FINAL

Mitigation Monitoring, Compliance and Reporting Program

San Diego Gas & Electric
Tie-Line 637 Wood-to-Steel Project

(Application No. 13-03-003); Decision (D.14-02-04)

FEBUARY 2014

PREPARED FOR:

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

PREPARED BY:

Dudek
605 Third Street
Encinitas, CA 92024

SAN DIEGO GAS & ELECTRIC COMPANY
TIE-LINE 637 WOOD-TO-STEEL REPLACEMENT PROJECT
MITIGATION MONITORING, COMPLIANCE, AND REPORTING PROGRAM

Prepared for:

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Prepared by:

DUDEK
605 Third Street
Encinitas, California 92024

FEBRUARY 2014

Printed on 30% post-consumer recycled material.

TABLE OF CONTENTS

Section **Page No.**

TABLE OF CONTENTS (CONTINUED)

Page No.

FIGURE

TABLES

ATTACHMENTS

1.0 INTRODUCTION

The Final Initial Study/Mitigated Negative Declaration (IS/MND) for the SDG&E Tie-Line 637 Wood-To-Steel Replacement Project, as adopted by the California Public Utilities Commission (CPUC) on February 5, 2014 (with Permit to Construct (PTC) issued on February 5, 2014), includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with mitigation measures approved in the Final IS/MND. Section 6.0 of the Final IS/MND provides the recommended framework for the implementation of the MMCRP by the California Environmental Quality Act (CEQA) lead agency, the CPUC, and describes the roles and responsibilities of government agencies in implementing and enforcing adopted mitigation measures. This MMCRP includes the information provided in Section 6.0, as well as specific protocols to be followed prior to and during construction by CPUC third-party environmental monitors (CPUC EMs) and San Diego Gas and Electric (SDG&E) project staff.

The project's MMCRP includes direct participation and commitment from SDG&E and CPUC EMs. The success of the program depends on the project management staff, monitors, and construction contractor personnel. Therefore, the goal of the MMCRP is to provide a clear understanding of the project's organization, establish lines of communication, and effectively document and report compliance with all of the mitigation measures.

The MMCRP was developed to provide guidelines and standardize procedures for environmental compliance on the project. The procedures have been developed in coordination with SDG&E, CPUC, and CPUC EMs to help define the reporting relationships, provide detailed information about the roles and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and establish a communication protocol.

1.1 Authority and Purpose of the Program

The California Public Utilities Code confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a Mitigation Monitoring, Compliance, and Reporting Program when it approves a project that is subject to preparation of an Final IS/MND. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting. The CPUC views the MMCRP as a working guide to facilitate not only the implementation of mitigation

measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

1.2 Program Adoption Process

The mitigation measures proposed in the Final IS/MND and the framework for this MMCRP, as described in Section 6.0 of the Final IS/MND, were approved by the CPUC on February 5, 2014 (Decision D.14-02-04)). A draft version of the MMCRP was distributed to SDG&E, CPUC, and CPUC's third party contractor for review and comment.

1.3 Project Description

1.3.1 Project Overview

The proposed project would consist of fire hardening of an approximately 14-mile span of the TL 637 alignment connecting SDG&E's existing Creelman and Santa Ysabel Substations. The TL 637 route currently supports a 69 kilovolt (kV) power line and a 12 kV distribution facility. Primary project components include the replacement of 156 existing wood tie-line support structures with steel poles along approximately 14 miles of the TL 637 route, minor modifications to the Creelman and Santa Ysabel Substations, and the installation of a new fiber optic line that would be co-located on the new TL 637 steel poles.

1.3.2 Schedule

Project-related construction activities will not begin until pre-construction mitigation measures and submittals have been satisfied. Once pre-construction mitigation measures have been completed, the CPUC will issue a Notice to Proceed (NTP), indicating that construction can commence. The NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. Section 4.3 of this MMCRP lists the mitigation measures, the timing for completion, and whether CPUC review or approval is required before construction can commence. A map of the construction elements are provided in Attachment A. Table 1 shows the estimated construction schedule by activity.

Table 1
Estimated Construction Schedule

Proposed Construction Schedule		
Proposed Project Activity	*Approximate Duration (months)*	*Anticipated Start Date*
Micropile foundation drilling and grouting	3	February 2014
Capping and testing	0.5	March 2014
Hole excavation (directly embedded poles)	4	March 2014
Temporary pole installation	0.5	March 2014
Power line construction (poles)	3	March 2014
Pulling and tensioning	2.5	April 2014
Sag work (overhead conductor)	2	May 2014
Underground distribution lines	2.5	March 2014
Demobilization	0.5	August 2014
Cleanup	1	September 2014

1.3.3 Project Documents

This document is intended to provide pertinent information necessary to successfully implement the MMCRP during construction. The mitigation measures listed in Section 4.3 of this MMCRP can be found in Section 6.0 of the Final IS/MND. Detailed discussions of each mitigation measure and potential impacts that could result if the mitigation measures are not implemented properly are provided in these sections as well. In addition to the Final IS/MND, construction activities must be conducted in accordance with the requirements stipulated in the following documents:

- SDG&E's Natural Community Conservation Plan (NCCP)
- State Water Resources Control Board (SWRCB) Natural Pollutant Discharge Elimination System (NPDES) General Construction Permit: Waiver or Waste Discharge Requirement Permit

1.4 Agency Jurisdiction

In addition to the CPUC, several local, state, and federal agencies have jurisdiction over lands within the project area. The CPUC, as the lead agency, is responsible for ensuring that mitigation measures reviewed and approved by jurisdictional agencies during the Final IS/MND process are implemented throughout construction. However, jurisdictional agencies may visit the project site from time to time and request information regarding the status of a mitigation measure. In addition, SDG&E, under their NCCP, is required to submit survey results to the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish

and Wildlife (CDFW) and consult with these agencies when project changes affect the condition of their permit. SDG&E is responsible for satisfying requests from jurisdictional agencies and will notify and copy the CPUC on all correspondences related to final approvals and verifications for the project if not otherwise copied on the correspondence. Additional information on communication protocols can be found in Section 2.3 of this MMCRP. Table 2 lists jurisdictional agencies associated with the project:

Table 2
Jurisdictional Agencies Associated with the
SDG&E Tie-Line 637 Wood-To-Steel Replacement Project

Permit/Approval/Consultation	Agency	Jurisdiction/Purpose	Permit Status
Federal Agencies			
National Environmental Policy Act (NEPA) Compliance (Categorical Exclusion), Right-of-Way (ROW) Grant amendment	BLM	Construction on BLM-managed lands	Right-of-Way Grant Amendment approved June 1, 2012
Clean Water Act Section 404	U.S. Army Corps of Engineers	Impacts to waters of the United States	Coverage under non-notifying Nationwide Permit No. 12
State Agencies			
National Pollutant Discharge Elimination System (NPDES)–General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities	State Water Resources Control Board	Stormwater discharges associated with construction activities disturbing more than 1 acre of land	Not yet applied for
Section 401 Water Quality Certification	Regional Water Quality Control Board	Impacts to waters of the United States	Permit obtained
Encroachment Permit	Caltrans	Construction, operation, and maintenance within, under, or over state highway ROW	Approval expired, an extension has been requested.
Local Agencies			
Traffic Control Plan(s)	San Diego County	Construction within, under, or over county roadways	Not yet submitted

Source: SDG&E 2013

2.0 ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities of key project personnel with respect to the MMCRP. Figure 1 provides an organizational chart of project members responsible for implementing the MMCRP and their relationship to other staff working on the project. The organization chart also establishes preliminary lines of communication between the project team.

2.1 Organization Overview

2.1.1 San Diego Gas & Electric Company

SDG&E Project Manager

SDG&E's project manager (PM) referenced in the contact list (Attachment B) oversee the activities of the assigned construction components. Specific responsibilities of the PM include, but are not limited to:

- Ensure compliance with project specifications, drawings, permit conditions, construction contracts, and applicable codes
- Notify environmental PM and environmental compliance lead of project schedule changes
- Work with SDG&E Environmental Project Management Team to evaluate and improve the implementation of the MMCRP as construction progresses
- Provide leadership for the engineering, procurement, and construction services by integrating environmental responsibility into the project organization
- Regularly facilitate project meetings

SDG&E Contract Administrators and Construction Personnel

Construction activity will take place at any given time within multiple construction components. Construction contractors will have significant responsibilities for implementation of and compliance with the environmental requirements of the project. SDG&E Contract Administrators, or CAs, referenced in the contact list (Attachment B) will oversee the day-to-day construction activities conducted by SDG&E's construction contractors. The construction contractors will be responsible for incorporating all project environmental requirements into their day-to-day construction activities. Key environmental responsibilities for contractors' staff include, but are not limited to:

- Verifying that all construction workers attend the project's environmental awareness training prior to beginning work on the project
- Reviewing and understanding the environmental requirements

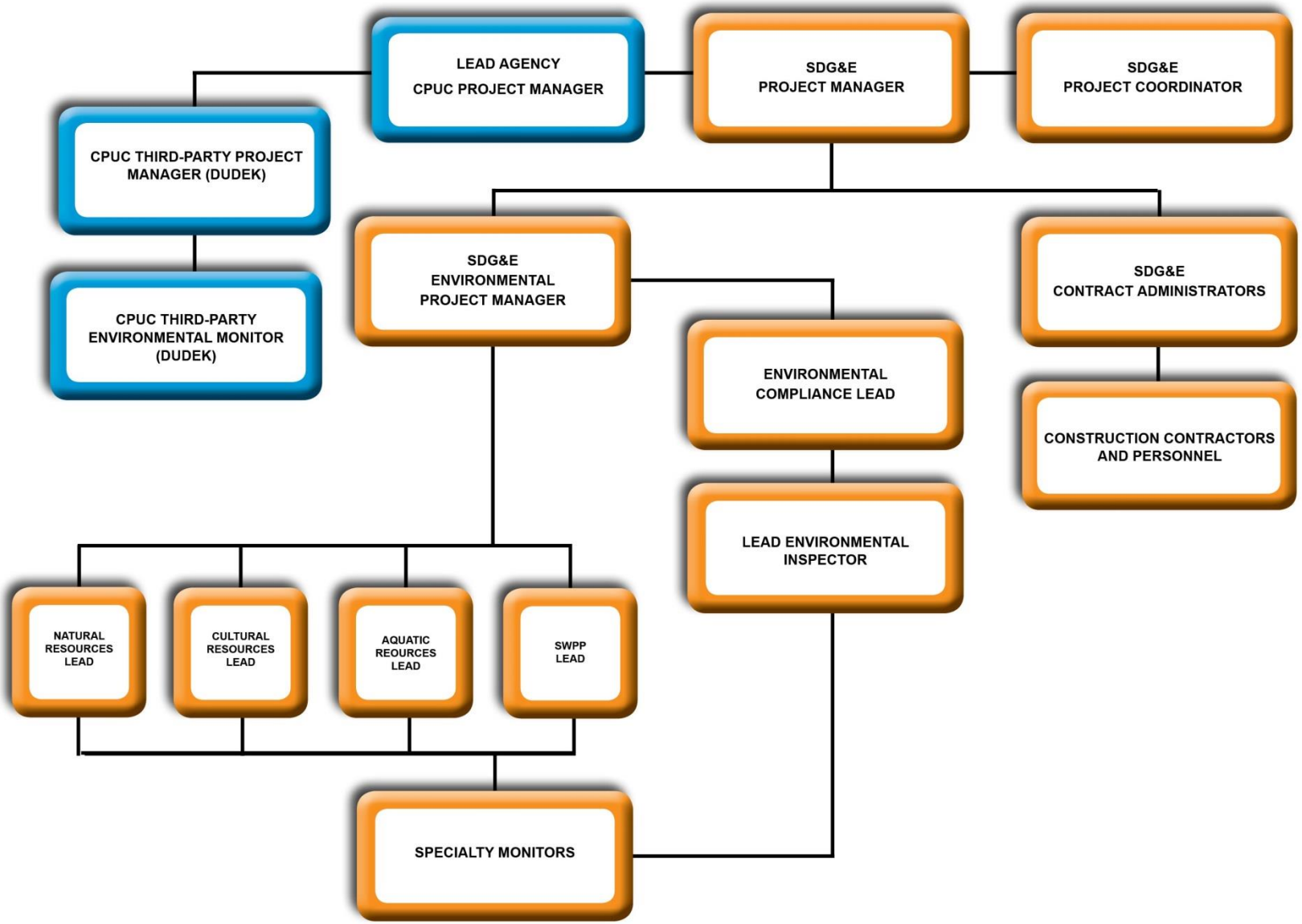
- Implementing and maintaining mitigation measure requirements and conditions during construction
- Responding to requests by SDG&E environmental specialists and environmental monitors during construction.

SDG&E Environmental Project Manager

SDG&E's environmental project manager (EPM) referenced in the contact list (Attachment B) is responsible for providing the appropriate level of resources for successful implementation of the MMCRP. The EPM will provide management, direction, and leadership to the SDG&E Environmental Project Management Team. Specific responsibilities of the EPM, include, but are not limited to:

- Directing the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Ensuring the development and implementation of environmental awareness training
- Ensure all construction personnel receive environmental awareness training
- Providing the leadership and resources to assure compliance with the MMCRP
- Ensuring frequent and clear communication between SDG&E environmental staff, construction personnel, responsible resource agencies, and EMs
- Actively communicating with the lead agencies, particularly in regards to the MMCRP
- Establishing and supporting the lines of communication between the SDG&E Environmental staff, construction personnel, agencies, and EMs.
- Submitting weekly compliance reports to the CPUC

Figure 1 Organizational Chart



SDG&E Environmental Compliance Lead

SDG&E's environmental compliance lead (ECL) referenced in the contact list (Attachment B) will assist the EPM by providing oversight of all activities required for compliance with the MMCRP. The ECL's responsibilities include, but are not limited to:

- Coordinating and tracking MMCRP compliance, including the submittal weekly and bi-weekly compliance reports and pre-construction submittals in order to receive NTPs
- Reviewing and approving daily inspection reports
- Preparing Minor Project Refinement requests or assisting SDG&E contractors with preparation of the requests.

SDG&E Resources Leads

SDG&E's resource leads referenced in the contact list (Attachment B) will support the EPM for successful implementation, planning, permitting, and compliance activities required under the MMCRP. The environmental specialists' responsibilities include, but are not limited to:

- Coordinating the activities of the biological, paleontological, cultural, air, water, visual, wilderness/recreation, and noise mitigation measure requirements, including environmental monitoring
- Coordinating the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Actively communicating with all agencies respective to the above mitigation measure requirements
- Providing technical assistance to the environmental monitors.
- Submitting summary reports to responsible resource agencies, as identified in mitigation or other applicable regulation.

SDG&E Lead Environmental Inspector

SDG&E's lead environmental inspector (LEI) in the contact list (Attachment B) will support the EPM and ECL for successful day-to-day field implementation of MMCRP. The LEI will assist the EPM and ECL in ensuring project compliance with the MMCRP through day-to-day field inspection and first line communication with the CAs, construction contractor foremen, and the EMs. The LEI's responsibilities include, but are not limited to:

- Coordinating with CPUC EMs as appropriate
- Coordinating the mobilization of other resource specialists, including cultural, Native American, paleontological, and a stormwater pollution prevention plan (SWPPP) specialist, as required
- Conducting daily inspection of construction activities
- Coordinating the assessment of work area conditions ahead of construction and providing advance notice of conditions and situations that require specific awareness, planning, or notifications
- Working closely with the EPM, ECL, CAs and CPUC EMs to evaluate the effectiveness of mitigation measures
- Providing coordination with the CAs, and construction and engineering groups to ensure mitigation measures are understood and implemented
- Providing and documenting environmental awareness training to project personnel
- Completing daily inspection reports
- Assisting the EMP and ECL with the preparation of Minor Project Refinement requests.

SDG&E Specialty Environmental Monitors

Several mitigation measures require a qualified specialty monitor during construction, as presented in Section 4.3. SDG&E is to provide these on-site specialty monitors to meet the conditions of the mitigation measures identified in Section 4.3. Contact information for all specialty environmental monitors will be made available as consultant and contract personnel are finalized. The specialty environmental monitors will provide oversight, protection, and direction for compliance within their field of expertise for the applicable construction components.

Additional SDG&E Roles

SDG&E Public Affairs

The SDG&E Public Affairs Manager provides information and guidance to both the Project Construction Management and Environmental Management Teams, as needed.

SDG&E Environmental Law Department

The SDG&E senior counsel for the Environmental Law Department provides information and guidance to both the Project and Environmental Management teams, as needed.

Mitigation Compliance

SDG&E is responsible for successfully implementing all the adopted mitigation measures and Applicant Proposed Measures (APMs) in the MMCRP. The MMCRP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining nondiscretionary permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the discretionary permit process.

2.1.2 CPUC

CPUC Project Manager

The CPUC project manager (see Attachment B, Project Contact List) has the overall responsibility for ensuring that mitigation measures are implemented as adopted by the CPUC. The CPUC delegates field monitoring and reporting responsibilities to Dudek. The CPUC PM will oversee Dudek's work through telephone calls and review of weekly status reports. The CPUC PM will be notified of all noncompliance situations immediately by telephone call or email and may suggest measures to help resolve the issue(s). All Minor Project Refinement Requests will be submitted to the CPUC PM for review and approval.

The CPUC PM will issue a NTP for construction. In the event the NTP covers CDFW or other jurisdictional lands, the CPUC's NTP does not authorize construction to start, but only documents compliance with all relevant mitigation measures and permit conditions. No construction may occur on other jurisdictional lands without specific approval (i.e., issuance of permits) by those agencies.

CPUC Environmental Monitors

The overall monitoring program will be administered under the direction and oversight of the CPUC PM. The CPUC has delegated daily monitoring and reporting responsibilities to

Dudek, a third-party monitoring firm. Individual roles are defined in Attachment B, Project Contact List. The number of CPUC environmental monitors (EMs) and frequency of site inspections will depend on the number of concurrent construction activities and their locations with respect to sensitive resources and land uses, and compliance with project mitigation measures and permit conditions during construction.

SDG&E environmental monitors have primary responsibility for ensuring that construction activities are conducted in accordance with approved project mitigation measures, compliance plans, and permit conditions. The role of the CPUC EMs (Dudek) is to ensure and document that compliance is being achieved using verbal and written communications.

- **Dudek Project Manager.** The project manager supervises Dudek's EMs, as well as determines the appropriate level of inspection frequency, and is responsible for weekly report preparation. The monitoring manager also serves as the main point of contact with the CPUC PM for major issues and noncompliance discussions.
- **CPUC Environmental Monitors (CPUC EMs).** CPUC EMs will be an integral part of the project team and will stay apprised of construction activities and schedule changes, and will monitor construction activities for compliance with project mitigation measures, compliance plans, and permit conditions. The CPUC EMs will document compliance through maintaining daily logs and use of a mitigation measure tracking table. The CPUC EMs will also provide input for the draft weekly reports. The CPUC EMs shall note problems with monitoring, notify designated project members, and report the problems to the CPUC PM. The enforcement and shut-down authority of the CPUC EM in the field is limited to issues that address imminent safety issues or resource danger. All other issues will be brought to the attention of the SDG&E environmental monitors to address appropriately.

2.1.3 Mitigation Monitoring Program Contact List

A Project Contact List has been included as Attachment B. The contact list includes the names of SDG&E and CPUC monitors, project managers, supervisory staff, and other members of the project team. The list also includes phone numbers, and email addresses where project members can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

2.2 Responsibilities

2.2.1 Monitoring

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this monitoring program and has primary

responsibility for implementation of the monitoring program. As mentioned above, the CPUC has delegated monitoring responsibilities to a third-party monitoring program. The CPUC EMs will be in the field on a regular basis, particularly when construction activities have the potential to impact a sensitive resource. Responsible agencies, such as the USFWS, CDFW, and RWQCB, may elect to monitor construction or conduct a site visit during construction.

SDG&E may elect to have one or more full-time environmental monitors on site on a daily basis to coordinate specialty monitors and assist construction crews with interpreting mitigation measures and correcting compliance problems in a timely manner.

2.2.2 Enforcement

The CPUC and other jurisdictional agencies are responsible for enforcing the procedures adopted for monitoring through the CPUC EMs assigned to each project component.

The CPUC has the authority to halt any construction activity associated with the SDG&E Tie-Line 637 Wood-To-Steel Replacement Project if the activity is determined to be a deviation from the approved project or adopted mitigation measures.

The CPUC EMs will also note problems with monitoring, notify designated project members, and report the problems to the CPUC PM.

Per Resolution E-4550 (May 9, 2013), CPUC may impose fines in the event SDG&E does not comply with mitigation measures. CPUC Staff will determine whether a fine is appropriate for non-compliance events consistent with Resolution E-4550. Examples of non-compliances that may result in fines being issued by CPUC Staff include but are not limited to the following;

- Continuing construction after an authorized staff person has required construction to stop;
- Starting construction components that have not been approved through a Notice to Proceed;
- Violating nest buffer zones;
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance;
- Grading, foundation, line work, or other ground disturbance without required biological pre-construction surveys or biological monitor on site;
- Use of new access roads, overland travel routes, staging areas, or extra work spaces that have not been approved;
- Failure to properly maintain an erosion or sediment control structure;
- Working outside of approved work hours; and,
- Project Personnel working without training.

Other jurisdictional agencies have the independent authority to halt construction, operation, or maintenance activity associated with the project within their respective jurisdictions if the activity is determined to be a deviation from the approved project or adopted mitigation measures or puts a sensitive resource at undue risk.

2.2.3 Mitigation Compliance

SDG&E is responsible for successfully implementing all the adopted mitigation measures in the MMCRP. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the permit process.

Should SDG&E identify potential challenges in implementing certain mitigation measures, SDG&E will inform the CPUC Project Manager for issue resolution in writing and in accordance with the dispute resolution procedures outlined in Section 6.2 of the Final IS/MND.

2.3 Communication

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives will need to interact regularly and maintain professional, responsive communications at all times. Similarly, SDG&E representatives will need to coordinate closely with CPUC EMs to address and resolve issues in a timely manner. Therefore, this section of the MMCRP provides a communication protocol to accurately disseminate information about on-going surveys and mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project.

Pre-construction Kickoff Meeting

A pre-construction meeting will be held with the CPUC, SDG&E, and CPUC EMs to review the MMCRP and mutually agree on the project's communication protocol. Based on discussion at the meeting and input from each party, Section 2 of this document will be finalized and incorporated into the MMCRP.

2.3.1 Construction Progress Meetings

SDG&E will conduct field meetings with the SDG&E PM, CAs, contractor supervisors, and SDG&E's environmental representatives to discuss work completed, work anticipated for the following period, and the status of mitigation measures. The field meetings will also be a forum for discussing environmental compliance issues or concerns with the construction contractors. SDG&E may request CPUC's EM(s) to participate in the meeting to help resolve

any issue that may have arisen during the previous period. Alternatively, SDG&E or CPUC's EM(s) may recommend a separate meeting to discuss mitigation, minor project refinement requests, or other project-related issues.

In addition to construction progress meetings conducted at the field level, the SDG&E PM, SDG&E construction manager, SDG&E EM, and the CPUC Lead EM and/or CPUC PM may participate in a teleconference calls. The teleconference calls would be similar to construction progress meetings; however, the conference calls would focus on the MMCRP.

2.3.2 Daily Communication

Many of the problems that come up during construction can be resolved in the field through regular communication between CPUC EMs, SDG&E, and construction contractors. Field staff will be equipped with cell phones and available to receive phone calls at all times during construction. A Project Contact List has been included in Attachment B. The organization chart (Figure 1) provided in Section 2.0 generally shows the lines of communication to be used during construction. The following sections provide additional guidelines to ensure effective communication in the field.

CPUC EM

The CPUC EM's primary point of contact in the field is SDG&E's LEI. The CPUC EM will contact SDG&E's LEI if an activity is observed that conflicts with one or more of the mitigation measures, so that the situation can be corrected. If the CPUC EM cannot immediately reach SDG&E's LEI, then the SDG&E CA, PM, EPM, or ECL will be contacted to address the problem. Similarly, the CPUC EM will contact SDG&E's LEI for information on where construction crews are working, the status of mitigation measures, and schedule forecasts. The CPUC EM will not direct the contractor; however, the CPUC EM has the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area).

SDG&E

SDG&E will provide the CPUC EMs with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title, responsibility, and whether their position is segment-specific. The contact list will be updated as new project personnel are assigned to the project and redistributed as necessary.

SDG&E will prepare and distribute a Weekly Construction Status and MMCRP Compliance Report (Weekly Report) to key project members, including the CPUC and its representatives.

The Weekly Reports may be reduced to bi-weekly if construction activities warrant a reduction and is approved by the CPUC PM. The CPUC PM will review the report to ensure that the status of mitigation measures is consistent with observations in the field. Any questions regarding the status of mitigation measures will be directed to the SDG&E EPM. The Weekly Report will also be a tool to keep all parties informed of construction progress and schedule changes.

2.3.3 Communicating Compliance Issues

Section 3.1.2.4 below describes procedures to communicate issues/concerns with implementation of mitigation identified by the CPUC EMs during site inspections.

2.3.4 Coordination with Other Agencies

As discussed in Section 1.4, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. SDG&E will be responsible for contacting resource agencies and immediately notifying them of issues regarding their jurisdiction. The CPUC EM may request copies of email correspondences, phone logs, or other documentation between SDG&E and resource agencies to avoid direct involvement from CPUC EMs. However, if there is an unresolved issue regarding compliance with a mitigation measure or permit requirement under the jurisdiction of a resource agency, the CPUC EM may elect to contact the agency to discuss resolution. The CPUC EM will coordinate this call with SDG&E and provide the opportunity to participate in the call.

INTENTIONALLY LEFT BLANK

3.0 ENVIRONMENTAL COMPLIANCE AND FIELD PROCEDURES

3.1 Mitigation Measures Compliance and Reporting

3.1.1 Pre-Construction Compliance Verification

SDG&E is required by the terms of the mitigation measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. Copies of this documentation will be retained by the CPUC EMs and provided to the CPUC with all files at the completion of the project. The plans, surveys, studies, and other documentation required to be completed by SDG&E before construction are listed in the mitigation measure and APM table in Section 4.3.

While these documents are being reviewed by the approving agencies, they are also reviewed by the CPUC. Compliance with all pre-construction mitigation measures and APMs presented will be verified prior to construction, and construction may not start on any segment before SDG&E receives a written NTP from the CPUC PM.

The CPUC EMs, including project management staff and the technical experts, will review all mitigation plans and reports and provide comments. Resource agencies will also be involved in the review of applicable plans and reports, primarily restoration-related, and will provide comments. Comments on these documents will be provided to SDG&E to ensure that they adequately accomplish the intended reduction in impacts. For required local and state agency permitting/consultations, the CPUC EMs will track SDG&E's progress as it relates to SDG&E's construction plans and project mitigation and permitting requirements. Based on SDG&E's construction plans, CPUC may authorize construction to begin on a phased basis, and the CPUC EMs will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

The CPUC will not authorize construction to begin until all pre-construction requirements have been fulfilled for a given phase. To save time, SDG&E should identify extra work space area located outside of the work limits included in the Final IS/MND, for each phase of construction prior to the start of active construction, so they can be included in the NTP

3.1.2 Notice to Proceed Procedures

The CPUC PM and Dudek will ensure that the NTP process is consistent with the adopted CEQA document. The NTP approval shall document that pre-construction mitigation measure requirements, applicable surveys and studies, as well as project permit requirements have been met.

In general, an NTP request must include the following information:

- A description of the work
- Detailed description of the location, including maps, photos, and/or other supporting documents
- Verification that all mitigation measures and APMs have been met or do not apply to the work covered by the NTP request
- Verification that all applicable permit conditions or requirements, project parameters, or other project stipulations have been met for the work covered by the NTP request
- In the case where some outstanding compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that outlines what submittals are outstanding and how they will be met and approved in a timely manner prior to construction
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction
- Cultural resource surveys or verification that no cultural resources would be significantly impacted
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work.

CPUC will review the NTP request and pre-construction requirement submittals per the steps outlined below to ensure that all of the information required to process the approval is included.

1. SDG&E submits NTP to the CPUC PM. CPUC will distribute the NTP request for review as follows:
    a. To the team biological resources expert for review for biological resources. Review questions/comments will be provided in a letter or email.
    b. To the team cultural resources expert for review of cultural resources. Review questions/comments will be provided in a letter or email.
    c. The remaining portions of the NTP request will be sent to issue-area reviewers where appropriate.
2. CPUC will also review and, if needed, will prepare a bullet list of outstanding requirements and where additional information or clarification is needed.
3. All questions and comments, as well as required additional information or clarifications, shall be sent to SDG&E by CPUC in an email.

4. SDG&E will supply clarifications and/or additional information to be added to the NTP request in a memo or letter format along with responses addressing all comments and questions forwarded by CPUC.
5. CPUC will complete a Compliance Status Table documenting compliance and any outstanding requirements that can be made conditions of the NTP.
6. CPUC will review the draft NTP approval letter and send the approval and an updated compliance table to SDG&E.
7. CPUC will then post the approved NTP documentation on the public CPUC project website.

3.1.3 Compliance Reporting

As described in Section 2.0, the CPUC EMs will perform compliance inspection throughout the construction period to ensure compliance with all applicable mitigation measures, plans, permits, and conditions of approval of the CPUC. Site visits may be coordinated with SDG&E or conducted unannounced. During the Pre-Construction Kick-off Meeting, SDG&E and the CPUC will agree upon a procedure for unannounced site visits. This procedure will ensure that SDG&E construction management and safety staff are aware of all personnel on the project site on any given day. Supplemental information provided by SDG&E, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondences, will also be used to verify compliance.

The CPUC EMs will document observations on site through the use of field notes and digital photography. The photos will be provided in the weekly reports and correlate to a discussion of specific construction or compliance activity. In addition, field inspection forms will be utilized in the field to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate weekly status reports and update the status of mitigation measures listed in Section 4.3. A sample site inspection form has been included in Attachment C. Weekly reports will be provided to all permitting agencies via email and/or posted on a CPUC public website during construction.

Separate enforcement actions by the regulatory agencies may not follow these steps.

3.1.4 Compliance Levels

The CPUC/ EM and SDG&E LEI shall document all observations and communications in a logbook and will determine whether the observed construction activities are consistent with mitigation measures, APMs, and project parameters, as adopted by the CPUC. All compliance

issues regardless of level will be documented in the weekly reports, which will be provided to all agencies upon request.

The CPUC EM shall not direct the work of a construction contractor or subcontractor. A construction activity that deviates from permit conditions or mitigation measures, particularly when the activity puts a resource at risk, would be considered a noncompliance. A noncompliance issue may also be reported by the SDG&E LEI and/or CPUC EM if a mitigation measure is not implemented according to the timing restrictions listed in the mitigation measure tables. Examples of non-compliant actionsinclude, but are not limited to:

- Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance
- Brush clearing outside the approved work limits
- Activity during seasonal activity restrictions
- Grading, foundation, or line work without required biological pre-construction surveys or biological monitor on site
- Failure of erosion or sediment control structures if it puts a sensitive resource at risk
- Discharge of sediment-laden trench or foundation hole water into a waterbody or storm drain.

SDG&E will immediately notify the CPUC EM and the CPUC PM if any noncompliance events occur, verbally or through email. SDG&E will follow up with a detailed written report of the event within 24 hours or at a time agreed upon with the CPUC PM. In the event the noncompliance is observed by a CPUC EM, the CPUC EM will immediately notify the designated SDG&E representative of a noncompliance that requires immediate corrective action. A noncompliance report will be sent to SDG&E from the CPUC PM that outlines the incident. The NCR shall list all actions required to bring the activity back into compliance, and provide a timeline for follow-up. All NCRs and Project Memoranda will be made available upon request to agencies with resources that were potentially affected by activities reported in the NCR. If a construction activity or observed resource protection measure only slightly deviates from project requirements and does not put a resource at immediate risk, the CPUC EM and/or SDG&E LEI may elect to issue a Project Memorandum to get the issue corrected. Construction activities that could result in a Project Memorandum include, but are not limited to:

- Failure to properly maintain an erosion or sediment control structure, but structural failure has not occurred
- Use of an existing unapproved access road (first offense)

- Project personnel begin work on site without proof of training
- Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot.

Through the issuance of Project Memoranda and NCRs, patterns of compliance issues can be discerned; preventative measures can be developed; and remedial work, if needed, can be scheduled.

Incident reports (e.g., reportable spills) would also be tracked in the Weekly Reports. Repeated events that individually might not be considered noncompliance may become noncompliance if continued occurrence after initial incident is observed and documented. In other words, repeated incidents will result in noncompliance.

Compliance and Noncompliance Violation Levels

Project compliance and noncompliance violation levels and the specific corrective actions are defined below. The compliance and noncompliance violation levels should be utilized by both SDG&E LEIs and CPUC EMs to document compliance levels throughout construction.

- ***Level 0 Compliance.*** This level indicates that all mitigation measures and permit conditions are being complied with and there are no violations. No corrective action is necessary.
- ***Level 1 Minor Deviation.*** This level indicates that a minor deviation from a mitigation measure has been identified and action is being taken in the field to immediately remedy the situation. No resources, beyond those originally identified within the Final IS/MND, are being impacted and no potential for new resource damage exists. If a minor deviation is not expeditiously corrected, it would become a Level 2 Noncompliance issue.
- ***Level 2 Noncompliance***. One or more aspects of a mitigation measure have not been complied with, making the mitigation ineffective and resulting in minor impacts not previously identified within the Final IS/MND. If allowed to continue, this noncompliance could result in a significant impact over time. A noncompliance may also include one or more of the aspects of a mitigation measure are not complied with and the implementation of a mitigation measure is deficient or nonexistent, resulting in significant impact(s), or there is immediate threat of major, irreversible environmental damage or property loss. The protocol outlined above for an NCR shall be completed in the event noncompliance is identified by a CPUC EM and/or SDG&E LEI.

All Level 1 Minor Deviations and Level 2 Noncompliance activity will be reported by Dudek and/or SDG&E LEI to the CPUC PM via immediate notification Based on the severity or pattern of noncompliance activity, the CPUC PM has the authority to shut down project construction

activities. If a shutdown of construction activity occurs, construction shall not resume until the CPUC PM authorizes it to do so. No Dudek personnel has the authority to shut down or restart construction activities on a component- or project-wide scale. However, the CPUC EM has the authority to redirect work if an immediate threat to safety or a sensitive resource is imminent.

3.2 Minor Project Refinements

The CPUC Energy Division may approve requests by SDG&E for minor project refinements that may be necessary to complete the project due to final engineering or other reasons. Minor project refinements cannot create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document. Minor project refinements cannot require new conditions for approval, without which the proposed refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. Minor project refinements cannot conflict with any mitigation measure or applicable law or policy or trigger an additional permit requirement. Specifically, minor project refinements must not change mitigation measures. Minor project refinements must be located within the geographic boundary of the project study area of the Initial Study/Mitigated Negative Declaration. SDG&E shall seek any other project refinements by a petition to modify the decision.

Requests for staff approval of a project change must be made in writing and should include the following:

- A detailed description of the proposed refinements, including:
    - an explanation of how the project refinement would deviate from the current project (include photos)
    - the original condition as described and approved
    - justification for change
    - maps and figures
    - environmental impacts
    - concurrence with other relevant agencies
- Whether certain resources are present within the proposed refinement (e.g. biological or cultural resources), and whether those resources were included in original baselines surveys and/or previous analysis (also include more recent preconstruction surveys, if applicable)
- Identification of applicable CEQA sections, potential impacts of proposed refinements, including original and new levels of impact and avoidance/minimization measures to be taken.

The CPUC PM may request additional information or a site visit in order to process the request.

Possible examples of project refinements that may be approved by staff after final engineering include, but are not limited to:

- Adding a temporary extra work area (for the duration of construction) or substituting a work area, including lay-down and staging, for another work area that is as suitable or more suitable than the originally proposed work area The temporary extra work area or substitute work area must be located in a disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, must not create any permanent impacts, and must be restored to either its initial condition or an improved condition.

- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new impact or a substantial increase in the severity of a previously identified impact.

- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new impact or a substantial increase in the severity of a previously identified impact.

To initiate a project refinement request, SDG&E will fill out a Minor Project Refinement Request Form (see Attachment D), prepare the appropriate supporting documentation, and obtain the required signatures. SDG&E will complete and submit the Minor Project Refinement Request Form and supporting documentation by email (scanned copy) to CPUC with a copy to Dudek.

3.3 Records Management

Daily inspection and weekly status reports will be filed and used by the CPUC third-party EM to prepare a final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure was implemented and include copies of submittals required for compliance.

3.4 Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports that do not include confidential information will be made available by the CPUC for public inspection on request. In order to facilitate the public's

awareness, the CPUC will make weekly reports and other pertinent project documents available on the project, accessible at http://www.cpuc.ca.gov/environment/info/dudek/WoodtoSteel/WoodtoSteel.htm

4.0 MITIGATION MONITORING PROGRAM TABLE

4.1 Using the Table

Section 4.3 below lists the mitigation measures included in the Final IS/MND and the CPUC Decision dated February 5, 2014. The Mitigation Monitoring Program table is the core document for environmental requirements on the project and will be the primary guideline for determining compliance with the MMCRP. A copy of the table should be kept with each crew working on site, and all supervisory staff working on the project should be familiar with its contents.

The CPUC will use a modified version of the mitigation measure tables during the pre-construction planning and construction monitoring phases of the project to accurately track the status of mitigation measures. The tables will be sorted and divided into pre-construction measures and measures to be implemented during construction. Similarly, a separate table listing mitigation measures that require CPUC approval may be generated. The modified tables will also include a status column that will be updated on a regular basis. Attachment E provides an example of a mitigation table that has been modified for tracking purposes.

4.2 Effectiveness Review

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

4.3 Mitigation Measures

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in air quality and noise impacts due to project construction overlap.		APM-GEN-1	**Construction scheduling.** SDG&E will coordinate construction of the proposed project such that construction activities will typically not overlap with other SDG&E construction projects in the immediate vicinity of the proposed project.	a. Documentation verifying construction schedules for SDG&E projects do not overlap in the immediate vicinity b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction	SDG&E and CPUC * Applicable to all project components during construction
Construction of the proposed project could result in noise impacts due to helicopter use.		APM-GEN-2	**Helicopter use.** Helicopter takeoffs and landings conducted at the Warnock and Santa Ysabel Staging Yards will be restricted to the approximate center of the staging area. Helicopter usage will conform to acceptable hours for construction activities, as outlined within the San Diego County Noise Code.	a. Identify the takeoff and landing locations at the Warnock and Santa Ysabel Yards. b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction	SDG&E and CPUC * Applicable at the Warnock and Santa Ysabel Yards
Aesthetics						
Construction of the proposed project could result in short-term visual impacts.		APM-AES-1	**Visual screening of staging yards.** The Warnock and Santa Ysabel Staging Yards will have opaque mesh installed along the fence that will soften the view of the staging yard from public vantage points such as roads, residences, and public vantage points.	a. Documentation verifying color of screening materials used at Warnock and Santa Ysabel staging yards b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction	SDG&E and CPUC * Applicable at the Warnock and Santa Ysabel Yards
Operation of the proposed project could result in long-term visual impacts.		APM-AES-2	**Restoring appearance of temporarily disturbed areas.** When proposed project construction has been completed, all temporarily disturbed terrain will be restored, as needed and as appropriate, to approximate pre-	a. Documentation of pre-construction conditions. b. Documentation demonstrating that disturbed areas have been	a. Prior to and during construction b. During construction c. During construction	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			construction conditions. Revegetation would be used, where appropriate (revegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to reestablish a natural-appearing landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape.	restored in accordance with the guidelines provided in section 7.2, "Habitat Enhancement Measures," of the NCCP. c. CPUC monitor: Line item in compliance monitoring report		
Biological Resources						
Construction of the proposed project could result in temporary and/or permanent loss of native vegetation, direct or indirect loss of listed/ sensitive plants or habitat for sensitive plants, and direct or indirect loss of listed/sensitive wildlife or habitat of sensitive wildlife.		APM-BIO-1	**SDG&E Subregional NCCP.** The proposed project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The proposed project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW – formerly the California Department of Fish and Game), respectively, for the management and conservation of multiple species and their associated habitats,	a. A Implement NCCP Protocols as defined b. CPUC monitor: Line item in compliance monitoring report	a. During construction and operations b. During construction	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			as established according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area. Pursuant to the SDG&E Subregional NCCP, SDG&E conducted pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm surveyed all proposed project impact areas and prepared a Preactivity Study Report (PSR) outlining all anticipated impacts related to the proposed project. The proposed project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR was submitted to the CDFW and USFWS, and no comments were received. Prior to the commencement of construction, a verification survey will be conducted of the proposed project disturbance areas, as required by the SDG&E Subregional NCCP.			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures. If the previously delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank will be required to address impacts from project-related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement. Specific operating restrictions that are incorporated into the proposed project design to comply with the SDG&E Subregional NCCP include the following:			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			• Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1). • No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (Section 7.1.1, 2). • Feeding of wildlife is not allowed (Section 7.1.1, 4). • No pets are allowed within the ROW (Section 7.1.1, 5). • Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7). • Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8). • Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9). • Field crews shall refer all environmental issues, including wildlife relocation, dead or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10). • All SDG&E personnel would			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11). • The Environmental Surveyor shall conduct preactivity studies for all activities occurring in natural areas, and will complete a preactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13). • The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14). • The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25). • In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28). • The Environmental Surveyor shall			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			conduct monitoring as recommended in the preactivity study form (Section 7.1.4, 35.). • Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38). Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39). • During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section 7.1.6, 50). • Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52). • Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).			
Construction activities could impact rare plants species.	BIO-1		Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) to conduct a focused rare plant survey during the time period when the following special-status plant species are	a. Biologist (including botanist) qualifications b. Focused surveys for species listed in measure c. Implement special procedures for pole activity	a. Prior to construction b. Timing is Plant-Specific c. During construction/ during hand removal of poles	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			detectable: San Diego gumplant (July – October; east of Del Amo Road (P65 east to Santa Ysabel Substation) in the following habitat types: chaparral, grassland, oak woodland, riparian forest, disturbed wetland, and in agricultural land east of Oak Hollow Road (P75 east to Santa Ysabel Substation)), and Coulter's saltbush (March – October; within proposed project impact areas within the project area in the following habitat types: agricultural land, coastal sage scrub, grassland, oak woodland, and disturbed wetlands). There is some potential for little mousetail to occur within vernal pool and wetland areas; these areas will be protected through implementation of MM BIO 7, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands. However, there is a confined area (P103 through P107), where poles are situated within a wet meadow and will be cut down and removed by hand. Therefore, in this confined area, presence is assumed and SDG&E shall do the following: using pin flags, narrowly define footpaths for hand crews to and from the poles; crews will hand-cut the pole; and the cut poles will be removed by hand or by helicopter only. Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-	in confined areas (where little mousetail is assumed present) d. Provide survey report and map of identified and inventoried SSP locations e. Monitor in vicinity of identified SSP (qualified biologist) if needed use fencing, markers or flagging f. Implement avoidance measures, if needed g. CPUC monitor: Line item in monitoring report	between P103 through P107 d. Prior to construction/CPUC to review and approve and make additional recommendations for avoidance prior to issuance of NTP e. During construction f. During construction g. During construction	

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated though off-site land preservation and /or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a covered species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided. The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC. CPUC will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.			
Construction activities could impact sensitive	BIO-2		San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project	a. Biologist qualifications b. CPUC monitor: line item in compliance monitoring	a. Prior to construction b. During construction c. Weekly during	SDG&E and CPUC * Applicable to all project

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
wildlife species.			construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site monitoring and documentation of violations and compliance. SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report at a minimum shall include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations.	report c. Weekly monitoring report summarizing biological monitoring activities (include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations) d. CPUC monitor: Line item in compliance monitoring report	construction d. Within 60 days of completing ground-disturbing activities	components during construction
Construction of the proposed project could impact sensitive wildlife species.	BIO-3		At the end of each workday, any open holes shall be fully covered, after they have been inspected by the on-site biologist, with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological	a. Implement open hole covering procedures b. Documentation that covering requirements in BIO-3 have been incorporated into construction contracts c. Documentation that notification and handling procedures are utilized for wildlife found in open holes	a. During construction b. During construction c. During construction d. During construction	SGE&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.	d. CPUC monitor: Line item in monitoring report.		
Construction of the proposed project could result in the potential impacts to nesting birds.	BIO-4		If construction activities including but not limited to tree trimming, road maintenance (i.e., re-establishing existing access roads), grading, or site disturbance are to occur between March 1 and September 1, a nesting bird survey shall be conducted by a qualified biologist to determine the presence of nests or nesting birds within 100 feet of the construction activities. The nesting bird surveys shall be completed no more than 72 hours prior to any construction activities. The survey will focus on special-status species known to use the area as well as other nesting birds that are protected under the Migratory Bird Treaty Act. If an active nest (defined below) is identified grading or site disturbance within a 100-foot buffer of the nest shall be monitored on a daily basis by a qualified biologist until project activities are no longer occurring within 100 feet of the nest or until fledglings become	a. Biologist Qualifications b. Conduct nesting bird survey c. Document survey efforts in daily log and report to CPUC at the end of each week. d. Documentation of monitoring active nests on daily basis within buffer areas (within 100 feet of construction activities or as increased by the biologist) e. CPUC to review and approve/deny decreases in buffer space	a. Prior to construction b. Survey no more than 72 hours prior to construction c. Prior to construction d. During construction e. Prior to or during construction	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			independent of the nest. "Nest" is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest. The monitoring biologist may increase the buffer radius if he or she determines it is necessary. The monitoring biologist may decrease the buffer radius upon receiving approval from California Public Utilities Commission (CPUC), if he or she determines that the construction activities are not disturbing the nesting activities and a smaller buffer is more appropriate. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing the nesting activities. The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as: (1) turning off vehicle engines and other equipment whenever possible to reduce noise, (2) working in other areas until the young have fledged, or (3) placing noise barriers to			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			maintain the noise at the nest to 60 dBA Leq hourly or less or to the preconstruction ambient noise level if that exceeds 60 dBA Leq hourly. The on-site biologist will review and verify compliance with these nesting boundaries and will verify that the nesting effort has finished. Unrestricted construction activities can resume when no other active nests are found. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC with the weekly report as identified in MM BIO-2. A nesting bird report, at a minimum, shall include the date, starting and ending time, general weather conditions (cloud cover, temperature, wind), name of biologist with affiliation, area surveyed including map, survey results (species, nest GPS location, nest stage [number of eggs, number of nestlings]), recommended compliance (e.g., 100-foot buffer recommended, buffer increased with explanation, recommended noise reduction, noise dBA Leq levels at nest), and compliance issues/concerns. The report shall also include the date and nesting outcome (e.g., depredated, nestling fledged, nest abandoned).			
Construction of the proposed project could result in the potential impacts	BIO-5		In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission	See blasting requirements under HAZ-3. a. Site-specific nesting bird survey (as part of Plan) and	a. Prior to blasting activities b. Prior to blasting activities/Prior to	SDG&E and CPUC * Applicable to all project components during

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
to nesting birds.			(CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC. If the CPUC-approved biologist observes an active nest (see definition below) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric would postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions. “Nest” is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.	communicate results to CPUC b. Biologist qualifications c. Documentation of postponing construction activities with respect to active nests (if applicable) d. CPUC monitor: Line item in compliance monitoring report	construction c. Prior to construction d. During construction	construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could impact Stephen's kangaroo rat habitat.	BIO-6		In locations where Stephen's kangaroo rat habitat assessments were not conducted during the 2010 field survey, a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC) approved biologist to assess the potential areas for Stephen's kangaroo rat to occur within the proposed project area. Any burrows, utilized habitat, or signs of Stephen's kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephen's kangaroo rat occupied habitat. If Stephen's kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephen's kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to project work area for complete avoidance of Stephen's kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to	a. Biologist qualifications b. Pedestrian preconstruction survey for potentially occupied suitable habitat (and follow-up trapping) in areas where survey was not conducted in 2010 c. Documentation that burrows, utilized habitat, and sign have been flagged for avoidance/provide map d. Biologist recommendations to minimize areas that cannot be avoided submitted to CPUC e. Prepare report and submit to CPUC f. CPUC monitor: Line item in compliance monitoring report	a. At least two weeks prior to construction b. At least two weeks prior to construction c. Prior to construction d. Prior to construction e. Prior to construction f. During construction	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.			
Construction of the proposed project could impact vernal pools.	BIO-7		Prior to construction, qualified biologists approved by the California Public Utilities Commission shall flag all vernal pools (marginal or otherwise) and associated existing connectivity within the project footprint (water entering area during rain events) for avoidance during the proposed construction activities. Rain events are defined as "a precipitation event of 0.5 inch or greater." If work is conducted during the rainy season (October 1 through May 1), before scheduling project activity in areas flagged as vernal pools, the weather forecast will be monitored. Work will not be scheduled in these areas if a greater than 40% chance of a rain event (as defined above) is forecasted during the time needed to complete project activities. If a rain event unexpectedly occurs during project activity, the site will be secured with appropriate best management practices as identified in APM HYD-1. Construction travel along public access roads where the road rut vernal pools have been identified will be flagged or otherwise marked prior to construction for minimal impact to these locations. Project related traffic in these	a. Biologist qualifications b. Documentation identifying the survey methods, locations of vernal pools, and construction footprint c. Documentation of flagged vernal pools for avoidance d. Documentation of weather monitoring prior to flagging vernal pools e. Documentation of work schedule that correlates with weather conditions in vernal pool areas f. Documentation of BMP implementation during rain events during project activity g. CPUC monitor: Line items in compliance monitoring report	a. At least two prior to construction b. Prior to construction c. Prior to construction d. During construction e. During construction f. During construction g. During construction	SDG&E and CPUC * Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			areas will be kept to the minimum required to implement the project.			
Cultural Resources						
Construction of the proposed project could affect known cultural resources.		APM-CUL-1	SDG&E's practices are in accordance with Federal, State, and local laws to protect and avoid cultural resources, including: Archaeological Resources Protection Act of 1979, as amended, National Historic Preservation Act of 1966, as amended (NHPA), California Penal Code 622 ½, PRC 5097.1 through 5097.6, PRC 5097.98, and CEQA. An independent Cultural Resource Management firm conducted pre-construction surveys under contract with SDG&E, prepared an inventory of cultural resources within the proposed project's Area of Potential Effect, and provided recommendations for avoidance and minimization to assist SDG&E in its compliance with CEQA requirements. SDG&E's Principal Cultural Resources Specialist worked closely with SDG&E design and engineering to move several of the poles during the design phase of the proposed project to avoid impacts to known cultural resources. Known cultural resources will be spanned or otherwise avoided through project design and through routing during construction activities to the extent feasible. In addition, the micropile pole type will be used at many locations during construction to minimize ground disturbance and decrease potential impacts to unknown buried deposits.	a. Provide documentation verifying commitments have been incorporated into the construction contracts. b. Implementation of avoidance measures through spanning and use of micropile techniques c. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction c. Prior to and during construction	SDG&E and CPUC *Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could affect cultural resources.		APM-CUL-2	**Cultural resources sensitivity training.** Prior to construction or ground-disturbing activities, all SDG&E, contractor, and subcontractor project personnel will receive training regarding the appropriate work practices necessary to effectively implement the project design features and ordinary construction restrictions relating to cultural resources, including the potential for exposing subsurface cultural resources and paleontological resources. This training will include presentation of the procedures to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as of paleontological resources. Known archaeological sites would be demarcated by a qualified archaeologist as Environmentally Sensitive Areas prior to the start of construction. Construction crews would be instructed to avoid disturbance of these areas.	a. Develop a cultural and paleontological resources sensitivity training program for all personnel working on project site b. Provide cultural and paleontological resources sensitive training material for review and approval. c. Provided weekly record of trained personnel and training session log maintained and kept on site with construction lead. d. Provide a map identifying all environmentally sensitive areas that will be flagged in the field and avoided during construction e. CPUC monitors. Line item in compliance monitoring report	a. Prior to construction. b. Prior to issuance of an NTP c. During construction. d. Prior to issuance of an NTP e. Prior to and during construction	SDG&E and CPUC *Applicable to all project components.
Construction of the proposed project could affect archaeological resources.		APM-CUL-3	**Archaeological monitoring.** A qualified archaeologist will attend preconstruction meetings, as needed, and a qualified archaeological monitor will monitor activities in the vicinity of all known cultural resources within the proposed project area. The requirements for archaeological monitoring will be noted on the construction plans. The archaeologist's duties will include monitoring, evaluation of any finds, analysis of materials,	a. Archaeologist qualifications b. Record of trained personnel and training session log c. Report of monitoring activities, recorded daily d. Prepare report conforming to Archaeological Resource Management Reports guidelines.	a. At least two prior to construction b. Prior to and during construction c. During construction d. During construction e. Prior to and during construction	SDG&E and CPUC *Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.	e. CPUC monitor: Line item in compliance monitoring report		
Construction of the proposed project could affect undiscovered human remains.		APM-CUL-5	**Unanticipated discovery of human remains.** If human remains are encountered during construction, SDG&E will comply with California State law (Health and Safety Code Section 7050.5; PRC Sections 5097.94, 5097.98 and 5097.99). This law specifies that work will stop immediately in any areas where human remains or suspected human remains are encountered. The appropriate agency and SDG&E will be notified of any such discovery. SDG&E will contact the Office of the Medical Examiner. The Medical Examiner has two working days to examine the remains after being notified by SDG&E. Under some circumstances, a determination may be made without direct input from the Medical Examiner. When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the identified most likely descendant (MLD) and the MLD has 24 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the remains and grave goods. If the MLD does not make recommendations within 24 hours, the area of the property must be secured from further disturbance. If there are disputes	a. Notification to CPUC of potential discovery and stop work (email) b. Documentation of notification of Medical Examiner within 24 hours of discovery (email) c. Documentation of the Medical Examiner's examination (email) d. If remains determined to be Native American, documentation of notification of Native American Heritage Commission (NAHC) e. NAHC to notify most likely decedent (MLD) within 24 hours - notification provided to CPUC (email) f. Notification of MLD recommendation (made within 24 hours) for treatment of remains and grave goods. g. CPUC monitor: Line item in compliance monitoring report	a. Within 1 hour of potential discovery b. Immediately upon notification c. Immediately upon receipt of findings from Medical Examiner d. *(d through f)* - Immediately upon notification g. During construction	SDG&E, CPUC, Medical Examiner, MLD, and NAHC *Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			between the landowner and the nearest likely descendants, the NAHC will mediate the dispute to attempt to find a resolution. If mediation fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.			
Construction of the proposed project could affect paleontological resources.		APM-CUL-6	**Paleontological monitoring.** A paleontological monitor will work under the direction of a qualified project paleontologist and will be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits for the eight poles located within paleontologically sensitive formations (i.e., Pomerado Conglomerate, Late Pleistocene to Holocene-age channel deposits). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	a. Paleontologist qualifications b. Provide map indicating where paleontological monitoring will be required. c. CPUC monitor: Line item in compliance monitoring report	a. At least two weeks prior to construction b. At least one week prior to issuance of NTP c. During construction	SDG&E and CPUC *Applicable to all project components during construction
Construction of the proposed project could affect undiscovered paleontological resources and fossils.		APM-CUL-7	**Unanticipated discovery of fossils.** In the event that fossils are encountered, the paleontological monitor would have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of	a. Paleontologist qualifications b. Notification provided that identifies the process that will be implemented to address the unanticipated discovery. c. CPUC monitor: Line item in compliance monitoring report	a. At least two weeks prior to construction b. Within 24 hours of an unanticipated discovery c. During construction	SDG&E and CPUC *Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			discovery. The paleontologist, in consultation with SDG&E's Cultural Resource Specialist, would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. If fossils are discovered, the paleontologist (or paleontological monitor) would recover them along with pertinent stratigraphic data. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth, recovery of bulk sedimentary-matrix samples for off-site wet screening from specific strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage would be cleaned, repaired, sorted, cataloged, and deposited in a scientific institution with permanent paleontological collections, and a paleontological monitoring report would be written.			
Construction of the proposed project could affect undiscovered	CUL-1		During construction of the proposed project, all Avoidance Measures as identified in Table 4 of the project-specific cultural resources report conducted by ASM (ASM 2012) shall be	a. Documentation indicating completion of all measures listed on Table 4 of the cultural resources report	a. Prior to and during construction b. Prior to issuance of an NTP	SDG&E and CPUC *Applicable to all project components during

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
cultural resources.			implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission. Avoidance Measures as listed in Table 4 of the report include retention of a cultural resources monitor during pole relocation work; establishment of Environmentally Sensitive Areas (ESAs) where sensitive resources are present in the vicinity of work sites; and avoiding sensitive bedrock, historical features, or other identified features within established ESAs.	prepared by ASM. b. Provide map identifying all environmentally sensitive areas to be flagged and avoided during construction c. CPUC monitor: Line item in compliance monitoring report	c. Prior to and during construction	construction
Construction of the proposed project could affect undiscovered cultural resources.	CUL-2		Prior to commencement of construction associated with the Santa Ysabel Staging Yard, an Environmentally Sensitive Area (ESA) shall be established around the existing resource by the retained cultural monitor. Fencing shall be erected to demarcate the ESA to minimize the potential for impacts during construction.	a. Documentation indicating fencing has been erected and is being maintained to demarcate the ESA. b. CPUC monitor: Line item in compliance monitoring report	a. Prior to commencement and during construction b. During construction	SDG&E and CPUC *Applicable to Santa Ysabel Staging Yard during construction
Construction of the proposed project could affect undiscovered cultural resources.	CUL-3		Where access roads traverse or are located near cultural resource sites as identified in the cultural resources report conducted by ASM (ASM 2012), vehicles shall be required to remain within existing access roads. No road grading shall be allowed within identified cultural resource site boundaries.	a. Provide map indicating sensitive areas identified in ASM cultural report b. CPUC monitor: Line item in compliance monitoring reports	a. Prior to construction b. During construction	SDG&E and CPUC *Applicable to all access roads that traverse or are near cultural resources sites during construction
Construction of the proposed project could affect undiscovered	CUL-4		In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or	a. Stop work upon discovery to ensure avoidance of significant resources b. Notification to CPUC of	a. Immediately within 50 feet of the resources b. Immediately upon	SDG&E and CPUC *Applicable to all project components during

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
cultural resources.			human bones, all work within 50 feet of the resources shall be halted, and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of San Diego Gas & Electric (SDG&E), California Public Utilities Commission (CPUC), and the qualified archaeologist shall confer to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curation, as necessary; and a report prepared by a specialist according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the CPUC and SDG&E shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out. If the CPUC, in consultation with the qualified archaeologist, determines that a significant	stop work (email) c. Record of evaluation, determination of significance, avoidance measures or other appropriate mitigation d. CPUC monitor: Line item in compliance monitoring report	discovery c. Within 3 weeks of find d. During construction	construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			archaeological resource is present and that the resource could be adversely affected by the proposed project, SDG&E will: a. Attempt to redesign the project to avoid any adverse effect on the significant archaeological resources. b. If the circumstances warrant an Archaeological Data Recovery Program (ADRP), such a program shall be conducted. The project archaeologist and the CPUC shall confer and consult to determine the scope of the ADRP. The archaeologist shall prepare a draft ADRP that shall be submitted to the CPUC for review and approval. The ADRP shall identify how the proposed ADRP would preserve the significant information the archaeological resource is expected to contain. That is, the ADRP shall identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to portions of the archaeological resource that could be adversely affected by the proposed project. Destructive analytical methods shall not be applied to cultural materials if nondestructive methods are practical.			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Geology and Soils						
Construction of the proposed project could expose people or structures to potential substantial adverse seismic effects and the proposed project would be located on unstable and expansive soils.		APM-GEO-1	**Project plans and specifications take into account the potential for mass wasting and liquefaction.** A geotechnical study was conducted by VO Engineering Inc. in 2011 to evaluate the pole locations along the proposed project power line route for the presence of geologic hazards. The geotechnical study indicated the presence of geologic conditions potentially susceptible to mass wasting or liquefaction at the locations of proposed Pole Nos. P103, R107, P110, P114, P129, P22, P23, P48, P49, and P51. The final project plans and specifications prepared by the responsible engineer have taken into account the geologic hazard conditions present at these locations and include appropriate engineering design and construction measures to minimize the potential for damage to proposed project structures in the event that there is an occurrence of these hazards.	a. Geotechnical investigation reports b. CPUC monitor: Line item in compliance monitoring reports	a. Prior to construction b. Prior to construction	SDG&E and CPUC *Applicable to all project components (as identified by the geotechnical study)
Construction of the proposed project could result in erosion impacts.		APM-GEO-2	**Soil stabilization.** Once temporary surface disturbances are complete, areas that would not be subject to additional disturbance will be stabilized to control soil erosion.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC *Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Hazards and Hazardous Materials						
Construction of the proposed project could result in wildland fire impacts.		APM-HAZ-1	**Steel structures.** New structures are designed utilizing steel to avoid potential adverse effects relating to fire and fire damage.	a. Provide designs illustrating pole structures	a. Prior to construction	SDG&E and CPUC *Applicable to all project components
Construction of the proposed project could result in wildland fire impacts.		APM-HAZ-2	**TL 637 Project Fire Plan.** The purpose of the proposed project is to improve the reliability of the power lines in fire-prone (very high to extreme fire threat areas) and wind-prone areas and minimize the risks associated with future wildfires. The proposed project is located within the Very High fire threat designation, as indicated on SDG&E's 2012 Fire Threat Zone Map. The proposed project design includes fire-hardening techniques, including replacing wood poles with steel poles, increasing conductor spacing to maximize line clearances, installing steel poles designed to withstand an extreme wind-loading case and known local conditions, and installing longer polymer insulators. These design components of the proposed project minimize fire risk through enhanced safety and reliability of the power line system during extreme weather conditions. In addition to these design features, the proposed project will implement the TL 637 Project Fire Plan. The TL 637 Project Fire Plan exceeds fire prevention measures as stated in California Forestry Practice Rules, PRC 4:6. Avoidance	a. Fire Plan (includes training, oversight, work controls, suppression methods, personnel) b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction	SDG&E and CPUC *Applicable to all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			and minimization measures to prevent wildland fires include training, oversight, and work controls in all phases of preparation and implementation of the proposed project. Training and briefings in fire prevention and suppression methods are key components of reducing the threat of a wildland fire on the proposed project. Additionally, suppression in the event of a fire starting will be facilitated by locating water tanks within two minutes of a work site, requiring firefighting equipment within 50 feet of any work/equipment site, and avoidance of construction activities during periods of declared Red Flag Warnings or other severe fire weather conditions as identified by SDG&E. Other avoidance and minimization measures may be employed, such as standby firefighters and fire engines. In addition, portions of the proposed project occurring within the Cleveland National Forest must abide by the Cleveland National Forest Fire Plan. The plan describes the project activity level (PAL) work restriction measures to employ while working on forest lands. Therefore, the proposed project design and construction avoidance and minimization measures will avoid and minimize fire risks as outlined in the TL 637 Project Fire Plan and the Cleveland National Forest Fire Plan.			

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in wildland fire impacts.		APM-HAZ-3	**Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety.** The proposed project will be constructed consistent with Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety. Electric Standard Practice 113.1 outlines practices and procedures for SDG&E activities occurring within areas of potential wildland fire threat within SDG&E's service territory. The proposed project design includes replacement of wood poles with steel poles, increased conductor spacing to maximize line clearances, installation of steel poles to withstand an extreme wind-loading case and known local conditions, and undergrounding of a portion of the power line. These design components of the proposed project minimize the fire risk through enhanced safety and reliability of the power line system, particularly during extreme weather conditions. The standard practices in Electrical Standard Practice 113.1 include avoidance and minimization measures to comply with state and local fire ordinances.	a. Project design and documentation that project design meets Electric Standard Practice 113.1 b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction b. During construction	SDG&E and CPUC *Applicable to all project components
Construction of the proposed project could result in safety hazards to recreational trail users.		APM-HAZ-4	**Coordination and measures within parks and preserves.** Appropriate safety measures will be implemented where trails and construction areas are near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ to provide a safety buffer between recreational users and construction	a. Documentation of coordination with authorized officer for the recreation area regarding construction schedule and activities. b. Implement safety buffers	a. Prior to and during construction b. During construction c. During construction	SDG&E, CPUC, and authorized officer of recreation area *Applicable to components of the project where trails and construction areas are

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			areas. Construction schedule and activities will be coordinated with the authorized officer for the recreation area.	and measures c. CPUC monitor: Line item in compliance monitoring report		near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.	HAZ-1		Prior to construction, all San Diego Gas & Electric, contractor, and subcontractor project personnel would receive training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures. A sign-in sheet of contractor and subcontractor project personnel who have received training shall be provided to California Public Utilities Commission on a weekly basis as indicated in MM BIO-2.	a. Conduct training program including content in mitigation measure b. Provide documentation (sign-in sheet) of contractor and subcontractor training to the CPUC	a. During construction b. Prior to construction; weekly during construction	SDG&E *Applicable to all project components
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard	HAZ-2		During construction, construction best management practices (BMPs) shall be implemented to prevent impacts from release of hazardous materials during construction activities. Typical BMPs could include, but would not be limited to, construction practices such as the use of absorbent pads for spill containment, specified locations for construction vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels	a. Implement BMPs as defined in mitigation measure and as further defined in the Storm Water Pollution Prevention Plan (SWPPP) b. CPUC monitor: Line item in compliance monitoring report	a. During construction b. During construction	SDG&E and CPUC *Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
to the public through accident conditions involving the release of hazardous material.			and/or oils as early as possible.			
Construction of the proposed project could result in hazard impacts during blasting activities.	HAZ-3		In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions: • The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas &Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the	a. Prepare and provide a noise and vibration calculation for CPUC and County of San Diego review if rock blasting is used during construction b. Pre-blast survey c. CPUC and County to review calculations/pre-blast survey d. Documentation that measures have been incorporated into construction contractor scope e. Final blasting plan that meets conditions in the mitigation measure f. CPUC and County to review final blasting plan g. CPUC monitor: Line item in compliance monitoring report	a. Prior to blasting activities b. Prior to blasting activities c. Prior to blasting activities d. Prior to blasting activities e. Prior to blasting activities f. Prior to blasting activities during construction g. Prior to blasting activities during construction	SDG&E, CPUC, and County of San Diego *Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			final blasting plan. • The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. • The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.			
Construction of the proposed project could result in a	HAZ-4		Prior to flight operations for helicopter use during construction, San Diego Gas &Electric (SDG&E) shall coordinate with local air traffic	a. Documentation showing coordination with local air traffic control and compliance	a. Prior to use of helicopters for construction activities	SDG&E, CPUC, local air traffic control

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
safety hazard near an airport.			control and comply with all Federal Aviation Administration regulations regarding helicopter use to prevent conflict with air traffic generated by the Ramona Airport. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction activities.	with all applicable FAA regulations b. CPUC Monitor: Line item in compliance monitoring report	b. During construction	*Applicable to all project components
Construction of the proposed project could result in a safety hazard near an airport.	HAZ-5		Prior to flight operations for helicopter use during construction, a Helicopter Lift Plan shall be prepared if required pursuant to Federal Aviation Administration regulations. The Helicopter Lift Plan shall be submitted to the California Public Utilities Commission for review and approval.	a. Helicopter Lift Plan b. CPUC to review and approve Helicopter Lift Plan c. CPUC Monitor: Line item in compliance monitoring report	a. Prior to construction-related flight operations b. Prior to construction-related flight operations c. During construction	SDG&E and CPUC
Hydrology and Water Quality						
		APM-HYD-1	**SDG&E Water Quality Construction BMPs Manual.** SDG&E's Water Quality Construction BMPs Manual (BMP Manual) was created to organize SDG&E's standard water quality protection procedures for various specific actions that routinely occur as part of SDG&E's ongoing construction, operations, and maintenance activities. The primary focus of most BMPs is the reduction and/or elimination of water quality impacts during construction of linear projects such as the proposed project. The BMPs described within the BMP Manual were derived from several sources, including the State of California guidelines as well as the	a. Implement measure as defined and incorporate commitments into construction contracts	a. Prior to and during construction	SDG&E, CPUC *Applicable to grading activities at all project components during construction

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			Caltrans Water Quality BMPs. The BMP Manual will be utilized during construction (by way of preparation and implementation of the SWPPP), operation, and maintenance of the proposed project to ensure compliance with all relevant SDG&E and government-mandated water quality standards.			
Construction of the proposed project could cause erosion impacts resulting in a violation of water quality standards or waste discharge requirements.	HYD-1		During routine operation and maintenance activities, if erosion is discovered along the proposed project alignment that would affect a surface water feature, including but not limited to a wet meadow, stream, channel or any other surface water body, San Diego Gas &Electric shall implement erosion control measures including but not limited to: • Periodic inspection and maintenance, including cleaning dips and cross-drains, repairing non-jurisdictional ditches, marking culvert inlets to aid in location, and clearing debris from culverts. • Avoid using roads during wet periods if such use would damage road drainage features. • Grade road surfaces only as often as necessary to maintain a stable running surface and to retain the original surface drainage. • Place all excess material removed by maintenance operations in safe disposal sites and stabilize these sites to prevent	Commitments to be incorporated into operational and maintenance contracts	Prior to operations	SDG&E and CPUC * Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			erosion. Avoid locations where erosion will carry materials into a stream.			
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements due to herbicide application.	HYD-2		Herbicides shall not be applied within 100 feet of a surface water feature, including but not limited to a wet meadow, stream, channel, or any other surface water body.	a. Commitments to be incorporated into construction and operational and maintenance contracts b. CPUC monitor: Line item in compliance monitoring report	a. During construction and operation b. During construction	SDG&E and CPUC * Applicable to all project components
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.	HYD-3		During pole repair work, mowing or trimming of vegetation shall be conducted to ensure that ground disturbance is minimized. Vegetation clearing shall be avoided where feasible. In the unlikely event that vegetation clearing or minor grading is required during operation and maintenance activities, San Diego Gas & Electric shall establish a temporary work site where work is to be conducted. Any topsoil or vegetation removed during this process shall be stored, and redistributed over the temporary work site when maintenance activities are completed, unless clearance is required around the poles.	Commitments to be incorporated into operational and maintenance contracts	Prior to operations	SDG&E and CPUC * Applicable to all project components
Construction of the proposed project could result in a violation of water quality standards or	HYD-4		San Diego Gas &Electric shall implement the terms and conditions as specified in the Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Certification (Certification No. 11C-114; May 16,	a. Provide a list of poles to remain in place and those to be relocated outside of jurisdictional areas b. CPUC monitor: Line item in	a. Prior to construction b. During construction	SDG&E and CPUC * Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
waste discharge requirements.			2012), which identifies the poles to remain in place and those to be relocated outside jurisdictional areas.	compliance monitoring report		
Noise						
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.		APM-NOI-1	**Generators.** Generator use will be limited to less than 50 horsepower (HP) at all staging yards. Any generators used at the staging yards will be located away from noise sensitive areas, and positioned on the property to comply with the San Diego County noise ordinance.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC * Applicable to all project components
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.		APM-NOI-2	**Mufflers.** Functioning mufflers will be maintained on all equipment.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC * Applicable to all project components
Construction of the proposed project could generate noise levels in excess of established standards and/or		APM-NOI-3	**Resident notification.** Residents within 50 feet will receive notification of the start of construction at least one week prior to the start of construction activities within that area.	a. Record of property owner notification b. CPUC monitor: Line item in compliance monitoring report	a. At least 1 week prior to construction b. Prior and/or during construction	SDG&E and CPUC * Applicable to property owners within 50 feet of all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
temporary or periodic increases in noise levels.						
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.	NOI-1		At least 30 days before helicopter use and stringing operations are employed San Diego Gas &Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the proposed project alignment, SDG&E shall notify landowners, livestock facility owners, and residents within 50 feet of construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.	a. Provide public notice mailer b. Mail notice to public c. CPUC monitor: Line in compliance monitoring report	a. At least 30 days prior to helicopter use and stringing operations b. At least 7 days prior to helicopter use and stringing operations c. During construction	SDG&E and CPUC * Applicable to all property owners within 50 feet of construction.
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.	NOI-2		In the event noise levels during construction activities are expected to exceed an 8- hour Leq of 75 dBA at the nearest property line or within 50 feet of the existing and proposed project alignment where noise sensitive areas are located, San Diego Gas &Electric (SDG&E) shall implement noise reduction measures to reduce noise levels below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or 2) if noise	a. Monitor noise where noise sensitive areas are located b. Documentation of noise levels c. CPUC monitor: Line item in compliance monitoring report	a. During construction b. During construction c. During construction	SDG&E and CPUC * Applicable to noise sensitive areas within 50 feet of construction.

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
			barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents.			
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.	NOI-3		In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.	a. Prepare noise and vibration calculation for rock blasting activities b. CPUC monitor: Line item in compliance monitoring report	a. Prior to rock blasting activities and in effect throughout construction b. During construction	SDG&E and CPUC * Applicable to all project components
Recreation						
Construction of the proposed project could result in temporary impacts to recreational trails.		APM-REC-1	**Temporary trail detours.** Where feasible, temporary detours will be provided for trail users. Signs will be provided to direct trail users to the temporary trail detours.	a. Signage for temporary detours b. CPUC monitor: Line item in compliance monitoring report	a. During construction b. During construction	SDG&E and CPUC * Applicable to all project components
Transportation/Traffic						
Project implementation could result in a conflict with an applicable traffic plan, ordinance, or policy.		APM-TRA-1	**Standard Traffic Control Procedures.** SDG&E will implement a traffic control plan to address potential disruption of traffic circulation during construction activities and address any safety issues. The traffic control plan will be prepared by the project engineer or contractor and subject to approval by the County.	a. Traffic control plan b. CPUC monitor: Line item in compliance monitoring report	a. Prior to and during construction b. Prior to and during construction	SDG&E and CPUC . * Applicable to all project components

Table 3
Mitigation Monitoring Program Table

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation[(a)] and Consultation	Timing	Responsible Party and Project Components
Project implementation could result in a conflict with an applicable traffic plan, ordinance, or policy.		APM-TRA-2	**Encroachment permits.** SDG&E will obtain the required encroachment permits from Caltrans for work near Highways 78 and 79, and will ensure that proper safety measures are in place while construction work is occurring near public roadways. These safety measures include flagging, proper signage, and orange cones to alert the public to construction activities near the roadway.	a. Documentation of coordination with the Caltrans and encroachment permit issuance b. CPUC monitor: Line item in compliance monitoring report	a. Prior to and during construction b. Prior to and during construction	SDG&E and CPUC * Applicable to project components near Highways 78 and 79

MM = Agency Mitigation Measure
APM = Applicant Proposed Measure
Note that SDG&E APMs-CUL-4, NOI-4 and NOI-5 were superseded by agency mitigation measures

INTENTIONALLY LEFT BLANK

ATTACHMENT A

Project Map

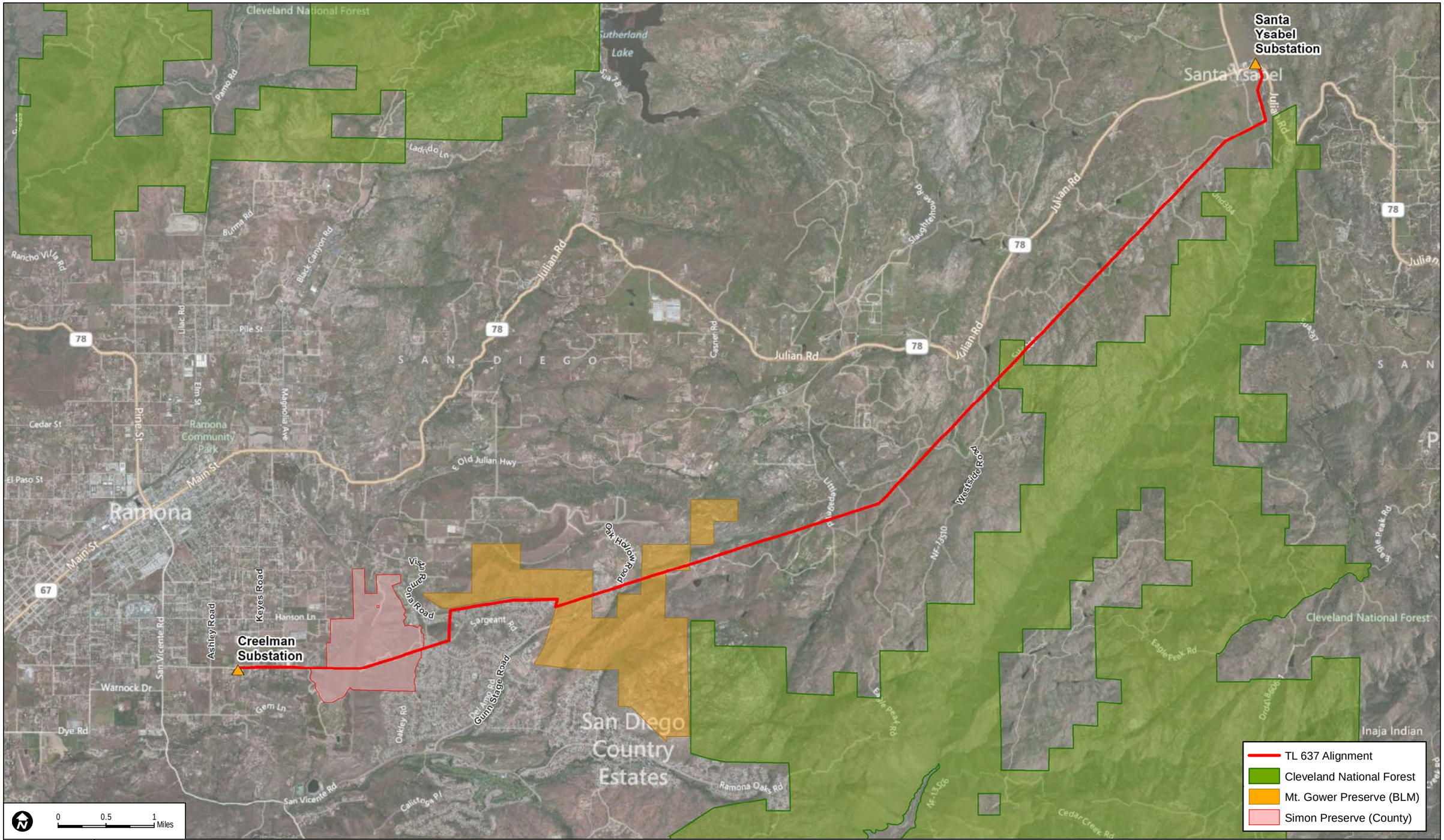
DUDEK

7668

FIGURE 1

Regional Map

TL 637 WOOD TO STEEL REPLACEMENT PROJECT



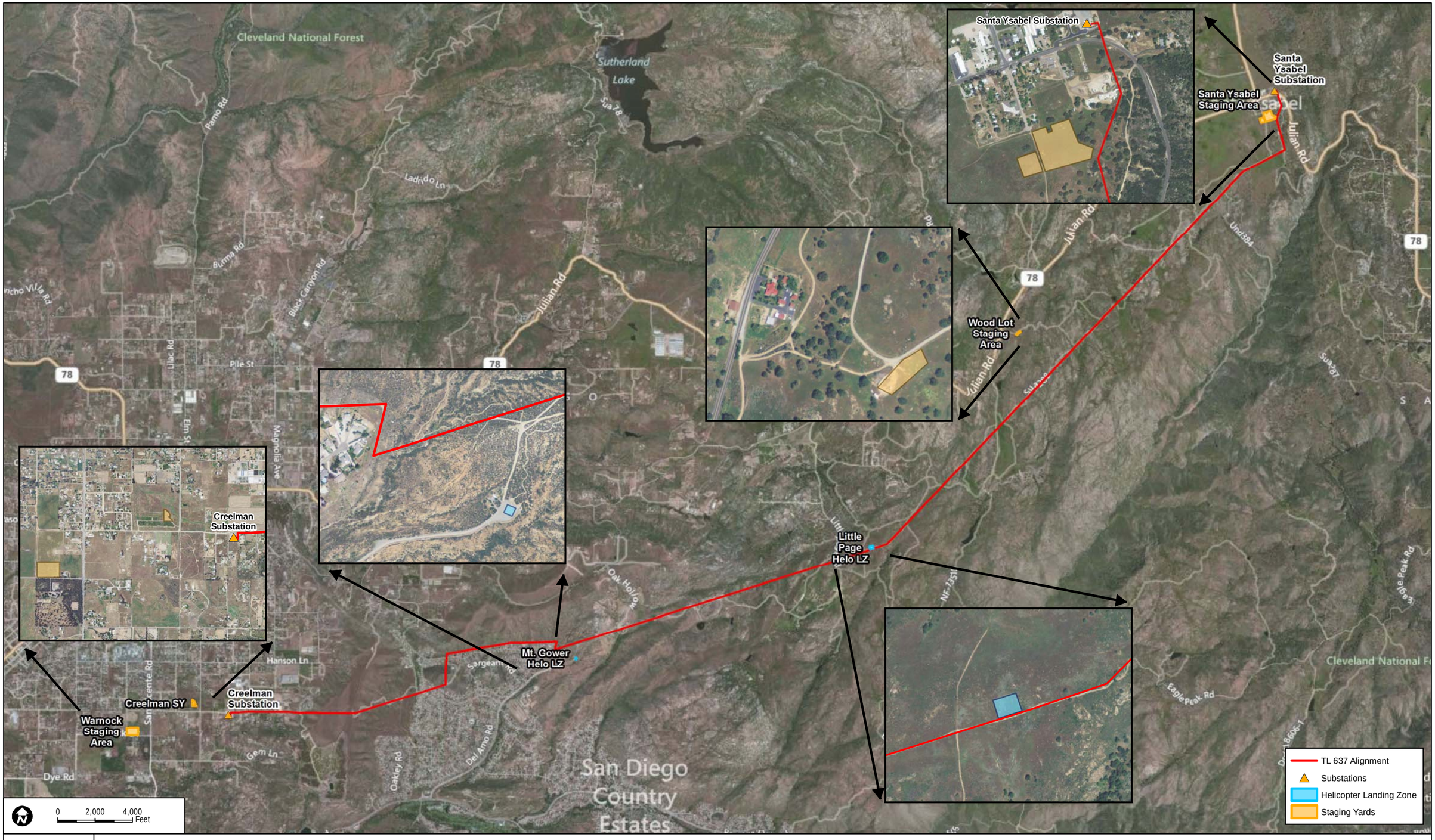
DUDEK

SOURCE: SDGE 2013; Bing Maps

FIGURE 2

Project Vicinity Map

TL 637 WOOD TO STEEL REPLACEMENT PROJECT



DUDEK

7668

SOURCE: SDG& 2013; NAIP 2012; Bing Maps

FIGURE 3

Helicopter Landing Zones and Staging Yards

TL 637 WOOD TO STEEL REPLACEMENT PROJECT

ATTACHMENT B

Project Contact List

Attachment B

Project Contact List

Contact Name & Title	Address	Phone	Cell	Email Address
San Diego Gas & Electric Company (SDG&E) Team				
SDG&E Project Managers				
Brad Carter, Project Manager	8315 Century Park Court San Diego, CA 92123	858-654-1269	626-893-6419	BCarter@semprautilities.com
Darleen Evans, Project Coordinator	8315 Century Park Court San Diego, CA 92123	858-654-8277	619-987-3270	DEvans@semprautilities.com
SDG&E Environmental				
Eden Nguyen, Environmental Project Manager	8315 Century Park Court San Diego, CA 92123	858-637-3716	858-449-1125	ENguyen@semprautilities.com
Rob Fletcher, Natural Resources Lead	8315 Century Park Court San Diego, CA 92123	858-637-3759	619-881-7820	RFletcher@semprautilities.com
Andrew Phan, SWPPP Lead	8315 Century Park Court San Diego, CA 92123	858-637-3715	619-247-8329	APhan@semprautilities.com
Cheryl Bowden-Renna, Cultural Resources Lead	8315 Century Park Court San Diego, CA 92123	858-637-3788	760-978-9738	CBowden-Renna@semprautilities.com
Tamara Spear, Aquatic Resources Lead	8315 Century Park Court San Diego, CA 92123	858-637-3740	858-472-9165	TSpear@semprautilities.com
Alicia Hill, Lead Environmental Inspector, TRC	4393 Viewridge Ave, Suite A, San Diego, CA 92123	858-505-8881 (x4911)	949-648-3753	AHill@trcsolutions.com
Josh Taylor, Environmental Compliance Lead, TRC	123 Technology Drive Irvine, CA 92618	949-789-4409	949-355-9721	jdtaylor@trcsolutions.com

SDG&E Additional Roles				
Mike Thomas, Contract Administrator	8315 Century Park Court San Diego, CA 92123	619-520-5033	619-520-5033	MThomas@semprautilities.com
Juanita Hayes, Public Affairs Manager	571 Enterprise Street Escondido, CA 92029	760-480-7650	760-420-4644	JHayes1@semprautilities.com
California Public Utilities Commission (CPUC) Team				
CPUC Manager				
Lon Payne, CPUC Project Manager	505 Van Ness, 4th Floor San Francisco, California 94102	415.703.3175	N/A	lon.payne@cpuc.ca.gov
CPUC Monitors				
David Hochart, Environmental Compliance Director, Dudek	605 Third Street Encinitas, California 92024	760.479.4259	760.415.2864	dhochart@dudek.com
Allison Shaffer, Environmental Compliance Manager, Dudek	605 Third Street Encinitas, California 92024	760.479.4278	760.846.5727	ashaffer@dudek.com
Drew Engstrom, Environmental Monitor, Dudek	605 Third Street Encinitas, California 92024	N/A	916.396.3025	aengsrom@dudek.com
Shane Valiere, Environmental Monitor, Dudek	605 Third Street Encinitas, California 92024	N/A	760.846.5558	svaliere@dudek.com
United States Fish and Wildlife Service				
XXX	XXX	XXX	XXX	XXX
Air Pollution Control District				
XXX	XXX	XXX	XXX	XXX
County of San Diego				
XXX	XXX	XXX	XXX	XXX
California Department of Fish and Wildlife				
XXX	XXX	XXX	XXX	XXX

San Diego Regional Water Quality Control Board				
XXX	XXX	XXX	XXX	XXX

ATTACHMENT C

Sample Site Inspection Form

MITIGATION MONITORING COMPLIANCE AND REPORTING PROGRAM

DUDEK

Site Inspection Form

Project:	SDG&E Tie-Line 637 Wood-to-Steel Replacement Project (Application A. 13-03-003)	**Date:**	
Owner:	San Diego Gas & Electric	**Project Component:**	
Project Manager:	Lon Payne	**Report:**	
Lead Agency:	California Public Utilities Commission	**Representative:**	

Location : ☐ On Site ☐ Off Site (List Location Below)

Project Phase: ☐ Design ☐ Construction ☐ Operation

SITE INSPECTION CHECKLIST

	Yes	No
Air Quality		
Is dust control being implemented (i.e., access roads watered, streets cleaned on a regular basis)?		
Do vehicles or equipment appear to be idling unnecessarily?		
Biology		
Are appropriate measures in place to protect sensitive habitat (i.e., flagging, signage, exclusion fencing, biological monitor)?		
Are all activities being conducted within the approved work limits?		
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		
Cultural and Paleontological Resources		
Are known cultural resources clearly marked for exclusion?		
Is a cultural monitor on site if grading is occurring near known cultural sites?		
Is a paleontological monitor on site if grading is occurring (see mitigation measure for specifications)?		
Hazardous Materials		
Have all spills been cleaned up in accordance with the project requirements?		
Are fuels, oils, lubricants, and other hazardous materials on site labeled and stored in appropriate containers?		
Water Quality		
Have temporary erosion and sediment control measures been installed?		
Are BMPs in good condition and functional?		
Is mud tracked onto roadways cleaned up in accordance with the project's SWPPP?		

DESCRIPTION OF OBSERVED ACTIVITY

MITIGATION MEASURES VERIFIED (provide Mitigation Measures and description)

ISSUES REQUIRING CORRECTIVE ACTION

COMPLIANCE

☐ **Incident Report** (Mitigation Measure not fully implemented, however, no eminent resource threat or damage.)

☐ **Noncompliance (**Violates the project's environmental requirements and places environmental resources at risk. A noncompliance situation may occur when minor incidents are repeated, and show a trend toward placing resources at unnecessary risk.)

Note: If no compliance level is checked, all applicable mitigations measure where being implemented at the time of inspection.

ITEMS REQUIRING FOLLOW-UP

Completed by:

Name:

Firm: Dudek

Date:

Distribution:

Lon Payne, CPUC

Allison Shaffer, DUDEK

David Hochart, DUDEK

ATTACHMENT D

Minor Project Refinement Request Form

TIE-LINE 637 WOOD-TO-STEEL REPLACMENT PROJECT

MINOR PROJECT REFINEMENT REQUEST FORM

[WITH INSTRUCTIONS]

Date Requested:	[Date that form is submitted to CPUC Compliance Manager]	**Report #:**	[CPUC Compliance Manager Fills In]
Date Approved:	[Date CPUC Compliance Manager sends the approved form back to SDG&E	**Approval Agency:**	[Consider whether another agency or municipality must approve the requested change]
Property Owner(s):		**Location/Milepost:**	
Land Use/ Vegetative Cover:		**Sensitive Resources:** [Any resource that could be affected, directly or indirectly, by this action even if mitigation measures will reduce these impacts to less than significant]	

Refinement / Modification From (check all that apply)**:**

☐ Permit	☐ Plan/Procedure	☐ Specification	☐ Drawing	☐ Mitigation Measure (MM)

☐ Other:

[What document contained the official workplan, construction description, mitigation measure or engineering drawing for this project component or activity? Include this document title in the description below. Consider whether this change differs from that description].

Description of Refinement

[Describe how project refinement deviates from current project. Include photos.]

Original Condition:

[Insert a concise description of the existing condition as it is originally described and approved (NTP, engineering specifications, Final MND, etc.) – i.e., how did SDG&E originally intend to build this/do this?]

Justification for Change:

[Insert a concise description of and justification for the change requested – i.e., what happened to make the change necessary?

- These descriptions should be detailed enough and include enough background so that a person unfamiliar with the project should be able to follow the narrative about what the original plan was and why the new plan is needed instead.
- The description should be in layman's terms to the extent possible. Be as specific as possible. The more vague the language, the more conditions may need to be added to account for omissions. Avoid logic leaps.]

Maps and Figures

[Insert exact location(s)/project component(s) the change will affect. Include dimensions, if applicable. A map and/or figure is usually extremely helpful. Make sure the map is at a readable scale. Ideally, the map should be based on the

most current project map and show other project components, survey areas, underlying topography, etc.]
Environmental Impact:
[Demonstrate that SDG&E has considered how this change will affect environmental/cultural resources. List MMs, plans, permits, etc. that were reviewed in order to ensure that this change will not result in significant impacts. - Include analyses demonstrating that projected impacts will not be significant (e.g., narrative justification, tables, figures, calculations, etc.). Base this analysis on what was previously analyzed in the NTP, Final MND, etc.]
Concurrence:
[Demonstrate that SDG&E has considered whether other agencies, municipalities, utilities, etc. would need to provide concurrence with this MPM. If so, either provide anticipated contact/approval schedule, or provide dates/contact reports/emails with approvals.]

Resources:			
Biological	☐ No Resources Present	☐ Resources Present	☐ N/A
Previous Biological Survey Report Reference: [Include dates of original "baseline" surveys (from MND analysis) to prove that the areas/practices were previously analyzed. Include more recent preconstruction sweeps, if applicable, to prove that SDG&E has an understanding of what resources are currently present in this new area or could be impacted by this new practice.]			
Cultural	☐ No Resources Present	☐ Resources Present	☐ Within Project Component
	☐ N/A (paved/graveled area or no ground disturbance)		
Previous Cultural Survey Report Reference:			
Disturbance Acreage Changes?	☐ Yes	☐ No	
Original Disturbance Acreage: **New Disturbance Acreage:**			

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	[Add notes to specify whether agency consultation is necessary, and if so, provide brief summary of that consultation.]
Hazardous Materials and Waste	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Hydrology	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Cultural Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Traffic and Circulation	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Air Quality	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Noise and Vibration	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	
Visual Resources	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Vegetation and Wildlife	☐ Y ☐ N	
Agency Consultation?	☐ Y ☐ N	

Resource Agency Coordination / Approvals				
Resource Agency	**Date**	**Name (print)**	**Signature**	
San Diego Gas & Electric Company Environmental Manager and/or San Diego Gas & Electric Company Environmental Manager				☐ Reviewed
CPUC Project Manager				☐ Approved ☐ Approved with Conditions (see below) ☐ Denied

For CPUC Compliance Manager Use Only		
☐ **Refinement Approved**	☐ **Refinement Denied**	☐ **Beyond Authority**

Conditions of Approval or Reason for Denial	
Prepared by:	**Date:**

Minor Project Refinement Definitions

Project refinements are strictly limited to minor changes that will not trigger less restrictive or new discretionary permit requirements, that do not increase or create impacts, and that comply with the intent of the mitigation measures.

Project Change Level	Description	Example
Level 1 (Minor Change)	Temporary actions that will not affect biological or cultural resources or deviate from APMs, MMs, or permit requirements; use of existing private resources (i.e., private road, well) with permission	Temporary use of an existing access road, storage yard, well, hydrant, etc. not associated with current project
Level 2 (Major Change)	Changes to established mitigation protocols or project activities due to new information or improved techniques that result in temporary, insignificant impacts on resources	Installing additional disposal sites; road widening or additional grading; changes to seed mix for restoration if does not significantly alter final targeted vegetation composition
Petition for Modification	Significant, long-term changes to construction plan or mitigation protocol that require additional biological or cultural surveys or verification; discovery of omissions or errors in project documents (permits, MMs, APMs) that jeopardize biological or cultural resources; discovery of new and significant biological or cultural resources that require new avoidance measures	Construction of a new access road or bridge; discovery of new sensitive species or habitat not initially described in project documents; changes to seed mix for restoration that significantly alter final targeted vegetation composition

ATTACHMENT E

Pre-construction Mitigation Measures

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
APM-GEN-1	**Construction scheduling.** SDG&E will coordinate construction of the proposed project such that construction activities will typically not overlap with other SDG&E construction projects in the immediate vicinity of the proposed project.	X	X		X	X
APM-GEN-2	**Helicopter use.** Helicopter takeoffs and landings conducted at the Warnock and Santa Ysabel Staging Yards will be restricted to the approximate center of the staging area. Helicopter usage will conform to acceptable hours for construction activities, as outlined within the San Diego County Noise Code.	X	X		X	
APM-AES-1	**Visual screening of staging yards.** The Warnock and Santa Ysabel Staging Yards will have opaque mesh installed along the fence that will soften the view of the staging yard from public vantage points such as roads, residences, and public vantage points.	X	X		X	
APM-AES-2	**Restoring appearance of temporarily disturbed areas.** When proposed project construction has been completed, all temporarily disturbed terrain will be restored, as needed and as appropriate, to approximate pre-construction conditions. Revegetation would be used, where appropriate (revegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to reestablish a natural-appearing landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape.		X	X	X	
APM-BIO-1	**SDG&E Subregional NCCP.** The proposed project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The proposed project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW – formerly the California Department of Fish and Game), respectively, for the management and conservation of multiple species and their associated habitats, as established according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native		X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area. Pursuant to the SDG&E Subregional NCCP, SDG&E conducted pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm surveyed all proposed project impact areas and prepared a Preactivity Study Report (PSR) outlining all anticipated impacts related to the proposed project. The proposed project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR was submitted to the CDFW and USFWS, and no comments were received. Prior to the commencement of construction, a verification survey will be conducted of the proposed project disturbance areas, as required by the SDG&E Subregional NCCP. Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures. If the previously delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank will be required to address impacts from project-related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement. Specific operating restrictions that are incorporated into the proposed project design to comply with the SDG&E Subregional NCCP include the following: • Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1). • No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (Section 7.1.1, 2). • Feeding of wildlife is not allowed (Section 7.1.1, 4).					

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	• No pets are allowed within the ROW (Section 7.1.1, 5). • Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7). • Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8). • Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9). • Field crews shall refer all environmental issues, including wildlife relocation, dead or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10). • All SDG&E personnel would participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11). • The Environmental Surveyor shall conduct preactivity studies for all activities occurring in natural areas, and will complete a preactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13). • The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14). • The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25). • In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28). • The Environmental Surveyor shall conduct monitoring as recommended in the preactivity study form (Section 7.1.4, 35.). • Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38). Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39).					

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	• During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section 7.1.6, 50). • Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52). • Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).					
BIO-1	Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) to conduct a focused rare plant survey during the time period when the following special-status plant species are detectable: San Diego gumplant (July – October; east of Del Amo Road (P65 east to Santa Ysabel Substation) in the following habitat types: chaparral, grassland, oak woodland, riparian forest, disturbed wetland, and in agricultural land east of Oak Hollow Road (P75 east to Santa Ysabel Substation)), and Coulter's saltbush (March – October; within proposed project impact areas within the project area in the following habitat types: agricultural land, coastal sage scrub, grassland, oak woodland, and disturbed wetlands). There is some potential for little mousetail to occur within vernal pool and wetland areas; these areas will be protected through implementation of MM BIO 7, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands. However, there is a confined area (P103 through P107), where poles are situated within a wet meadow and will be cut down and removed by hand. Therefore, in this confined area, presence is assumed and SDG&E shall do the following: using pin flags, narrowly define footpaths for hand crews to and from the poles; crews will hand-cut the pole; and the cut poles will be removed by hand or by helicopter only. Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing.	X	X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated though off-site land preservation and /or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a covered species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided. The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC. CPUC will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.					
BIO-2	San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site monitoring and documentation of violations and compliance. SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report at a minimum shall include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations.	X	X		X	X
BIO-3	At the end of each workday, any open holes shall be fully covered, after they have been inspected by the on-site biologist, with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or		X		X	X

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.					
BIO-4	If construction activities including but not limited to tree trimming, road maintenance (i.e., re-establishing existing access roads), grading, or site disturbance are to occur between March 1 and September 1, a nesting bird survey shall be conducted by a qualified biologist to determine the presence of nests or nesting birds within 100 feet of the construction activities. The nesting bird surveys shall be completed no more than 72 hours prior to any construction activities. The survey will focus on special-status species known to use the area as well as other nesting birds that are protected under the Migratory Bird Treaty Act. If an active nest (defined below) is identified grading or site disturbance within a 100-foot buffer of the nest shall be monitored on a daily basis by a qualified biologist until project activities are no longer occurring within 100 feet of the nest or until fledglings become independent of the nest. "Nest" is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest. The monitoring biologist may increase the buffer radius if he or she determines it is necessary. The monitoring biologist may decrease the buffer radius upon receiving approval from California Public Utilities Commission (CPUC), if he or she determines that the construction activities are not disturbing the nesting activities and a smaller buffer is more appropriate. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing the nesting activities. The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as: (1) turning off vehicle engines and other equipment whenever possible to reduce noise, (2) working in other areas until the young have fledged, or (3) placing noise barriers to maintain the noise at the nest to 60 dBA Leq hourly or less or to the preconstruction ambient noise level if that exceeds 60 dBA Leq hourly. The on-site biologist will review and verify compliance with these nesting		X		X	X

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	boundaries and will verify that the nesting effort has finished. Unrestricted construction activities can resume when no other active nests are found. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC with the weekly report as identified in MM BIO-2. A nesting bird report, at a minimum, shall include the date, starting and ending time, general weather conditions (cloud cover, temperature, wind), name of biologist with affiliation, area surveyed including map, survey results (species, nest GPS location, nest stage [number of eggs, number of nestlings]), recommended compliance (e.g., 100-foot buffer recommended, buffer increased with explanation, recommended noise reduction, noise dBA Leq levels at nest), and compliance issues/concerns. The report shall also include the date and nesting outcome (e.g., depredated, nestling fledged, nest abandoned).					
BIO-5	In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC. If the CPUC-approved biologist observes an active nest (see definition below) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric would postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions. “Nest” is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.	X	X		X	
BIO-6	In locations where Stephen’s kangaroo rat habitat assessments were not conducted during the 2010 field survey, a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm		X	X	X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	species, will be conducted by a California Public Utilities Commission (CPUC) approved biologist to assess the potential areas for Stephen's kangaroo rat to occur within the proposed project area. Any burrows, utilized habitat, or signs of Stephen's kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephen's kangaroo rat occupied habitat. If Stephen's kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephen's kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to project work area for complete avoidance of Stephen's kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.					
BIO-7	Prior to construction, qualified biologists approved by the California Public Utilities Commission shall flag all vernal pools (marginal or otherwise) and associated existing connectivity within the project footprint (water entering area during rain events) for avoidance during the proposed construction activities. Rain events are defined as "a precipitation event of 0.5 inch or greater." If work is conducted during the rainy season (October 1 through May 1), before scheduling project activity in areas flagged as vernal pools, the weather forecast will be monitored. Work will not be scheduled in these areas if a greater than 40% chance of a rain event (as defined above) is forecasted during the time needed to complete project activities. If a rain event unexpectedly occurs during project activity, the site will be secured with appropriate best management practices as identified in APM HYD-1. Construction travel along public access roads where the road rut vernal pools have been identified will be flagged or otherwise marked prior to construction for minimal impact to these locations. Project related traffic in these areas will be kept to the minimum required to implement the project.	X	X		X	
APM-CUL-1	SDG&E's practices are in accordance with Federal, State, and local laws to protect and avoid cultural resources, including: Archaeological Resources Protection Act of 1979, as amended, National Historic Preservation Act of 1966, as amended (NHPA), California Penal Code 622 ½, PRC 5097.1 through 5097.6, PRC 5097.98, and CEQA. An independent Cultural Resource Management firm	X	X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	conducted pre-construction surveys under contract with SDG&E, prepared an inventory of cultural resources within the proposed project's Area of Potential Effect, and provided recommendations for avoidance and minimization to assist SDG&E in its compliance with CEQA requirements. SDG&E's Principal Cultural Resources Specialist worked closely with SDG&E design and engineering to move several of the poles during the design phase of the proposed project to avoid impacts to known cultural resources. Known cultural resources will be spanned or otherwise avoided through project design and through routing during construction activities to the extent feasible. In addition, the micropile pole type will be used at many locations during construction to minimize ground disturbance and decrease potential impacts to unknown buried deposits.					
APM-CUL-2	**Cultural resources sensitivity training.** Prior to construction or ground-disturbing activities, all SDG&E, contractor, and subcontractor project personnel will receive training regarding the appropriate work practices necessary to effectively implement the project design features and ordinary construction restrictions relating to cultural resources, including the potential for exposing subsurface cultural resources and paleontological resources. This training will include presentation of the procedures to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as of paleontological resources. Known archaeological sites would be demarcated by a qualified archaeologist as Environmentally Sensitive Areas prior to the start of construction. Construction crews would be instructed to avoid disturbance of these areas.	X	X		X	X
APM-CUL-3	**Archaeological monitoring.** A qualified archaeologist will attend preconstruction meetings, as needed, and a qualified archaeological monitor will monitor activities in the vicinity of all known cultural resources within the proposed project area. The requirements for archaeological monitoring will be noted on the construction plans. The archaeologist's duties will include monitoring, evaluation of any finds, analysis of materials, and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.	X	X		X	
APM-CUL-5	**Unanticipated discovery of human remains.** If human remains are encountered during construction, SDG&E will comply with California State law (Health and Safety Code Section 7050.5; PRC Sections 5097.94, 5097.98 and 5097.99). This law specifies that work will stop immediately in any areas where human remains or suspected human remains are encountered. The appropriate agency and SDG&E will be notified of any such discovery. SDG&E will contact the Office of the Medical Examiner. The Medical Examiner has two working days to examine the remains after being		X		X	X

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	notified by SDG&E. Under some circumstances, a determination may be made without direct input from the Medical Examiner. When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the identified most likely descendant (MLD) and the MLD has 24 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the remains and grave goods. If the MLD does not make recommendations within 24 hours, the area of the property must be secured from further disturbance. If there are disputes between the landowner and the nearest likely descendants, the NAHC will mediate the dispute to attempt to find a resolution. If mediation fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.					
APM-CUL-6	**Paleontological monitoring.** A paleontological monitor will work under the direction of a qualified project paleontologist and will be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits for the eight poles located within paleontologically sensitive formations (i.e., Pomerado Conglomerate, Late Pleistocene to Holocene-age channel deposits). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	X	X		X	
APM-CUL-7	**Unanticipated discovery of fossils.** In the event that fossils are encountered, the paleontological monitor would have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with SDG&E's Cultural Resource Specialist, would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. If fossils are discovered, the paleontologist (or paleontological monitor) would recover them along with pertinent stratigraphic data. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth,		X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	recovery of bulk sedimentary-matrix samples for off-site wet screening from specific strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage would be cleaned, repaired, sorted, cataloged, and deposited in a scientific institution with permanent paleontological collections, and a paleontological monitoring report would be written.					
CUL-1	During construction of the proposed project, all Avoidance Measures as identified in Table 4 of the project-specific cultural resources report conducted by ASM (ASM 2012) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission. Avoidance Measures as listed in Table 4 of the report include retention of a cultural resources monitor during pole relocation work; establishment of Environmentally Sensitive Areas (ESAs) where sensitive resources are present in the vicinity of work sites; and avoiding sensitive bedrock, historical features, or other identified features within established ESAs.		X		X	X
CUL-2	Prior to commencement of construction associated with the Santa Ysabel Staging Yard, an Environmentally Sensitive Area (ESA) shall be established around the existing resource by the retained cultural monitor. Fencing shall be erected to demarcate the ESA to minimize the potential for impacts during construction.		X		X	
CUL-3	Where access roads traverse or are located near cultural resource sites as identified in the cultural resources report conducted by ASM (ASM 2012), vehicles shall be required to remain within existing access roads. No road grading shall be allowed within identified cultural resource site boundaries.		X		X	
CUL-4	In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or human bones, all work within 50 feet of the resources shall be halted, and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of San Diego Gas & Electric (SDG&E), California Public Utilities Commission (CPUC), and the qualified archaeologist shall confer to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curation, as necessary; and a report prepared by a specialist according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the CPUC and SDG&E shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project		X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out. If the CPUC, in consultation with the qualified archaeologist, determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, SDG&E will: a. Attempt to redesign the project to avoid any adverse effect on the significant archaeological resources. b. If the circumstances warrant an Archaeological Data Recovery Program (ADRP), such a program shall be conducted. The project archaeologist and the CPUC shall confer and consult to determine the scope of the ADRP. The archaeologist shall prepare a draft ADRP that shall be submitted to the CPUC for review and approval. The ADRP shall identify how the proposed ADRP would preserve the significant information the archaeological resource is expected to contain. That is, the ADRP shall identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to portions of the archaeological resource that could be adversely affected by the proposed project. Destructive analytical methods shall not be applied to cultural materials if nondestructive methods are practical.					
APM-GEO-1	**Project plans and specifications take into account the potential for mass wasting and liquefaction.** A geotechnical study was conducted by VO Engineering Inc. in 2011 to evaluate the pole locations along the proposed project power line route for the presence of geologic hazards. The geotechnical study indicated the presence of geologic conditions potentially susceptible to mass wasting or liquefaction at the locations of proposed Pole Nos. P103, R107, P110, P114, P129, P22, P23, P48, P49, and P51. The final project plans and specifications prepared by the responsible engineer have taken into account the geologic hazard conditions present at these locations and include appropriate engineering design and construction measures to minimize the potential for damage to proposed project structures in the event that there is an occurrence of these hazards.	X			X	
APM--GEO-2	**Soil stabilization.** Once temporary surface disturbances are complete, areas that would not be subject to additional disturbance will be stabilized to control soil erosion.		X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
APM-HAZ-1	**Steel structures.** New structures are designed utilizing steel to avoid potential adverse effects relating to fire and fire damage.					
APM-HAZ-2	**TL 637 Project Fire Plan.** The purpose of the proposed project is to improve the reliability of the power lines in fire-prone (very high to extreme fire threat areas) and wind-prone areas and minimize the risks associated with future wildfires. The proposed project is located within the Very High fire threat designation, as indicated on SDG&E's 2012 Fire Threat Zone Map. The proposed project design includes fire-hardening techniques, including replacing wood poles with steel poles, increasing conductor spacing to maximize line clearances, installing steel poles designed to withstand an extreme wind-loading case and known local conditions, and installing longer polymer insulators. These design components of the proposed project minimize fire risk through enhanced safety and reliability of the power line system during extreme weather conditions. In addition to these design features, the proposed project will implement the TL 637 Project Fire Plan. The TL 637 Project Fire Plan exceeds fire prevention measures as stated in California Forestry Practice Rules, PRC 4:6. Avoidance and minimization measures to prevent wildland fires include training, oversight, and work controls in all phases of preparation and implementation of the proposed project. Training and briefings in fire prevention and suppression methods are key components of reducing the threat of a wildland fire on the proposed project. Additionally, suppression in the event of a fire starting will be facilitated by locating water tanks within two minutes of a work site, requiring firefighting equipment within 50 feet of any work/equipment site, and avoidance of construction activities during periods of declared Red Flag Warnings or other severe fire weather conditions as identified by SDG&E. Other avoidance and minimization measures may be employed, such as standby firefighters and fire engines. In addition, portions of the proposed project occurring within the Cleveland National Forest must abide by the Cleveland National Forest Fire Plan. The plan describes the project activity level (PAL) work restriction measures to employ while working on forest lands. Therefore, the proposed project design and construction avoidance and minimization measures will avoid and minimize fire risks as outlined in the TL 637 Project Fire Plan and the Cleveland National Forest Fire Plan.	X	X		X	
APM-HAZ-3	**Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety.** The proposed project will be constructed consistent with Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety. Electric Standard Practice 113.1 outlines practices and procedures for SDG&E activities occurring within areas of potential wildland fire threat within SDG&E's service territory. The proposed project design includes replacement of wood poles with steel poles, increased	X	X		X	X

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	conductor spacing to maximize line clearances, installation of steel poles to withstand an extreme wind-loading case and known local conditions, and undergrounding of a portion of the power line. These design components of the proposed project minimize the fire risk through enhanced safety and reliability of the power line system, particularly during extreme weather conditions. The standard practices in Electrical Standard Practice 113.1 include avoidance and minimization measures to comply with state and local fire ordinances.					
APM-HAZ-4	**Coordination and measures within parks and preserves.** Appropriate safety measures will be implemented where trails and construction areas are near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ to provide a safety buffer between recreational users and construction areas. Construction schedule and activities will be coordinated with the authorized officer for the recreation area.	X	X		X	
HAZ-1	Prior to construction, all San Diego Gas & Electric, contractor, and subcontractor project personnel would receive training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures. A sign-in sheet of contractor and subcontractor project personnel who have received training shall be provided to California Public Utilities Commission on a weekly basis as indicated in MM BIO-2.	X	X		X	X
HAZ-2	During construction, construction best management practices (BMPs) shall be implemented to prevent impacts from release of hazardous materials during construction activities. Typical BMPs could include, but would not be limited to, construction practices such as the use of absorbent pads for spill containment, specified locations for construction vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible.	X	X		X	X

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
HAZ-3	In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions: • The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas &Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan. • The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. • The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.	X	X		X	
HAZ-4	Prior to flight operations for helicopter use during construction, San Diego Gas &Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration regulations regarding helicopter use to prevent conflict with air traffic generated by the Ramona Airport. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction activities.	X	X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
HAZ-5	Prior to flight operations for helicopter use during construction, a Helicopter Lift Plan shall be prepared if required pursuant to Federal Aviation Administration regulations. The Helicopter Lift Plan shall be submitted to the California Public Utilities Commission for review and approval.	X	X		X	
APM-HYD-1	**SDG&E Water Quality Construction BMPs Manual.** SDG&E's Water Quality Construction BMPs Manual (BMP Manual) was cre**a**ted to organize SDG&E's standard water quality protection procedures for various specific actions that routinely occur as part of SDG&E's ongoing construction, operations, and maintenance activities. The primary focus of most BMPs is the reduction and/or elimination of water quality impacts during construction of linear projects such as the proposed project. The BMPs described within the BMP Manual were derived from several sources, including the State of California guidelines as well as the Caltrans Water Quality BMPs. The BMP Manual will be utilized during construction (by way of preparation and implementation of the SWPPP), operation, and maintenance of the proposed project to ensure compliance with all relevant SDG&E and government-mandated water quality standards.	X	X		X	X
HYD-1	During routine operation and maintenance activities, if erosion is discovered along the proposed project alignment that would affect a surface water feature, including but not limited to a wet meadow, stream, channel or any other surface water body, San Diego Gas &Electric shall implement erosion control measures including but not limited to: • Periodic inspection and maintenance, including cleaning dips and cross-drains, repairing non-jurisdictional ditches, marking culvert inlets to aid in location, and clearing debris from culverts. • Avoid using roads during wet periods if such use would damage road drainage features. • Grade road surfaces only as often as necessary to maintain a stable running surface and to retain the original surface drainage. • Place all excess material removed by maintenance operations in safe disposal sites and stabilize these sites to prevent erosion. Avoid locations where erosion will carry materials into a stream.	X		X	X	X
HYD-2	Herbicides shall not be applied within 100 feet of a surface water feature, including but not limited to a wet meadow, stream, channel, or any other surface water body.		X	X	X	X
HYD-3	During pole repair work, mowing or trimming of vegetation shall be conducted to ensure that ground disturbance is minimized. Vegetation clearing shall be avoided where feasible. In the unlikely event that vegetation clearing or minor grading is required during operation and maintenance activities, San			X	X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
	Diego Gas & Electric shall establish a temporary work site where work is to be conducted. Any topsoil or vegetation removed during this process shall be stored, and redistributed over the temporary work site when maintenance activities are completed, unless clearance is required around the poles.					
HYD-4	San Diego Gas &Electric shall implement the terms and conditions as specified in the Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Certification (Certification No. 11C-114; May 16, 2012), which identifies the poles to remain in place and those to be relocated outside jurisdictional areas.		X		X	X
APM-NOI-1	**Generators.** Generator use will be limited to less than 50 horsepower (HP) at all staging yards. Any generators used at the staging yards will be located away from noise sensitive areas, and positioned on the property to comply with the San Diego County noise ordinance.		X		X	
APM-NOI-2	**Mufflers.** Functioning mufflers will be maintained on all equipment.		X		X	X
APM-NOI-3	**Resident notification.** Residents within 50 feet will receive notification of the start of construction at least one week prior to the start of construction activities within that area.	X	X		X	X
NOI-1	At least 30 days before helicopter use and stringing operations are employed San Diego Gas &Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the proposed project alignment, SDG&E shall notify landowners, livestock facility owners, and residents within 50 feet of construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.	X	X	X	X	
NOI-2	In the event noise levels during construction activities are expected to exceed an 8- hour Leq of 75 dBA at the nearest property line or within 50 feet of the existing and proposed project alignment where noise sensitive areas are located, San Diego Gas &Electric (SDG&E) shall implement noise reduction measures to reduce noise levels below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or 2) if noise barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents.	X	X		X	

Attachment E
Pre-Construction Mitigation Measures

Mitigation Measures and APMs		Timing			Project Component	
MM/APM	*Measure*	*Prior*	*During*	*After*	*Wood-to-Steel Pole Replacement*	*Substation Improvements*
NOI-3	In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.	X	X		X	
APM-REC-1	**Temporary trail detours.** Where feasible, temporary detours will be provided for trail users. Signs will be provided to direct trail users to the temporary trail detours.		X		X	
APM-TRA-1	**Standard Traffic Control Procedures.** SDG&E will implement a traffic control plan to address potential disruption of traffic circulation during construction activities and address any safety issues. The traffic control plan will be prepared by the project engineer or contractor and subject to approval by the County.	X	X		X	X
APM-TRA-2	**Encroachment permits.** SDG&E will obtain the required encroachment permits from Caltrans for work near Highways 78 and 79, and will ensure that proper safety measures are in place while construction work is occurring near public roadways. These safety measures include flagging, proper signage, and orange cones to alert the public to construction activities near the roadway.					