to the CPUC on July 7, 2010. If blasting is deemed necessary, a site-specific blasting plan will be submitted to the CPUC and implemented during construction.
N-02a: Restore damaged structure and compensate owner	This mitigation measure will be fulfilled post construction, as needed.
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 Construction Notification Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. The preconstruction component of this measure is complete. SDG&E will provide the CPUC with 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, which was approved by the CPUC on March 1, 2010, identifies the public liaison person who will 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.

Mitigation Measure and APM	Status
T-01a: Restrict lane closures or obstructions on major roadways	SDG&E submitted two memos to the CPUC for their administrative record documenting coordination regarding traffic issues. A memo documenting coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010. Lane closures are not anticipated to occur; however, if lane closures do occur this measure will be implemented during construction. Lane closures will be addressed in traffic plans as required by any encroachment permits required by the agencies.
T-04a: Provide temporary pedestrian access	Interference with pedestrian access is not anticipated to occur. However, if temporary closures of sidewalks and other pedestrian facilities do occur during construction, this measure will be implemented.
T-04a: Provide detours and signs for bike route closures	Bike route or path closures are not anticipated to occur. However, if bike route or bike path closures do occur during construction, this measure will be implemented.
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	Access agreements/easements will be obtained prior to any road work. Measures required in the agreement/easement will be implemented during construction.
T-07a: Conform to agency requirements if parking spaces are eliminated or relocated	The Construction Notification Plan addresses notification of the public through local newspapers and on-site postings when parking spaces may be temporarily eliminated or relocated. The Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. Impacts to parking are not anticipated. However, if parking spaces are eliminated or relocated as a result of construction, SDG&E will post "No Parking" signs 48 hours in advance to notify the public of potential short-term elimination of parking spaces.
T-09a: Prepare a Construction Transportation Management Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by Imperial County on August 19, 2010, San Diego County on September 29, 2010 and Caltrans on August 19, 2010. The Study revealed that there is only one area, Highway 67 on Link 5, where a CTMP will be required. Documentation of coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010.
T-11b: Provide notification when and where the line will be erected prior to construction	SDG&E has consulted with U.S. Customs and Border Patrol regarding the location of new transmission lines and towers. 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, which was approved by the CPUC and BLM in a Determination Memorandum on September 22, 2010, 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	In areas where a temporary lane closure is determined to be necessary, SDG&E will obtain required permits from Imperial County, San Diego County, and Caltrans. This measure will be satisfied during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans regarding traffic impacts.
T-APM-02b: Submit Detour Plans	In an area where detours are determined to be necessary, SDG&E will submit detour plans to Imperial County, San Diego County, and Caltrans. No detours will occur until detour plans are submitted to the appropriate agency and permits are obtained. This measure will be implemented during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans related to traffic impacts.
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 mitigation measure is not applicable.

Mitigation Measure and APM	Status
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	SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
T-APM-04a: Notify cities and counties regarding construction activities	SDG&E shall notify and provide required information to counties and cities prior to initiation of construction activities that could impact police, fire, ambulance and paramedic services.
T-APM-05a: Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	SDG&E has coordinated with school districts project-wide to discuss construction activities adjacent to school bus stops. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-05a: Consult with transit authorities 1 month prior to construction	SDG&E has coordinated with the Metropolitan Transit District to discuss construction activities and potential impacts to transit services. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-06b: Parking in San Diego County shall comply with County regulations and per an approved traffic control plan	This measure will be implemented during construction.
T-APM-08a: Obtain permit(s) if entering railroad right-of-way	No railroad crossing permits are required for Link 2; therefore, this mitigation measure is not applicable.
T-APM-09a: Underground utility facilities within 1,000 feet of an Officially Designated Scenic Highway	There will be no new or relocated utility facilities on Links 1, 2, or 5 within 1,000 feet of an Officially Designated Scenic Highway. Therefore, this measure is not applicable to Links 1, 2, or 5.
T-APM-10a: Ensure continuous access to properties	During construction, SDG&E will ensure that the construction contractor provides driveway access to businesses and residences.
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 secondary containment.
HS-APM-03: Develop applicable safety plans	The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS. Appropriate safety plans, such as a HMBP and/or SPCC Plan will be developed as the project progresses and storage locations are identified. Plans will be updated during construction as needed.
HS-APM-05: Investigate impacts of all contaminated sites	The Soil Management Plan was submitted to the CPUC on July 2, 2010 and approved on September 9, 2010. The Soil Management Plan addresses the requirements stipulated in this measure. The Phase 1 Environmental Site Assessment was submitted to CPUC on December 3, 2009 and provides additional information, as well as the results of the investigation.
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	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure HS-APM-9, Task 1, on September 10, 2010.

Mitigation Measure and APM	Status
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, acknowledged by the CAL Fire Chief, was submitted to the CPUC on December 14, 2009 and approved 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 approved by the CPUC on February 2, 2010. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP.
HS-APM-12: Develop a Traffic Control Plan	See T-9a
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-02a: Test farmed soil samples and submit sampling and testing plan 60 days prior to construction	The Sampling and Testing Plan was approved by the CPUC on May 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010.
P-02a: Submit laboratory results 30 days prior to construction	The Sampling and Testing Plan was approved on March 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010. The Soil Management Plan was approved by the CPUC on September 9, 2010. This measure is complete for all project areas with the exception of one property in Link 5 associated with structures CP63 and CP64.
P-02a: Follow regulatory procedures for handling and disposal of contaminated soil	Excavated materials containing elevated levels of pesticide or herbicide will be managed in compliance with the Soil Management Plan approved by the CPUC on September 9, 2010.
P-02a: Use effective dust suppression procedures	During construction, effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public.

Mitigation Measure and APM	Status
P-02a: Consult regulatory agencies for handling, treatment, and/or disposal	Regulatory agencies for the State of California (DTSC or RWQCB) and San Diego County will be contacted by SDG&E or its contractor to plan handling, treatment, and/or disposal options.
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.
P-07a: Implement steps 60 days prior to construction if excavation will occur	The Soil Management Plan was approved by the CPUC on September 9, 2010 as fully addressing the requirements of this measure. A Phase 1 Environmental Site Assessment was submitted to the CPUC for review on December 2, 2009. In the event that new areas requiring ground disturbance are identified during construction, a Phase 1 will be conducted and submitted to the CPUC prior to construction in those areas.
PS-01a: Limit conductor surface gradient	SDG&E submitted a memorandum to the CPUC on September 30, 2010 demonstrating that SDG&E has limited the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.
PS-02a: Identify objects within and near ROW for induced voltages and implement electrical grounding	A memorandum addressing completion of this measure was submitted to the CPUC on September 30, 2010 and approved on October 6, 2010.
AQ-01a: Pave, apply water 3 times daily, or apply soil stabilizers	A Dust Control Plan was submitted to the CPUC and approved on January 20, 2010. This measure will be implemented during construction, as well as the measures specified in the Dust Control Plan.
AQ-01a: Pre-water sites 48 hours prior to clearing	This mitigation measure will be fulfilled during construction.
AQ-01a: Reduce amount of disturbed area	This mitigation measure will be fulfilled during construction.
AQ-01a: Spray stock-piles daily or as needed	This mitigation measure will be fulfilled during construction.
AQ-01a: Cover loads in trucks or maintain 6 inches of free-board	This mitigation measure will be fulfilled during construction.
AQ-01a: Pre-moisten import and export dirt prior to transport	This mitigation measure will be fulfilled during construction.
AQ-01a: Sweep public streets daily if soil tracking visible	This mitigation measure will be fulfilled during construction.
AQ-01a: Plant vegetative ground cover following construction	This mitigation measure will be implemented immediately following construction.
AQ-01a: Apply soil stabilizers or water on inactive work areas	This mitigation measure will be fulfilled during construction.
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 at the yard. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. 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.

Mitigation Measure and APM	Status
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.
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. A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout the Project.
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-01k: File hazardous substance plan within 1 year of license issuance	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and receive authorization from the USFS prior to starting work on USFS lands.
H-01k: Confine vehicles to roads identified in a Road and Traffic Management Plan	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and implement the approved Road and Transportation Management Plan.
H-01k: File an Erosion Control Measure Plan prior to construction	The SWPPP and NPDES permit associated with WDID #937C357500 was submitted to the CPUC and USFS on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts. This measure is only applicable to USFS-managed lands.
H-01k: Submit NEPA analysis prior to ground disturbing work	The Final Environmental Impact Report/Environmental Impact Statement was submitted to the USFS for analysis. The Project Modification Report and Mapbook, was submitted to the USFS on May 14, 2010. This measure is only applicable to USFS-managed lands.

Mitigation Measure and APM	Status
H-01k: Enter into a cost recovery agreement with the Forest Service	A cost recovery agreement with USFS will be determined before ground disturbing activities may proceed on USFS-managed lands. This measure is only applicable to USFS-managed lands.
H-01k: File a Water Resources Management Plan within 6 months of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. The SWPPPs and NPDES permits associated with the following WDID #s 937C358169 and 937C358216 were submitted to the CPUC on September 15, 2010. Qualified Stormwater monitors will be on-site during construction monitoring erosion control. This results will be documented in the weekly monitoring report. This measure is only applicable to USFS-managed lands.
H-01k: File a plan for ground and surface water management within 1 year of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. Groundwater supplies will not be used during project construction; therefore, this component of H-01k is not applicable. This measure is only applicable to USFS-managed lands.
H-01l: Submit a site-specific sediment control plan and SWPPP prior to construction	The SWPPP and NPDES permit associated with WDID #9 37C357500 were submitted to the CPUC and USFS on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during the construction to prevent and avoid hydrologic impacts.
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	A Wells and Springs Survey was submitted to CPUC on July 7, 2010 to address this mitigation measure prior to construction. This report was approved by CPUC on September 2, 2010. During construction, if blasting is determined to be necessary near a surveyed well or spring, SDG&E's contractor will prepare a blasting plan that addresses protection of the nearby well or spring.
H-06a: Determine which towers require scour protection during design phase	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.
H-06a: Submit evaluation and design plans 60 prior to constructing towers	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.
H-07a: Submit a Hazardous Substance Control and Emergency Response Plan 60 days prior to construction	<p>A memo was submitted to the CPUC for their administrative record on September 15, 2010 documenting compliance with this mitigation measure and provides the Waste Discharge Identification numbers assigned by the California State Water Resources Control Board. WDID numbers associated with Link 2 include: 937C358169 and 937C358216.</p> <p>Two site-specific SWPPPs have been developed for Link 2. These SWPPPs contain procedures (Section 8.0) to reduce the potential of spills and emergency response information to ensure quick and safe clean-up of spills. In addition, hazardous materials management is addressed in the Spill Prevention, Control and Countermeasure (SPCC) plans and Hazardous Materials Business Plans developed for the Project.</p>
WQ-APM-01: Minimize disturbance to water resources	This mitigation measure will be implemented during construction. Grading plans, which were submitted to the CPUC on September 2, 2010, demonstrate how disturbance to water resources will be minimized. In addition, the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, addressed changes to the final alignment to reduce impacts to water resources.
WQ-APM-02: Avoid sensitive water features	<p>A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-2, on August 30, 2010.</p> <p>Impacts to jurisdictional features were considered during design of the project and have been avoided, to the extent feasible. The locations of the structures are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved through a Determination Memorandum dated September 22, 2010.</p>

Mitigation Measure and APM	Status
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. Surface disturbing activities will not be allowed to begin until the sites have been clearly marked, fenced or flagged to delineate those areas specifically allowed for use and those areas that are restricted.
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 locations of the structures are shown in the PMR Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by CPUC and BLM through a Determination Memorandum dated September 22, 2010.
WQ-APM-04: Prepare and implement erosion control BMPs per the SWPPP	The SWPPPs and NPDES permits associated with the following WDID #s 937C358169 and 937C358216 were submitted to the CPUC on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts.
WQ-APM-04: Select upland pull sites to minimize disturbance to water resources	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.
WQ-APM-04: Do not place structures in streambeds or drainage channels	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.
WQ-APM-05: Construct stream crossings and develop a mitigation and restoration plan	Stream crossings will be constructed at low flow periods. A mitigation and restoration plan has been developed as part of the HMMP and was submitted to the agencies on July 14, 2010. A revised plan was submitted on October 8, 2010 to address agency comments. This mitigation measure will be implemented during construction.
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	This mitigation measure will be fulfilled during construction.
WQ-APM-06: Conduct interviews with affected landowners prior to construction	Groundwater supplies will not be used during project construction; therefore this mitigation measure is not applicable.
WQ-APM-06: Negotiate with landowners to provide alternative water supplies	Groundwater supplies will not be used during project 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 used during project construction; therefore this mitigation measure is not applicable.

Mitigation Measure and APM	Status
WQ-APM-08: Contain and sample if dewatering and then release water according to test results	Discharge of groundwater and dewatering is not anticipated during construction. If it is later determined that dewatering is necessary, SDG&E will implement this measure as described.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	This mitigation measure will be fulfilled during construction.
WQ-APM-10: Minimize stream bank erosion	See H-06a
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 SWPPPs and NPDES permits associated with the following WDID #s 937C358169 and 937C358216 were submitted to the CPUC on September 15, 2010. The conditions of the permits and SWPPPs will be implemented and enforced during the construction to prevent and avoid hydrologic impacts.
WQ-APM-15: Adjust route of access roads to avoid sensitive features	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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011. Also see BIO-APM-05.
WQ-APM-15: Use existing roads or cross-country access routes	This mitigation measure will be fulfilled during construction.
WQ-APM-15: Clearly mark approved construction traffic routes	This mitigation measure will be fulfilled during construction.
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	SDG&E has located staging/storage areas for equipment and materials outside of riparian areas. This is demonstrated in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010.
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 Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. CPUC issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04a: Submit site-specific seismic analyses 60 days prior to final project design	A Geotechnical Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. An explanation of structure design based on windloading instead of seismic loading is included in the Executive Summary. The final project design is based on the findings of this report. CPUC's geotechnical consultant issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04b: Submit liquefaction studies 60 days prior to final project design	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. SDG&E will conduct additional geotechnical exploration, including borings, as soon as authorization is received from the appropriate land-managing agency. A supplemental report will be provided prior to installation of structures.

Mitigation Measure and APM	Status
G-06a: Submit slope stability analyses 60 days prior to construction	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. A report titled Geotechnical Evaluation, Access Roads and Structure Pads (dated October 16, 2009) was submitted to CPUC for review and approval on May 28, 2010. These reports included slope stability analyses as described in this measure. The final project design is based on the findings of these reports. As required by the CPUC memo dated June 18, 2010, additional investigations for landslide and rock fall hazards will occur in areas along Segment 8A of Link 2 prior to construction in this area.
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 implemented during construction.
GEO-APM-03: Avoid placing structures in areas of high shrink/swell potential	The 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	See G-6a
GEO-APM-05: Implement construction to avoid or minimize new soil disturbance	The preconstruction portion of this measure is complete. Final grading and plan and profiles were submitted to the CPUC on September 2, 2010. Project construction activities were designed to avoid or minimize new disturbance and erosion on manufactured slopes. SDG&E will adhere to the grading plans and the SWPPP during construction.
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	Erosion control will be implemented under Project site-specific SWPPPs and shall include areas where re-contouring and substantial ground disturbance will be required. This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction.
GEO-APM-09: Consult with agencies if paleontological resources cannot be avoided	This mitigation measure will be fulfilled during construction.
PSU-APM-01: Coordinate with utility providers	There are no third party utilities that will be affected by the project on Link 2; therefore, this mitigation measure is not applicable. A memo was submitted to the CPUC documenting compliance with Mitigation Measure PSU-APM-1 on October 14, 2010 and approved November 5, 2010.
PSU-APM-02: Notify Underground Service Alert 48 hours prior to earth-disturbing activities	This mitigation measure will be implemented during construction.
PSU-APM-03: Minimize disruption to response times and access for emergency and police services	This mitigation measure will be implemented during construction.
S-02a: Provide copies of posted public notices of planned outages	This measure will be implemented during construction. Copies of notices and dates of public notification shall be provided to the CPUC and BLM prior to any planned outage.
S-03a: Provide documentation to show amount of waste recycled	This mitigation measure will be implemented during and following the completion of construction.

Mitigation Measure and APM	Status
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. In addition, an Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011. SDG&E will obtain a variance for the use of reclaimed water outside of the Padre Dam and City of San Diego jurisdictions. Potable water will be used until the variance is obtained. Copies of variances will be submitted to the CPUC prior to use of 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, and Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011.
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 January 20, 2010.
F-01a: Receive approval of final Plan 30 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and approved by the CPUC on January 20, 2010.
F-01a: Implement Fire Plan during construction and maintenance	The preconstruction component of this measure has been completed. A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on January 20, 2010. The Construction Fire Plan includes the requirements of this mitigation measure and will be implemented and enforced during construction.
F-01c: Do not obstruct firefighting equipment or crews	This measure will be implemented during construction.
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	This measure will be implemented during construction.
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.
F-02b: Relocate 69 kV lines onto non-specular steel poles using vertical conductor construction	SDG&E has incorporated non-specular steel poles into the project design in compliance with this mitigation measure. SDG&E provided the CPUC with final construction drawings on September 2, 2010.
F-03a: Contribute annually to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. This mitigation measure will be implemented during and following construction.
F-03b: Create and implement a Multi-agency Fire Prevention MOU	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU.

Attachment A: Preconstruction Status Report

Friday, March 25, 2011

10:45:00 AM

Report Criteria:

AGENCY: BLM

LOCATION: Link 5

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

 -To Be Implemented During Construction

 -Pending OR To Be Implemented Immediately Prior to Construction

 -Complete

 -Not Applicable

Location: Link 5

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, which was submitted on May 14, 2010 and approved by the BLM and CPUC in a Determination Memorandum 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 Project will impact sensitive vegetation communities on lands already in use as mitigation. A Habitat Acquisition Plan, which discusses doubled mitigation ratios on lands already in mitigation, was submitted for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies as described in the G-CM-17 of the reinitiated Biological Opinion, dated November 10, 2010.
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	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction.
B-01a: Post signs on access road gates prohibiting unauthorized users	This mitigation measure will be fulfilled during construction.
B-01a: Provide funding for off-road vehicle patrols	SDG&E has coordinated with land managers regarding unauthorized use of access roads by off-road vehicle enthusiasts, including funding of off-road vehicle patrols and gate installation. A memo was submitted to CPUC for the administrative record on October 26, 2010 documenting coordination.
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 Conservation Measure G-CM-6 of the reinitiated Biological Opinion, dated November 10, 2010.
B-01a: Submit a Habitat Restoration Plan	SDG&E submitted the Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas to the CPUC, BLM, USFS and Wildlife Agencies for review and approval on September 24, 2010. A revised plan incorporating agency 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), as noted in Conservation Measure G-CM-16 (page 33 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 shall 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on February 4, 2010. The HAP was further refined and resubmitted on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP 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 to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The 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, should a project-caused fire occur.
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 accepted by the Army Corps of Engineers on August 27, 2010.
B-02a: Mitigate impacted areas as required by wetland permitting	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Attachment 2 of the permit provides a summary of the impacts to wetlands and the required mitigation. Enclosures 4 and 5 of the permit provide detailed lists of the wetlands and their locations.
B-02a: Prepare jurisdictional delineation and impact assessment	The entire 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. Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010 for the administrative record.
B-02a: Mitigate for jurisdictional wetland habitat	SDG&E received Nationwide Permit #12 under Section 404 of the Clean Water Act on January 7, 2011 for impacts to Waters of the U.S., including wetlands. Mitigation requirements and ratios are stipulated on pages 2 through 8 of the permit.
B-02a: Obtain wetland permits prior to construction	The 401 Water Quality Certification was issued on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was issued on January 7, 2011.

Mitigation Measure and APM	Status
B-02a: Delineate all limits of construction	The Project Modification Report and Mapbook, which was 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	This mitigation measure will be fulfilled during construction.
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 submitted a 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 Army Corps of Engineers, California Department of Fish and Game, and State Water Resources Control Board in concept; however, the agencies have asked that the plan be reformatted to break out each mitigation property. The revised plans (one for each of the five mitigation sites) were submitted to the agencies on November 30, 2010 and accepted on December 16, 2010. This plan was prepared by a qualified habitat restoration specialist and will be implemented by a qualified habitat restoration specialist.
B-02a: Submit a Habitat Management Plan that includes jurisdictional areas	The Habitat Management Plan (HMP) was submitted to the CPUC, BLM, Wildlife Agencies, and the USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
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	This mitigation measure will be fulfilled during/post construction.
B-03a: Submit monthly wash logs during construction and annual logs during operation/maintenance	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 2010 rare plant survey, which included all project areas as described in the Project Modification Report, was approved by the USFWS on December 22, 2010 and the CPUC on January 19, 2011.
B-05a: Stake or flag special status plant populations	Special status plant populations will be staked or flagged immediately prior to construction by a qualified biologist.
B-05a: Avoid impacts to federal and state listed plant species	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 sensitive resource areas that may be disturbed. As noted in the revised Biological Opinion, dated November 10, 2010, SDG&E will not impact any listed plant species during construction activities for this project (see pages 3-4 of the Biological Opinion).

Mitigation Measure and APM	Status
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 and approved on January 3, 2011.
B-05a: Avoid impacts to moderately sensitive plant species	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 and approved on January 3, 2011.
B-05a: Submit a Restoration Plan for special status plant species	No federal or state listed plant will be impacted by construction activities on the project; however moderately sensitive plant species will be affected. SDG&E has prepared a Restoration Plan for Special Status Plants. This plan was submitted to the agencies for review on November 29, 2010 and approved on January 3, 2011.
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: Conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season September 16-March 14	Grading and brushing in least Bell's vireo and southwestern willow flycatcher habitat will occur as outlined in this mitigation measure.
B-07e: Survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work in area	The Riparian Bird Survey Report for 2009 was submitted to CPUC for review on January 10, 2010. The 2010 Riparian Bird Survey Report was submitted to the agencies on October 28, 2010 and approved by the CPUC on November 2, 2010 and the Wildlife Agencies on November 10, 2010. Least Bell's vireo were observed near milepost 101. No construction impacts are expected to occur to least Bell's vireo, but preconstruction surveys will be conducted as required by this mitigation measure.
B-07e: Survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present	This mitigation measure will be fulfilled during construction.
B-07e: Establish 300-foot buffer if active nest found	This mitigation measure will be fulfilled during construction.
B-07e: Monitor noise if construction occurs within buffer	This mitigation measure will be fulfilled during construction.
B-07e: Provide mitigation for temporary and permanent impacts	A Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion. The Habitat Acquisition Plan discusses mitigation for impacts to least Bell's vireo occupied habitat, although no permanent impacts are expected to occur to occupied or critical habitat on Link 5.
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 was submitted to CPUC for review on January 14, 2010. The 2010 Riparian Bird Survey Report was submitted to CPUC on October 28, 2010. A Habitat Management Plan was submitted to the CPUC on September 22, 2010. The plan was approved by the Wildlife Agencies as described in G-CM-17 of the reinitiated Biological Opinion, dated November 10, 2010.
B-07h: No activities within 4,000 ft. of eagle nest during breeding season	Data was obtained from the USFS and BLM regarding potential eagle nest locations for 2009. 2010 surveys were performed by SDG&E. This measure will be implemented during and post construction.

Mitigation Measure and APM	Status
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 protocol 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. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
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 mileposts 116.5, 110, 79 to 80, 74.5, 71, and 36. These surveys results were accepted by the Wildlife Agencies (as described in the revised Biological Opinion dated November 10, 2010) and by the CPUC on January 21, 2011.
B-07i: Mitigation required if survey non-conclusive for determining QCB presence	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 protocol 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. Survey results indicate QCB were found near mileposts 110 and 116 on Link 5. All QCB surveys have been conclusive for the project.
B-07i: Submit a Habitat Management Plan that addresses offsite mitigation for QCB habitat	Survey results indicate QCB were found near mileposts 110 and 116 on Link 5. A Habitat Management Plan has been submitted to the agencies for approval on September 22, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion.
B-07j: Conduct pre-construction protocol survey for arroyo toad	USFWS protocol-level arroyo toad (ARTO) surveys were conducted in 2009 and 2010. The 2009 ARTO Survey Report was submitted to the CPUC on October 2, 2009 and re-submitted to CPUC on January 14, 2010 to address their comments. On August 26, 2010, the CPUC advised that their comments were not fully addressed in the January 14, 2010 re-submittal; however, on September 2, 2010 the CPUC advised that these comments could be addressed in the upcoming 2010 ARTO Survey Report. Based on the 2009 and 2010 survey results, no ARTO have been observed on Link 5.
B-07j: Remove toad riparian breeding habitat October-December	This mitigation measure will be fulfilled during construction.
B-07j: Install exclusion fencing if toad is present and monitor daily during construction	If arroyo toads are present, or assumed to be present, exclusion fencing will be installed as outlined in this measure. Exclusion fencing will be monitored during construction and observations will be summarized and submitted to the CPUC in the weekly report.
B-07j: Conduct pre- and post-exclusion fencing surveys	Clearance surveys shall occur as outlined in this measure.
B-07j: Conduct daily surveys in the morning prior to work activities	This measure will be implemented during and post construction.
B-07j: Mitigate for the loss of occupied arroyo toad habitat	Loss of arroyo toad-occupied habitat shall be mitigated as outlined in this measure.
B-07j: Submit a Habitat Management Plan that includes arroyo toad habitat	A Habitat Management Plan was submitted to the appropriate agencies for review and approval on September 22, 2010. This plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion (G-CM-17).
B-07l: Conduct brushing or grading in occupied gnatcatcher habitat outside breeding season February 15-August 30	This mitigation measure will be fulfilled during construction.
B-07l: Conduct gnatcatcher survey within 10 days of initiating other activities in area and submit to agencies	Nesting surveys for coastal California gnatcatcher will be conducted by a qualified biologist within 10 days of construction. Results of the surveys will be submitted to Wildlife Agencies for review and approval.
B-07l: Establish 300-foot buffer if active nest found	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
B-07l: Mitigate the loss of occupied habitat and unoccupied designated critical habitat	The Habitat Acquisition Plan discusses mitigation for impacted habitat. A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. This plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010. This mitigation will be implemented during construction.
B-07l: Submit a Habitat Management Plan that addresses the coastal California gnatcatcher and its habitat	A Habitat Management Plan has been submitted to the appropriate agencies for review and approval on September 22, 2010. This plan was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010.
B-08a: Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	This mitigation measure will be fulfilled during construction.
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 to the agencies.
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. A 2009 Bat Survey Report Amendment-Report and 2009 Bat Survey Amendment - Appendix 1 were submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. If bat nursery colonies are observed during construction, this mitigation measure will be implemented.
B-10a: Install transmission lines using Avian Power Line Interaction Committee standards	SDG&E will install transmission lines as outlined in this mitigation measure. Where diverters/markers have been installed, a study will be funded as outlined in this measure. SDG&E has submitted an Avian Monitoring and Mitigation Plan to the CPUC, CDFG, BLM, USFWS and USFS for review and approval on November 11, 2010. This plan will be implemented during project operation.

Mitigation Measure and APM	Status
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. Per G-CM-32 of the Revised Biological Opinion dated November 10, 2010, surveys for federally listed species have been deemed complete by the Wildlife Agencies. The following survey reports for the 2010 survey season have been approved: 2010 Riparian Bird Survey Report; 2010 Arroyo Toad Survey; 2010 Rare Plant Survey; 2010 Quino Checkerspot Butterfly Report; and 2010 Coastal California Gnatcatcher Survey Report. The 2010 Bat Survey Report is currently pending and is expected to be submitted in March 2011.
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 and submit survey results to the USFWS and CDFG should access road construction occur during nesting season or if it is not feasible to keep vehicles on existing access roads.
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	Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings.
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	To the extent possible, access roads shall be constructed as outlined in this mitigation measure.
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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011.
BIO-APM-05: Minimize disturbance from construction and maintenance activities	This mitigation measure will be fulfilled during construction.
BIO-APM-06: Comply with all applicable environmental laws and regulations	This mitigation measure will be fulfilled during 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.
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.

Mitigation Measure and APM	Status
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.
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 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 entered into SDG&E's mitigation measure tracking system and Sempra's system-wide mapping 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	This mitigation measure will be fulfilled during and post construction.
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	During construction, access roads will be constructed as outlined in this measure. In addition, SDG&E has secured required permits for access road construction that will impact sensitive water features. More specifically, the 401 Water Quality Certification was issued on November 15, 2010, the California Department of Fish and Game Streambed Alteration Agreement (SAA) was issued on on November 17, 2010, and the ACOE 404 permit was issued on January 7, 2011.
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). The BO was reinitiated and finalized on November 10, 2010.
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	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	This mitigation measure will be fulfilled during construction.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction.
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-Report and 2009 Bat Survey Amendment were 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	Construction of Link 5 of the Sunrise Powerlink Project will occur during daytime hours, as directed by local county ordinances. No night construction is anticipated and construction night lighting is not anticipated to be needed, therefore, this mitigation measure does not apply. Should night lighting be deemed necessary during construction, SDG&E will comply with this mitigation measure.
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	See B-1c
G-CM-02: Use SDG&E's Water Quality Construction BMP Manual.	See WQ-APM-4. This mitigation measure will be implemented during construction.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	See WQ-APM-14
G-CM-04: Training to implement conservation measures.	See BIO-APM-2
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.	Final Grading Plans and Plan and Profiles has been submitted to the CPUC on September 2, 2010. Project activities will be confined to areas noted in final engineering drawings. Also see BIO-APM-4.
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

Mitigation Measure and APM	Status
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
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 extend 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-1a 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 5. No desert scrub or dune habitats exist along Link 5.
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.

Mitigation Measure and APM	Status
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
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 and BIO-APM-4
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	See B-1a
G-CM-31: Mowing of access roads to maintain access for maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	See B-5a and BIO-APM-1
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8
G-CM-34: Native Tree Restoration	The Habitat Acquisition Plan discusses mitigation for loss of native trees. A Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. Tree mitigation will occur as described in the Habitat Acquisition/Habitat Management Plan which was approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	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

Mitigation Measure and APM	Status
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. The Project site specific SWPPPs designate where fueling is permitted to occur. Unless otherwise indicated in the SWPPPs, all other areas are considered "No-Fueling Zones".
G-CM-42: Maintain riparian buffer construction/staging areas and riparian areas.	This mitigation measure will be implemented during construction.
G-CM-44: Determine project limits for temporary and permanent disturbance to occur during maintenance activities.	Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010. Project and survey activities will be confined to areas noted in final engineering drawings. The preconstruction component of this measure is complete. Adherence to the right-of-way limits and approved work areas will occur during construction.
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	This mitigation measure will be implemented during construction.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	This measure will be implemented if construction and O&M activities occur during the gnatcatcher breeding season within suitable gnatcatcher habitat.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	This mitigation measure will be implemented during construction.
SS-CM-05: Conduct construction and O&M activities outside the vireo breeding season or implement pre-activity surveys	This mitigation measure will be implemented immediately prior to construction during the vireo breeding season.
SS-CM-05: Survey for nesting vireos	This mitigation measure will be implemented during construction if vireos are present.
SS-CM-06: Purchase and manage suitable vireo habitat	This mitigation measure will be implemented during construction.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	This measure will be implemented during construction.
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Site-specific restoration will be developed as stated in this mitigation measure. Site-specific restoration will be developed during construction and will be based on actual temporary impacts to Quino habitat.
SS-CM-10: Purchase and manage occupied Quino habitat	This mitigation measure will be fulfilled during construction.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	This plan will be implemented during construction.
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	This mitigation measure will be implemented during construction.
SS-CM-13: No construction activities within arroyo toad breeding habitat.	This measure will be implemented during construction.

Mitigation Measure and APM	Status
SS-CM-14: Remove all temporary exclusion and construction fencing at conclusion of construction.	All temporary exclusion fencing installed during construction will be removed, during or following construction, once protection measures are no longer required.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	This mitigation measure will be implemented during construction to compensate for habitat impacts to arroyo toad habitat along Link 5.
SS-CM-16: Prohibit construction and O&M activities during lambing season	Peninsular bighorn sheep do not occur on Link 5; therefore, this mitigation measure is not applicable.
SS-CM-17: Restore suitable bighorn sheep habitat	Peninsular bighorn sheep does not occur on Link 5; 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 5; 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 5; 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 5; 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 5 ; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund Monitoring Program for PBS	Peninsular bighorn sheep do not occur on Link 5; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund aerial surveys for PBS	Peninsular bighorn sheep do not occur on Link 5; therefore, this mitigation measure is not applicable.
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 pre-construction component of this measure has been completed. The location of staging, material and equipment storage areas and helicopter fly yards are shown in the Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the CPUC and BLM on September 22, 2010. The Construction Yard Visual Screening Plan also shows the location of these yards and illustrates how these areas will be visually screened with temporary screening fencing. The Construction Yard Visual Screening Plan submitted to the CPUC, City of San Diego, BLM and USFS on August 4, 2010 and to Helix Water District on August 19, 2010. The Construction Yard Visual Screening Plan was approved by the CPUC on October 19, 2010.

Mitigation Measure and APM	Status
V-01a: Submit final construction plans 60 days prior to construction	Final construction grading plans and Plan and Profile drawings were submitted to the CPUC, BLM, USFS, County of San Diego and Helix Water District on September 2, 2010.
V-01b: Design and install lighting to avoid night lighting impacts	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-01b: Submit a Construction Lighting Mitigation Plan 90 days prior to construction	SDG&E submitted a Construction Lighting Mitigation Plan to the CPUC as outlined in this mitigation measure on November 30, 2010. The CPUC approved the plan on January 31, 2011.
V-02a: Construct access and spur roads at appropriate angles	Construction of access or spur roads shall occur as outlined in this measure.
V-02a: Consult with visual resources specialist to evaluate access road visibility prior to final design	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010. The final design of access roads was based on coordination with several visual resource specialists.
V-02a: Submit table 60 days prior to construction	A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, which showed the location of each structure and the alignment of the access roads. The final design of access roads was based on coordination with several visual resource specialists.
V-02a: Submit final construction plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC for the administrative record on September 2, 2010.
V-02b: Revegetate boundaries of disturbed areas	This mitigation measure will be fulfilled during construction.
V-02b: Return graded roads to pre-construction conditions	This measure will be fulfilled during construction.
V-02b: Create barriers for public access if opened as a construction route	This mitigation measure will be fulfilled during construction.
V-02b: Submit final construction and restoration plans 60 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC and BLM on May 24, 2010 and approved by the BLM and CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the access roads based on coordination with several visual resources specialists. Final Grading Plan and Profiles were submitted to the CPUC on September 2, 2010.
V-02c: Treat disturbed soils visible from sensitive public viewing locations	SDG&E submitted a Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas on September 24, 2010. This plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010. During construction, SDG&E will consult with the Authorized Officer regarding the site-by-site use of Eonite. This measure is only applicable to non-Forest lands.
V-02c: Submit final construction and restoration plans 60 days prior to construction	SDG&E has submitted Final Grading Plans and Plan and Profile drawings on September 2, 2010 for the overhead portion of the project. A Restoration Plan for Temporary Impacts to Sensitive Vegetation Communities was submitted on September 24, 2010; this plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 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.
V-02d: Conduct Agency Consultations 120 days prior to construction	SDG&E has coordinated with the appropriate agencies and received approvals 120 days prior to construction. The Project Modification Report and Mapbook, which was submitted on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment and incorporates a redesign of the alignment based on this coordination.
V-02f: Limit vegetation clearing	This measure will be implemented during construction on USFS-managed lands.

Mitigation Measure and APM	Status
V-02f: Incorporate mitigation to reduce total visual impact	The Scenery Conservation Plan, which was approved by the USFS in March 2011, discusses mitigation to reduce the total visual impact of vegetation clearing on USFS-managed lands. The preconstruction component of this measure is complete.
V-02f: Submit Scenery Conservation Plan at least 120 days prior to construction	The Scenery Conservation Plan was approved by the USFS in March 2011. The preconstruction component of this measure is complete.
V-03a: Conductors shall be non-specular	SDG&E submitted a memorandum to the CPUC on September 30, 2010 demonstrating that SDG&E has ordered non-specular conductor in order to reduce conductor visibility and visual contrast of conductors and towers in compliance with this measure.
V-03a: Consult with a visual resources specialist to evaluate new access roads	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.
V-03a: Submit a table 60 days prior to construction	The final design of the alignment incorporates a redesign and elimination of access roads based on coordination with several visual resources specialists. The Project Modification Report, which was 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 these changes.
V-45a: File Scenery Conservation Plan within 1 year after license is issued for USFS	The Scenery Conservation Plan was submitted to the USFS for review in December 2010. The USFS approved the Plan in March 2011. SDG&E prepared a Scenery Conservation Plan, which was submitted to the USFS for review in December 2010. The USFS approved the plan in March 2011.
V-66a: Reconsider the location of transition structures	According to the CPUC's visual resources consultant and documented on October 6, 2010, the relocation of the Chocolate Canyon transition cable poles as shown in the April 30, 2010 Mapbook demonstrates compliance with the requirements of V-66a.
V-68a: Eliminate skylining of ridgeline towers and conductors when viewed from Moreno Boulevard or SR67	The Project Modification Report, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, discusses changes in PMR 34 and PMR 35 regarding skylining of towers. The modifications allowed for the reduction in the number of towers, but did increase the elevation of other towers; these changes were approved through the Determination Memorandum.
V-68a: Submit final construction plans 120 days prior to construction	The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010 demonstrates compliance with this measure. Final construction plans for the overhead alignment were submitted to the CPUC on September 2, 2010.
VR-APM-01: Place structures at maximum distance from crossings	The Project Management Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved on September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to reduce visual impacts at highway, canyon, and trail crossings.
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	SDG&E did not locate structures directly in front of residences or in direct line-of-sight from residences, where possible. SDG&E consulted with affected property owners on the proposed structure locations to reduce land use and visual impacts. SDG&E has coordinated with affected landowners in accordance with MM L-2b.
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 for site specific areas of the Project.

Mitigation Measure and APM	Status
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 for site specific areas of the Project.
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 for site specific areas of the Project.
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-01c: Provide project engineering details to MCAS Miramar 90 days prior to construction	SDG&E and Miramar had a coordination meeting on March 5, 2010. A copy of the minutes from that meeting were submitted to the CPUC on May 19, 2010 for their administrative record. During that meeting SDG&E provided engineering details to MCAS Miramar for review and approval. No work will occur on MCAS until authorization has been received from MCAS. THIS MEASURE IS APPLICABLE TO MCAS MANAGED LANDS ON LINK 5 ONLY. CONSTRUCTION ON MCAS MANAGED LANDS WILL NOT COMMENCE UNTIL AN AUTHORIZATION TO PROCEED HAS BEEN RECEIVED FROM MCAS.
L-01c: Provide evidence of coordination 60 days prior to construction	SDG&E and Miramar had a coordination meeting on March 5, 2010. A copy of the minutes from that meeting were submitted to the CPUC on May 19, 2010 for their administrative record. SDG&E is continuing to meet with Miramar and will continue to provide CPUC and BLM with documentation of this on-going coordination.
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 the CPUC on May 14, 2010 and approved by the BLM and the 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 alignment along Highway 67 was shifted as shown on the Project Modification Report (PMR) Map Book page MS-134 and is located further away from the preserve as shown in the PMR that was approved on September 22, 2010.

Mitigation Measure and APM	Status
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	SDG&E placed new structures more than 330 feet from existing residences to the extent feasible. Only two structures are closer than 330 feet to a residence and were not able to be moved. These structures include CP-7 (located on Link 5) and EP-228 (located on Link 1).
LU-APM-03: Compensate farmers for loss of crops	One agricultural operator has been compensated for loss of crops (oat hay). This compensation is summarized in a memo submitted to the CPUC on October 15, 2010. See mitigation measures Ag-1a and Ag-1c for additional detail.
LU-APM-03: Avoid planting, growing, and harvesting seasons	This measure will be implemented during construction.
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 necessary.
LU-APM-05: Coordinate construction activities with water management representatives	There are no irrigation canals or flood management structures impacted by construction activities on Link 5; therefore this mitigation measure is not applicable.
LU-APM-06: Restrict and confine activity within limits of construction	Final construction plans, which were submitted to the CPUC on September 2, 2010, illustrates the limits of construction. Construction activities will be restricted to and confined within those limits during construction.
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.
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 will pay just compensation to the property owners through contractual agreements with each landowner. SDG&E submitted a memo to CPUC on October 5, 2010 documenting landowner notification and consultation; the CPUC approved this memo on October 12, 2010. The final alignment is shown on the Project Modification Report and Mapbook, which was submitted to CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum 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	A ROW Grant (CACA 47658) for the Project was issued on January 20, 2009. SDG&E's contractor will obtain encroachment permits from each local jurisdiction, if necessary, during construction.
LU-APM-10: Match structure locations with existing transmission facilities	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure LU-APM-10, on September 1, 2010.
R-APM-02a: Provide advance notice if restrictions in access routes to recreational use areas	This mitigation measure will be implemented during construction.
R-APM-02b: No construction on federal holidays that affects trail use	This measure will be implemented during construction.
R-APM-02c: Coordinate construction activities affecting parkland and trails prior to construction	SDG&E has coordinated with the appropriate land management agencies, as required. During construction, advance notice of restrictions to recreational use areas will be provided to the agencies.
R-APM-02d: Post signs at alternative park access and parking	This measure will be implemented during construction.
R-APM-02e: Post signs at alternative trails and bikeways	This measure will be implemented during construction.

Mitigation Measure and APM	Status
R-APM-02f: Post signs at equestrian trails during helicopter construction	This measure will be implemented during construction.
R-APM-02f: Regularly check and maintain signs during helicopter construction	This measure will be implemented during construction.
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.
WR-01a: Coordinate construction activities and schedule 60 days prior to construction	SDG&E has been coordinating with the County of San Diego to identify recreational areas that may be impacted by the project and will schedule construction to avoid temporary preclusion of recreational area use. SDG&E will continue its coordination with the County of San Diego and other jurisdictional agencies during construction.
WR-01a: Submit documentation of coordination 30 days prior to construction	SDG&E submitted a memorandum to the CPUC for the administrative record on November 5, 2010 documenting its coordination efforts related to recreational areas and trails. SDG&E has coordinated with the USFS, BLM and County of San Diego regarding recreational areas and trails.
WR-01b: Coordinate temporary detours of trails 60 days prior to construction	SDG&E began coordination efforts with the Trails Coordinator for San Diego County on June 21, 2010. Coordinating with the County 60-days prior to construction has been fulfilled. Coordination efforts are on-going and will continue throughout the preconstruction and construction phases of the project. Two memos documenting coordination efforts were submitted to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01b: Site new trail segments to avoid sensitive resources and restore to pre-construction conditions	This measure will be implemented during construction.
WR-01b: Post public notices at trail detours	This measure will be implemented during construction.
WR-01b: Submit documentation of coordination 30 days prior to construction	See WR-1a
WR-01c: Coordinate alternative recreation facilities 60 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-01c: Post public notices at recreation facilities	This measure will be implemented during construction.
WR-01c: Submit documentation of coordination 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.
WR-02a: Relocate 500kV line along southern boundary of JAM properties	The JAM property is not located on Link 5; therefore, this measure is not applicable.
WR-02a: Submit memo and construction plans 120 days prior to construction	The BCD Alternative does not occur on Link 5; therefore, this measure is not applicable.
WR-03a: Coordinate to determine locations of tower sites and spur roads	SDG&E has made considerable effort to limit access roads and tower locations within recreational areas in coordination with the BLM, USFS, City of San Diego, and County of San Diego. No access roads are located on trails (e.g. PCT, Trans-County Trail, etc.). The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, illustrates changes to the final design of the alignment incorporating re-design of the alignment to avoid recreational areas as much as feasible. Mitigation of impacts have been calculated in the Habitat Acquisition Plan and Habitat Management Plan submitted to the agencies on September 22, 2010 and approved by the Wildlife Agencies on November 10, 2010.
WR-03a: Coordinate 60 days prior to construction and submit documentation 30 days prior to construction	SDG&E has made considerable effort to work with local agencies to identify alternative recreational areas that may be used by the public in lieu of affected parks during construction. SDG&E submitted documentation of this coordination to the CPUC for the administrative record on November 5 and November 23, 2010.

Mitigation Measure and APM	Status
AG-01a: Coordinate with property owners and tenants 60 days prior to construction	<p>SDG&E has coordinated with agricultural property owners and tenants in order to ensure avoidance or minimization of interference with agricultural operations.</p> <p>On Link 5, SDG&E coordinated with the Hartung property owners regarding impacts to oat hay production. The property owner provided SDG&E with their requirements, which were incorporated into the official Right of Entry document. A memorandum summarizing this coordination was submitted to CPUC on October 15, 2010.</p>
AG-01b: Restore disturbed soils 30 days after completion of construction clean-up	This measure will be implemented during construction.
AG-01c: Coordinate with grazing operators 60 days prior to construction and 30 days after construction	<p>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.</p> <p>On September 14, 2010, SDG&E coordinated with Hartung property representatives regarding reconfiguration of fencing to accommodate grazing operations and minimize impacts to cattle.</p>
AG-03b: Consult and notify 60 days prior to erection of any structure affecting aerial applicator operations	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010 for their administrative record. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
AG-03b: Provide maps of the alignment on or near agricultural lands	SDG&E sent notification letters to aerial applicators operating in San Diego and Imperial Counties on July 6, 2010. Copies of these notifications were sent to the CPUC, BLM and County Farm Bureaus on July 13, 2010. The notification advised when and where the new transmission line and towers will be erected and included aerial maps depicting the proposed project route and agricultural lands near the route.
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 selected ROW and tower locations were staked prior to the cultural resource field surveys.
C-01b: Protect potential and register-eligible resources from direct project impacts	<p>The Project Modification Report and Mapbook, which was 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 review of the National Register of Historic Places and consultation with the SHPO.</p> <p>The Final Class III Inventory, which was approved by the CPUC and BLM on June 2, 2010, determined that no cultural resource sites will be directly impacted on Link 5.</p>
C-01b: Undertake additional studies if resources cannot be protected from direct impacts	Based on the Final Class III Inventory, all cultural resource sites have been avoided on Link 5.
C-01b: Incorporate results of studies in HPTP	A Historic Properties Treatment Plan (HPTP) will be developed as appropriate based on the results of the eligibility evaluation of the archaeological resources identified in the Class III Survey Report. The HPTP is currently pending. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when complete.
C-01b: Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	SDG&E will designate NRHP and/or CRHR resources as an ESA if within 50 feet of direct impact areas. These ESAs will be monitored by archaeological and Native American monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
C-01b: Erect protective flagging or other markers for ESA	If cultural resources sites identified on this link (or within 50 feet of the right-of-way) are determined to be eligible by the SHPO or Native American Tribes, protective fencing and markers will be used to designate areas that can be avoided as an ESA. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.

Mitigation Measure and APM	Status
C-01b: Develop and implement monitoring program as part of HPTP	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.
C-01c: Submit Historic Properties Treatment Plan	The Historic Properties Treatment Plan (HPTP) is currently being prepared. SDG&E will submit the HPTP to the BLM and CPUC for review and approval when available.
C-01d: Conduct data recovery investigations to reduce adverse effects	Data gathered during the eligibility evaluation phase will be summarized in the Historic Properties Treatment Plan (HPTP). Data-recovery methods, sample sizes, and recommended procedures will be detailed in the HPTP as appropriate. The proposed mitigation for resource impacts will also be presented in the HPTP. A data recovery report and documentation of other mitigation efforts will be prepared and submitted to the BLM and CPUC for review. Submittal and approval of the HPTP is currently pending.
C-01d: Submit field closure report prior to construction within 100 feet of affected resource	This mitigation measure will be fulfilled for those resource areas to which it applies.
C-01d: Submit final report of data-recovery investigations within 1 year of completing fieldwork	This mitigation measure will be fulfilled within one year of the completion of fieldwork.
C-01e: Implement archaeological monitoring at cultural ESAs	a qualified archaeologist will conduct full-time monitoring during ground-disturbing activities in ESAs. The Historic Properties Treatment Plan (HPTP), which is currently being prepared, will include locations of ESAs and protection boundaries. The HPTP will provide recommendations for further management and monitoring during construction.
C-01e: Qualification of archaeologists must be approved	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 were 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.
C-01e: Retain and schedule any required Native American monitoring	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.
C-01e: Submit cultural resources monitoring monthly reports during construction	This mitigation measure will be fulfilled during construction.
C-01e: Notify if any damage to cultural resource ESAs and divert work to a buffer distance	This mitigation measure will be fulfilled during construction.
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 5. 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. Any discoveries will be processed in the manner described in this measure and detailed in the HPMP and HPTP for this project.
C-02a: Assist and support MLD with reinterment location	SDG&E will provide all necessary support to the Most Likely Deceased (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, statutes and regulations as appropriate if Native American human remains are encountered during construction.

Mitigation Measure and APM	Status
C-02a: Support in consultations with Native Americans and implement required actions and studies	Government-to-government consultations have been ongoing. Records of consultations are being held with the BLM. This measure will be satisfied during construction.
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 in the Historic Properties Treatment Plan (HPTP). Monitoring will be conducted per the HPTP and the Historic Properties Management Plan (HPMP). The HPMP was approved by the CPUC and BLM on July 15, 2010. The HPTP will be submitted to the CPUC, BLM, SHPO, and Native American Tribes for review and approval when complete.
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 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	This plan is being prepared by SDG&E and will be submitted for review and approval at least 30 days prior to project operation.
C-06a: Provide inventory to conduct visual analysis of all known and potential historic built environment resources in HPTP	All known historic built environment resources located within 0.5 mile of the project have been inventoried and will be included in the Historic Properties Treatment Plan (HPTP). Historic built environment resources that are eligible for nomination to the National Register were analyzed for visual impacts from the project. The HPTP is currently being prepared and will include mitigation measures for visual impacts. SDG&E will submit the HPTP to the BLM and CPUC for review and approval once it is available.
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	Cultural site inventories have been conducted. An HPTP is in preparation. Cultural resource sites have been avoided to the extent feasible and sites that cannot be avoided are being evaluated for National Register eligibility. Cultural resource sites in proximity to the project will be protected using Environmentally Sensitive Area designations.
CR-APM-02: Implement impact avoidance and APMs during construction	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, as appropriate.
CR-APM-03: Report within 24 hours any previously unidentified cultural resource discovered	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
CR-APM-03: Suspend operations in the immediate area of the discovered cultural resource	This mitigation measure will be fulfilled during construction as needed.
CR-APM-03: Evaluate the discovered resource and determine appropriate actions.	This mitigation measure will be fulfilled during construction as needed.
CR-APM-03: Develop and implement a treatment plan to mitigate impacts	The HPTP and HPMP provide direction for discovery and mitigation of impacts to cultural resource sites.
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	Historic properties have been surveyed and will be included in the HPTP. The HPTP will be submitted to the BLM and CPUC when available. Properties that cannot be avoided will be flagged as ESAs. These ESAs will be monitored by cultural monitors during construction and observations will be summarized and submitted to the CPUC in the weekly report.
CR-APM-06: Implement a plan if historic properties cannot be avoided	The Historic Properties Management Plan (HPMP), which was approved by the CPUC on July 15, 2010, identifies historic properties along the Project route. The Historic Properties Treatment Plan, which is currently being developed, will include details regarding the recordation, relocation, and data recovery of historic properties. This plan will be submitted to the CPUC and BLM for review and approval once complete.
CR-APM-07: Control impacts that can deteriorate historic	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement protective measures to minimize erosion and weeds	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement control measures to minimize vibration, dust, and fumes	This mitigation measure will be fulfilled during construction.
CR-APM-07: Minimize deterioration to buildings and structures	This mitigation measure will be fulfilled during construction.
CR-APM-07: Implement a plan if deterioration cannot be avoided	This mitigation measure will be fulfilled during construction.
CR-APM-08: Avoid and protect landscaping essential to historic property	SDG&E has consulted with the appropriate property owners to avoid impacts to historic properties. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating re-design of the alignment based on these consultations. The Project Modification Report briefly discusses these reroutes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved by the BLM and CPUC through a Determination Memorandum on September 22, 2010.
CR-APM-08: Minimize intrusion to the historic setting	This mitigation measure will be fulfilled during construction.
CR-APM-09: Install permanent fencing, barriers, or controlled access	This mitigation measure will be fulfilled during construction.
CR-APM-09: Restrict construction and operation access	This mitigation measure will be implemented during construction.
CR-APM-09: Instruct construction and maintenance personnel to protect sensitive properties	Construction and maintenance personnel will be instructed in protection of sensitive properties.

Mitigation Measure and APM	Status
CR-APM-10: Span conductors over historic property	A memo was submitted to the CPUC on September 13, 2010 documenting compliance with this mitigation measure. As part of the final design, SDG&E located project structures so that conductors span linear historic property to the extent feasible.
CR-APM-10: Boring shall avoid disturbance to historic property	Boring is not required to avoid historic properties on the overhead portion of the line; therefore, this mitigation measure is not applicable.
CR-APM-11: Implement standard practices on private land	SDG&E has conducted cultural surveys for areas not identified in the approved FEIR/EIS. The preconstruction component of this measure has been complete and SDG&E's standard practices will be implemented throughout the duration of the project.
CR-APM-12: Conduct cultural surveys for staging areas not yet identified	SDG&E has performed cultural surveys for staging areas not previously identified. The April 30, 2010 Mapbook illustrates changes to the final design of the alignment incorporating a redesign of the alignment based on these surveys. The Project Modification report briefly discusses these changes. A revised Mapbook and PMR was submitted to the CPUC on May 14, 2010 and approved by a Determination Memorandum dated September 22, 2010.
PAL-01a: Submit an inventory of significant paleontological resources	SDG&E has conducted and submitted a "Paleontological Records" report dated February 25, 2010 and a "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 based on Society of Vertebrate Paleontology guidelines and was approved by the BLM, CPUC and other agencies with jurisdiction on July 20, 2010.
PAL-01c: Conduct full-time paleontological construction monitoring	The areas that require paleontological monitoring have been identified and monitors will be present during ground disturbance activities.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	This mitigation measure will be fulfilled during construction.
PAL-01c: Divert construction activities when significant fossils are recovered	The approved Monitoring and Treatment plan specifies a process for the discovery of paleontological resources.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction. If it is determined that a variance is needed for construction noise, it will be applied for and obtained prior to construction.
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	The preconstruction component of this measure is complete. A Blasting Preparation and Protection Plan was submitted to the CPUC on July 7, 2010. If blasting is deemed necessary, a site-specific blasting plan will be submitted to the CPUC and implemented during construction.
N-02a: Restore damaged structure and compensate owner	This mitigation measure will be fulfilled post construction, as needed.
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 Construction Notification Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. The preconstruction component of this measure is complete. SDG&E will provide the CPUC with 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, which was approved by the CPUC on March 1, 2010, identifies the public liaison person who will respond to concerns of neighboring receptors about noise disturbances.

Mitigation Measure and APM	Status
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-01a: Restrict lane closures or obstructions on major roadways	SDG&E submitted two memos to the CPUC for their administrative record documenting coordination regarding traffic issues. A memo documenting coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010. Lane closures are not anticipated to occur; however, if lane closures do occur this measure will be implemented during construction. Lane closures will be addressed in traffic plans as required by any encroachment permits required by the agencies.
T-04a: Provide temporary pedestrian access	Interference with pedestrian access is not anticipated to occur. However, if temporary closures of sidewalks and other pedestrian facilities do occur during construction, this measure will be implemented.
T-04a: Provide detours and signs for bike route closures	Bike route or path closures are not anticipated to occur. However, if bike route or bike path closures do occur during construction, this measure will be implemented.
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	Access agreements/easements will be obtained prior to any road work. Measures required in the agreement/easement will be implemented during construction.
T-07a: Conform to agency requirements if parking spaces are eliminated or relocated	The Construction Notification Plan addresses notification of the public through local newspapers and on-site postings when parking spaces may be temporarily eliminated or relocated. The Plan was submitted to the CPUC on August 26, 2009 and approved by the CPUC on March 1, 2010. Impacts to parking are not anticipated. However, if parking spaces are eliminated or relocated as a result of construction, SDG&E will post "No Parking" signs 48 hours in advance to notify the public of potential short-term elimination of parking spaces.
T-09a: Prepare a Construction Transportation Management Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by Imperial County on August 19, 2010, San Diego County on September 29, 2010 and Caltrans on August 19, 2010. The Study revealed that there is only one area, Highway 67 on Link 5, where a CTMP will be required. Documentation of coordination with Imperial County was submitted to CPUC on October 15, 2010. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010.
T-11b: Provide notification when and where the line will be erected prior to construction	SDG&E has consulted with U.S. Customs and Border Patrol regarding the location of new transmission lines and towers. 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, which was approved by the CPUC and BLM in a Determination Memorandum on September 22, 2010, 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	In areas where a temporary lane closure is determined to be necessary, SDG&E will obtain required permits from Imperial County, San Diego County, and Caltrans. This measure will be satisfied during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans regarding traffic impacts.
T-APM-02b: Submit Detour Plans	In an area where detours are determined to be necessary, SDG&E will submit detour plans to Imperial County, San Diego County, and Caltrans. No detours will occur until detour plans are submitted to the appropriate agency and permits are obtained. This measure will be implemented during construction. See mitigation measure T-9a regarding coordination with Imperial County, San Diego County, and CalTrans related to traffic impacts.

Mitigation Measure and APM	Status
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 mitigation 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	SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
T-APM-04a: Notify cities and counties regarding construction activities	SDG&E shall notify and provide required information to counties and cities prior to initiation of construction activities that could impact police, fire, ambulance and paramedic services.
T-APM-05a: Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	SDG&E has coordinated with school districts project-wide to discuss construction activities adjacent to school bus stops. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-05a: Consult with transit authorities 1 month prior to construction	SDG&E has coordinated with the Metropolitan Transit District to discuss construction activities and potential impacts to transit services. Documentation of this coordination effort was provided to CPUC for the administrative record on October 28, 2010.
T-APM-06b: Parking in San Diego County shall comply with County regulations and per an approved traffic control plan	This measure will be implemented during construction.
T-APM-08a: Obtain permit(s) if entering railroad right-of-way	No railroad crossing permits are required for Link 5; therefore, this mitigation measure is not applicable.
T-APM-09a: Underground utility facilities within 1,000 feet of an Officially Designated Scenic Highway	There will be no new or relocated utility facilities on Links 1, 2, or 5 within 1,000 feet of an Officially Designated Scenic Highway. Therefore, this measure is not applicable to Links 1, 2, or 5.
T-APM-10a: Ensure continuous access to properties	During construction, SDG&E will ensure that the construction contractor provides driveway access to businesses and residences.
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 secondary containment.
HS-APM-03: Develop applicable safety plans	The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS. Appropriate safety plans, such as a HMBP and/or SPCC Plan will be developed as the project progresses and storage locations are identified. Plans will be updated during construction as needed.
HS-APM-04: Develop site specific blasting plan	SDG&E will prepare a site specific blasting plan prior to blasting. This measure will be satisfied during construction.
HS-APM-04: Use California licensed Blasting Contractor	A California licensed Blasting Contractor shall be used for all blasting operation.
HS-APM-05: Investigate impacts of all contaminated sites	The Soil Management Plan was submitted to the CPUC on July 2, 2010 and approved on September 9, 2010. The Soil Management Plan addresses the requirements stipulated in this measure. The Phase 1 Environmental Site Assessment was submitted to CPUC on December 3, 2009 and provides additional information, as well as the results of the investigation.

Mitigation Measure and APM	Status
HS-APM-06: Investigate UXO by trained contractor	An investigation of the project ROW has been conducted by In Depth Corporation, a trained contractor. A memo summarizing these results was submitted to the CPUC on October 7, 2010. A revised memo was submitted on October 26, 2010 to address comments received from the CPUC.
HS-APM-06: Remove UXO by trained personnel	An investigation of the project ROW was conducted by a UXO trained contractor. No UXO were located; however, if potential UXO is found during construction, construction will be temporarily halted until a trained contractor can assess the situation.
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	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure HS-APM-9, Task 1, on September 10, 2010.
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, acknowledged by the CAL Fire Chief, was submitted to the CPUC on December 14, 2009 and approved 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 approved by the CPUC on February 2, 2010. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP.
HS-APM-12: Develop a Traffic Control Plan	See T-9a
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.

Mitigation Measure and APM	Status
P-02a: Test farmed soil samples and submit sampling and testing plan 60 days prior to construction	The Sampling and Testing Plan was approved on March 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010 and an amendment to the Sampling Report was approved on January 31, 2011. The Soil Management Plan was approved by the CPUC on September 9, 2010.
P-02a: Submit laboratory results 30 days prior to construction	The Sampling and Testing Plan was approved on March 23, 2010. The Agricultural Sampling Report dated May 7, 2010 was approved on September 2, 2010 and an amendment to the Sampling Report was approved on January 31, 2011. The Soil Management Plan was approved by the CPUC on September 9, 2010. This measure is complete for all project areas with the exception of one property in Link 5 associated with structures CP63 and CP64.
P-02a: Follow regulatory procedures for handling and disposal of contaminated soil	Excavated materials containing elevated levels of pesticide or herbicide will be managed in compliance with the Soil Management Plan approved by the CPUC on September 9, 2010.
P-02a: Use effective dust suppression procedures	During construction, effective dust suppression procedures will be used in construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public.
P-02a: Consult regulatory agencies for handling, treatment, and/or disposal	Regulatory agencies for the State of California (DTSC or RWQCB) and San Diego County will be contacted by SDG&E or its contractor to plan handling, treatment, and/or disposal options.
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.
P-07a: Implement steps 60 days prior to construction if excavation will occur	The Soil Management Plan was approved by the CPUC on September 9, 2010 as fully addressing the requirements of this measure. A Phase 1 Environmental Site Assessment was submitted to the CPUC for review on December 2, 2009. In the event that new areas requiring ground disturbance are identified during construction, a Phase 1 will be conducted and submitted to the CPUC prior to ground disturbance in those areas.
PS-01a: Limit conductor surface gradient	SDG&E submitted a memorandum to the CPUC on September 30, 2010 demonstrating that SDG&E has limited the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.
PS-02a: Identify objects within and near ROW for induced voltages and implement electrical grounding	A memorandum addressing completion of this measure was submitted to the CPUC on September 30, 2010 and approved on October 6, 2010.
AQ-01a: Pave, apply water 3 times daily, or apply soil stabilizers	A Dust Control Plan was submitted to the CPUC and approved on January 20, 2010. This measure will be implemented during construction, as well as the measures specified in the Dust Control Plan.
AQ-01a: Pre-water sites 48 hours prior to clearing	This mitigation measure will be fulfilled during construction.
AQ-01a: Reduce amount of disturbed area	This mitigation measure will be fulfilled during construction.
AQ-01a: Spray stock-piles daily or as needed	This mitigation measure will be fulfilled during construction.
AQ-01a: Cover loads in trucks or maintain 6 inches of free-board	This mitigation measure will be fulfilled during construction.
AQ-01a: Pre-moisten import and export dirt prior to transport	This mitigation measure will be fulfilled during construction.
AQ-01a: Sweep public streets daily if soil tracking visible	This mitigation measure will be fulfilled during construction.
AQ-01a: Plant vegetative ground cover following construction	This mitigation measure will be implemented immediately following construction.

Mitigation Measure and APM	Status
AQ-01a: Apply soil stabilizers or water on inactive work areas	This mitigation measure will be fulfilled during construction.
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 at the yard. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. 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.
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. A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout the Project.
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.

Mitigation Measure and APM	Status
H-01a (CC): Construct Chocolate Canyon Option in dry season	This mitigation measure will be fulfilled during construction.
H-01a (CC): Drainage control and BMPs in place prior to winter rains	This mitigation measure will be fulfilled during construction.
H-01a (CC): Implement Source Water Protection Guidelines	This mitigation measure will be fulfilled during construction.
H-01b: Project construction plans and SWPPP for Los Peñasquitos Canyon Preserve	Los Peñasquitos Canyon Preserve is located west of Sycamore Canyon Substation which is the westerly end of the project; therefore, this measure is not applicable.
H-01k: File hazardous substance plan within 1 year of license issuance	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and receive authorization from the USFS prior to starting work on USFS lands.
H-01k: Confine vehicles to roads identified in a Road and Traffic Management Plan	This mitigation measure is only applicable to USFS-managed lands. SDG&E will comply with all Forest Service conditions as required by the Special Use Permit and implement the approved Road and Transportation Management Plan.
H-01k: File an Erosion Control Measure Plan prior to construction	The SWPPP and NPDES permit associated with WDID #937C357500 was submitted to the CPUC and USFS on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts. This measure is only applicable to USFS-managed lands.
H-01k: Submit NEPA analysis prior to ground disturbing work	The Final Environmental Impact Report/Environmental Impact Statement was submitted to the USFS for analysis. The Project Modification Report and Mapbook, was submitted to the USFS on May 14, 2010. This measure is only applicable to USFS-managed lands.
H-01k: Enter into a cost recovery agreement with the Forest Service	A cost recovery agreement with USFS will be determined before ground disturbing activities may proceed on USFS-managed lands. This measure is only applicable to USFS-managed lands.
H-01k: File a Water Resources Management Plan within 6 months of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. The SWPPPs and NPDES permits associated with the following WDID #s 937C358169 and 937C358216 were submitted to the CPUC on September 15, 2010. Qualified Stormwater monitors will be on-site during construction monitoring erosion control. This results will be documented in the weekly monitoring report. This measure is only applicable to USFS-managed lands.
H-01k: File a plan for ground and surface water management within 1 year of license issuance	A Water Use Study that discussed coordination efforts with local water districts was submitted for review on February 22, 2010. Groundwater supplies will not be used during project construction. This measure is only applicable to USFS-managed lands.
H-01l: Submit a site-specific sediment control plan and SWPPP prior to construction	The SWPPPs and NPDES permits associated with the following WDID #s 937C358184 and 937C358217 were 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 hydrologic impacts.
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	A Wells and Springs Survey was submitted to CPUC on July 7, 2010 to address this mitigation measure prior to construction. This report was approved by CPUC on September 2, 2010. During construction, if blasting is determined to be necessary near a surveyed well or spring, SDG&E's contractor will prepare a blasting plan that addresses protection of the nearby well or spring.
H-06a: Determine which towers require scour protection during design phase	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.

Mitigation Measure and APM	Status
H-06a: Submit evaluation and design plans 60 prior to constructing towers	SDG&E provided the CPUC with an engineering report, sealed by a civil engineer registered in the State of California, demonstrating which towers may reasonably be subject to erosion during the life of the project. The report also provided plans for protection from scour, as well as an engineering demonstration that the tower and associated structures will not induce erosion onto adjacent property. The report was approved by the CPUC on October 7, 2010.
H-07a: Submit a Hazardous Substance Control and Emergency Response Plan 60 days prior to construction	<p>A memo was submitted to the CPUC for their administrative record on September 15, 2010 documenting compliance with this mitigation measure and provides the Waste Discharge Identification numbers assigned by the California State Water Resources Control Board. WDID numbers associated with Link 5 include: 937C358184 and 937C358217.</p> <p>Two site-specific SWPPPs have been developed for Link 5. These SWPPPs contain procedures (Section 8.0) to reduce the potential of spills and emergency response information to ensure quick and safe clean-up of spills. In addition, hazardous materials management is addressed in the Spill Prevention, Control and Countermeasure (SPCC) plans and Hazardous Materials Business Plans developed for the Project.</p>
WQ-APM-01: Minimize disturbance to water resources	This mitigation measure will be implemented during construction. Grading plans, which were submitted to the CPUC on September 2, 2010, demonstrate how disturbance to water resources will be minimized. In addition, the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010, addressed changes to the final alignment to reduce impacts to water resources.
WQ-APM-02: Avoid sensitive water features	<p>A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-2, on August 30, 2010.</p> <p>Impacts to jurisdictional features were considered during design of the project and have been avoided, to the extent feasible. The locations of the structures are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved through a Determination Memorandum dated September 22, 2010.</p>
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. Surface disturbing activities will not be allowed to begin until the sites have been clearly marked, fenced or flagged to delineate those areas specifically allowed for use and those areas that are restricted.
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 locations of the structures are shown in the PMR Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by CPUC and BLM through a Determination Memorandum dated September 22, 2010.
WQ-APM-04: Prepare and implement erosion control BMPs per the SWPPP	The SWPPPs and NPDES permits associated with the following WDID #s 937C358184 and 937C358217 were submitted to the CPUC on September 15, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts.
WQ-APM-04: Select upland pull sites to minimize disturbance to water resources	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.

Mitigation Measure and APM	Status
WQ-APM-04: Do not place structures in streambeds or drainage channels	A memo was submitted to the CPUC for their administrative record documenting compliance with Mitigation Measure WQ-APM-4, on August 30, 2010. Impacts to surface water, riparian areas, wetlands, and floodplains were considered during design of the project and have been avoided to the extent feasible. The locations of the pull sites are shown in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010.
WQ-APM-05: Construct stream crossings and develop a mitigation and restoration plan	Stream crossings will be constructed at low flow periods. A mitigation and restoration plan has been developed as part of the HMMP and was submitted to the agencies on July 14, 2010. A revised plan was submitted on October 8, 2010 to address agency comments. This mitigation measure will be implemented during construction.
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	This mitigation measure will be fulfilled during construction.
WQ-APM-06: Conduct interviews with affected landowners prior to construction	Groundwater supplies will not be used during project construction; therefore this mitigation measure is not applicable.
WQ-APM-06: Negotiate with landowners to provide alternative water supplies	Groundwater supplies will not be used during project 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 used 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 and dewatering is not anticipated during construction. If it is later determined that dewatering is necessary, SDG&E will implement this measure as described.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	This mitigation measure will be fulfilled during construction.
WQ-APM-10: Minimize stream bank erosion	See H-06a
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 SWPPPs and NPDES permits associated with the following WDID #s 937C358184 and 937C358217 were submitted to the CPUC on September 15, 2010. The conditions of the permits and SWPPPs will be implemented and enforced during the construction to prevent and avoid hydrologic impacts.
WQ-APM-15: Adjust route of access roads to avoid sensitive features	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 the Streambed Alteration Agreement (SAA) on November 17, 2010. The ACOE 404 permit was received on January 7, 2011. Also see BIO-APM-05.
WQ-APM-15: Use existing roads or cross-country access routes	This mitigation measure will be fulfilled during construction.
WQ-APM-15: Clearly mark approved construction traffic routes	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
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	SDG&E has located staging/storage areas for equipment and materials outside of riparian areas. This is demonstrated in the Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010.
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 Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. CPUC issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04a: Submit site-specific seismic analyses 60 days prior to final project design	A Geotechnical Report titled, "Geotechnical and Geologic Hazards Investigation Report" dated October 16, 2009 was submitted to CPUC for review and approval on April 19, 2010. An explanation of structure design based on windloading instead of seismic loading is included in the Executive Summary. The final project design is based on the findings of this report. CPUC's geotechnical consultant issued a memorandum on June 18, 2010 confirming that this report satisfies the requirements of this mitigation measure.
G-04b: Submit liquefaction studies 60 days prior to final project design	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. The final project design is based on the findings of this report. SDG&E will conduct additional geotechnical exploration, including borings, as soon as authorization is received from the appropriate land-managing agency. A supplemental report will be provided prior to installation of structures.
G-06a: Submit slope stability analyses 60 days prior to construction	The Geotechnical and Geologic Hazards Investigation Report (dated October 16, 2009) was submitted to CPUC for review and approval on April 19, 2010. The Geotechnical Evaluation, Access Roads and Structure Pads (dated October 16, 2009) was submitted to CPUC for review and approval on May 28, 2010. These reports included slope stability analyses as described in this measure. The final project design is based on the findings of these reports. As required by the CPUC memo dated June 18, 2010, additional investigations for landslide and rock fall hazards will occur in areas along Section 5 and Segment 4A of Link 5 prior to construction in these areas.
G-09a: Coordinate to determine status and plans of active quarries	There are no active quarries in Link 5. There is one property, Hansen, where quarry operations may occur in the future. SDG&E has coordinated with the Hansen property owner to determine the status of and plans for future quarry operations and SDG&E has agreed to compensate the owner if construction interferes with future quarry plans.
G-09a: Submit plan to avoid impacts to mining operations 60 days prior to construction	There are no active quarries in Link 5. However, SDG&E has agreed to compensate the Hansen property owner if construction interferes with future quarry plans.
G-09a: Provide map of reroute and summary of impacts to mining areas	Neither the SWPL or the Interstate 8 Alternative require a reroute due to quarry operations.
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 implemented during construction.
GEO-APM-03: Avoid placing structures in areas of high shrink/swell potential	The 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.

Mitigation Measure and APM	Status
GEO-APM-04: Place structures in geologically stable areas	See G-6a
GEO-APM-05: Implement construction to avoid or minimize new soil disturbance	The preconstruction portion of this measure is complete. Final grading and plan and profiles were submitted to the CPUC on September 2, 2010. Project construction activities were designed to avoid or minimize new disturbance and erosion on manufactured slopes. SDG&E will adhere to the grading plans and the SWPPP during construction.
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	Erosion control will be implemented under Project site-specific SWPPPs and shall include areas where re-contouring and substantial ground disturbance will be required. This mitigation measure will be fulfilled during construction.
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	This mitigation measure will be fulfilled during construction.
GEO-APM-09: Consult with agencies if paleontological resources cannot be avoided	This mitigation measure will be fulfilled during construction.
PSU-APM-01: Coordinate with utility providers	There are no third party utilities that will be affected by the project on Link 5; therefore, this mitigation measure is not applicable. A memo was submitted to the CPUC documenting compliance with Mitigation Measure PSU-APM-1 on October 14, 2010 and approved November 5, 2010.
PSU-APM-02: Notify Underground Service Alert 48 hours prior to earth-disturbing activities	This mitigation measure will be implemented during construction.
PSU-APM-03: Minimize disruption to response times and access for emergency and police services	This mitigation measure will be implemented during construction.
S-02a: Provide copies of posted public notices of planned outages	This measure will be implemented during construction. Copies of notices and dates of public notification shall be provided to the CPUC and BLM prior to any planned outage.
S-02b: Submit documentation prior to construction of the underground transmission line	Link 5 does not include underground transmission line construction; therefore, this mitigation measure is not applicable.
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. In addition, an Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011. SDG&E will obtain a variance for the use of reclaimed water outside of the Padre Dam and City of San Diego jurisdictions. Potable water will be used until the variance is obtained. Copies of variances will be submitted to the CPUC prior to use of 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, and Addendum to the 23 April 2010 Water Resources Availability Study (dated March 18, 2011) was submitted on March 21, 2011.
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 January 20, 2010.
F-01a: Receive approval of final Plan 30 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and approved by the CPUC on January 20, 2010.

Mitigation Measure and APM	Status
F-01a: Implement Fire Plan during construction and maintenance	The preconstruction component of this measure has been completed. A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on January 20, 2010. The Construction Fire Plan includes the requirements of this mitigation measure and will be implemented and enforced during construction.
F-01c: Do not obstruct firefighting equipment or crews	This measure will be implemented during construction.
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	This measure will be implemented during construction.
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.
F-02b: Relocate 69 kV lines onto non-specular steel poles using vertical conductor construction	SDG&E has incorporated non-specular steel poles into the project design in compliance with this mitigation measure. SDG&E provided the CPUC with final construction drawings for reference.
F-03a: Contribute annually to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. This mitigation measure will be implemented during and following construction.
F-03b: Create and implement a Multi-agency Fire Prevention MOU	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU.

ATTACHMENT C: MAPS OF POST-PMR PROJECT CHANGES

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
SECTION 10B											
IV Sub Const. Yard	Small location change to IV Sub CY access road	0.22AC	0.22AC	Y		X	051-380-04/BLM	Y	Y	No, see map, page 1. Change falls within surveyed area.	
EP347	Structure maintenance access road entrance widened	0.25AC	0.27AC	Y		X	051-010-09/BLM	Y	Y	No, see map, page 2. Change falls within surveyed area.	
EP342	Structure maintenance road re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.38AC	0.37AC	Y		X	034-360-53/BLM	Y	Y	No, see map, page 3. Change falls within surveyed area.	
EP336	Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.22AC	0.19AC	Y		X	034-360-53/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP331	Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.55AC	0.35AC	Y		X	034-360-50/BLM, 034-360-46/SD & AE RAILROAD	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP330-1	Pullsite P330-1-PS-A northwest portion outside of CY boundary included to achieve proper pullsite operation set-backs	2.26AC	2.81AC	N	X		034-360-25/BLM, 033-230-08/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP330-1	Plaster City CY boundary change to encompass maintenance pads since CY access road was deleted due to steep terrain.	20.38AC	22.30AC	N	X		034-360-25/BLM, 033-230-08/BLM	Y	N	Yes, see map, page 4. Needs plant survey.	
EP324	Small TSAP relocation to reduce grading	0.01AC	0.01AC	Y		X	033-230-10/BLM	Y	Y	No, see map, page 5. Change falls within surveyed area.	
EP323-1	TSAP relocated to avoid dry-wash area impacts per Army Corps request	0.01AC	0.01AC	Y		X	033-230-11/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP322-1	Pullsite road relocated to avoid dry-wash area impacts per Army Corps request	0.40AC	0.38AC	Y	X		033-230-11/BLM	Y	N	Yes, needs plant survey. Habitat assessment done under EP 323-1.	12/9/2010
EP316-2	Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.24AC	0.08AC	Y		X	033-230-13/BLM	Y	Y	No, see map, page 7. Change falls within surveyed area.	
EP313	Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.23AC	0.17AC	Y		X	033-230-13/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP307-1	Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.30AC	0.30AC	Y		X	033-220-23/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010
EP303-2	Guard structure re-located	0.01AC	0.01AC	N	X		033-220-022/BLM	Y	Y	No, see map, page 8. Change falls within surveyed area.	
EP302-1	Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.28AC	0.32AC	Y		X	033-220-22/BLM	Y	Y	No, see map, page 9. Change falls within surveyed area.	
EP301	Structure maintenance pad and road slightly re-aligned to accommodate quarry operations	0.69AC	0.68AC	Y		X	033-220-22/BLM	Y	Y	No, see map, page 10. Change falls within surveyed area.	
EP300-1	Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.21AC	0.21AC	Y		X	033-240-12/BLM	Y	Y	No, see map, page 11. Change falls within surveyed area.	
EP298	Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.22AC	0.25AC	Y		X	033-240-12/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/9/2010

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
EP292-1	Pullsite road re-aligned to avoid/reduce dry-wash area impacts per Army Corps request	0.19AC	0.25AC	Y		X	033-280-01/BLM	Y	Y	No, see map, page 12. No change from PMR.	
Dunway Const. Yard	Existing unimproved road use added to provide access to construction yard	0.0 AC	0.80AC	N	X		051-010-30/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/29/2010
S2 Const. Yard	Existing unimproved road use added to provide access to construction yard	0.0 AC	0.66AC	N	X		033-240-17/BLM, 033-240-11/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/29/2010

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
SECTION 9C											
EP280-3	Structure moved 40' north	0.23AC	0.23AC	Y		X	033-430-006/BLM	Y	Y	No, see map, page 13. Change falls within surveyed area.	
EP272-3	Small TSAP relocation to reduce grading	0.01AC	0.01AC	Y		X	033-430-032/BLM	Y	Y	No, see map, page 14. Change falls within surveyed area.	
EP265-2	TSAP relocated to flatter terrain to eliminate the need for a helicopter platform	0.01AC	0.01AC	Y		X	033-510-02/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/10/2010
EP263A-2	Small TSAP relocation to reduce grading	0.01AC	0.01AC	Y		X	033-510-007/BLM	Y	Y	No, see map, page 15. Change falls within surveyed area.	
EP258-3	Existing access road improvement southwest of tower for construction yard access	0.37AC	0.37AC	Y		X	614-120-32/BLM	Y	N	Yes, see map, page 16. Needs plant survey. Only a very small amount of changed area has not been surveyed.	
EP250	Structure access road re-aligned to avoid/reduce impacts	0.25AC	0.24AC	N		X	661-041-01/BLM	Y	Y	No. Change falls within surveyed area.	
EP249	TSAP located to eliminate/reduce impacts caused by structure access road and maintenance pad which have been removed	0.42 AC	0.01AC	N		X	661-041-01/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/8/2010
EP248-1	Structure relocated to eliminate/reduce impacts	0.84AC	0.01AC	Y		X	661-030-06/BLM	Y	Y	No, see map, page 17. Change falls within surveyed area.	
EP246	TSAP located to eliminate/reduce impacts caused by structure access road and maintenance pad which have been removed	0.84AC	0.01AC	Y		X	661-030-06/BLM	Y	N	Yes, needs plant survey. Habitat assessment done.	12/8/2010
SECTION 9B											
EP205-2	Small revision in road location	.07AC	.07AC	Y		X	611--120--09/BLM	Y	Y	No, see map, page 18. Change falls within surveyed area.	
EP200A-1	Structure maintenance pad and road were re-aligned due to tower move	0.16AC	0.17AC	Y		X	611-120-09/BLM	Y	Y	No, see map, page 19. Change falls within surveyed area.	
EP200-3	Structure maintenance pad and road were re-aligned to provide a smaller impact area	0.99AC	0.26AC	Y		X	611-120-09/BLM	Y	Y	No, see map, page 20. No change from PMR.	
EP200-3	Pullsites added to structure	0.00AC	2.69AC	Y	X		611-120-09/BLM	Y	N	Yes, see map, page 20. Needs plant survey. Only a very small amount of changed area has not been surveyed.	
EP197-3	Structure maintenance pad and road were re-aligned to avoid impacts and due to tower move	0.22AC	0.09AC	N		X	611-030-03/BLM	Y	N	Yes, see map, page 21. Needs plant and QCB survey. Only a very small amount of changed area has not been surveyed.	
EP196-2	TSAP located to eliminate impacts and due to tower move	0.01AC	0.01AC	N		X	611-030-03/BLM	Y	N	Yes, see map, page 22. Needs plant and QCB survey.	
EP195-2	TSAP footpath relocated due to tower move	0.01AC	0.01AC	N		X	529-140-03/BLM	Y	Y	No, see map, page 23. Change falls within surveyed area.	
EP194-3	TSAP located to eliminate impacts and due to tower move	0.01AC	0.01AC	N		X	529-140-03/BLM	Y	N	Yes, see map, page 24. Needs plant and QCB survey.	

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
EP193-2	Structure maintenance pad and road were re-aligned to avoid impacts and due to tower move	0.86AC	0.78AC	N		X	529-140-03/BLM	Y	N	Yes, see map, page 25. Needs plant and QCB survey.	
EP192-2	Structure maintenance pad and road were re-aligned to avoid impacts and due to tower move	0.86AC	0.93AC	N		X	529-140-03/BLM	Y	N	Yes, see map, page 26. Needs plant and QCB survey.	
EP191-2	Structure maintenance pad and road were re-aligned to avoid impacts and due to tower move	0.36AC	0.37AC	N		X	529-140-03/BLM	Y	Y	No, see map, page 27. Change falls within surveyed area.	
EP190-2	Guard structure re-located	0.01AC	0.01AC	N	X		529-110-02/BLM	Y	Y	No, see map, page 28. Change falls within surveyed area.	
EP189-3	Final engineering: small change to grading limits	0.01AC	0.01AC	Y		X	529-100-04/BLM	Y	Y	No, see map, page 29. Change falls within surveyed area.	
EP186-1	Final engineering: small change to grading limits	0.69AC	0.69AC	Y		X	529-060-03/BLM	Y	Y	No, see map, page 30. Change falls within surveyed area.	
EP180	Final engineering: small change to grading limits	0.45AC	0.45AC	Y		X	529-050-03/BLM	Y	Y	No, see map, page 31. Change falls within surveyed area.	
EP175	Structure maintenance pad and access road re-aligned to a hook per CPUC visual consultants request	0.27AC	0.30AC	Y		X	528-230-11/BLM	Y	N	Yes, needs plant and QCB survey. Habitat assessment done.	12/8/2010
EP170	Final engineering: small change to pull site grading limits	0.42AC	0.42AC	Y	X		528-050-02/BLM	Y	Y	No, see map, page 32. Change falls within surveyed area.	

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
EP147	TSAP relocated to flatter terrain to eliminate the need for a helicopter platform	0.01AC	0.01AC	Y		X	528-230-04/BLM	Y	N	Yes, see map, page 33. Needs plant and QCB survey.	

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
SECTION 8E											
EP103A	Final engineering: small change to grading limits	0.58 AC	0.58AC	Y		X	605-110-17/BLM	Y	Y	No, see map, page 34. Change falls within surveyed area.	
EP99-2	Final engineering: small change to grading limits	0.39AC	0.39AC	Y		X	606-160-02/BLM	Y	Y	No, see map, page 35. Change falls within surveyed area.	
EP98-1	Final engineering: small change to grading limits	1.36AC	1.36AC	Y		X	606-160-02/BLM	Y	Y	No, see map, page 36. Change falls within surveyed area.	
EP97	Final engineering: small change to grading limits	0.75AC	0.75AC	Y		X	607-061-03/BLM	Y	Y	No, see map, page 37. Change falls within surveyed area.	
EP96	Final engineering: small change to grading limits	1.58AC	1.58AC	Y		X	607-061-03/BLM	Y	Y	No, see map, page 38. Change falls within surveyed area.	
EP95	Final engineering: small change to grading limits	0.79AC	0.79AC	Y		X	607-061-03/BLM	Y	Y	No, see map, page 39. Change falls within surveyed area.	
SECTION 8D											
EP75-2	Existing Road rehab: Access road needs to be graded around tower leg foundation	0.00AC	0.05AC	Y		X	604-130-03/BLM	Y	Y	No, see map, page 40. Change falls within surveyed area.	
SECTION 8C											
EP56-4	Structure moved to avoid/minimize impacts	0.01AC	0.01AC	Y		X	604-050-03/BLM	Y	Y	No, see map, page 41. Change falls within surveyed area.	
EP53-3	Structure and TSAP relocated due to impacts	0.01AC	0.01AC	Y		X	604-050-02/BLM	Y	N	Yes, see map, page 42. Needs plant and QCB survey.	
EP51-1	Final engineering: small change to grading limits	0.54AC	0.61AC	Y		X	602-110-02/BLM	Y	Y	No, see map, page 43. Change falls within surveyed area.	
EP50	Final engineering: small change to grading limits	0.33AC	0.60AC	Y		X	602-110-02/BLM	Y	Y	No, see map, page 44. Change falls within surveyed area.	
EP49	Final engineering: small change to grading limits	0.15AC	0.16AC	Y		X	602-100-02/BLM	Y	Y	No, see map, page 45. Change falls within surveyed area.	
EP47-2	Pullsite:Revised per CPUC comment to avoid notch in ridge line	2.33AC	2.28AC	Y	X		602-100-02/BLM	Y	N	Yes, see map 46. Needs plant and QCB survey.	
SECTION 8B											
EP45-1	TSAP relocated to flatter terrain to eliminate the need for a helicopter platform	0.01AC	0.01AC	Y		X	602-090-02/BLM	Y	N	Yes, needs plant and QCB survey. Habitat assessment done.	12/6/2010
SECTION 8A											

Structure #	Explanation of Change	Comparison - Impact Areas in Acres		Included in CPUC Mapbook (Y/N)	Proposed Impact		APN/Land Owner	Cultural Field Survey Complete (Y/N)	Biological Field Survey Complete (Y/N)	Biological Field Survey Needed	Date of HA
		Original	New		Temporary	Permanent					
EP42	Final engineering: small change to grading limits	1.63AC	1.63AC	Y		X	602-080-04/BLM	Y	Y	No, see map, page 47. Change falls within surveyed area.	

SUNRISE POWERLINK PROJECT
REVIEW MEMORANDUM
CULTURAL AND PALEONTOLOGICAL RESOURCES
PUBLIC DOCUMENT

Document: Request for NTP to begin construction on all Bureau of Land Management (BLM) lands within Link 1 (Segments 2, 3, 4, 5, 6), Link 2 (Segments 7, 8, 9, 10, 11, 12), and Link 5 (Segments 14, 16, 17, 18), of the Sunrise Powerlink Project

Reviewer: Susan Goldberg, M.A., RPA, Applied EarthWorks, Inc.

Date: 24 February 2011

Link 1 (Segments 2, 3, 4, 5, 6)

Paleontology

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, the potential to encounter paleontological resources along Link 1 varies from no potential to high potential. In accordance with Mitigation Measure **PAL-01c: Conduct full-time paleontological construction monitoring**, full-time construction monitoring will be conducted by a qualified paleontologist in areas determined to have a moderate to high paleontological sensitivity. In addition, **PAL-01c: Conduct part-time monitoring of sediments with low, marginal, undetermined sensitivity**, states that construction work in areas determined to have a low, marginal, and/or undetermined paleontological resource sensitivity will be monitored on a part-time basis as determined by a qualified paleontologist. It should be noted that regardless of paleontological sensitivity, areas in which micro pile work will be conducted will not require a paleontological monitor, due to the small bore hole size. The following Mile Posts (MP) within Link 1 will be monitored:

Paleontological Construction Monitoring	
Full-time Monitoring	Part-time Monitoring
MP-5.5 to MP-6.0	MP-0.0 to MP-1.5
MP-6.6 to MP-7.2	MP-1.8 to MP-5.5
MP-7.6 to MP-7.7	MP-6.0 to MP-6.6
MP-7.9 to MP-8.0	MP-7.2 to MP-7.6
MP-12.1 to MP-12.5	MP-7.7 to MP-7.9
MP-13.0 to MP-15.3	MP-8.6 to MP-12.1
MP-15.6 to MP-16.1	MP-15.3 to MP-15.6
MP-16.5 to MP-17.7	MP-17.7 to MP-17.8
	MP-18.2 to MP-22.8
	MP-29.9 to MP-30.2
	MP-31.7 to MP-31.9

Paleontological Construction Monitoring	
Full-time Monitoring	Part-time Monitoring
	MP-32.2 to MP-32.3

Cultural Resources

1. The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010 (Garcia-Herst et al. 2010). Eighteen cultural resources sites were identified within the Area of Potential Effects (APE) for Link 1. Sixteen cultural resources sites are located on BLM land (CA-IMP-1015/4348/8744; -3784/3785/4340/4341/4344; -4327; -10372 (LMP-S-61/SPBB-S-7); -103/3710; -3708; -4228; CA-SDI-7060; -6776/7051/7059/19035; -19304; -19851; -19301; -19293; -19853; -19364 (SPBB-S-1); and -19018) and two cultural resources sites span both BLM and private lands (CA-SDI-7043/7044 and -4788). Archaeological testing to enable formal eligibility determinations of these resources has been initiated. An Evaluation Report and Historic Properties Treatment Plan (HPTP) describing the results of these studies will be prepared and submitted to BLM for review and approval planned for March 2011. National Register of Historic Places (NRHP) eligibility recommendations have not been made; the BLM must formally make these determinations and the State Historic Preservation Officer (SHPO) must have an opportunity to review the determinations of eligibility before construction work within the boundaries of the nineteen above-mentioned sites can begin without restrictions. Once a cultural resource is determined not eligible for listing in the NRHP by BLM, in consultation with the SHPO, no further management of the resource is required. However, if BLM determines a site to be eligible for the NRHP, mitigation will be used to resolve adverse effects of project construction. Therefore, until the HPTP for these sites is approved, and, if necessary, mitigation measures proposed at the sites have been completed, Environmentally Sensitive Areas (ESA) will be required to protect the nineteen unevaluated sites. In accordance with Mitigation Measure **C-01b: Erect protective flagging or other markers for ESA**; sites will be flagged off with temporary orange fencing and designated as Environmentally Sensitive Areas (ESA). ESA buffers around each site will be established and these sites will be protected as exclusionary zones; site specific ESA buffers are detailed in the table below. Mitigation Measure **C-01e: Implement archaeological monitoring at cultural ESAs**, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) will be implemented during construction, as required (Iversen et al. 2010).

With notification from BLM/CPUC, SDG&E may begin work within Link 1 after BLM has consulted with SHPO on the eligibility and treatment of sites CA-IMP-1015/4348/8744; -3784/3785/4340/4341/4344; -4327; -10372 (LMP-S-61/SPBB-S-7); -103/3710; -3708; -4228; CA-SDI-7060; -6776/7051/7059/19035; -19304; -19851; -19301; -19293; -19853; -19364 (SPBB-S-1);

-19018; -7043/7044; and -4788. The following sites within the APE for Link 1 will be temporarily protected as ESAs:

Cultural Resources Sites within the Area of Potential Effects (APE) to be Evaluated (n=18)	
Site Designation	Proposed Mitigation
IMP-1015/4348/8744	20 m ESA buffer around site boundary within work area EPXXX*; ESA along existing road and access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-3784/3785/4340/4341/4344	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along existing road and access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-4327	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road and access road to EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-10372 (LMP-S-61/SPBB-S-7)	20 m ESA buffer around site boundary within structure and work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-103/3710	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road; ESA within stringing area between EPXXX and EPXXX. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
IMP-3708	ESA along existing road within EPXXX
IMP-4228	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; 20 m ESA buffer around site boundary within helipads EPXXX and EPXXX. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-7060	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road and access road. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-6776/7051/7059/19035	20 m ESA buffer around site boundary within structures EPXXX and EPXXX; 20 m ESA buffer around site boundary within work area and access road EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.

Cultural Resources Sites within the Area of Potential Effects (APE) to be Evaluated (n=18)	
Site Designation	Proposed Mitigation
SDI-19304	20 m ESA buffer around site boundary within structure and work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-7043/7044	20 m ESA buffer around site boundary within structure and helipad EPXXX and EPXXX; ESA along existing road. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-4788	20 m ESA buffer around site boundary within structure EPXXX; ESA (3-strand barbed wire fencing) along existing McCain Valley Road with breach for access to EPXXX; Until site is cleared by SHPO, the eastern access road cannot be used and EPXXX must be accessed from the North.
SDI-19851	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along existing road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19301	20 m ESA buffer around site boundary within work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19293	20 m ESA buffer around site boundary within work area and helipad EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19853	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along access road
SDI-19364 (SPBB-S-1)	20 m ESA buffer around site boundary within work area EPXXX; ESA along access road
SDI-19018	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.

*Site locations are confidential; therefore, identifying work areas and structure numbers have been removed from the Public document.

- As stated in the HPMP for the Sunrise Powerlink Project, approved on July 15, 2010, sites that can be protected from direct impacts, but are within close proximity (within 50 feet) of proposed construction activities will be identified and labeled as ESAs. These sites may include those determined eligible for NRHP listing by the BLM, or others that have not had formal eligibility evaluations. Forty-eight cultural resources sites, within Link 1, will be flagged off with temporary orange fencing and designated as ESAs. Forty-six cultural resources sites are located

on BLM land and two cultural resources sites are located on both BLM and private lands (CA-SDI-7077 and -19001/19003). In accordance with Mitigation Measure **C-01b: Erect protective flagging or other markers for ESA**; sites will be flagged off with temporary orange fencing and designated as ESAs. ESA buffers around each site will be established and these sites will be protected as exclusionary zones; site specific ESA buffers are detailed in the table below. Mitigation Measure **C-01e: Implement archaeological monitoring at cultural ESAs**, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required. The following sites within 50 feet of the APE for Link 1 will be protected as ESAs:

Cultural Resources Sites within 50 feet of the Area of Potential Effects (APE) (n=48)	
Site Designation	Proposed Mitigation
IMP-8793	20 m ESA buffer around site boundary within structure and work area EPXXX*
IMP-8665	20 m ESA buffer around site boundary within work area EPXXX
IMP-8776	20 m ESA buffer around site boundary within work area EPXXX
IMP-4349	ESA along existing road within EPXXX
IMP-8740	20 m ESA buffer around site boundary within work area EPXXX
IMP-3774	20 m ESA buffer around site boundary within construction yard E EPXXX and EPXXX
IMP-3775	20 m ESA buffer around site boundary within construction yard EPXXX and EPXXX
IMP-3773	20 m ESA buffer around site boundary within work area EPXXX
IMP-10847	20 m ESA buffer around entire site boundary
IMP-10883	20 m ESA buffer around entire site boundary
IMP-8740	20 m ESA buffer around site boundary within work area EPXXX
IMP-8739	20 m ESA buffer around site boundary within string site EPXXX
IMP-8733	20 m ESA buffer around entire site boundary
IMP-2372/3765	20 m ESA buffer around site boundary within work area EPXXX
IMP-3761H	ESA along existing road within EPXXX

Cultural Resources Sites within 50 feet of the Area of Potential Effects (APE) (n=48)	
Site Designation	Proposed Mitigation
IMP-10891	20 m ESA buffer around site boundary within work area EPXXX
IMP-3728	ESA along existing road between EPXXX and EPXXX
IMP-8810	ESA along existing road within EPXXX
IMP-8813	20 m ESA buffer around site boundary within work area EPXXX
IMP-3720	ESA along existing road between EPXXX and EPXXX
IMP-10869	20 m ESA buffer around site boundary within work area EPXXX
IMP-10864	20 m ESA buffer around site boundary within helipad EPXXX
IMP-10861	20 m ESA buffer around entire site boundary
IMP-4724	20 m ESA buffer around entire site boundary
IMP-7886	ESA along existing road within EPXXX
IMP-10852	ESA along existing road within EPXXX and monitor grading
IMP-10897	20 m ESA buffer around site boundary within helipad EPXXX
IMP-4706	20 m ESA buffer around site boundary within helipad EPXXX
SDI-7077	ESA along existing roads; monitor guard structure installation at EPXXX and EPXXX
SDI-7053	ESA along existing road within EPXXX and monitor grading
SDI-7052	ESA along existing road within EPXXX and monitor grading
SDI-19882	ESA along existing road within EPXXX
SDI-18063	ESA along existing road within EPXXX and monitor grading
SDI-19870	20 m ESA buffer around site boundary within work area EPXXX
SDI-19868	20 m ESA buffer around entire site boundary
SDI-19869	20 m ESA buffer around site boundary within work area EPXXX
SDI-17817	ESA along existing road within EPXXX
SDI-19001/19003	20 m ESA buffer around site boundary within structure and EPXXX; ESA along access road

Cultural Resources Sites within 50 feet of the Area of Potential Effects (APE) (n=48)	
Site Designation	Proposed Mitigation
SDI-19849	20 m ESA buffer around site boundary within access road for EPXXX
SDI-19853	20 m ESA buffer around entire site boundary and work area EPXXX; ESA along new access road
SDI-19854	20 m ESA buffer around site boundary within work area EPXXX
SDI-19935	20 m ESA buffer around site boundary within access road for EPXXX
SDI-19874	20 m ESA buffer around site boundary within string site and access road for EPXXX; monitor grading
SDI-19857	20 m ESA buffer around site boundary within string site for EPXXX
SDI-19860	20 m ESA buffer around site boundary within string site for EPXXX
SDI-19936	20 m ESA buffer around entire site boundary
SDI-19865	20 m ESA buffer around entire site boundary
SDI-19864	20 m ESA buffer around site boundary within helipad EPXXX

*Site locations are confidential; therefore, identifying work areas and structure numbers have been removed from the Public document.

3. The Final HPMP states that monitoring will take place 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. The Buried Site Sensitivity Model and Testing Plan has not been finalized or implemented. In accordance with Mitigation Measure **C-03a: Implement archaeological monitoring**, archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified as sensitive for buried archaeological deposits. Therefore, construction disturbance associated with the following tower structures within Link 1, located in areas determined to be of high sensitivity for buried sites, must be monitored by both a qualified archaeologist and Native American monitor:
 - SSDE5, EP363-1, EP362-1, EP361, EP360, EP357, EP356, EP355, EP354, EP353, EP349, EP348, EP342, EP341, EP340, EP336, EP335, EP334, EP333, EP332, EP331, EP330-1, EP329-1, EP328-1, EP327, EP326, EP324, EP323-1, EP316-2, EP313, EP306-1, EP303-2, EP302-1, EP301, EP300-1, EP299, EP298, EP297, EP294, EP293, EP292-1, EP251, EP206-1, EP205-2, EP204-3, EP202-3, EP200A-1, EP200-3, EP174, EP173-1, EP172, EP171, EP150, EP142-1, and EP118-2.

4. In the event of an unanticipated discovery of archaeological materials within a work area during construction monitoring, all ground-disturbing work at the work area will be suspended as stipulated in Mitigation Measures **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties**, **C-1e: Monitor construction at known ESAs**, and **C-3a: Monitor construction in areas of high sensitivity for buried resources**. Any new discoveries shall be managed in compliance with the following procedures and guidelines for **Treatment For Unanticipated Discoveries** set forth in the Final HPMP:
- The archaeological monitor will inspect the ground surface around the discovery to determine whether the discovery is an isolated find (fewer than three items) or a site (three or more items, or a feature).
 - If the discovery is determined to be an isolated find (with the exception of human remains), the discovery will be documented and reported in the weekly monitoring report; isolated finds will only be collected if they are diagnostic artifacts. After the isolated find is documented, construction work may resume in the area.
 - If the discovery is determined to be a site, the discovery area will be flagged off and secured; no ground-disturbing activities will be allowed within the discovery area until a formal eligibility determination of the site has been made. The archaeological monitor will notify the Principal Investigator (PI), who will notify the BLM archaeologist and the CPUC of the nature and extent of the discovery. In consultation with the PI, the BLM archaeologist will determine what additional fieldwork is necessary to determine the site's potential eligibility for the NRHP.
 - At this time, all parties will consult the detailed Unanticipated Discoveries Plan as outlined in the Final HPMP.

Link 2 (Segments 7, 8, 9, 10, 11, 12)

Paleontology

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, the potential to encounter paleontological resources along Link 2 varies from no potential to low potential. In accordance with Mitigation Measure **PAL-01c: Conduct part-time monitoring of sediments with low, marginal, undetermined sensitivity**, construction work in areas determined to have a low, marginal, and/or undetermined paleontological resource sensitivity will be monitored on a part-time basis as determined by a qualified paleontologist. The following Mile Posts (MP) within Link 2 will be monitored:

Paleontological Construction Monitoring	
Full-time Monitoring	Part-time Monitoring
--	MP-73.6 to MP-73.9

Cultural Resources

1. The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010. All known cultural resources identified within the APE for Link 2 will be avoided. Furthermore, mitigation measures set forth in the HPMP for the Sunrise Powerlink Project, approved on July 15, 2010, will be implemented during construction, as required.
2. As stated in the HPMP for the Sunrise Powerlink Project, approved on July 15, 2010, sites that can be protected from direct impacts, but are within close proximity (within 50 feet) of proposed construction activities will be identified and labeled as ESAs. These sites may include those determined eligible for NRHP listing by the BLM, or others that have not had formal eligibility evaluations. Two cultural resources sites, within Link 2, will be flagged off with temporary orange fencing and designated as ESAs. One cultural resources site is located on BLM land (CA-SDI-19797) and one cultural resources site is located on both BLM and private lands (CA-SDI-8440). In accordance with Mitigation Measure **C-01b: Erect protective flagging or other markers for ESA**, sites will be flagged off with temporary orange fencing and designated as ESA. ESA buffers around each site will be established and these sites will be protected as exclusionary zones; site specific ESA buffers are detailed in the table below. Mitigation Measure **C-01e: Implement archaeological monitoring at cultural ESAs**, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required. The following sites within 50 feet of the APE of Link 2 will be protected as ESAs:

Cultural Resources Sites within 50 feet of the Area of Potential Effects (APE) (n=2)	
Site	Proposed Mitigation
SDI-19797	20 m ESA buffer around site boundary within work area EPXXX* and monitor guard structure installation
SDI-8440	ESA along existing road within EPXXX; no grading/improvements permitted; 20 m ESA buffer around entire site boundary

*Site locations are confidential; therefore, identifying work areas and structure numbers have been removed from the Public document.

3. The Final HPMP states that monitoring will take place at highly sensitive areas defined during 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. The Buried Site Sensitivity Model and Testing Plan has not been finalized or implemented. In accordance with Mitigation Measure **C-03a: Implement archaeological monitoring**, archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified as sensitive for buried archaeological deposits. Therefore, construction disturbance associated with the following tower structures within Link 2, located in areas determined to be of high sensitivity for buried sites, must be monitored by both a qualified archaeologist and Native American monitor:
 - EP113-4, EP112A, EP101-2, EP96, and EP94.
4. In the event of an unanticipated discovery of archaeological materials within a work area during construction monitoring, all ground-disturbing work at the work area will be suspended as stipulated in Mitigation Measures **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties**, **C-1e: Monitor construction at known ESAs**, and **C-3a: Monitor construction in areas of high sensitivity for buried resources**. Any new discoveries shall be managed in compliance with the following procedures and guidelines for **Treatment For Unanticipated Discoveries** set forth in the Final HPMP:
 - The archaeological monitor will inspect the ground surface around the discovery to determine whether the discovery is an isolated find (fewer than three items) or a site (three or more items, or a feature).
 - If the discovery is determined to be an isolated find (with the exception of human remains), the discovery will be documented and reported in the weekly monitoring report; isolated finds will only be collected if they are diagnostic artifacts. After the isolated find is documented, construction work may resume in the area.
 - If the discovery is determined to be a site, the discovery area will be flagged off and secured; no ground-disturbing activities will be allowed within the discovery area until a formal eligibility determination of the site has been made. The archaeological monitor will notify the Principal Investigator (PI), who will notify the BLM archaeologist and the CPUC of the nature and extent of the discovery. In consultation with the PI, the BLM

archaeologist will determine what additional fieldwork is necessary to determine the site's potential eligibility for the NRHP.

- At this time, all parties will consult the detailed Unanticipated Discoveries Plan as outlined in the Final HPMP.

Link 5 (Segments 14, 16, 17, 18)

Paleontology

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, there are no sensitive paleontological resources located on BLM land within Link 5 (Segments 14, 16, 17, 18). No NTP conditions are recommended.

Cultural Resources

1. The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010. All known cultural resources identified within the APE for Link 5 will be avoided. Furthermore, mitigation measures set forth in the Final Historic Properties Management Plan (HPMP) for the Sunrise Powerlink Project, approved on July 15, 2010, will be implemented during construction, as required.
2. As stated in the Final HPMP, sites that can be protected from direct impacts, but are within close proximity (within 50 feet) of proposed construction activities will be identified and labeled as Environmentally Sensitive Areas (ESA). These sites may include those determined eligible for NRHP listing by the BLM, or others that have not had formal eligibility evaluations. One cultural resource site (CA-SDI-8251/19247), located on BLM land within Link 5, will be flagged off with temporary orange fencing and designated as an ESA. In accordance with Mitigation Measure **C-01b: Erect protective flagging or other markers for ESA**, sites will be flagged off with temporary orange fencing and designated as ESAs. ESA buffers around each site will be established and these sites will be protected as exclusionary zones; site specific ESA buffers are detailed in the table below. Mitigation Measure **C-01e: Implement archaeological monitoring at cultural ESAs**, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required. The following site within 50 feet of the APE for Link 5 will be protected as an ESA:

Cultural Resources Sites within 50 feet of the Area of Potential Effects (APE) (n=1)	
Site Designation	Proposed Mitigation
SDI-8251/19247	20 m ESA buffer around site boundary within work area and helipad CPXXX*

*Site locations are confidential; therefore, identifying work areas and structure numbers have been removed from the Public document.

3. The Final HPMP states that monitoring will take place 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. The Buried Site Sensitivity Model and Testing Plan has not been finalized or implemented. However, areas within Link 5 have been determined to be of very low sensitivity.

Therefore, archaeological and Native American monitors will not be required to monitor earth-moving activities associated with overhead construction along Link 5.

4. In the event of an unanticipated discovery of archaeological materials within a work area during construction monitoring, all ground-disturbing work at the work area will be suspended as stipulated in Mitigation Measures **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties**, **C-1e: Monitor construction at known ESAs**, and **C-3a: Monitor construction in areas of high sensitivity for buried resources**. Any new discoveries shall be managed in compliance with the following procedures and guidelines for **Treatment For Unanticipated Discoveries** set forth in the Final HPMP:
 - The archaeological monitor will inspect the ground surface around the discovery to determine whether the discovery is an isolated find (fewer than three items) or a site (three or more items, or a feature).
 - If the discovery is determined to be an isolated find (with the exception of human remains), the discovery will be documented and reported in the weekly monitoring report; isolated finds will only be collected if they are diagnostic artifacts. After the isolated find is documented, construction work may resume in the area.
 - If the discovery is determined to be a site, the discovery area will be flagged off and secured; no ground-disturbing activities will be allowed within the discovery area until a formal eligibility determination of the site has been made. The archaeological monitor will notify the Principal Investigator (PI), who will notify the BLM archaeologist and the CPUC of the nature and extent of the discovery. In consultation with the PI, the BLM archaeologist will determine what additional fieldwork is necessary to determine the site's potential eligibility for the NRHP.
 - At this time, all parties will consult the detailed Unanticipated Discoveries Plan as outlined in the Final HPMP.

References

Garcia-Herbst, Arleen, David R. Iversen, Don Laylander, and Brian Williams

2010 Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California. ASM Affiliates, Inc. Submitted to Bureau of Land Management, El Centro Field Office and San Diego Gas & Electric.

Iversen, David R., Arleen Garcia-Herbst, and Don Laylander

2010 Historic Properties Management Plan for the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California. ASM Affiliates, Inc. Submitted to Bureau of Land Management, El Centro Field Office and San Diego Gas & Electric.



Memorandum

Date: July 6, 2010

To: Molly Frisbie

From: Mike Hatch

Subject: **Sunrise Geotechnical Investigation**

Molly, the following discussion and table are in response to your questions regarding the rationale for structures selected as boring or trench locations for the geotechnical investigation.

Borings were selected based on a number of considerations including; structure type, geologic unit, geologic hazards and general coverage. Major angles and deadends are a priority for foundation design and are a focus of the boring program and the selection process. The evaluation of potential geologic hazards results in a series of borings to address landslide hazards and liquefaction. The following table presents the borings proposed to address geologic hazards.

In addition to the boring program there are exploratory trenches planned at 5 locations to evaluate the presence or absence of fault rupture hazards in the vicinity of mapped faults.

Structure Designation	Investigation Method	Geologic Conditions/Hazards to be evaluated
CP-20	Geotechnical Boring	Evaluate possible ancient landslide
EP 54	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 90-1	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 141	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 239-1	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 240	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 257	Fault Trench	Address presence or absence of possible fault ("Jacume")
EP 296	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 303-2	Fault Trench	Address presence or absence of Elsinore Fault traces
EP 304-2	Fault Trench	Address presence or absence of Elsinore Fault traces
EP 316-2	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 324	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 335	Fault Trench	Address presence or absence of Yuha Wells Fault traces
EP340	Fault Trench	Address presence or absence of Yuha Wells Fault traces
EP 361	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential
EP 363	Geotechnical Boring	Young alluvium/possible shallow water/liquefaction potential

United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office

1661 South 4th Street

El Centro, CA 92243

www.blm.gov/ca/elcentro/

In Reply Refer To:

CA-670-06-28/CA-47658/ EIS CA-670-2006-31/DOI-BLM-CA-D070-2011-0056-DNA
(8100)P

Memorandum

To: Field Manager, El Centro Field Office (CA-670)

From: Archaeologist, El Centro Field Office (CA-670)

Subject: Agency Findings and Determinations under Section 106 of the National Historic Preservation Act

Project: Sunrise Powerlink: BLM Notice to Proceed for BLM lands in Links 1, 2 and 5 (NTP)-2, Imperial County, California

The Bureau of Land Management (BLM) El Centro Field Office is proposing to issue a NTP to San Diego Gas and Electric to begin construction on all Bureau of Land Management (BLM) lands within Link 1 (Segments 2, 3, 4, 5, 6), Link 2 (Segments 7, 8, 9, 10, 11, 12), and Link 5 (Segments 14, 16, 17, 18), of the Sunrise Powerlink Project.

Pursuant to the Sunrise Powerlink Programmatic Agreement (PA)* executed in December 2008 and Chapter 7 of the *Final Historic Properties Management Plan for the Approved San Diego Gas and Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* (HPMP) which provides for issuance of clearances to begin construction and documentation of compliance with Section 106, BLM professional cultural resources staff have reviewed this undertaking and have made the following recommendations regarding historic properties that may be affected.

Identification and evaluation efforts for the Sunrise Powerlink project are described in the report titled *Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* prepared by ASM Affiliates (Arlene Garcia-Herbst et al, June 2010). Based on the above documentation, the PA, the HPMP and the BLM Record of Decision, the following actions are required as part of issuance of this NTP:

- **C-1b: Avoid and protect potentially significant resources**

* Programmatic Agreement Among the Department of the Interior, Bureau of Land Management, the Department of Agriculture, Forest Service, the Marine Corps Air Station Miramar, the U.S. Army Corps of Engineers, the California Public Utilities Commission, San Diego Gas and Electric Company, and the California State Historic Preservation Officer Regarding the Proposed San Diego Gas and Electric Power Company's Sunrise Powerlink Transmission Line Project, Imperial and San Diego Counties, California

- **C-1c: Develop and implement Historic Properties Treatment Plan** The HPMP provides additional procedures and requirements.
- **C-1d: Conduct data recovery to reduce adverse affects**
- **C-1e: Monitor construction at known ESAs-** The HPMP provides additional procedures and requirements.
- **C-2a: Properly treat human remains -** The HPMP provides additional procedures and requirements.
- **C-3a: Monitor construction in areas of high sensitivity for buried resources -** The HPMP provides additional procedures and requirements.
- **C-4a: Complete consultation with Native American and other Traditional Groups**
- **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties-** The HPMP provides additional procedures and requirements.
- **C-6a: Reduce adverse visual intrusions to historic built environment properties**
- **CR-APM-05: Follow procedures for inadvertent discoveries –** The HPMP documents these procedures and requirements.
- SDG&E will also continue to comply with Cultural resources mitigation measures as outlined in the MMCRP.

Eighteen archaeological sites were identified within or very near the area of direct impacts on BLM land for Link 1 [(CA-IMP-1015/4348/8744; -3784/3785/4340/4341/4344; -4327; -10372 (LMP-S-61/SPBB-S-7); -103/3710; -3708; -4228; CA-SDI-7060; -6776/7051/7059/19035; -19304; -19851; -19301; -19293; -19853; -19364 (SPBB-S-1); and -19018)], and two sites span both BLM and private lands for Link 1 (CA-SDI-7043/7044 and -4788); all known archaeological sites identified within the area of direct impacts for Link 2 will be avoided; and all known archaeological sites identified within the area of direct impacts for Link 5 will be avoided. Archaeological testing to enable formal eligibility determinations of these resources has been initiated. An Evaluation Report and a Historic Properties Treatment Plan (HPTP) describing the results of these studies will be prepared and submitted to BLM for review and approval. At this time National Register of Historic Places (NRHP) eligibility recommendations have not yet been made; the BLM must formally make these determinations and the State Historic Preservation Officer (SHPO) and other consulting parties must have an opportunity to review the determinations of eligibility before they can become final.

Therefore no construction work within the boundaries of the above-mentioned sites can begin until this process is complete and until such time as a Historic Properties Treatment Plan has been approved, executed as appropriate and mitigation measures listed above have been fulfilled. These areas will be protected as Environmentally Sensitive Areas with a buffer (see table below). BLM will notify SDG&E in writing when these areas are cleared for access.

Cultural Resources Sites within the Area of Direct Impacts to be Evaluated (n=18)	
Site Designation	Proposed Mitigation
IMP-1015/4348/8744	20 m ESA buffer around site boundary within work area EPXXX*; ESA along existing road and access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-3784/3785/4340/4341/4344	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along existing road and access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-4327	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road and access road to EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-10372 (LMP-S-61/SPBB-S-7)	20 m ESA buffer around site boundary within structure and work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
IMP-103/3710	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road; ESA within stringing area between EPXXX and EPXXX. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
IMP-3708	ESA along existing road within EPXXX
IMP-4228	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; 20 m ESA buffer around site boundary within helipads EPXXX and EPXXX. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-7060	20 m ESA buffer around site boundary within structures and work areas EPXXX and EPXXX; ESA along existing road and access road. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-6776/7051/7059/19035	20 m ESA buffer around site boundary within structures EPXXX and EPXXX; 20 m ESA buffer around site boundary within work area and access road EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19304	20 m ESA buffer around site boundary within structure and work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-7043/7044	20 m ESA buffer around site boundary within structure and helipad EPXXX and EPXXX; ESA along existing road. Therefore, work associated with towers EPXXX and EPXXX is not allowed until site evaluations are complete.
SDI-4788	20 m ESA buffer around site boundary within structure EPXXX; ESA (3-strand barbed wire fencing) along existing McCain Valley Road with breach for access to EPXXX; Until site is cleared by SHPO, the eastern access road cannot be used and EPXXX must be accessed from the North.
SDI-19851	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along existing road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19301	20 m ESA buffer around site boundary within work area EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19293	20 m ESA buffer around site boundary within work area and helipad EPXXX. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.
SDI-19853	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along access road

Cultural Resources Sites within the Area of Direct Impacts to be Evaluated (n=18)	
Site Designation	Proposed Mitigation
SDI-19364 (SPBB-S-1)	20 m ESA buffer around site boundary within work area EPXXX; ESA along access road
SDI-19018	20 m ESA buffer around site boundary within structure and work area EPXXX; ESA along access road. Therefore, work associated with tower EPXXX is not allowed until site evaluations are complete.

*Site locations are confidential; therefore, identifying work areas and structure numbers have been removed.

The BLM has determined that the previous inventory efforts and required mitigation measures are adequate to identify and protect historic properties on public lands that might be affected by this undertaking. Therefore, the BLM staff archaeologist has recommended that the proposed NTP would have no effect on historic properties if the above measures are implemented.

The BLM makes the following finding for this undertaking.

The BLM finds that there will be *no historic properties affected* by this undertaking.

This memorandum documents the recommendations of the cultural resources staff, the acceptance of these recommendations by the Agency Official (as defined in 36 CFR §800.2(a), Protection of Historic Properties), and constitutes the formal statement of Agency findings and determinations for Section 106 of the National Historic Preservation Act. For this NTP, the BLM has satisfied its responsibilities to take into account the effects of this undertaking on historic properties that may be included or eligible for inclusion on the National Register of Historic Places.

Recommended by:


Archaeologist, El Centro Field Office


Date

Acceptance by the Agency Official:


Field Manager, El Centro Field Office


Date

References:

Garcia-Herbst, Arleen, David R. Iversen, Don Laylander, and Brian Williams
2010, Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California. ASM Affiliates, Inc. Submitted to Bureau of Land Management, El Centro Field Office and San Diego Gas & Electric.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RIGHT-OF-WAY NOTICE TO PROCEED

Certified/Registered Mail - Return Receipt Requested

Right-of-Way or Temporary Use Permit (TUP) Serial Number

CACA-47658

Date

04/01/2011

Issuing Office

El Centro Field Office

Right-of-Way or TUP name

Sunrise Powerlink 500kV Transmission Line

INSTRUCTIONS — Use Certified or Registered Mail or hand delivery. Send or give original to Holder. Distribute other copies as indicated after receipt date.

Holder:

In accordance with the terms and conditions of the above referenced right-of-way grant or IUP you are hereby authorized to proceed with the activities noted below in the locations specified. Map(s) are attached. ☒ Yes ☐ No

Activity	Location
<p>SDG&E may begin construction on all Bureau of Land Management (BLM) lands within Link 1 (Segments 2, 3, 4, 5, and 6), Link 2 (Segments 7, 8, 9, 10, 11, and 12), and Link 5 (Segments 14, 16, 17 and 18) of the Sunrise Powerlink right-of-way. Implementation of mitigation measures C-1b, C-1c, C-1d, C-1e, C-2a, C-3a, C-4a, C-5a, C-6a, and CR-APM-05 shall be required as part of the issuance of the NTP.</p> <p>No construction work within the boundaries of the 18 identified archeological sites identified with Link 1, the sites identified within the area of Link 2, and all known sites in Link 5 can begin until the Evaluation Report and Historic Properties Treatment Plan (HPTP) has been approved by the BLM, executed as appropriate and mitigation measures been fulfilled. These areas shall be protected as Environmentally Sensitive Areas with a buffer (see table attached). BLM will notify SDG&E in writing when these areas are cleared for access.</p>	<p>BLM lands in Links 1, 2 and 5, Imperial County, California</p>

Authorized officer is:

Margaret L. Goodro

Field Manager

Name

Title

Onsite inspection and compliance of the Right-of-Way or IUP stipulations will be conducted by the authorized officer's representative.

Thomas Zale

1661 South 4th Street, El Centro, CA 92243

Name of Authorized Officer's Representative

Office, Street, Address, City, State, Zip

760-334-4420

Office Phone Number

Home Phone Number (Optional)

04/01/2011

Date

Authorized Officer's or Representative's Signature
Holder's acknowledgement when notice is delivered in person

Signature of Recipient

San Diego Gas & Electric Company

Firm Name

Name of Recipient

Date

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

RIGHT-OF-WAY NOTICE TO PROCEED

Certified/Registered Mail - Return Receipt Requested

Right-of-Way or Temporary Use Permit (TUP) Serial Number

CACA-47658

Date

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Sunrise Powerlink 500kV Transmission Line

INSTRUCTIONS — Use Certified or Registered Mail or hand delivery Send or give original to Holder Distribute other copies as indicated after receipt date

Holder:

In accordance with the terms and conditions of the above referenced right-of-way grant or TUP you are hereby authorized to proceed with the activities noted below in the locations specified Map(s) are attached ☒ Yes ☐ No

Activity	Location
SDG&E may begin construction on all Bureau of Land Management (BLM) lands with in Link 1 (Segments 2, 3, 4, 5, and 6), Link 2 (Segmanets 7, 8, 9, 10, 11, and 12), and link 5 (Segments 14, 16, 17 and 18) of the Sunrise Powerlink right-of-way Implementation of mitigation measures C-1b, C-1e, C-1d, C-1e, C-2a, C-3a, C-4a, C-5a, C-6a, and CR-APM-05 shall be required as part of the issuance of the NTP No construction work within the boundries of the 18 identified archeological site identified with Link 1, the sites identified within the area of Link 2, and all known sites in link 5 can begin until the Evaluation Report and Historic Properties Treatment Plan (HPTP) has been approved by the BLM, executed as appropriate and mitigation measures been fulfilled These areas shall be proteeted as Envirinmentally Sensitive Areas with a buffer (see table attached). BLM will notify SDG&E in writing when these area are cleared for access.	BLM lands in Links 1, 2 and 5, Imperial County, California

Authorized officer is:

Margaret L. Goodro

Field Manager

Name

Title

Onsite inspection and compliance of the Right-of-Way or TUP stipulations will be conducted by the authorized officer's representative

Thomas Zale

1661 South 4th Street, El Centro, CA 92243

Name of Authorized Officer's Representative

Office, Street, Address, City, State, Zip

760-334-4420

Office Phone Number

Home Phone Number (Optional)

04/04/2011

Date

Authorized Officer's or Representative's Signature
Holder's acknowledgement when notice is delivered in person

Signature of Recipient

San Diego Gas & Electric Company

Firm Name

Name of Recipient

Date

Worksheet
Determination of NEPA Adequacy (DNA)

Sunrise Powerlink Project
Proposed Changes to the
Approved Project

U.S. Department of the Interior
Bureau of Land Management

April 2011

Worksheet

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

OFFICE: El Centro Field Office

TRACKING NUMBER: DOI-Control No. DES-07-58

CASE FILE/PROJECT NUMBER: CACA-47658

PROPOSED ACTION TITLE/TYPE: The proposed action is a set of minor changes to the approved project, the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project as modified in the Project Modification Report (PMR), and as analyzed in the Final EIR/EIS and Associated Amendment to the Eastern San Diego County Resource Management Plan (RMP) for a single utility crossing in the McCain Valley. These proposed changes include minor realignment of structure pads, roads, and tower staging access pads to avoid sensitive resources, a new pullsite, use of existing unimproved roads to provide access to construction yards, and relocation of tower staging access pads to eliminate need for a helicopter platform. In addition, SDG&E has submitted a revision to their Plan of Development (POD) to include the temporary storage of hazardous materials at construction yards and has stated that if necessary, secondary containment systems would be installed around material storage areas to prevent contaminated run-off from leaving storage areas or to capture product from a leaking container.

The need for each of the proposed changes considered herein was identified subsequent to the approval of the PMR in September 2010 as a result of continued efforts to further reduce impacts to resources including visual, cultural and biological, final engineering, and at the request of agencies and Native American tribes.

LOCATION/LEGAL DESCRIPTION: The Sunrise Powerlink Transmission Project is a 500 kV electrical transmission line from Imperial Valley Substation to a newly-constructed 500/230 kV Suncrest Substation that was identified in the Final EIR/EIS (called Modified Route D Alternative Substation in the Final EIR/EIS), a distance of approximately 92.53 miles. The right-of-way also granted SDG&E the right to use the described public lands to construct, operate, maintain and terminate a 230 kV electrical transmission line from the Suncrest Substation to Sycamore Canyon Substation, located in San Diego. For the first 36 miles of the Selected Alternative

(approved project), the 500 kV transmission line will be built on BLM lands adjacent to the existing Southwest Powerlink 500 kV line. The approved project crosses approximately 49 miles of BLM land, 19 miles of Forest Service land, two miles of Department of Defense land, and 0.4 miles of state land. The remainder of the line crosses lands in various ownerships, including private and local agencies.

The proposed changes to the approved project follow the approved route of the Sunrise Powerlink Transmission Project, as defined in the Final EIR/EIS and modified in the PMR, and would not substantially change the location of the approved project. All are within 250 feet of the approved project alignment as modified by the PMR (approved September, 2010).

APPLICANT: San Diego Gas and Electric Company

A. Description of the Action and any applicable mitigation measures

Proposed Changes to the approved Sunrise Powerlink Transmission Project as modified by the Project Modification Report (approved September, 2010)

Approved Project Components

The Sunrise Powerlink Transmission Project FESSR, as defined in the Final EIR/EIS and approved in the ROD, is a combination of alternatives and route segment options. These are listed in Table 1. The ROD for the approved project adopted the mitigation recommended in the Final EIR/EIS and incorporated it as terms and conditions in the right-of-way grant. Although the ROD applies only to the BLM-administered public lands within the Selected Alternative, the same mitigation was incorporated in the California Public Utilities Commission's (CPUC) approval of the project.

In September 2010, the BLM published a Determination of NEPA Adequacy for the modifications proposed by SDG&E in the Project Modifications Report (May, 2010). The BLM determined that the modifications to the Sunrise Powerlink Project were within the scope of the Record of Decision issued by the BLM. These changes are summarized in Table 1 as part of the approved project.

Table 1 lists the approved components of the Sunrise Powerlink Project, under headings identifying which parts are on public lands under BLM jurisdiction, and which are on private lands and have been approved by the CPUC. The private land segments are described here for informational purposes only; they are not covered in this DNA. For additional information on project components on lands not managed by the BLM, please see the CPUC's website at:

<http://www.cpuc.ca.gov/environment/info/aspen/sunrise/sunrise.htm>

Table 1. Approved Components of the Sunrise Powerlink Project**Approved Components on Public Lands (BLM Jurisdiction)**

Interstate 8 Alternative between the Imperial Valley Substation and MP I8-40 (where the BCD Alternative diverges), including the following reroutes and modifications from the PMR (May, 2010):

- Southwest Powerlink (SWPL) Archaeological Site Reroute; and
- Jacumba SWPL Breakaway Point Revision
- PMR1. Imperial Valley Substation
- PMR2. EP363-1 to EP333 (Dunaway Road)
- PMR3. EP333 to EP324 (Plaster City)
- PMR4. EP324 to EP301 (Pyramid Mining)
- PMR5. EP301 to EP276-1 (Sugarloaf)
- PMR6. EP276 to EP255-1 (Desert View Tower)
- PMR7. EP255 to EP252-1 (Jade Mountain)
- PMR8. EP252-1 to EP239-1 (Jacumba)
- PMR9. EP239-1 to EP229-1 (Quino)
- PMR10. EP229 to EP221-A (Bankhead Springs)
- PMR11. EP221-A to EP219-1 (Jackson-Gatlin)

BCD Alternative and BCD South Option Revisions including the following reroutes and modifications from the PMR (May, 2010):

- PMR12. EP219-1 to EP206-1 (State Corrections)
- PMR13. EP206-1 to EP196-1 (Rough Acres)
- PMR14. EP196-1 to EP170 (McCain Valley)
- PMR15. EP170 to EP141 (JAM)
- PMR16. EP141 to EP122 (Thing Valley)

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Table 1. Approved Components of the Sunrise Powerlink Project

Modified Route D Alternative, including the Modified Route D Alternative Substation, as modified to incorporate the following SDG&E reroutes and modifications from the PMR (May, 2010):

- Cameron Reroute
- Pacific Crest Trail (PCT) Option A, which follows the existing SDG&E 69 kV line, is approved BLM worked with the Forest Service to develop additional mitigation (WR-2c, PCT Route Impact Mitigation) for the PCT crossing
- Western Modified Route D Alternative (MRDA) Reroute
- Star Valley Option Revision was identified by, the Forest Service as its preferred segment in eastern Alpine
- PMR17 EP122 to EP108-2 (La Posta)
- PMR18 EP108-2 to EP99-2 (Lenac)
- PMR19 EP105-2 (Rees)
- PMR20 EP99-2 to EP79 (Bartlett)
- PMR21 EP79 to EP67 (Pacific Crest Trail)
- PMR22 EP67 to EP62A-1 (Long Potrero)
- PMR23 EP62A-1 to EP47-2 (Potrero)
- PMR24 EP47-2 to P39-1 (Barrett Lake)
- PMR25 EP39-1 to EP22-1 (Hermes)
- PMR26 EP22-1 to EP12-3 (Gaskill Peak North)
- PMR27 EP12-3 to EP9-1 (Cedar Ranch)
- PMR28 EP9-1 to EP1-3 (Just)
- PMR29. Suncrest Substation and Access Road (Suncrest Substation)
- PMR30. CP109 to CP106-1 (Bell Bluff)
- PMR31 CP106-1 to CP98-1 (Jerney)
- PMR32. CP98-1 to CP95-1 (230 kV UG Including Loritz Driveway)

Approved Components on Private Lands (CPUC Jurisdiction)

Interstate 8 Alternative installed underground in Alpine Boulevard, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR33. 230 kV Underground from Alpine Blvd/Loritz Driveway to CP88-1/CP87-1 (230 kV UG)

Chocolate Canyon Option Revision, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR34. CP88-1/CP87-1 to CP64-2 (Chocolate Canyon)

Interstate 8 Alternative from the end of the Chocolate Canyon Option Revision to where it joins the Proposed Action/Project route at MP 130, incorporating the High Meadows Reroute and the Highway 67 Hansen Quarry Reroute, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR35 CP64-2 to CP53-1 (Morgan)
- PMR36 CP53-1 to CP44-1 (High Meadow Ranch)
- PMR37 CP44-1 to CP37-2 (County Aqueduct)
- PMR38. CP37-2 to CP31-2 (Schmidt)

Table 1. Approved Components of the Sunrise Powerlink Project

Proposed Action/Project from MP 130 to the Sycamore Canyon Substation, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR39. CP31-2 to CP12-1 (Sycamore Preserve)
- PMR40. CP12-1 to CP3 (Stonebridge)
- PMR 41. CP3 to SSDE-1

Coastal Link System Upgrades Alternative Revision, which includes, as modified to incorporate the following modifications from the PMR (May, 2010):

- Reconductoring of existing transmission segments: Sycamore Canyon–Pomerado double-circuit 69 kV; Sycamore Canyon–Scripps 69 kV transmission line; and the existing Sycamore–Elliott 69 kV transmission line.
- Installation of a third 230/69 kV transformer at the existing Sycamore Canyon Substation and a new 230/138 kV transformer at the existing Encina Substation
- PMR42. Sycamore Canyon to Pomerado Substation (TL6915/6924) Reconductoring
- PMR 43 Sycamore Canyon to Elliot Substation (TL639) Reconductoring
- PMR44. Sycamore Canyon to Scripps Substation (TL6916) Reconductoring (Scripps)

Additional Project Modifications Requested

A number of mitigation measures incorporated as right-of-way terms and conditions required SDG&E to continue to attempt to avoid resources and minimize environmental impacts in the final engineering and design for the approved project. Implementation of these mitigation measures have resulted in further proposed changes, beyond those approved in the PMR. The measures resulting in additional changes include the following:

Mitigation Measures for Biological Resources

B-1a: Provide restoration/compensation for impacted sensitive vegetation communities

B-2a: Provide restoration/compensation for impacted jurisdictional areas

BIO-APM-1: SDG&E would perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted by the project based on final design in accordance with federal or State regulations or statutes

Mitigation Measure for Cultural Resources

C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE). (pg. E.1.7-5, FEIR/EIS 2008)

C-1b: Avoid and protect potentially significant resources (pg. E.1.7-5, FEIR/EIS 2008)

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C-6a Reduce adverse visual intrusions to historic built environment properties (pg. E.1.7-8, FEIR/EIS 2008)

CR-APM-2: Archaeological sites that are eligible or potentially eligible for the National Register will be flagged in the field and spanned or otherwise avoided through routing during construction activities to the extent feasible (pg. D.7-23, FEIR/EIS 2008)

Mitigation Measures for Visual Resources

V-1a: Reduce visibility of construction activities and equipment (pg. E.2.3-12, FEIR/EIS 2008)

V-2d: Construction by helicopter (pg. E.2.3-14; FEIR/EIS 2008)

V-3a: Reduce visual contrast of towers and conductors (pg. E.2.3-5; FEIR/EIS 2008)

In compliance with these mitigation measures, in responses to requests by agencies and interested parties to avoid sensitive resources, and based on final engineering and design, SDG&E has identified proposed changes to the approved project. These changes are described in Table 2. These include minor changes in structure, maintenance pads, and roads to avoid sensitive biological resources, use of a new pullsite, use of existing unimproved roads, and relocation/use of tower access staging pads to eliminate access roads and maintenance pads. The proposed changes to the approved project are tabulated in a spreadsheet titled 'BLM Table of Changes since PMR' dated January 31, 2011 and are shown in 'BLM-Mapbook of Changes' pages 1-40. Table 1 describes the approved project (FESSR as modified by the PMR) as well as each of the specific proposed changes by segment. Because each change is minor and occurs at a specific tower location, they have been identified by the tower number. Table 2 also defines the mitigation measure (by number only) that required each change to be made.

Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
Interstate 8 Alternative between the Imperial Valley Substation and MP 18- 40 (where the BCD Alternative diverges)	<ul style="list-style-type: none"> • B-1a: pg. E.1.2-7, FEIR/EIS 2008 • B-2a: pg. E.1.2-20, FEIR/EIS 2008 • BIO-APM-1: pg. E.1.2-13, FEIR/EIS 2008 • C-1a: pg. E.1.7-5, FEIR/EIS 2008 • C-1b: pg. E.1.7-5, FEIR/EIS 2008 • C-6a: pg. E.1.7-8, FEIR/EIS 2008 	Segment 1: IV Sub Const. Yard	Small location change to IV Sub CY access road
		Segment 2	<p>EP347: Structure maintenance access road entrance widened</p> <p>EP342: Structure maintenance road re-aligned northward to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP 336: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP331: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP330-1: Pulisite P330-1-PS-A northwest portion outside of corridor boundary included to achieve proper pulisite operation set-backs. Plaster City yard boundary change to encompass maintenance pads since yard access road was deleted due to steep terrain.</p> <p>EP324: Small TSAP relocation to reduce grading</p> <p>EP323-1: TSAP relocated to avoid dry-wash area impacts per Army Corps request</p> <p>EP322-1: Pulisite road relocated to avoid dry-wash area impacts per Army Corps request</p> <p>EP316-2: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP313: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP307-1: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP303-2: Guard structure re-located</p> <p>EP302-1: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP301: Structure maintenance pad and road slightly re-aligned to accommodate quarry operations</p>

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)			
Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)	<ul style="list-style-type: none"> B-1a: pg. E.1.2-7, FEIR/EIS 2008 B-2a: pg. E.1.2-20, FEIR/EIS 2008 BIO-APM-1: pg. E.1.2-13, FEIR/EIS 2008 C-1a: pg. E.1.7-5, FEIR/EIS 2008 C-1b: pg. E.1.7-5, FEIR/EIS 2008 C-6a: pg. E.1.7-8, FEIR/EIS 2008 	Segment 3	<p>EP300-1: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP298: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP292-1: Pullsite road re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>Dunway Const. Yard: Existing unimproved road use added to provide access to construction yard</p> <p>S2 Const. Yard: Existing unimproved road use added to provide access to construction yard</p> <p>EP280-3: Tower structure moved 40' north to reduce impacts to cultural resources</p>
		Segment 5	<p>EP250: Structure access road re-aligned to avoid/reduce cultural area impacts</p> <p>EP249: TSAP located to eliminate/reduce cultural impacts caused by structure access road and maintenance pad which have been removed</p> <p>EP248-1: Tower structure relocated approximately 40 feet northeast to eliminate/reduce cultural impacts</p> <p>EP246: TSAP located to eliminate/reduce cultural impacts caused by structure access road and maintenance pad which have been removed</p>

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
BCD Alternative and BCD South Option Revisions	• V-1a: pg. E.2.3-12, FEIR/EIS 2008	Segment 6	EP205-2: Small revision in road location
	• V-2d: pg. E.2.3-14, FEIR/EIS 2008		EP200A-1: Structure maintenance pad and road were re-aligned due to tower move
	• V-3a: pg. E.2.3-5, FEIR/EIS 2008		EP200-3: Structure maintenance pad and road were re-aligned to provide a smaller impact area. Pullsites added to structure
	• C-1a: pg. E.2.7-2, FEIR/EIS 2008		EP197-3: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 75 feet southwest
	• C-1b: pg. E.2.7-2, FEIR/EIS 2008		EP196-2: TSAP located to eliminate cultural impacts and due to tower move approximately 150 feet south
	• CR-APM-2: pg. D.7-23, FEIR/EIS 2008		EP195-2: TSAP footprint relocated due to tower move approximately 140 feet south
Modified Route D Alternative, including the Modified Route D Alternative Substation	<ul style="list-style-type: none"> • B-1a: pg. E.4.2-9, FEIR/EIS 2008 • V-2d: pg. E.4.3-9, FEIR/EIS 2008 • L-2b: pg. E.4.47, FEIR/EIS 2008 • C-1a: pg. E.4.7-3, FEIR/EIS 2008 • C-1b: pg. E.4.7-3, FEIR/EIS 2008 	Segment 7	EP194-3: TSAP located to eliminate cultural impacts and due to tower move approximately 50 feet west
			EP193-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 75 feet south
			EP192-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 125 feet south
			EP191-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 25 feet south
			EP190-2: Guard structure re-located
			EP189-3: Final engineering: small change to grading limits
		Segment 8	EP186-1: Final engineering: small change to grading limits
			EP180: Final engineering: small change to grading limits
		Segment 9	EP175: Structure maintenance pad and access road re-aligned to a hook per CPUC visual consultants request
			EP170: Final engineering: small change to pull site grading limits
		Segment 7	EP147: TSAP relocated to flatter terrain to eliminate the need for a helicopter platform
			EP103A: Final engineering: small change to grading limits
		Segment 8	EP99-2: Final engineering: small change to grading limits
			EP98-1: Final engineering: small change to grading limits
		Segment 9	EP97: Final engineering: small change to grading limits
			EP96: Final engineering: small change to grading limits
		Segment 9	EP95: Final engineering: small change to grading limits
			EP75-2: Existing Road rehab: Access road needs to be graded around tower leg foundation

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)			
Modified Route D	• B-1a: pg. E.4.2-9, FEIR/EIS 2008	Segment 10	EP56-4: Tower structure moved approximately 50 feet east to avoid/minimize cultural impacts
Alternative, including the Modified Route D	• V-2d: pg. E.4.3-9, FEIR/EIS 2008		EP53-3: Tower structure moved approximately 200 feet northwest and TSAP relocated due to cultural impacts
Alternative Substation	• L-2b: pg. E.4.47, FEIR/EIS 2008		EP51-1: Final engineering: small change to grading limits
	• C-1a: pg. E.4.7-3, FEIR/EIS 2008		EP50: Final engineering: small change to grading limits
	• C-1b: pg. E.4.7-3, FEIR/EIS 2008	Segment 11	EP49: Final engineering: small change to grading limits
			EP47-2: Pullsite: Revised per CPUC comment to avoid notch in ridge line
			EP45-1: TSAP relocated to flatter terrain to eliminate the need for a helicopter platform
			EP42: Final engineering: small change to grading limits

The majority of the changes are located on land previously surveyed for the approved project as modified by the PMR. Where the proposed change does not occur on previously surveyed land, additional biological surveys were conducted in December, 2010. Additional biological surveys will be conducted for rare plant species during the appropriate season and for the Quino Checkerspot butterfly where the habitat is appropriate.

This DNA also considers a minor change in the Sunrise Plan of Development (POD). The Sunrise Plan of Development originally submitted to the BLM in November 2008, did not address the need to temporarily store hazardous materials such as petroleum products (gasoline, diesel fuel, crankcase oil, lubricants, and cleaning solvents) at construction yards on BLM-administered land. SDG&E has submitted a revised POD to include the storage of hazardous materials and has stated that if necessary, secondary containment systems would be installed around material storage areas to prevent contaminated run-off from leaving storage areas or to capture product from a leaking container. Similar language was included in the Public Health and Safety Sections (Section 1.10, 2.10, and 4.10 for the approved project) the Final EIR/EIS.

B. Land Use Plan (LUP) Conformance

LUP Name* California Desert Conservation Area Plan Date Approved 1980, as amended

LUP Name Eastern San Diego County RMP Date Approved 2008, as amended

Other Document Yuha Basin ACEC Management Plan Date Approved 1981

LUP Name Cleveland National Forest Management Plan Date Approved 2006, as amended

- *List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

California Desert Conservation Area Plan, 1980 as amended. BLM lands in the California Desert District are managed pursuant to the *California Desert Conservation Area Plan (CDCA Plan, 1980 as amended)*. The Energy Production and Utility Corridor Element of the CDCA Plan established a network of joint-use planning corridors intended to meet the projected utility service needs at the time the Plan was written. The CDCA Plan, 1980 as amended applies to that portion of the approved project (as amended by the PMR) and the current proposed changes to the approved project situated on public lands administered by the BLM in Imperial County.

Within Imperial County, the proposed changes to the approved project (as revised by the PMR) are in conformance with the CDCA Plan, 1980 as amended because they would remain within the same BLM CDCA-designated utility corridor as the approved project. Thus, a CDCA Plan amendment is not required for the proposed changes to the approved project.

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Eastern San Diego County Resource Management Plan (2008). Like the approved project (the FESSR as revised by the PMR), the proposed changes to the approved project traverse the BLM El Centro Field Office's Eastern San Diego County Management Area. New transmission line towers and cables 161 kV and above are required to be located within a single designated utility ROW (the SWPL corridor) one mile wide and between one and 1.5 miles in length encompassing 960 acres of BLM-administered land within the planning area. Since the FESSR would be partially located on public lands outside of the designated utility corridor, it required a Plan Amendment. The ROD for the project amended the Eastern San Diego County RMP to allow for a one-time exemption for the Sunrise Powerlink Project (as approved and defined as the FESSR).

One proposed change to the approved project on BLM-administered land in Eastern San Diego County (EP 200-3) would involve pullsites added to structure EP200-3 and would go outside (150 feet) of the right-of-way along same alignment. The pullsites would be temporary. These changes are in conformance with the land use plan because they are clearly consistent with the 2009 plan amendment for the Sunrise Powerlink and are proposed as in accordance with the mitigation measures listed above and included in the ROD that approved both the plan amendment and the project.

Four additional changes to the approved project on BLM-administered land in Eastern San Diego County, would involve minor shifts in tower staging access pads (TSAPs) and access roads up to 200 feet outside of the right-of-way. The proposed changes are in conformance with the land use plan because they were designed to further avoid cultural resources as provided for in the FESSR under C-1b: Avoid and protect potentially significant resources (pg. E.1.7-5, FEIR/EIS 2008) and required in the ROD.

Yuha Basin Area of Critical Environmental Concern (ACEC) Management Plan, June 1981. The proposed changes to the approved project, like the FESSR, would pass through the Yuha Basin ACEC south of I-8 in Imperial County. The Yuha Basin ACEC Management Plan has been prepared to give additional protection to unique cultural resource and wildlife values within portions of the Yuha Basin. This ACEC contains high density and diversity of cultural resource values, including intaglios, temporary camps, lithic scatters, cremation loci, pottery loci, trails, and shrines. The ACEC also includes 11 sections containing high relative densities of the flat-tailed horned lizard (FTHL). Mitigation Measures C1b (Avoid and protect potentially significant resources) and C2a (Consult with agencies and Native Americans) were required for the FESSR within the Yuha Basin ACEC and resulted in proposed changes to the approved project to reduce impacts to the resources that exist in the ACEC. Impacts to public land resources within the ACEC were fully analyzed and disclosed in the Final EIR/EIS. In addition, adverse effects to cultural resources would be reduced through implementation of mitigation measures

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such as C1e (Monitor construction) and C1f (Train construction personnel). These mitigation measures apply to the approved project and would likewise apply to the proposed changes to the approved project.

As described on page D.16-13 of the Final EIR/EIS, the proposed changes conform to the proposed ACEC management plan because:

- The proposed changes to the approved project within the ACEC would be limited to a geographic area in close proximity to the existing SWPL transmission line, which is located within the VRM Class III area. While the new line would not repeat the basic elements of the existing natural features in the landscape, it would repeat the characteristics of the existing line. Although the project would be visible, it would not dominate the view of the casual observer. The moderate level of change that would result from the new line (structures and conductors) would meet the VRM Class III objective of moderate (or lower) visual change,
- The proposed changes to the approved project would not impact any historic properties within the Yuha Basin ACEC that are listed on the National Register of Historic Places, and
- The proposed changes to the approved project would decrease the ground disturbance within the Yuha ACEC reducing impacts to wildlife (FTHL).

Cleveland National Forest Land Management Plan. The approved project, as revised by the PMR, would pass through the Cleveland National Forest. The Forest Service amended the Cleveland National Forest Land Management Plan in the Record of Decision (July 2010) to permit an exception to standards for scenic integrity along the proposed modifications to the approved project alignment in the Morena, Sweetwater, and Pine Creek places; permit an exception to Riparian Condition and Biological Resource Condition goals for project activities in Riparian Conservation Areas, and to permit construction of a transmission line tower in a Back Country Non-motorized (BCNM) land use zone. The record of decision amended the Cleveland National Forest Land Management Plan to provide the exceptions which apply only to the proposed modifications to the approved project. Because none of the proposed changes considered herein would occur on the Cleveland National Forest, conformance with the Cleveland National Forest Land Management Plan is not applicable.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- *Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (January 2008).
- *Recirculated Draft Environmental Impact Report/Supplemental Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (July 2008).

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- *Final Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (October 2008).
- *Record of Decision for the Sunrise Powerlink Transmission Project and Associated Amendment to the Eastern San Diego County Resource Management Plan*, CACA 47658, BLM (January 2009)
- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Project Modifications (September, 2010).

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- *Biological Assessment for the Sunrise Powerlink Project*. Prepared by San Diego Gas and Electric Company, Ebbin Moser + Skaggs LLP, ICF Jones & Stokes, KP Environmental, John Messina, TRC Companies, Inc., Wildlife International, (November 2008)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2009*, Carlsbad Fish and Wildlife Office (January 2009)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010*, Carlsbad Fish and Wildlife Office (November 2010)
- *Programmatic Agreement Among the Department of the Interior, Bureau of Land Management, the Department of Agriculture, Forest Service, the Marine Corps Air Station Miramar, the U.S. Army Corps of Engineers, the California Public Utilities Commission, San Diego Gas and Electric Company, and the California State Historic Preservation Officer Regarding the Proposed San Diego Gas and Electric Power Company's Sunrise Powerlink Transmission Line Project, Imperial and San Diego Counties, California* (December 2008)
- *Final Mitigation Monitoring Compliance and Reporting Plan San Diego Gas & Electric Company's Sunrise Powerlink Project*. (April, 2010). A number of pre-compliance reports, permit applications, and other documents are available at the CPUC website that are part of the construction progress and mitigation monitoring at <http://www.cpuc.ca.gov/environment/info/aspen/sunrise/otherdocs.htm>
- *Project Modification Report*. Prepared by San Diego Gas and Electric Company (May 2010).
- *Sunrise Powerlink Project Modifications Report Memorandum*. Prepared by the CPUC and BLM (September, 2010).

D. NEPA Adequacy Criteria

1A. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)?

YES. As stated above, the proposed changes to the approved project as revised by the PMR are minor changes in structure, maintenance pads, and roads to avoid sensitive biological

resources, use of a new pullsite, use of existing unimproved roads, and relocation/use of TSAPs to eliminate access roads and maintenance pads which are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1, E.2, and E.4) as modified by the PMR. The changes detailed in Table 2 would function the same way as the FESSR and its associated equipment as evaluated in the Final EIR/EIS. The minor structure shifts and relocation of TSAPs and roads would not materially change the overall alignment of this transmission line, the location of the line or the analysis area. All are within 200 feet of the approved project ROW and were required due to final engineering or were proposed at the request of reviewing agencies or interested parties and would further avoid biological, visual, and cultural resources.

New language was included in the Sunrise Powerlink Project POD addressing the need to temporarily store hazardous materials at the construction yards on BLM-administered land. The original POD submitted to the BLM did not address storage of hazardous materials at construction yards; however, the Final EIR/EIS did address this potential impact. Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS addressed handling and storage of hazardous materials (see Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5). Impact P-1 noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage of hazardous materials. Including a similar description of the hazardous materials to be stored at construction sites along the approved project ROW in the POD including the potential need for secondary containment systems, does not change the analysis in the Final EIR/EIS and instead validates the analysis currently found in the Final EIR/EIS.

1B. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)?

The proposed changes to the approved project are within the same geographic area as the approved project as modified by the PMR and the resource conditions are substantially the same as those analyzed in the Final EIR/EIS. This fact is confirmed by the close proximity of the proposed changes and the approved route. The proposed changes on public lands requiring relocation of transmission structures and access roads are within the same CDCA utility corridor as those of the approved project and shift less than two hundred feet west in Thing Valley. The tower staging access pads are within 150 feet of the approved route. While some of the revised tower staging access pads, such as the pad associated with EP249-1 is approximately 50 feet

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outside the approved ROW, this access pad allows for the elimination of an access road to reduce impacts to cultural resources.

1C. If the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)?

As noted above, the proposed changes to the approved project do not substantially change the project location. To the extent that minor shifts are proposed in the locations of project structures due to the implementation of required mitigation, these changes are not substantial and would be sufficiently similar to those analyzed in the Final EIR/EIS. In particular, the geographic and resource conditions in the areas where the changes would take place are virtually the same as those of the approved project, although impacts to these resources would be reduced compared to those analyzed in the Final EIR/EIS for the approved project. This reduction in project impacts to resources was the intended consequence of the implementation of the mitigation listed above and included in the ROD.

Note: See item 4 below for a listing of impacts that would be reduced with the proposed changes as compared with the approved project.

1D. If there are differences to geographic and resource conditions, can you explain why they are not substantial?

Differences to geographic and resource conditions are not substantial because only minor shifts are proposed in the locations of project infrastructure and these shifts reduce resource impacts as required by the mitigation measures listed above and included in the ROD.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

YES. The project changes are within the range of alternatives evaluated in the Final EIR/EIS as explained below.

Transmission Line Structure Changes. As detailed in Table 1, the following proposed changes to the approved alignment as modified by the PMR are components of alternatives that were evaluated in the Final EIR/EIS:

- Proposed changes to Segments 1 through 5 are components of the I-8 Alternative (between MP-0 to MP-40), analyzed in Section E.1.2 through E.1.15.
- Proposed changes to Segment 6 are within the area defined as the BCD Alternative and BCD South Option analyzed in Section E.2.2 through E.2.15.

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- Proposed changes to Segment 7 through 11 are within the Modified Route D Alternative, including the Modified Route D Alternative Substation, the Cameron Reroute, Pacific Crest Trail (PCT) Option A, Western Modified Route D Alternative (MRDA) Reroute, and Star Valley Option Revision. Each of these alternative segments was analyzed in Section E.4.2 through E.4.15.
- No additional proposed changes would occur on land under BLM management.

Hazardous Materials Description in the POD. New language was included in the Sunrise Powerlink Project POD addressing the need to temporarily store hazardous materials at the construction yards on BLM-administered land. This is essentially the same as Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5 in Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS. Impact P-1 noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage of hazardous materials.

The resource values evaluated in the Final EIR/EIS that might be impacted by an unintended release of hazardous materials during project construction have not changed, nor have any new adverse impacts been identified as a result of the added language. This is because while the language included in the POD addresses the potential to temporarily store hazardous materials at construction yards on BLM-administered land, Applicant Proposed Measures (APM) HS-APM-1 (personnel trained in proper use and safety procedures for the chemicals used), HS-APM-2 (personnel trained in refueling of vehicles), HS-APM-3 (preparation of environmental safety plans including spill prevention and response plan), HS-APM-8 (SDG&E's and/or General Contractor environmental/health and safety personnel), and HS-APM-10 (proper storage and disposal of generated waste), would be included as part of the project in order to reduce the likelihood of spills. Mitigation Measures P-1a (Implement Environmental Monitoring Program) and P-1b (Maintain emergency spill supplies and equipment) are also required and would reduce the environmental impacts to less than considerable. Including the language in the POD does not change the analysis of the Final EIR/EIS.

3A. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)?

Since the issuance of the ROD for the Sunrise Powerlink Project, new information or circumstances includes:

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- The Bald and Golden Eagle Protection Act (September 2009) and new interim bald and golden eagle inventory and monitoring protocols and other recommendations,
- New critical habitat for arroyo toad,
- Reinstatement of the U.S. Fish and Wildlife Service proposed rule to list the flat-tailed horned lizard. (Note: On February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing for the flat-tailed horned lizard (76 Fed. Reg. 14209, March 15, 2011)), and
- New critical habitat designation for the Quino checkerspot butterfly (QCB).

The terms of the Record of Decision, the Right of Way Grant, and the Biological Opinion, for the Sunrise Powerlink Project require re-initiation of consultation if the re-initiation criteria of the regulations are met. As such some of these new biological circumstances caused the BLM to reinitiate consultation under the Federal Endangered Species Act. While Section 7(d) of the Endangered Species Act prohibits the agency and the permit applicant from making certain commitments of resources during the pendency of the consultation, the mere act of re-initiation does not require supplementation of the EIR/EIS. In November 2010, the U.S. Fish and Wildlife Service reissued the Biological Opinion on the Sunrise Powerlink Project to address these new information or circumstances.

The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the Project would not likely jeopardize the continued existence of five listed species Quino checkerspot butterfly (*Euphydryas editha quino*); arroyo toad (*Anaxyrus californicus*); least Bell's vireo (*Vireo bellii pusillus*); coastal California gnatcatcher (*Poliophtila californica californica*); and Peninsular bighorn sheep (*Ovis canadensis nelsoni*) or adversely modify designated or proposed critical habitat of four species (coastal California gnatcatcher, Quino checkerspot butterfly, arroyo toad and Peninsular bighorn sheep). Additionally, the Biological Opinion concluded that the Project would not likely jeopardize the continued existence of one species which, at that time, was proposed to be listed, flat-tailed horned lizard (*Phrynosoma mcallii*).

Although addressed in the 2009 biological and conference opinion, the San Diego thornmint (*Acanthomintha ilicifolia*) was excluded from evaluation in the revised biological and conference opinion (2010) due to the current determination that the Sunrise Powerlink Project is "not likely to adversely affect" the San Diego thornmint based on updated survey information.

As discussed below, none of these new biological circumstances affect the validity of the EIR/EIS as it relates to the proposed changes to the approved project as modified by the PMR.

Peninsular bighorn sheep. The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the Project would not likely jeopardize the continued existence of the PBS. Additionally, it concluded that the level of bio-monitoring will enable expanding the annual construction period in bighorn sheep habitat to include July 1 through

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December 31. This is consistent with SDG&E's proposal to reduce the construction time from three years to two years in PBS habitat of the Jacumba Mountains, including the I-8 Island. The following changes detailed in Table 2 have the potential to impact PBS:

- EP-313 (PBS were seen outside the 500 foot buffer zone for this species),
- EP-307-1 (within PBS habitat), and
- EP265-2 (within PBS critical habitat).

Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat) adopted from the Final EIR/EIS as well as the measures required in the biological opinion requires SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species consistent with the Final EIR/EIS and would be required at the identified locations. No additional NEPA review is required.

Bald and Golden Eagles. The Bald and Golden Eagle Protection Act (September 2009) rule published by USFWS was not in place at the time the Final EIR/EIS was published. However, the potential impacts of the project on eagles were fully analyzed in the Final EIR/EIS (Impact B-7h, Direct or indirect loss of golden eagle or direct loss of habitat). Impacts to golden eagles were considered adverse according to Significance Criteria 1.e. (substantial adverse effect on the breeding success of the golden eagle), 1.f. (project would directly or indirectly cause the mortality of a special status species), 1.g. (project would result in the abandonment of migratory bird nests and/or eggs), and 1.h. (project would take golden eagles, eagle eggs, or any part of an eagle). (EIR/EIS Section D.2.4.1, Significance Criteria.) Impacts to golden eagles were considered adverse because construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Mitigation was adopted in the Final EIR/EIS to minimize effects on nesting eagles.

Four golden eagle nest sites occur within 4,000 feet of the FESSR and the EIR/EIS concluded that each of the 4 nest sites would be adversely affected by the project. The new Bald and Golden Eagle Protection Act would not change the EIR/EIS analysis; had the analysis been completed after the Act was passed, the effects of the FESSR as modified by the PMR and the proposed changes to the approved project would remain adverse. The number of nest sites potentially affected by the project as modified by the PMR or the proposed changes has not increased since the EIR/EIS. No additional NEPA review is required.

Arroyo Toad. No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was published and the ROD issued. Impacts to the arroyo toad were analyzed based on identification of "suitable habitat" which allowed appropriate

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assessment of effects to the species. The analysis is presented under Impact B-7K: Direct or indirect loss of arroyo toad or direct loss of habitat in Section E 1.2, E.2.2, and E 4.2. Impacts to the arroyo toad and its habitat were assessed in the EIR/EIS, were determined to be adverse and mitigation was required to avoid or minimize the impact (Mitigation Measure B-7j Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies). This measure was identified in the Final EIR/EIS and would also apply to all proposed changes to the approved project. The following changes detailed in Table 2 have the potential to impact arroyo toad:

- EP53-2 (arroyo toad occupied habitat) and
- EP45-1 (arroyo toad occupied habitat).

The mitigation measure is adequate to ensure that impacts to arroyo toad as a result of the changes would be minimized or avoided to the greatest extent practicable. The proposed critical habitat would not result in any new adverse impacts and no additional NEPA review is required.

Flat-Tailed Horned Lizard. The Final EIR/EIS analyzed impacts to the flat-tailed horned lizard (FTHL) as a BLM sensitive species and California Species of Special Concern and determined that the approved project would have permanent impacts to 22.62 acres of FTHL Management Areas and to 52.95 acres of habitat outside of Management Areas. The approved project would have temporary impacts to 91.31 acres of FTHL Management Areas and to 141.53 acres of habitat outside of Management Areas. After the completion of the Final EIR/EIS, the U.S. Fish and Wildlife Service notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. More recently, on February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing for the flat-tailed horned lizard. Nevertheless, additional surveys along the approved route as modified by the PMR have been performed in compliance with mitigation. Analysis now shows that the approved project with the proposed modifications from the PMR would result in permanent impacts to FTHL habitat (9.54 acres of Management Areas and 26.35 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of Management Areas and 94.88 acres of habitat outside Management Areas. Mitigation adopted from the Final EIR/EIS required SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species; reduction in impacts to FTHL habitat (Management Areas as well as habitat outside Management Areas) would apply to all proposed changes.

The following changes detailed in Table 2 have the potential to impact FTHL as they are all within FTHL habitat:

- EP336,
- EP331,

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- EP330-1,
- EP323-1,
- EP322-1,
- EP313,
- EP307-1,
- EP298,
- Dunaway Yard Access Road (within an FTHL management area as designated by BLM), and
- Road to S2 Yard.

The proposed changes considered herein could result in nominal differences in the location and total acres of FTHL habitat that would be impacted. The analysis conducted in the Final EIR/EIS for FTHL concluded that impacts to the species and its habitat were a significant and unmitigable impact (Class I). The impacts of the proposed changes considered herein would be similar in nature to those disclosed in the Final EIR/EIS, just they would occur in different locations and the amount of habitat would be slightly different. Furthermore, the mitigation proposed by SDG&E greatly exceeds the amount of mitigation required by the Final EIR/EIS and Biological Opinion. As such, the impact of the proposed changes has been mitigated. Therefore, no additional NEPA analysis is required.

Quino Checkerspot Butterfly. The Final EIR/EIS determined that the approved project would have permanent impacts to 19.20 acres of 2002 critical habitat for the Quino checkerspot butterfly (QCB) and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB and required appropriate mitigation. After the completion of the Final EIR/EIS, additional surveys have been performed in compliance with mitigation, and 2009 critical habitat for QCB has been designated. Analysis now shows that the approved project as amended by the proposed modifications in the PMR would result in permanent impacts to QCB habitat (4.45 acres of 2009 critical habitat and 15.16 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.08 acres (1.59 acres of 2009 critical habitat and 17.49 acres of occupied habitat, which is former 2002 critical habitat). The following changes detailed in Table 2 have the potential to support QCB:

- EP-249,
- EP-246,
- EP196-2 and EP197-3,
- EP194-3,
- EP193-2,

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- EP192-2,
- EP 175,
- EP 147,
- EP53-3,
- EP47-2, and
- EP45-1.

The proposed changes considered herein could result in nominal differences in the location and total acres of Quino checkerspot butterfly habitat that would be impacted. The analysis conducted in the Final EIR/EIS for Quino concluded that impacts to the species and its habitat were a significant and unmitigable impact (Class I). The impacts of the proposed changes considered herein would be similar in nature to those disclosed in the Final EIR/EIS, just they would occur in different locations and the amount of habitat would be slightly different. Furthermore, the mitigation proposed by SDG&E greatly exceeds the amount of mitigation required by the Final EIR/EIS and Biological Opinion. As such, the impact of the proposed changes has been mitigated. Therefore, no additional NEPA analysis is required.

3B. Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the approved action?

YES. The analyses and conclusions in the Final EIR/EIS continue to be valid. Biological and cultural resources surveys were performed in 2009 and 2010 as required by mitigation measures in the Final EIR/EIS, and these surveys helped shape the project changes in avoidance of impacts to specific resources. There is no new information or no new guidance that would trigger the need for additional analyses of the proposed changes to the approved action, as modified by the PMR, as discussed in the following sections.

Peninsular Bighorn Sheep. The Final EIR/EIS analyzed the project's potential impacts on Peninsular bighorn sheep (Impacts B-7B). The minor structure revisions do not change the conclusions in the Final EIR/EIS (adverse) and are consistent with the Final EIR/EIS in Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat). SDG&E is required to comply with Mitigation Measure B-7c for any of the changes that occur on PBS habitat. There would be no change in the impacts to Peninsular bighorn sheep from the time the Final EIR/EIS was published as the result of the proposed changes considered herein.

Eagles. As noted above, the Final EIR/EIS analyzed the project's potential impacts on golden eagles and bald eagles (Impacts B-7h, B-7i, B-10, and B-12). The new 2009 rule does not change the conclusions in the Final EIR/EIS (adverse for Impacts B-7H and B-10, adverse but

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mitigable for Impact B-12 and no impact for Impact B-7I) but rather provides a permit process that the project may need to follow if disturbance impacts to eagles cannot be avoided. As stated in the Final EIR/EIS, construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Therefore, there would be no change in the impacts to golden eagles from the time the Final EIR/EIS was published as the result of the proposed changes considered herein.

Flat-Tailed Horned Lizard. Since the publication of the Final EIR/EIS, the U.S. Fish and Wildlife Service notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. On February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing of the FTHL. This does not change the analysis in the Final EIR/EIS because it considered impacts to FTHL Management Areas and habitat outside Management Areas in place at the time the Final EIR/EIS was published. The Final EIR/EIS determined that impacts to the FTHL and its habitat were adverse and the changes to the approved project as modified by the PMR considered herein would be subject to mitigation identified in the Final EIR/EIS and Biological Opinion. Therefore, the proposed changes considered herein would not substantially change the analysis of the approved action as presented in the Final EIR/EIS.

Arroyo Toad. Since the publication of the Final EIR/EIS, the U.S. Fish and Wildlife Service proposed new areas as critical habitat for arroyo toad. This does not change the analysis in the Final EIR/EIS because it considered impacts to designated critical and suitable habitat in place at the time the Final EIR/EIS was published. The Final EIR/EIS determined that impacts to the arroyo toad and its habitat were potentially adverse and mitigable and the mitigation would apply to any of the proposed changes considered herein that occur on occupied arroyo toad habitat.

Quino Checkerspot Butterfly. Since the completion of the Final EIR/EIS, additional surveys have been performed and as stated above, the 2009 critical habitat for QCB has been designated. Analysis now shows that the proposed modifications to the approved project would result in permanent impacts to a total of 19.61 acres of QCB habitat (4.45 acres of 2009 critical habitat and 15.16 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.08 acres (1.59 acres of 2009 critical habitat and 17.49 acres of occupied habitat, which is former 2002 critical habitat). In addition, some of the proposed changes occur on QCB habitat and would be mitigated accordingly. Therefore, the proposed changes considered herein would not substantially change the analysis of the approved action as presented in the Final EIR/EIS.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the modified action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

YES. The direct, indirect and cumulative effects of proposed changes to the approved project are similar to those analyzed in the Final EIR/EIS for the FESSR.

The effects of each major modified component are summarized below.

Transmission Line Structure Changes. Table 1 summarizes the approved project as modified by the PMR and Table 2 presents the proposed changes that are considered in this DNA. The effects of the approved project were identified in the Final EIR/EIS and the required mitigation measures resulted in SDG&E proposing changes to the approved project. Specifically, the following impacts would be reduced with the proposed changes as compared with the approved project:

- Impact B-1: Construction activities would result in temporary and permanent losses of native vegetation (pg. E.1.2-13, E.2.2-4, and E.4.2-5; Final EIR/EIS). The proposed changes to the approved project structures incorporated design revisions and made minor grading adjustments to reduce the impact area and grading (see EP200-3).
- Impact B-2: Construction activities would result in adverse effects to jurisdictional waters and wetlands through vegetation removal, placement of fill, erosion, sedimentation, and degradation of water quality (pg. E.1.2-19, E.2.2-9, and E.4.2-9; Final EIR/EIS). The proposed changes to the approved project incorporated minor design revisions and revise the structures to avoid dry-wash area impacts per Army Corps request. As such, the changes reduced the temporary and permanent impacts to jurisdictional waters.
- Impact V-75: Inconsistency with BLM VRM Class II objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 61 on at Carrizo Overlook (pg. E.2-5). The proposed change to the approved project would re-align the structure maintenance pad and access to a hook per CPUC visual consultants request (see EP175).
- Impact C-1: Construction of the project would cause an adverse change to known historic properties (pg. E.1.7-4, E.2.7-2, E.4.7-2). Additional cultural surveys were completed after the ROD was published. As a result of the cultural surveys, SDG&E worked with the BLM to design changes to the route alignment to avoid resources where feasible.
- Impact G-9: Construction activities would interfere with access to known mineral resources (pg. E.1.13-9, Final EIR/EIS). SDG&E continued to work with the BLM and landowners incorporate changes to slightly re-align maintenance pad and road to accommodate quarry operations (see EP 301).

Impacts to biological resources, visual resources, cultural resources, and geological resources would be reduced as a result of the proposed changes considered herein as compared with the impact levels defined in the Final EIR/EIS.

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Because some of the changes would occur on rare plant and QCB habitat, protocol level surveys would be required prior to ground disturbance in accordance with Mitigation Measure B-5a and Mitigation Measure B-7i, respectively. The changes that would occur on rare plant habitat which would require additional surveys include EP336, EP331, EP330-1, EP323-1, EP322-1, EP313, EP307-1, EP298, Dunaway Yard Access Road, Road to S2 Yard, EP265-2, EP258-3 (only a small portion of the change has not been previously surveyed), EP250, EP249, EP246, EP200-3 (only a small portion of the change has not been previously surveyed), EP197-3, EP196-2, EP194-3, EP193-2, EP192-2, EP175, EP147, EP53-3, EP47-2, and EP45-1. Surveys for rare plants was included as a condition of Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies. As such, surveys would be required prior to ground disturbance at these locations. Should any rare plants be found, Mitigation Measure B-5a identified in the Final EIR/EIS is adequate to ensure that impacts to the rare plants as a result of the proposed changes considered herein would be minimized or avoided to the greatest extent practicable. Once the surveys have been completed and reviewed, no additional NEPA review is required.

The proposed changes that would occur on QCB habitat which would require additional surveys include EP249, EP246, EP197-3, EP196-2, EP194-3, EP193-2, EP192-2, EP175, EP147, EP53-3, EP47-2, and EP45-1. Surveys for QCB was included as a condition of Mitigation Measure B-7i, Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies. Should any QCB be identified, Mitigation Measure B-7i identified in the Final EIR/EIS is adequate to ensure that impacts to QCB as a result of the changes would be minimized or avoided to the greatest extent practicable. Once the surveys have been completed and reviewed, no additional NEPA review is required.

All other mitigation measures presented in the Final EIR/EIS would also apply to the proposed changes where appropriate, and would mitigate the impacts of the transmission line realignments on all resources as they would for the approved project.

Hazardous Materials Description in the POD. Although new language was included in the Sunrise Powerlink Project POD addressing the need to store hazardous materials at the construction yards on BLM-administered land, storage of hazardous materials was already analyzed in the Final EIR/EIS. Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5 in Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage.

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The direct, indirect, and cumulative effects of including the language in the POD would be essentially the same (both quantitatively and qualitatively) as those analyzed in the Final EIR/EIS since the same hazardous materials were already analyzed in the Final EIR/EIS. Resources that might be impacted by an unintended release of hazardous materials during project construction have not changed, nor have any new adverse impacts been identified as a result of the new language. As noted above this is because while the language included in the POD addresses the potential to store hazardous materials at construction yards on BLM-administered land, Applicant Proposed Measures (APM) HS-APM-1 (personnel trained in proper use and safety procedures for the chemicals used), HS-APM-2 (personnel trained in refueling of vehicles), HS-APM-3 (preparation of environmental safety plans including spill prevention and response plan), HS-APM-8 (SDG&E's and/or General Contractor environmental/health and safety personnel), and HS-APM-10 (proper storage and disposal of generated waste), would be included as part of the project in order to reduce the likelihood of spills. Mitigation Measures P-1a (Implement Environmental Monitoring Program) and P-1b (Maintain emergency spill supplies and equipment) are also required and would reduce the significant environmental impacts to less than considerable.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. Public review and comment on the Sunrise Powerlink Transmission Project were extensive. Public scoping, including 15 public meetings and numerous agency meetings, initiated the public review process. The combined comment periods on the Draft EIR/EIS, RDEIR/SDEIS, and BLM's proposed plan amendments occurred over five and a half months. BLM and CPUC held 14 public meetings and received approximately 3,900 pages of comments on two draft documents. All public comments received were carefully analyzed and agency responses are included in the Final EIR/EIS. Twenty protests to BLM's proposed plan amendments were considered and resolved by the Director of the BLM.

On May 14, 2010, SDG&E submitted to CPUC and BLM a final Project Modifications Report that defines changes made to the project along the entire route after publication of the Final EIR/EIS. The final PMR document explains the reason for each change, and presents the comparative environmental impacts of the project components analyzed in the Final EIR/EIS and those presented in the PMR. The CPUC and BLM accepted public comments on the Final PMR from May 14 to June 7, 2010. All changes included in the final PMR have been reviewed by the lead agencies, CPUC and BLM, along with the cooperating, responsible and resource agencies.

In January 2011, SDG&E submitted to the BLM the minor proposed changes to the project along the route on BLM-administered land. The proposed changes were submitted with

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documentation explaining the reason for each change and figures identifying each change. The BLM reviewed the changes and all associated impacts.

E. Persons/Agencies/BLM Staff Consulted

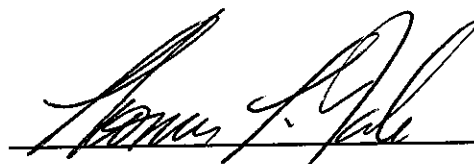
Carrie Simmons	Archaeologist	El Centro Field Office, BLM
Daniel Steward	Resources Staff Supervisor	El Centro Field Office, BLM
Thomas Zale	Associate Field Manager	El Centro Field Office, BLM
Margaret L. Goodro	Field Manager	El Centro Field Office, BLM
Susan Lee		Aspen Environmental Group
Emily Capello		Aspen Environmental Group

Note: Refer to the EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.


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Conclusion *(If you found that one or more of these criteria is not met, you will not be able to check this box.)* ☒

Based on the review documented above in this DNA, I conclude that the proposed changes to the approved project conform to the applicable land use plans inasmuch as the proposed changes are within the approved plan amendment for the Sunrise Powerlink Project. The NEPA EIS documentation fully covers the proposed action described above and constitutes BLM's compliance with the requirements of NEPA.



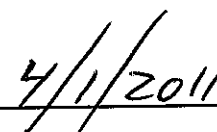
 Signature of Project Lead



 Signature of NEPA Coordinator

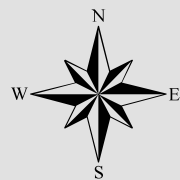
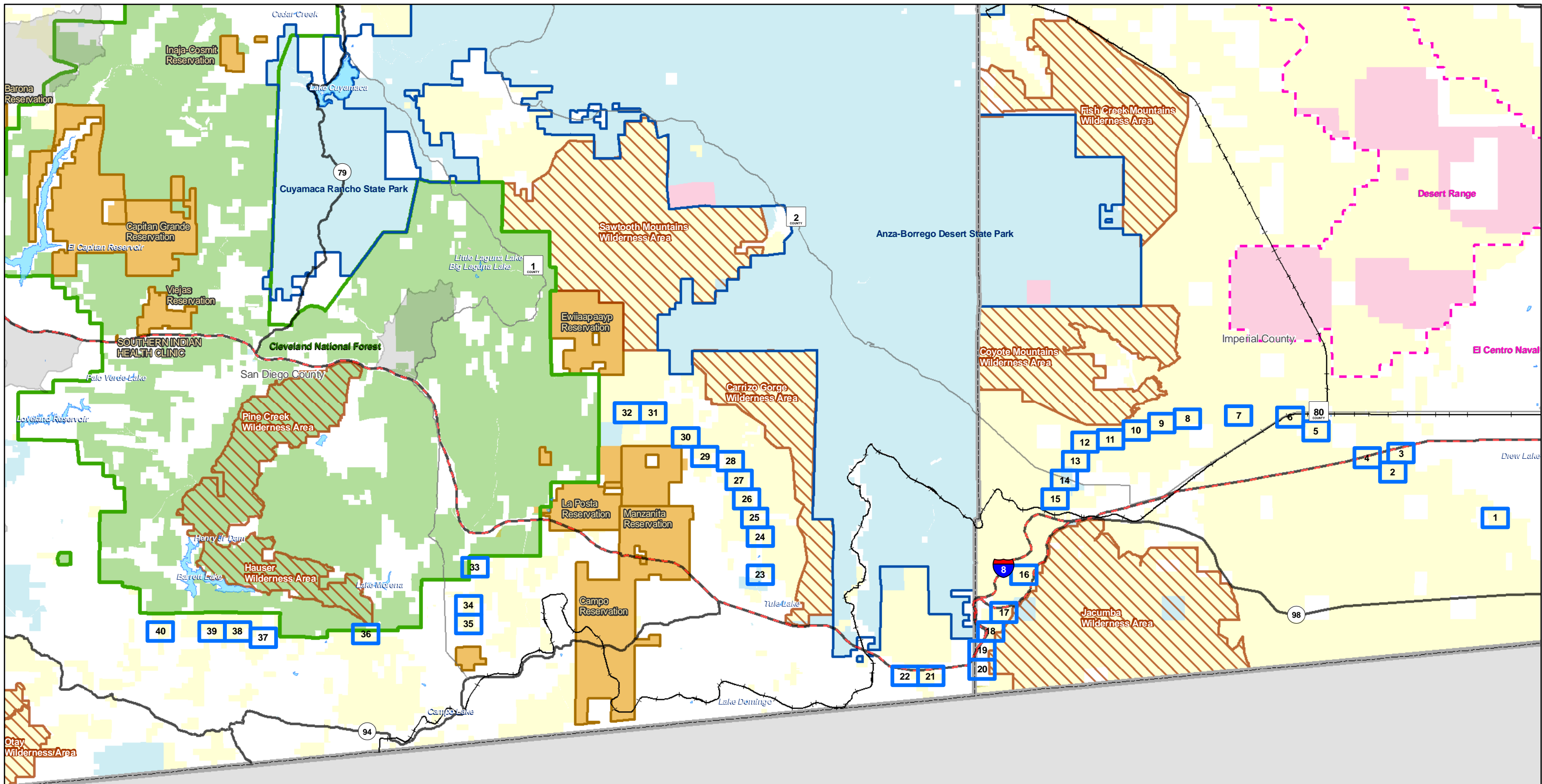


 Signature of the Responsible Official:



 Date

The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.









Sunrise Powerlink

Changes on BLM from PMR to Current Alignment

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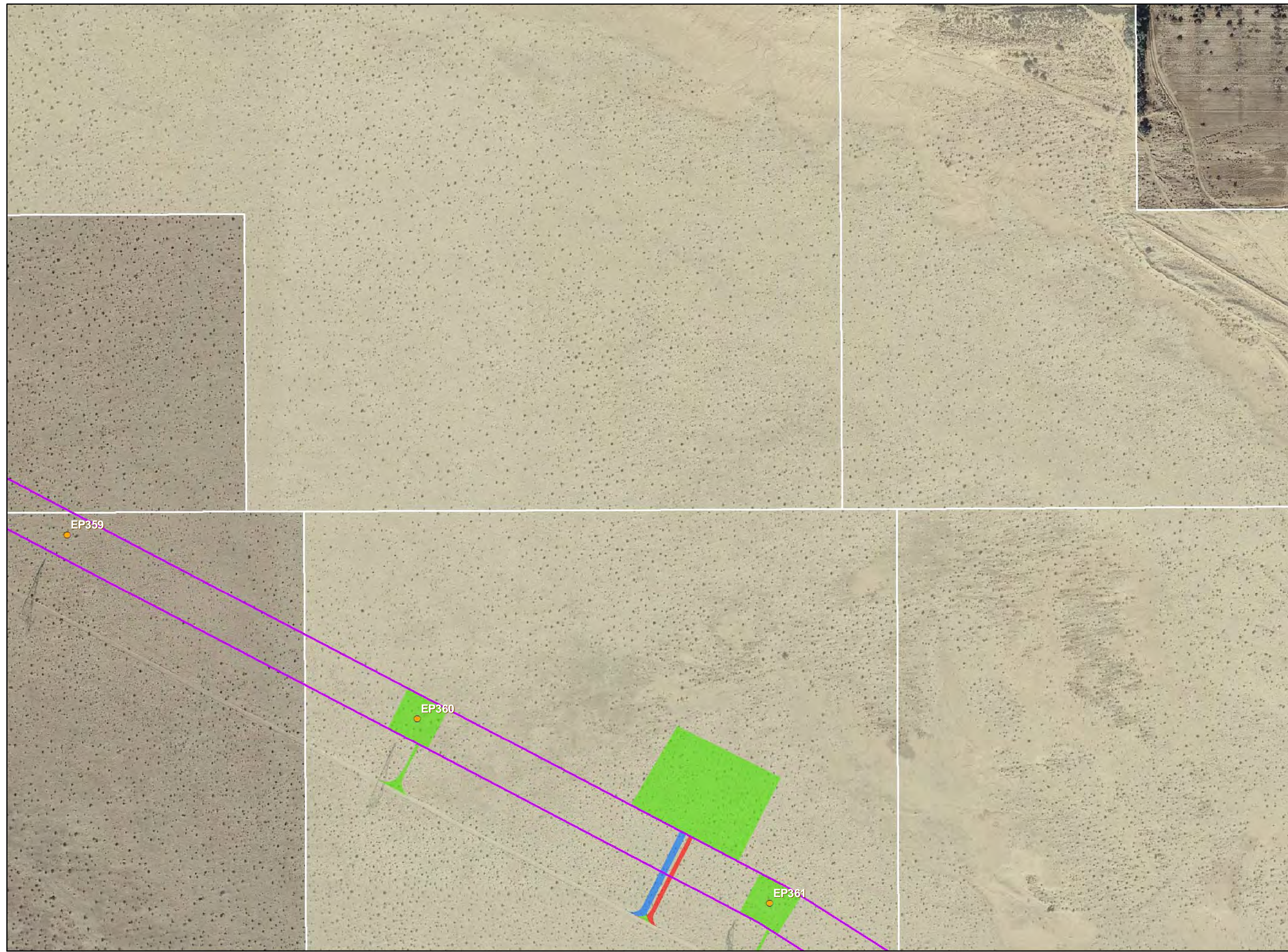
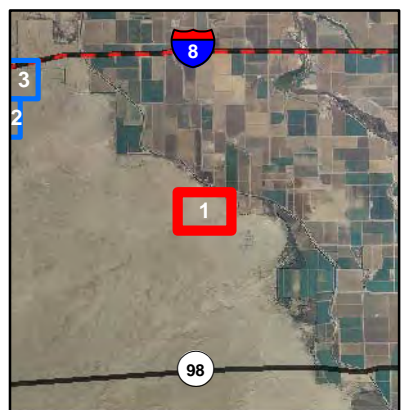
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Changes on BLM land since PMR







Please note:
Only Impacts on BLM lands are shown in this map book



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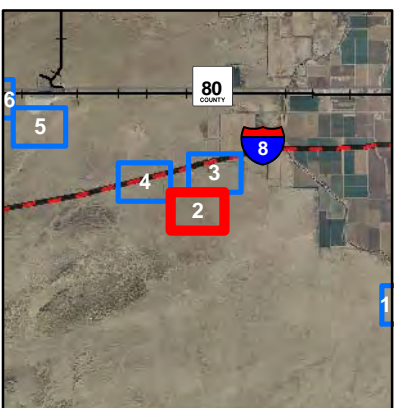
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-  Current & PMR Impact
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Changes on BLM land since PMR

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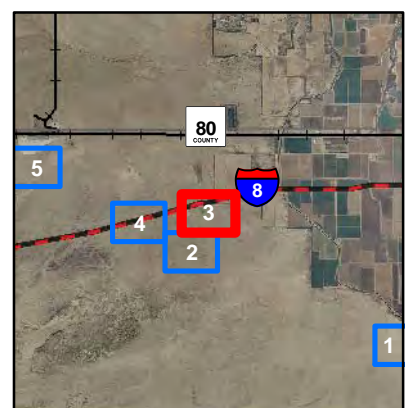
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Changes on BLM land since PMR







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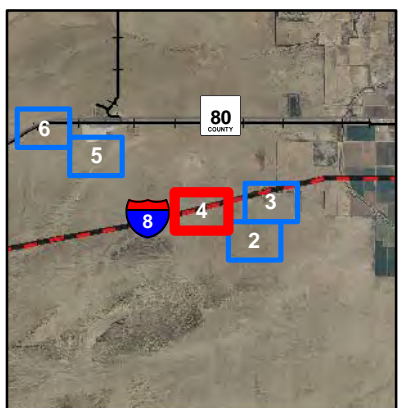
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Changes on BLM land since PMR







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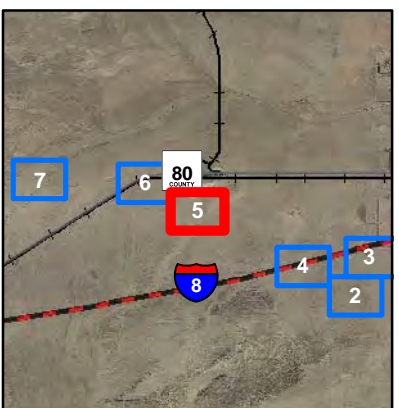
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Changes on BLM land since PMR

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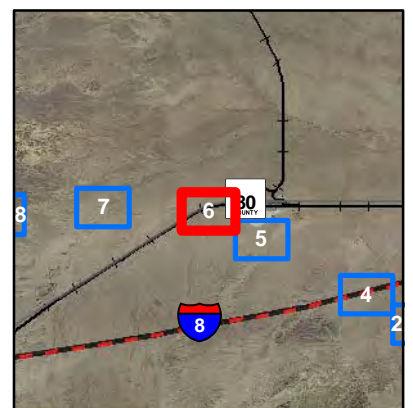
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-  BLM owned Land

Changes on BLM land since PMR







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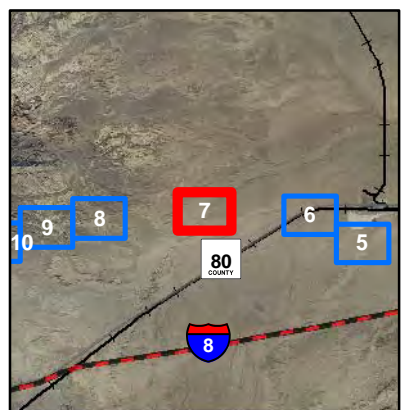
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Changes on BLM land since PMR

Please note:
Only Impacts on BLM lands are shown in this map book



0 200 400 Feet
1 inch = 400 feet



Legend

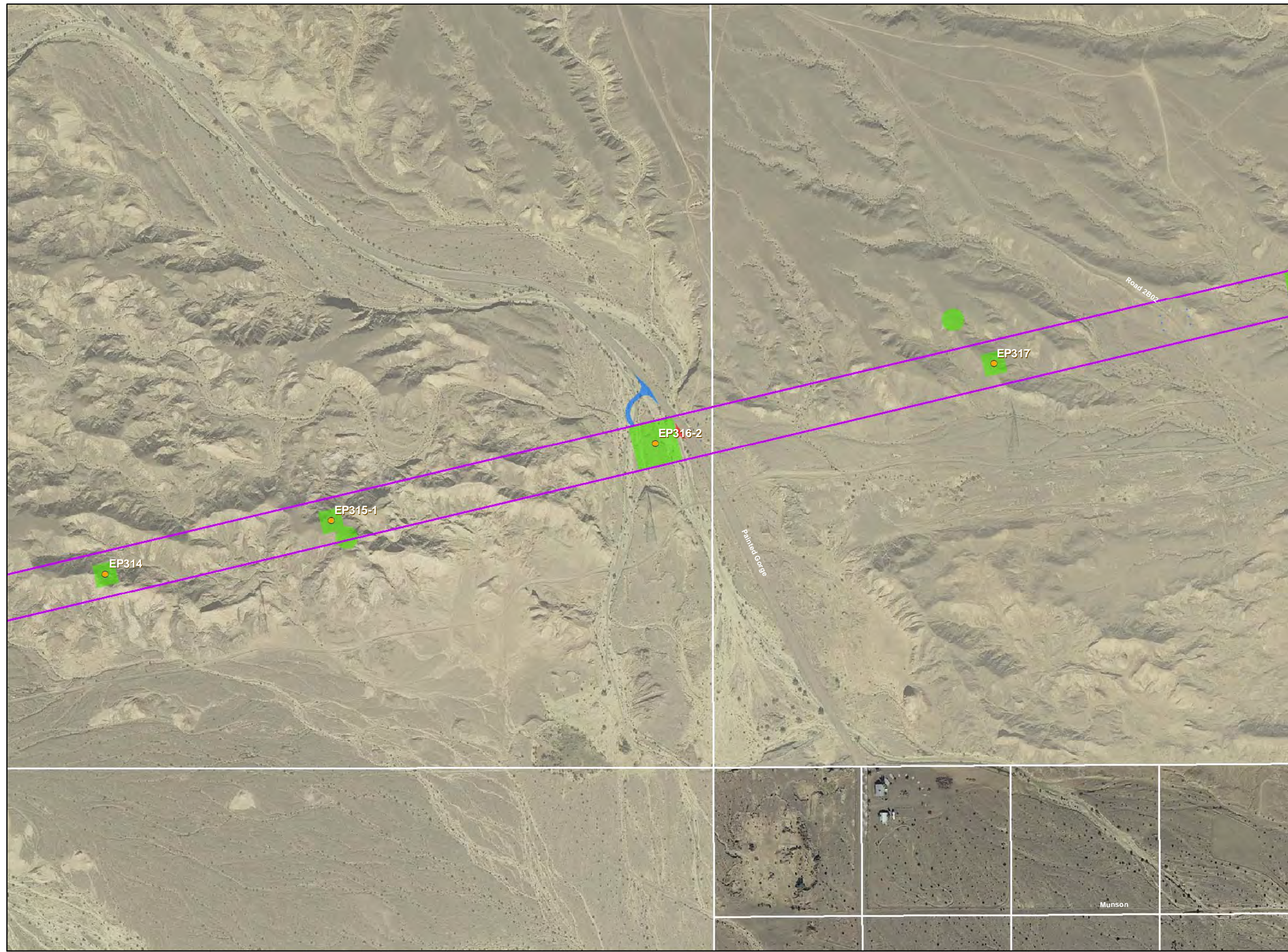
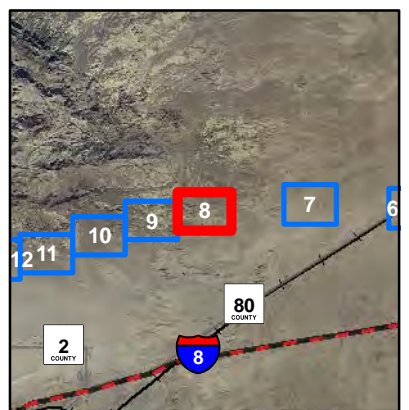
- BLM owned Land
- Current ROW
- Current Impact Not in PMR
- PMR Impact Not a Current Impact
- Current & PMR Impact
- BLM owned Land

Changes on BLM land since PMR

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Legend

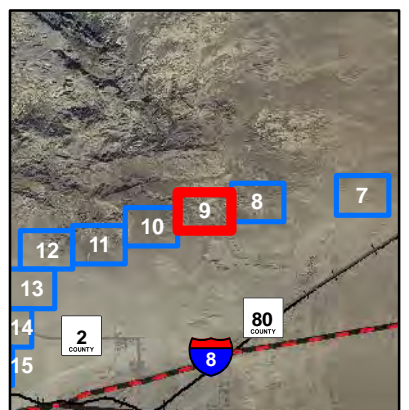
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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Legend

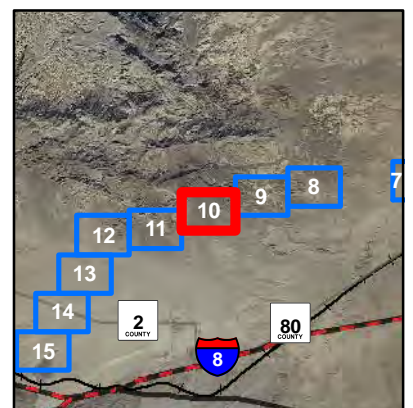
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-  Current ROW
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Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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Legend

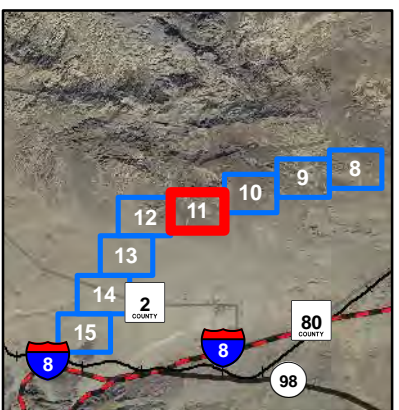
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-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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Legend

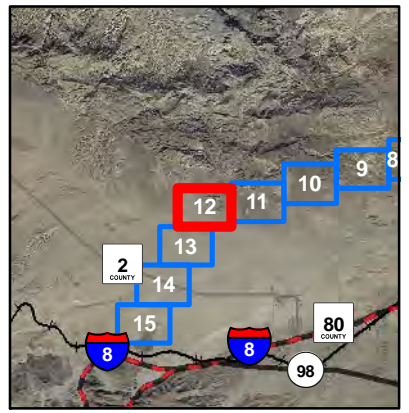
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-  Current Impact
Not in PMR
-  PMR Impact
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Impact
-  BLM owned Land

Changes on BLM land since PMR

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Legend

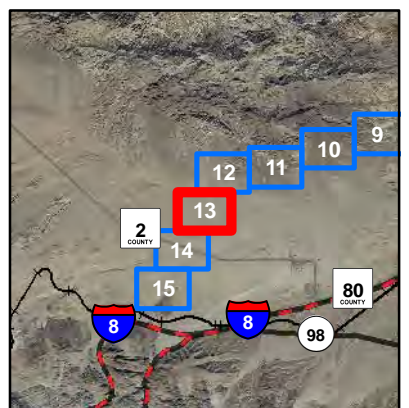
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-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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Legend

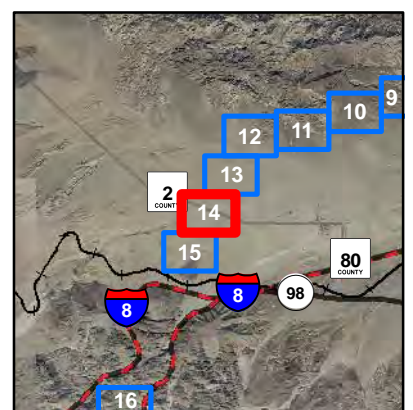
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-  BLM owned Land

Changes on BLM land since PMR







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1 inch = 400 feet



Legend

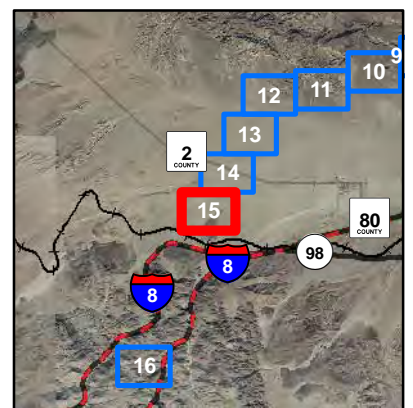
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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0 200 400 Feet
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Legend

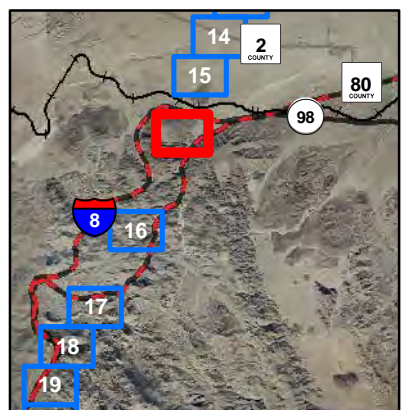
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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






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1 inch = 400 feet



Change at EP280-3

Legend

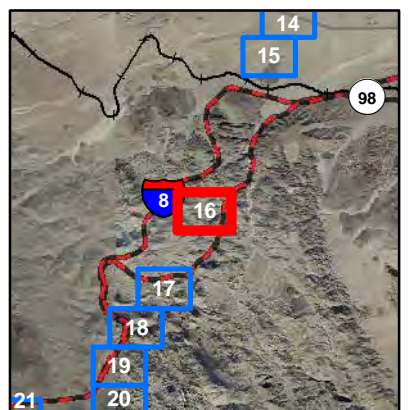
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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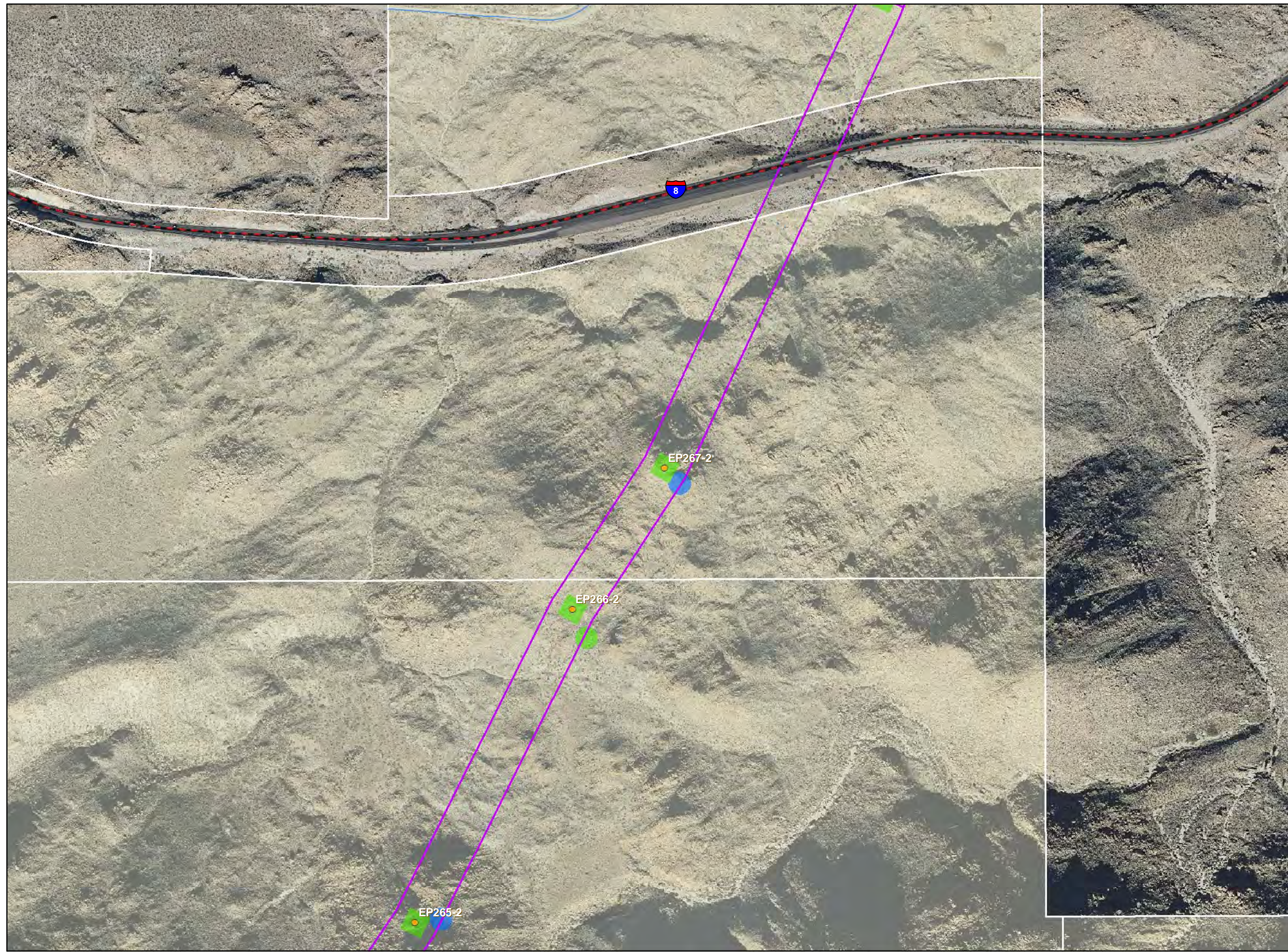
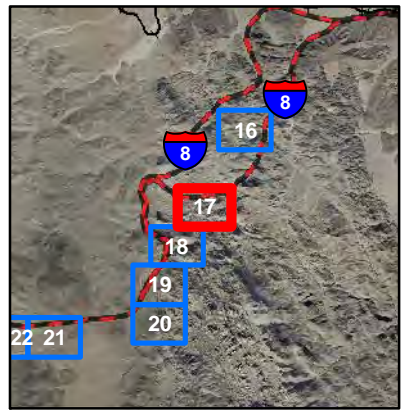
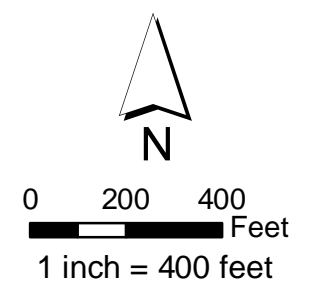


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




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- BLM owned Land

Changes on BLM land since PMR

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Legend

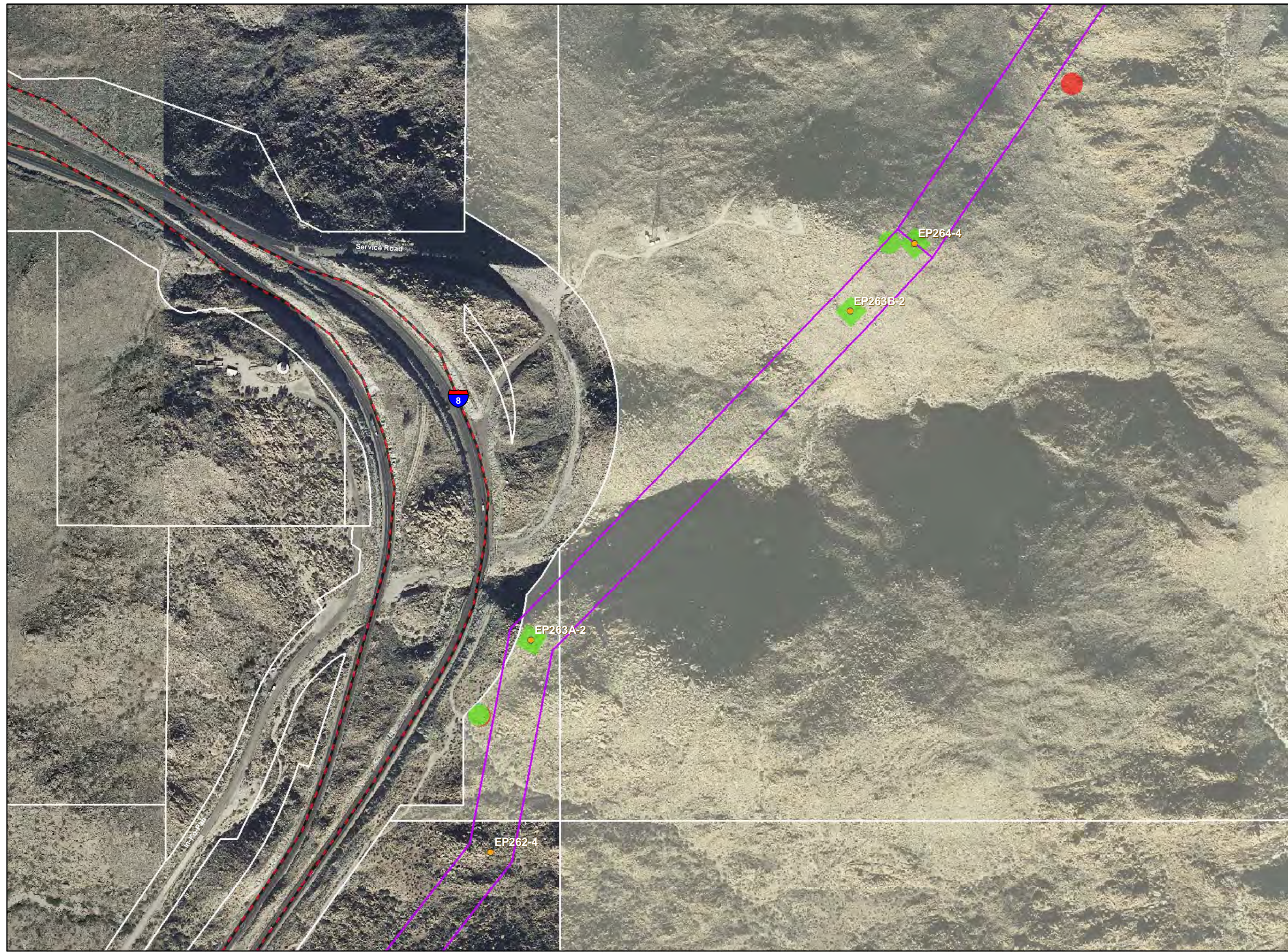
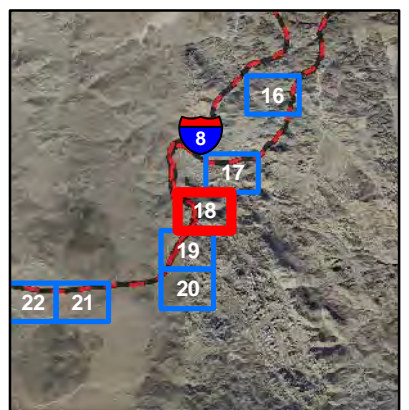
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
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-  BLM owned Land

Changes on BLM land since PMR

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






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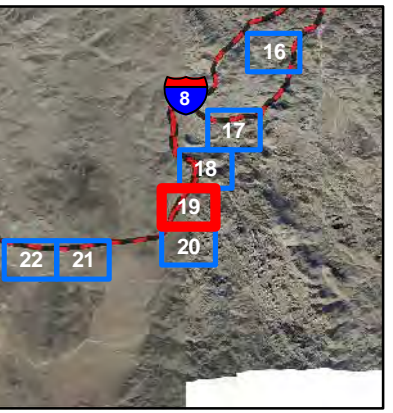
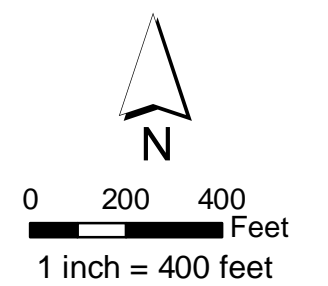


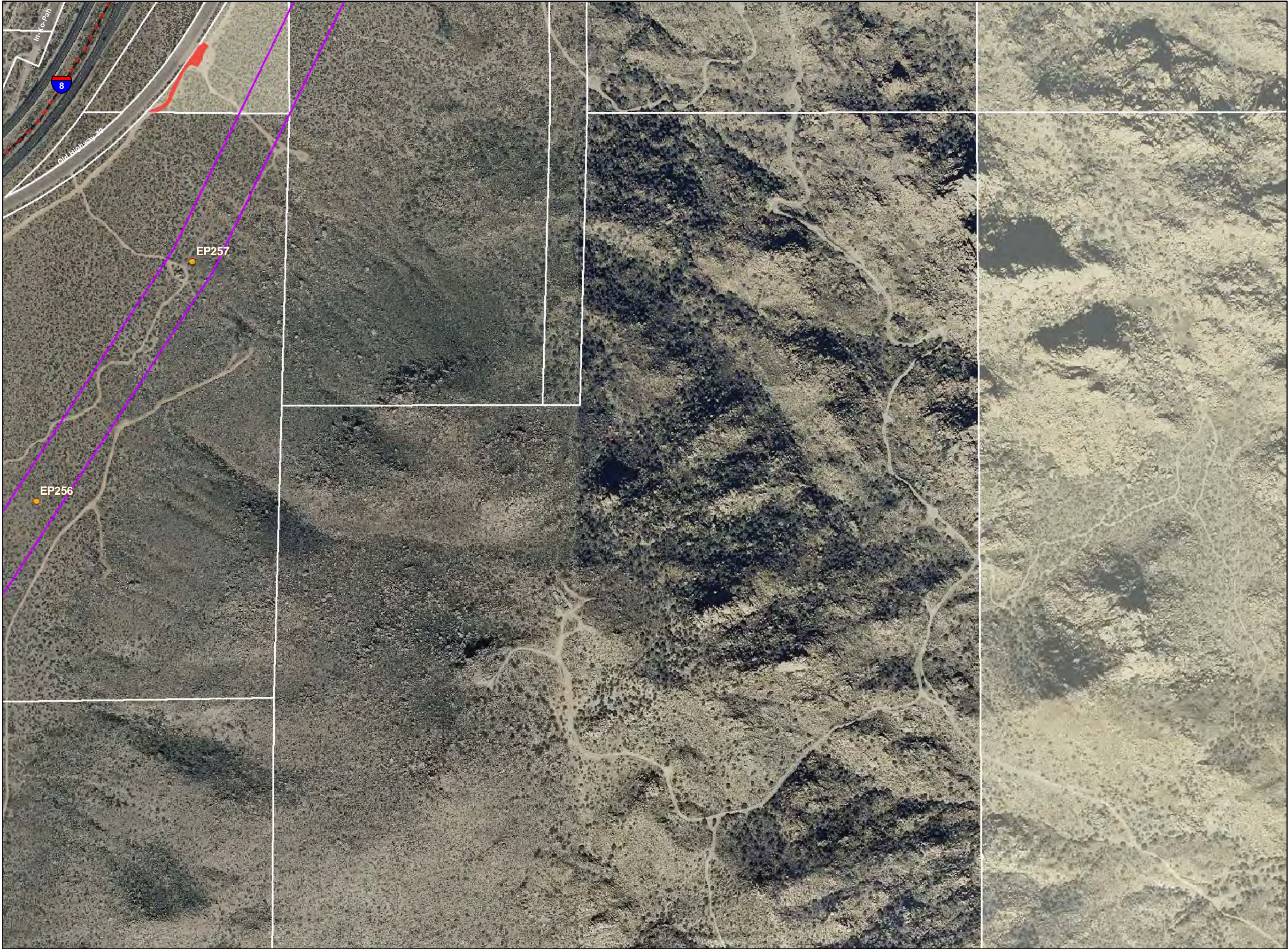
Legend

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-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current
Impact
-  Current & PMR
Impact
-  BLM owned Land







**Changes on BLM
land since PMR**

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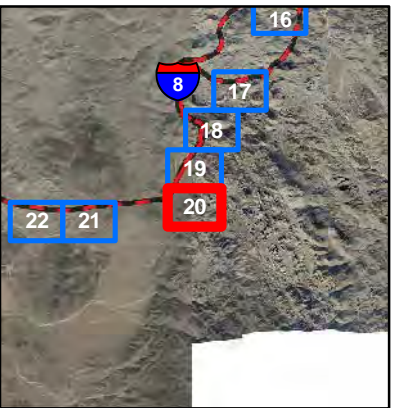
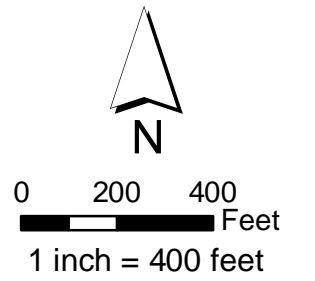


Legend

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-  Current Impact
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Not a Current
Impact
-  Current & PMR
Impact
-  BLM owned Land

**Changes on BLM
land since PMR**

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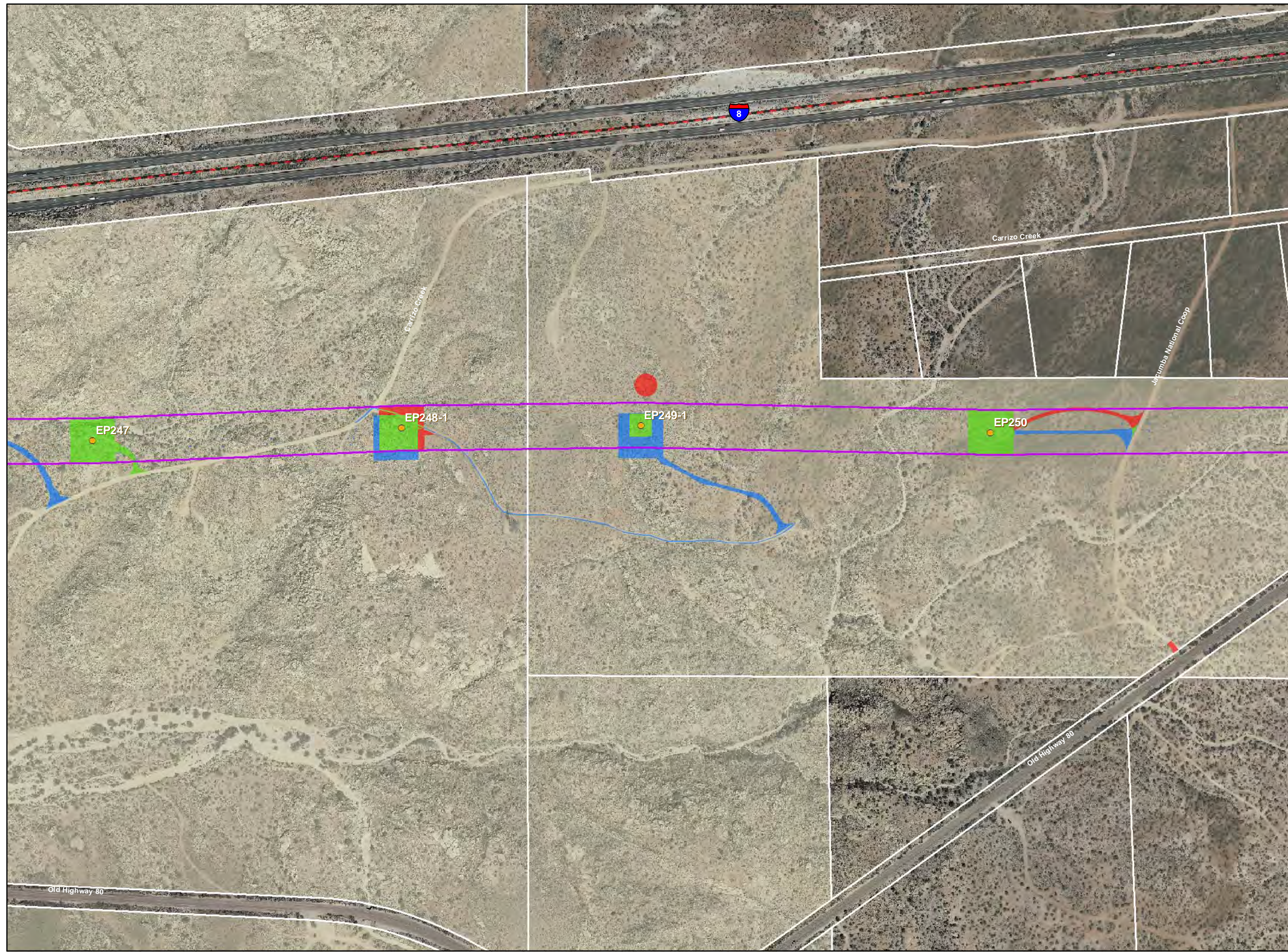
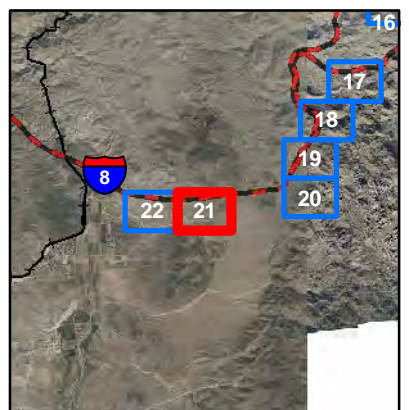
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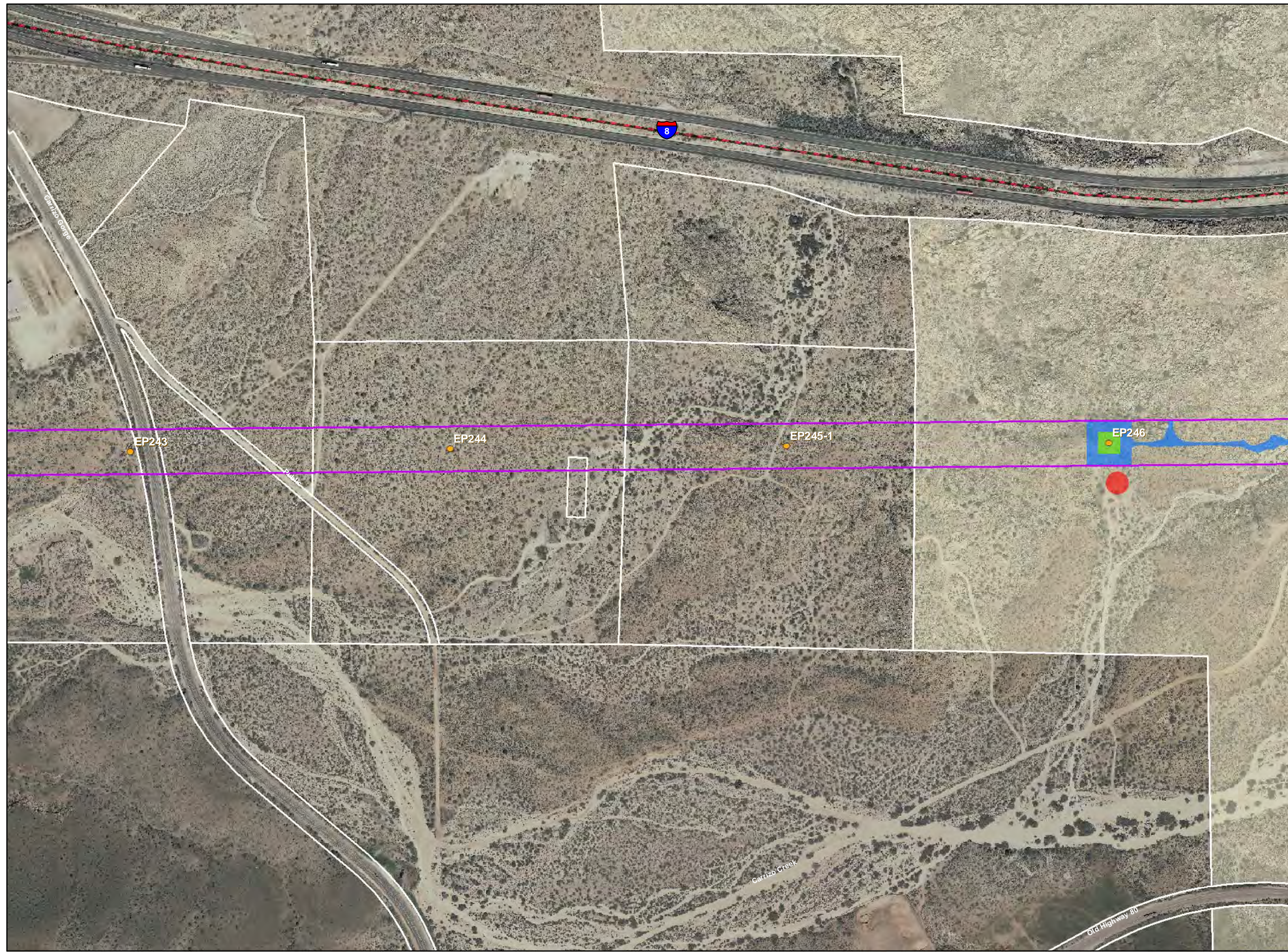
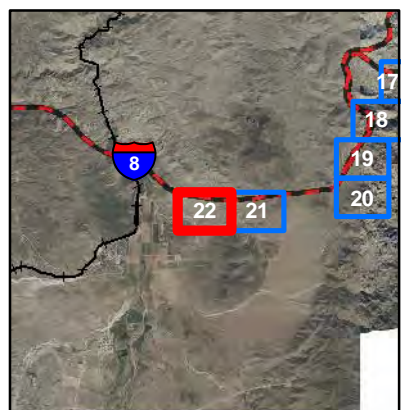
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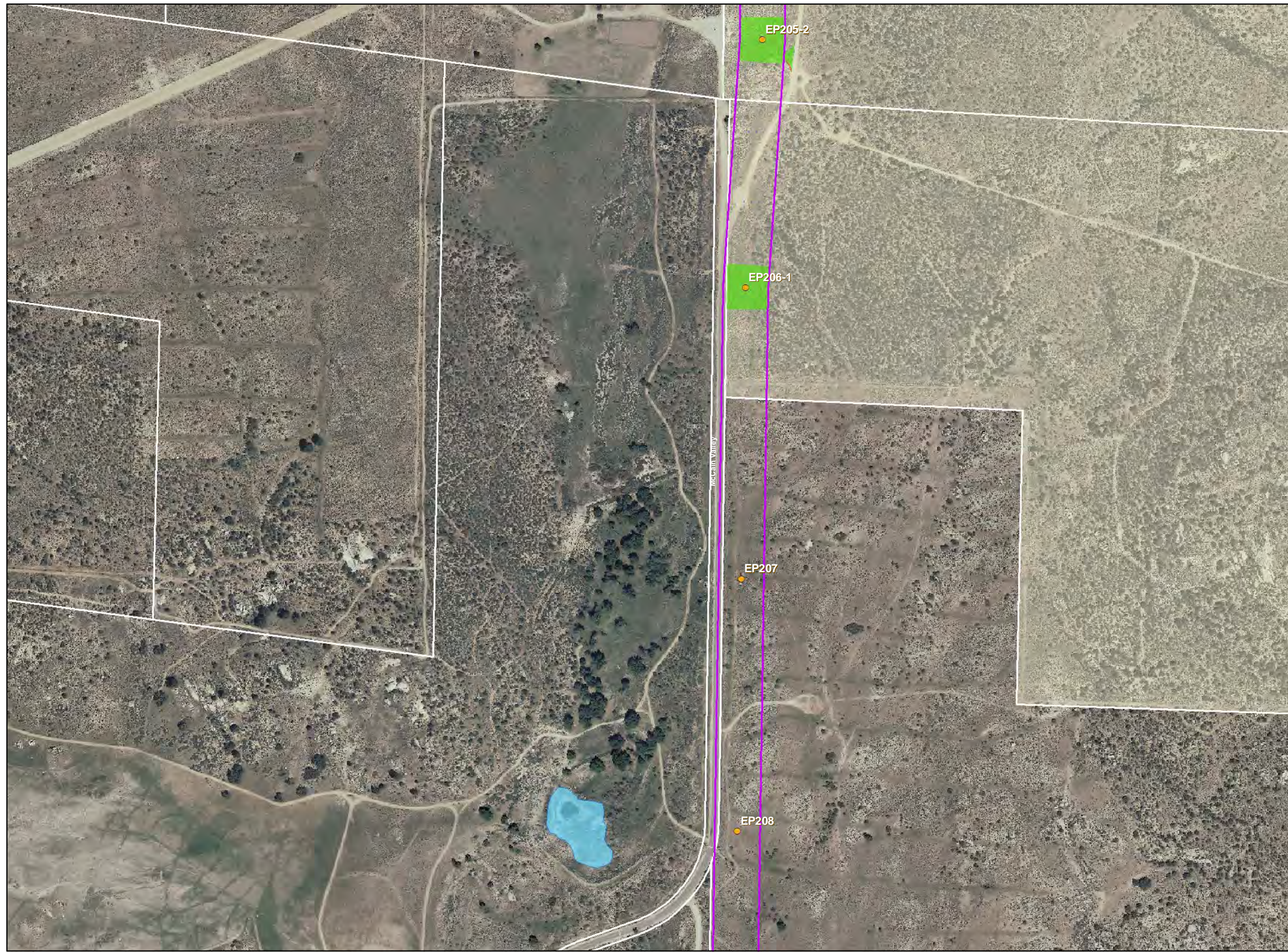
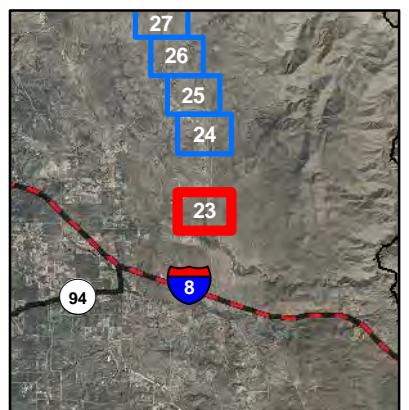
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Changes on BLM land since PMR







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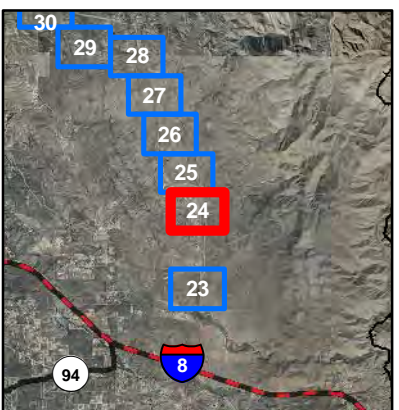
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Changes on BLM land since PMR







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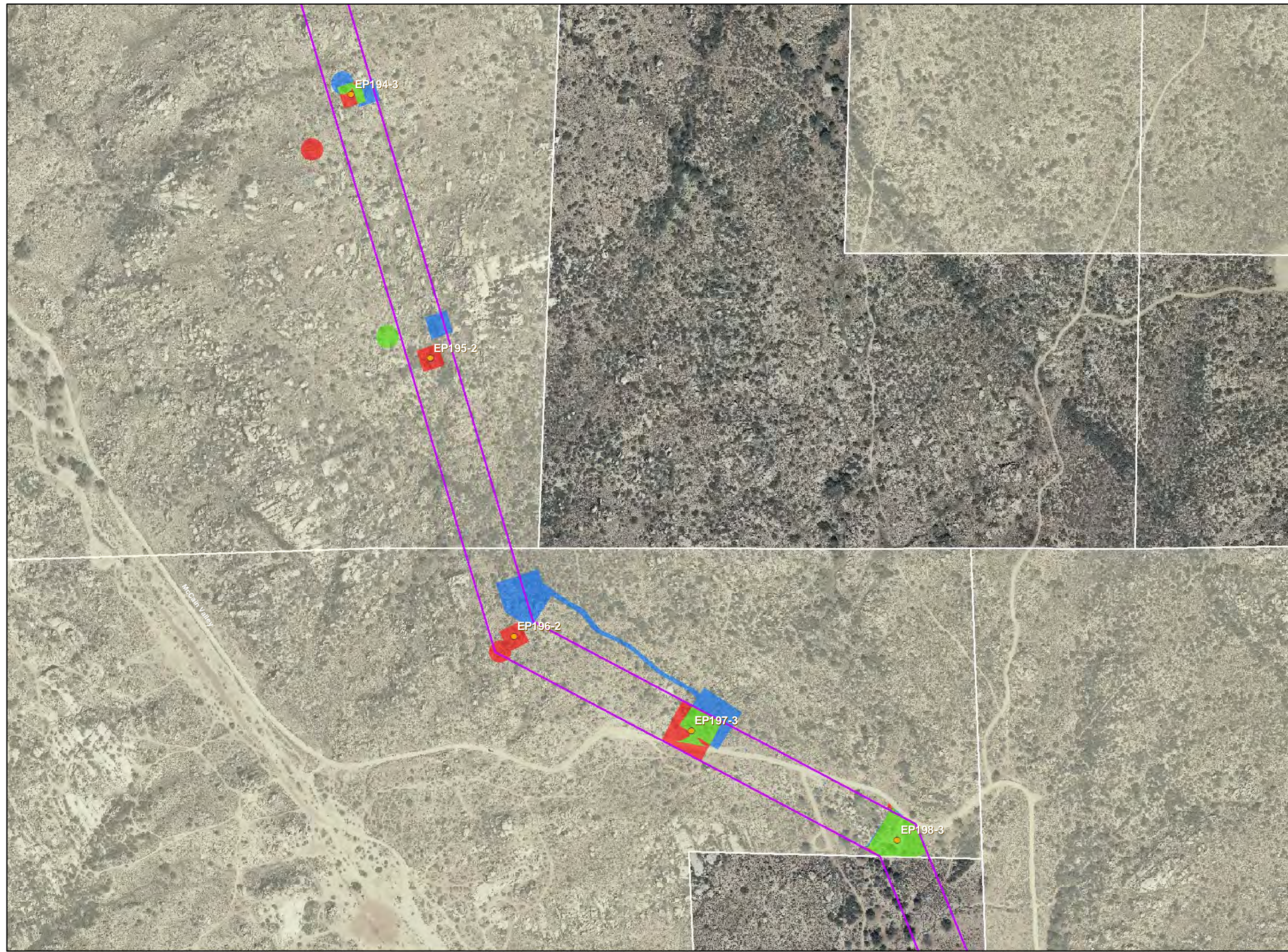
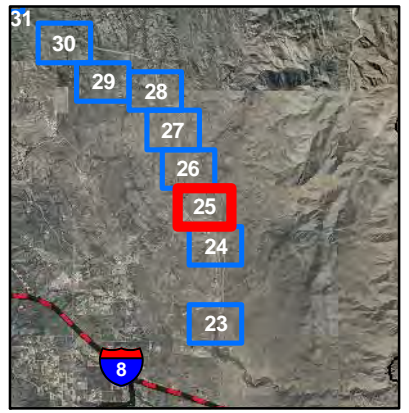
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Changes on BLM land since PMR







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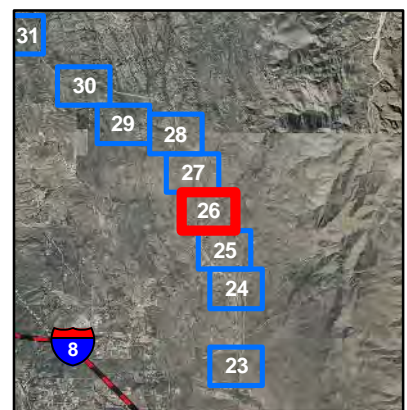
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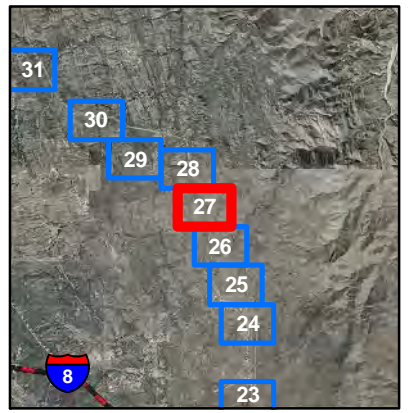
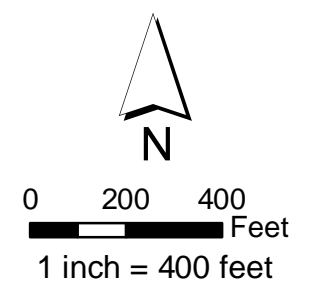


Legend

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Changes on BLM land since PMR

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Legend

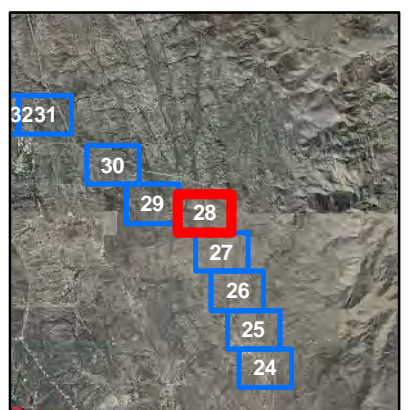
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Changes on BLM land since PMR

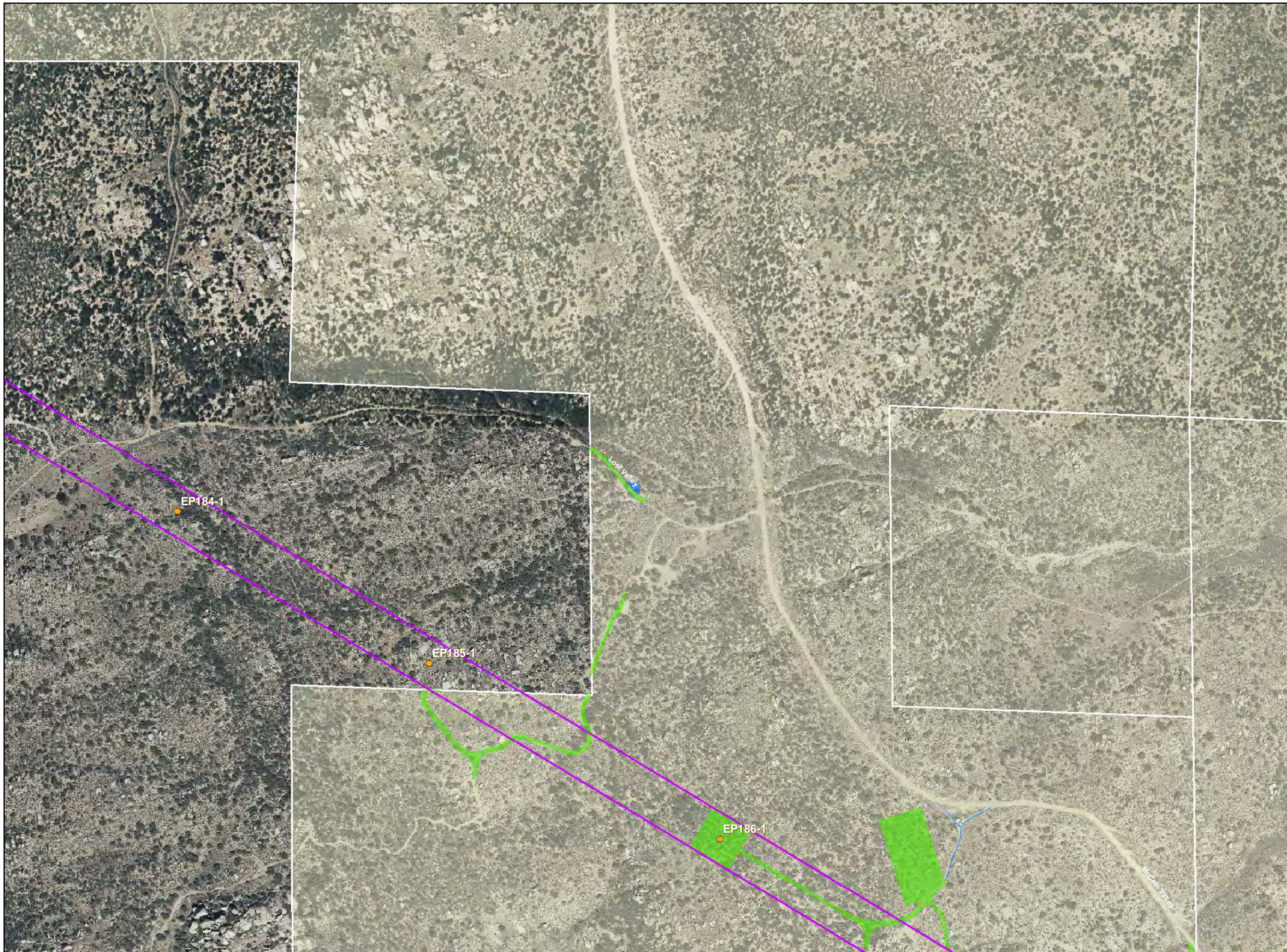
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




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Legend

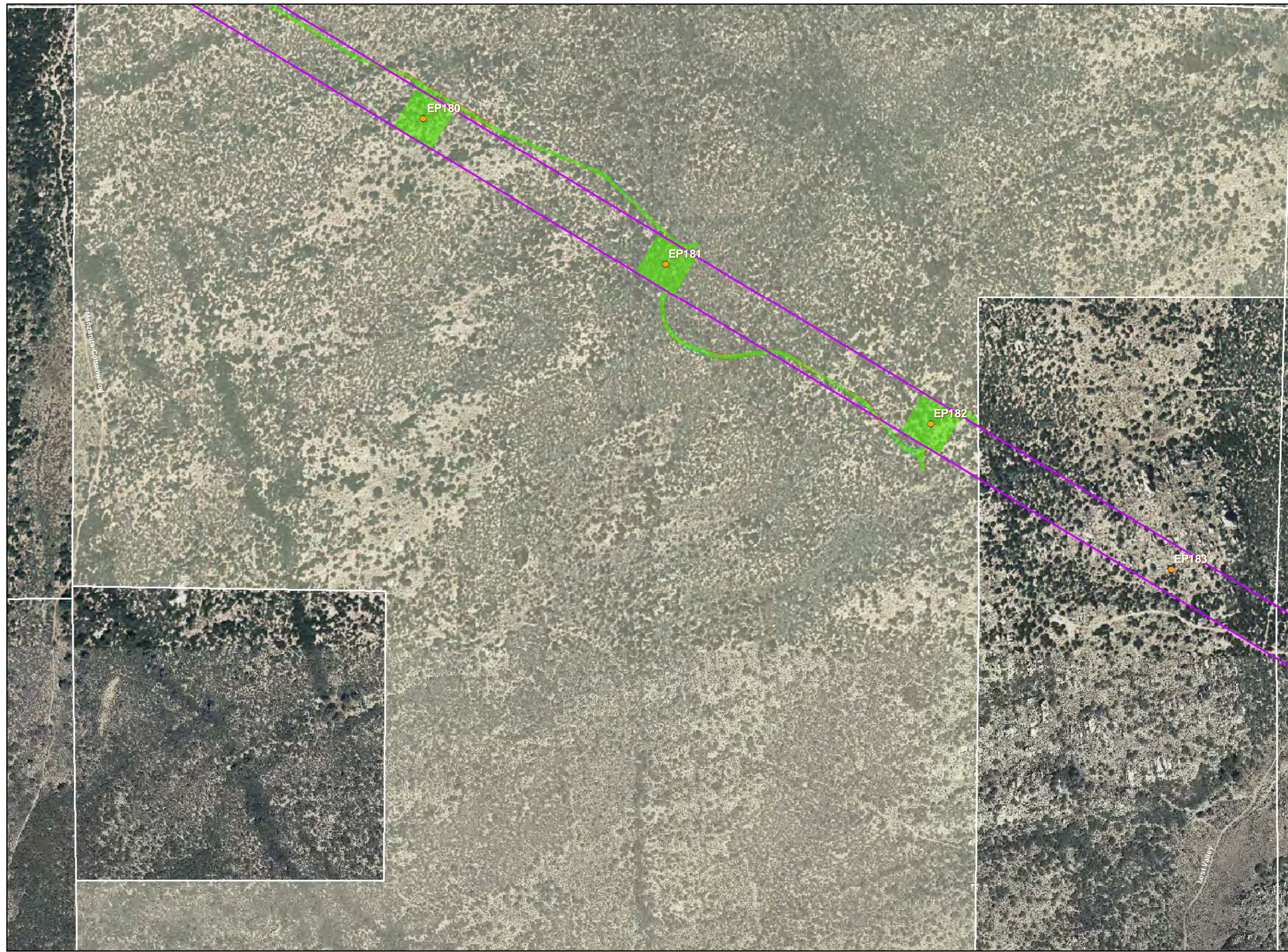
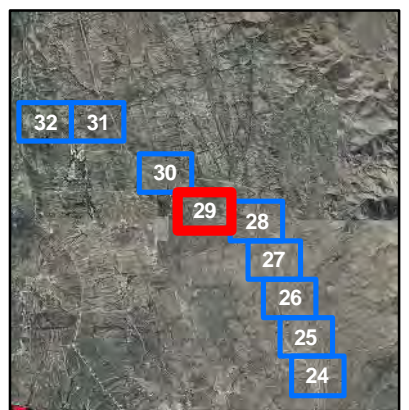
-  BLM owned Land
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-  Current Impact
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Changes on BLM land since PMR







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Legend

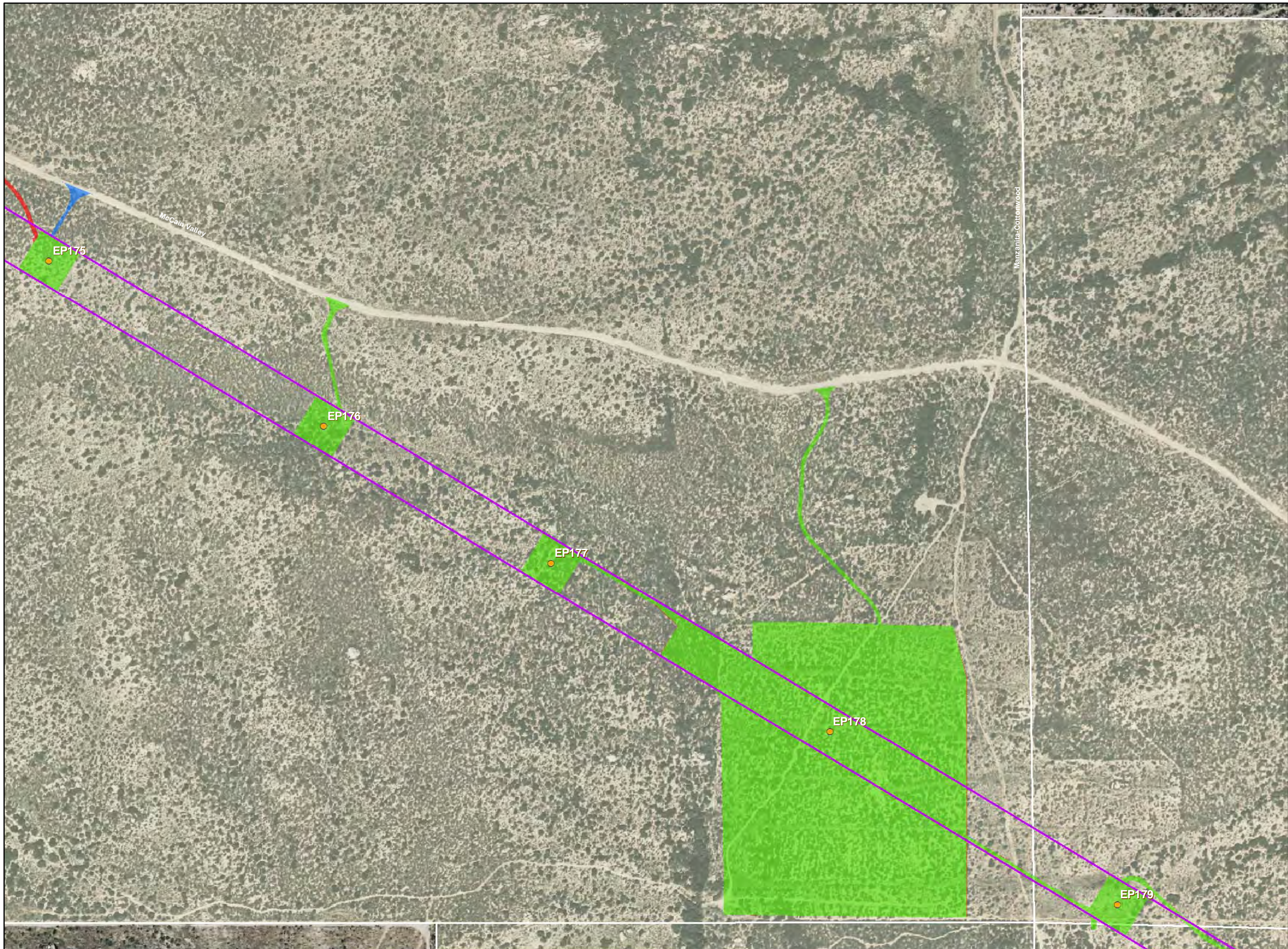
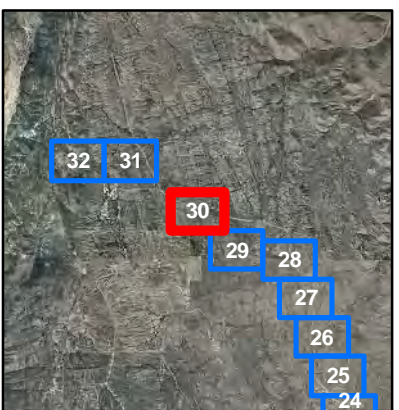
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

Please note:
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Legend

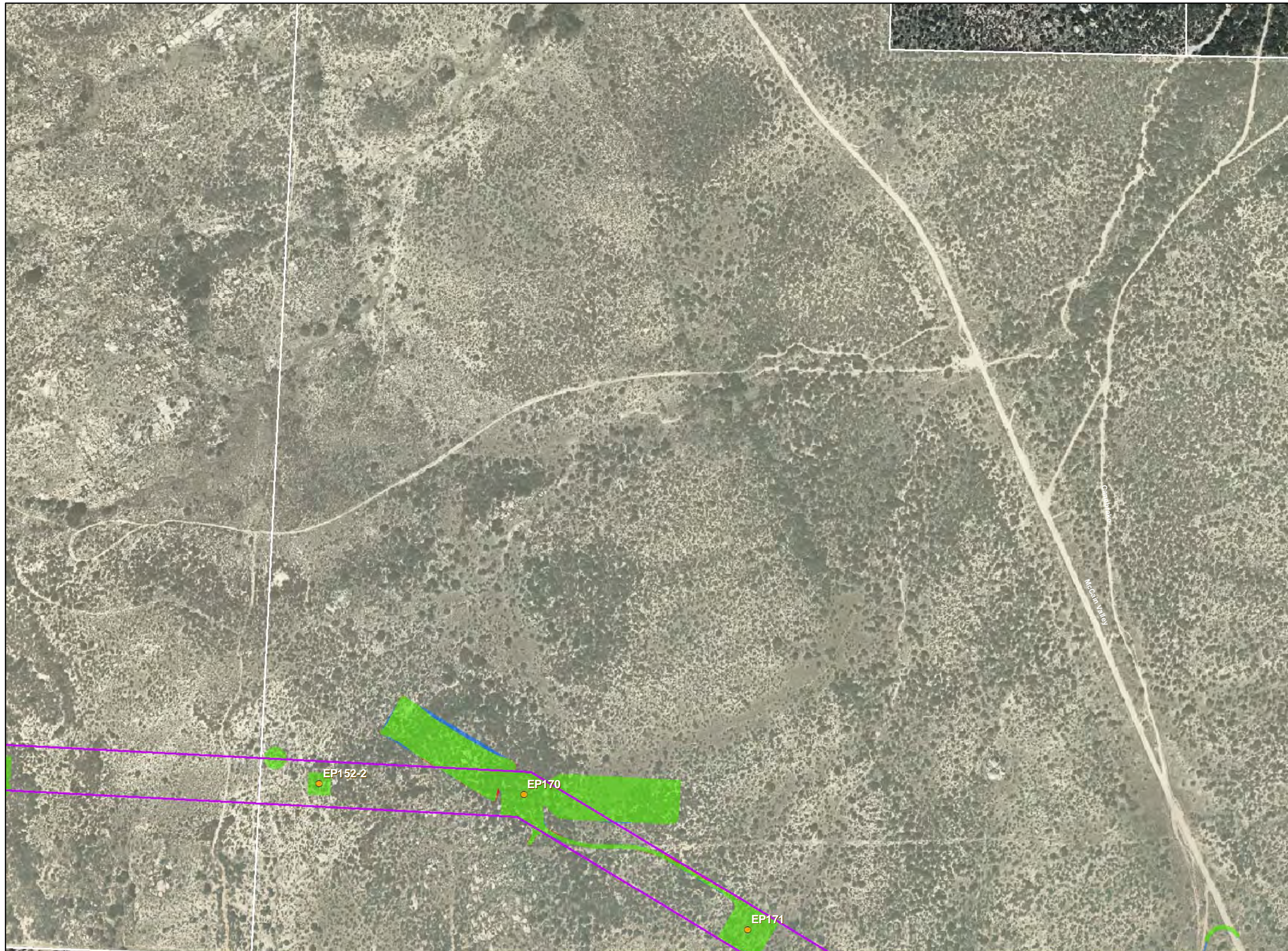
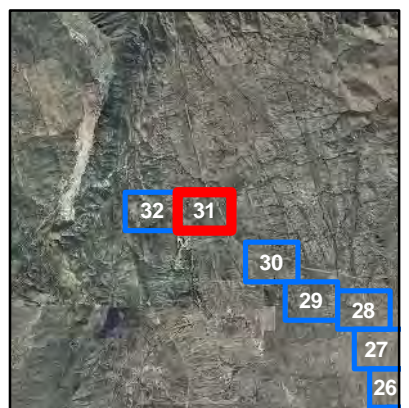
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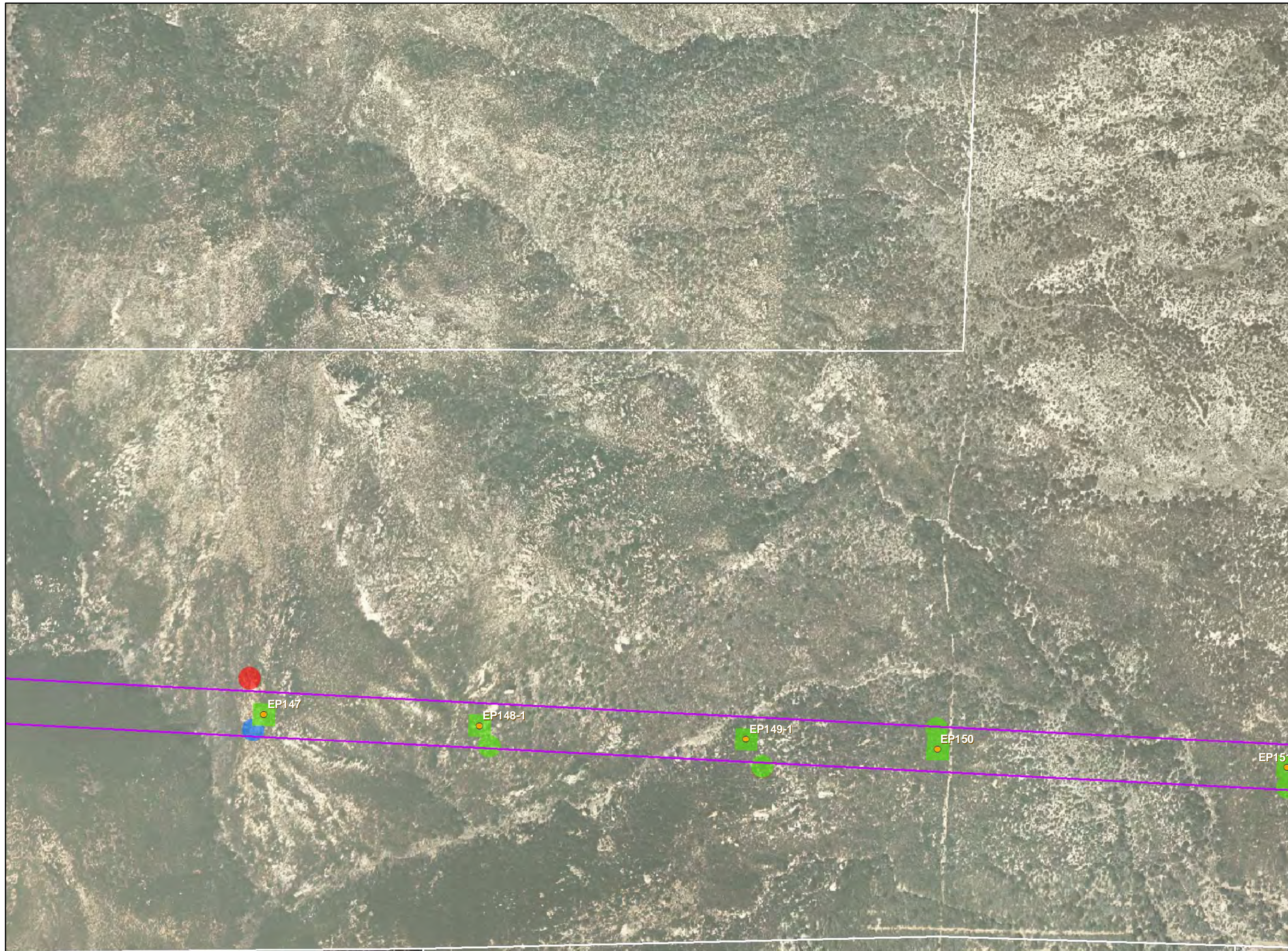
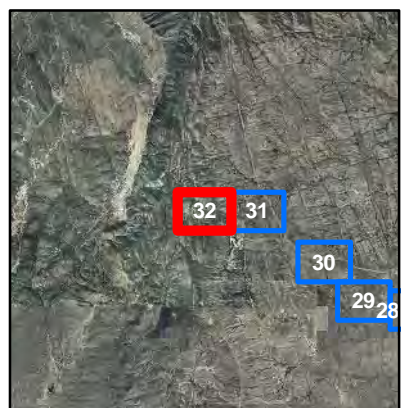
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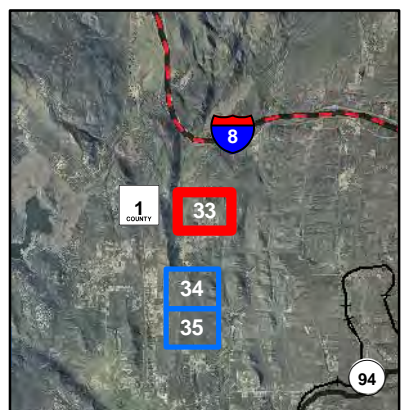
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




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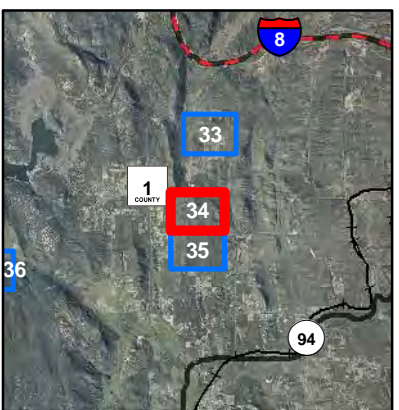
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




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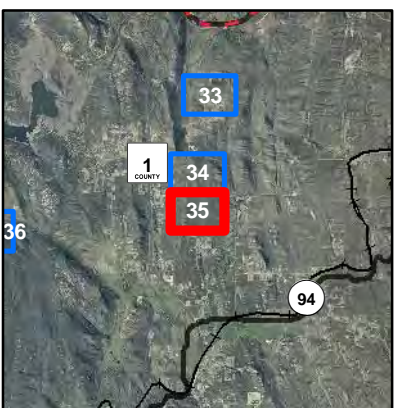
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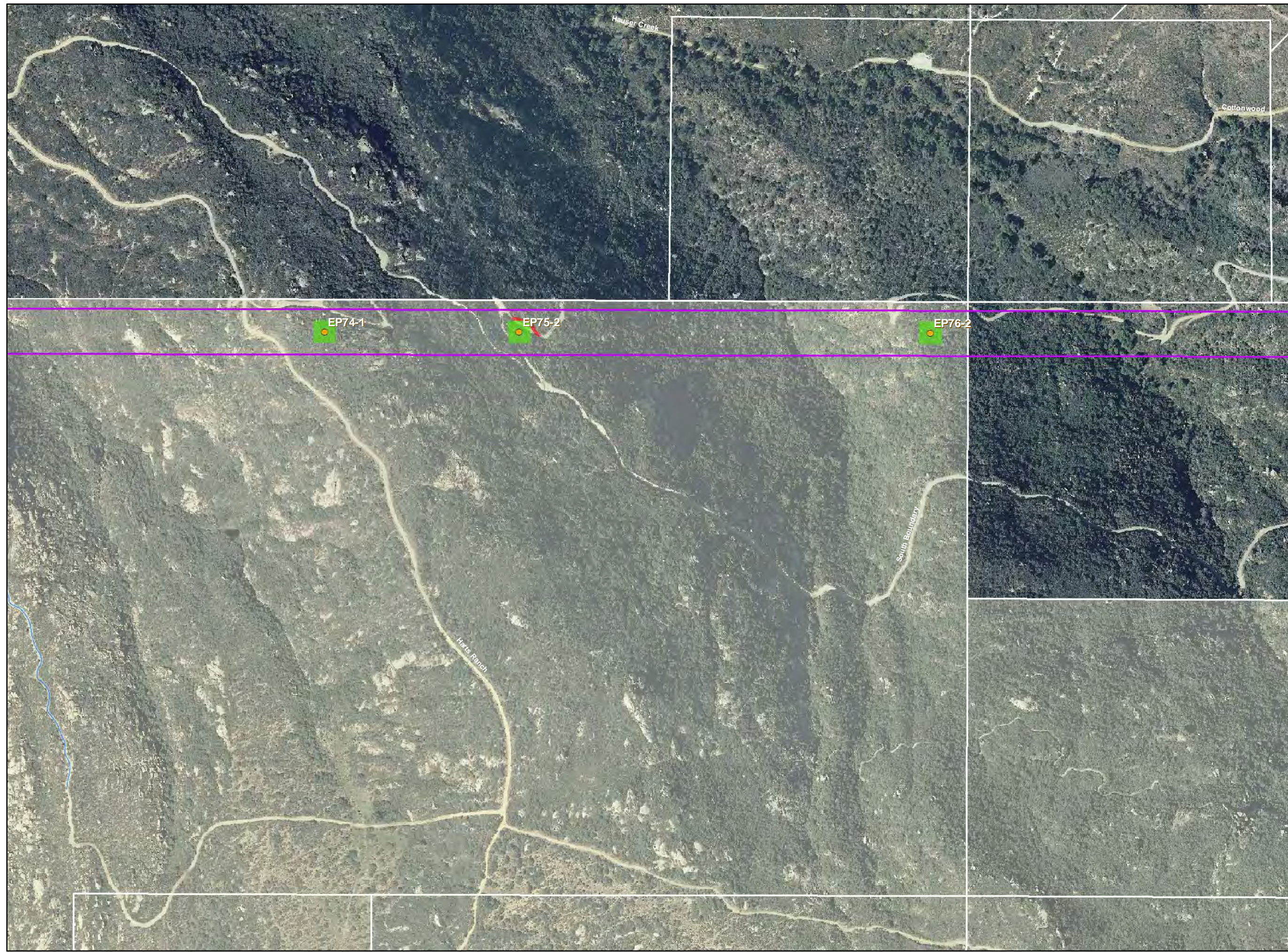
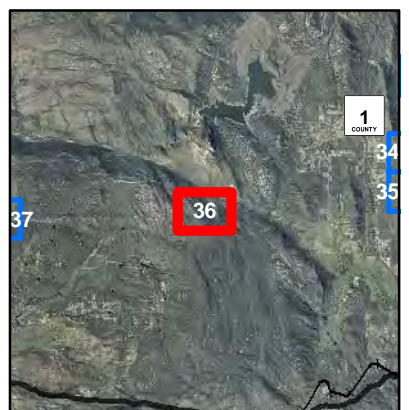
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




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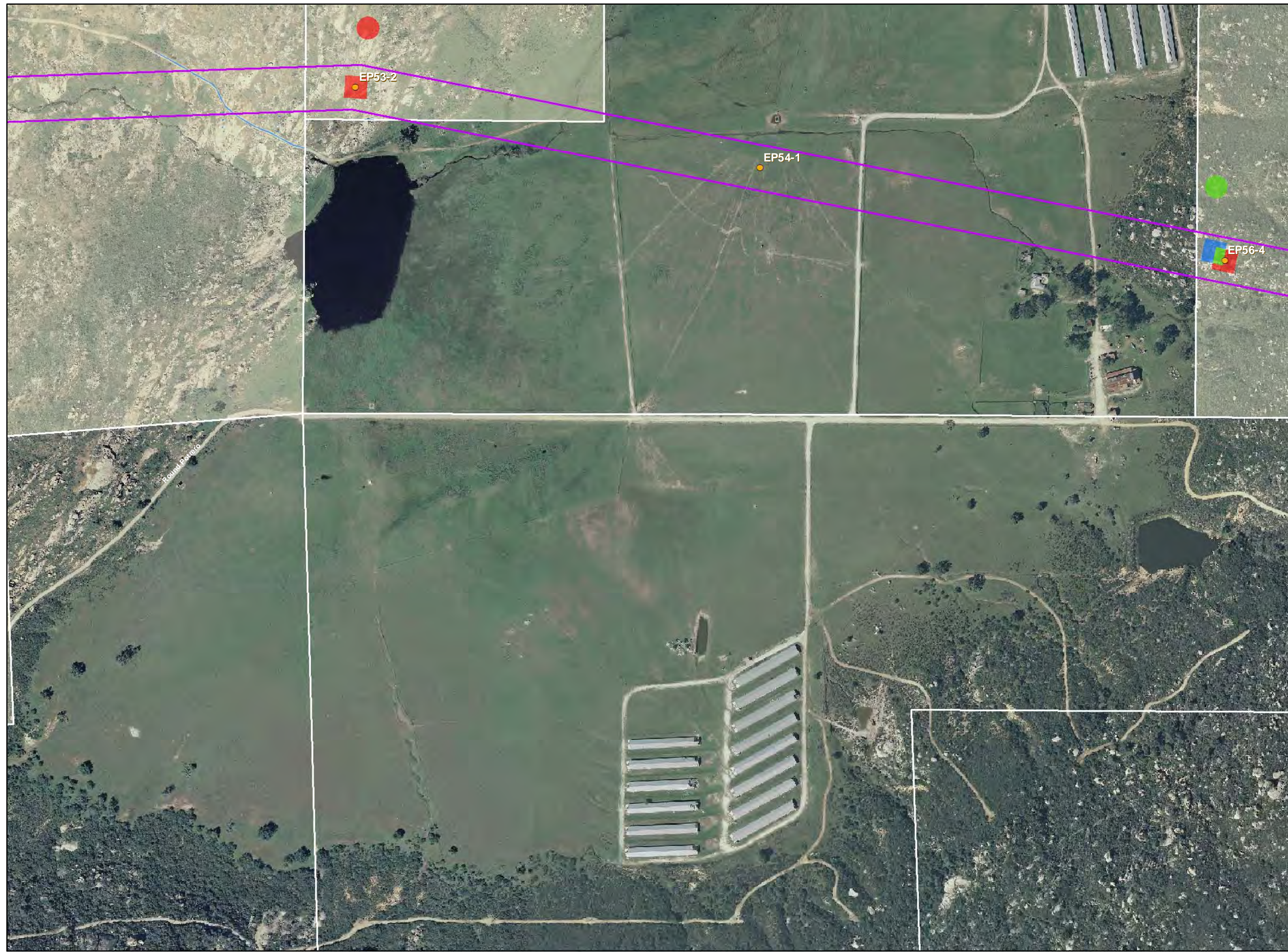
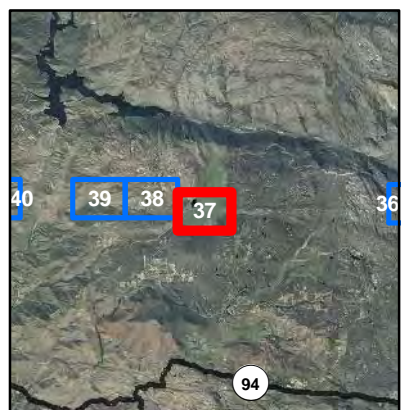
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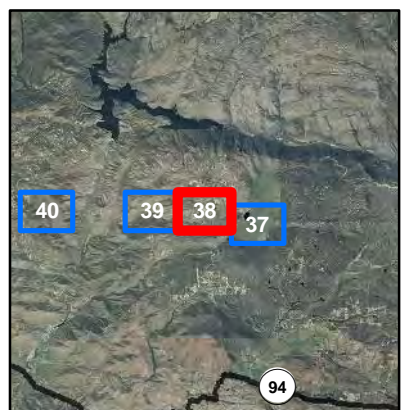
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




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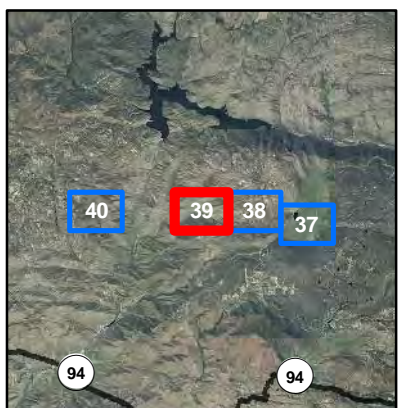
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


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