



Eden Nguyen Kilburg
Environmental Project Manager
San Diego Gas & Electric Company
8326 Century Park Court
San Diego, CA 92123
(T) (858) 637-3716
(C) (858) 449-1125

June 11, 2019

John Forsythe
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Notice to Proceed (NTP) Request to Construct the Tie Line (TL) 649 Wood-to-Steel Replacement Project (Project)

Dear Mr. Forsythe,

On January 22, 2019, the California Public Utilities Commission (CPUC) granted San Diego Gas & Electric Company (SDG&E) a Permit to Construct the TL 649 Project (Decision 19-01-011). The decision conditionally authorizes construction of the Project with the implementation of pre-construction mitigation measures (MMs) identified in the Mitigation Monitoring and Reporting Program (MMRP).¹

Activity Summary

SDG&E is formally requesting authorization from the CPUC to begin the construction phase of the Project. Construction of the Project will occur in accordance with the descriptions provided in the Final Initial Study/Mitigated Negative Declaration (IS/MND).² The information provided in Sections 1.5 and 1.7 of the Final IS/MND include specific details pertaining to construction methods, procedures for removing and installing poles and conductors, and material staging and storage.

Construction of the Project is anticipated to take approximately nine months from initial mobilization through construction completion, beginning in July 2019 and ending in April 2020.

Pre-Construction Mitigation Measures

A list of all pre-construction measures identified in the MMRP of the Project is provided in Attachment A: Pre-Construction Status Report of this NTP request. All design and pre-construction phase measures required to be implemented prior to contractor mobilization have been fulfilled, with the exception of the following (which will be completed and submitted to the

¹ D.19-01-011, Attachment 1.

² TL 649 Wood-to-Steel Replacement Project, Initial Study/Mitigated Negative Declaration, October 2018.

CPUC where applicable or require CPUC approval prior to the anticipated construction start date):

- MM-BIO-03: CPUC approval of the environmental training and training materials. This has been submitted to the CPUC.
- MM-BIO-17: CPUC approval of the Burrowing Owl Monitoring and Management Plan. The Plan has been submitted to the wildlife agencies.
- MM-NOI-03: CPUC approval of the construction noise complaint tracking procedures. This has been submitted to the CPUC.
- MM-NOI-05: CPUC approval of the Construction Noise Management Plan. This has been submitted to the CPUC.
- MM-NOI-06: CPUC approval of the Vibration Impact Assessment. This has been submitted to the CPUC.

To facilitate tracking and implementation, each measure has been organized into tasks so that the various elements of each measure can be tracked separately. Attachment A: Pre-Construction Status Report provides the full text of the measures for each component, as well as each measure's corresponding completion status for that component and descriptive details regarding the measure's status.

We respectfully request authorization of this NTP request by June 21, 2019, in order to begin establishing the staging yards and commencing construction activities on July 8, 2019 along TL 649. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 637-3716.

Sincerely,

Eden Nguyen Kilburg

Eden Nguyen Kilburg
Environmental Project Manager
SDG&E

Attachment A: Pre-Construction Status Report

cc:

Lonn Maier, CPUC
Tom Engels, Horizon Water and Environment
Rob Fletcher, SDG&E
Keri Cuppage, SDG&E
Kirstie Raagas, SDG&E
Armen Keochekian, Insignia Environmental (Insignia)
Adam Lievers, Insignia

ATTACHMENT A: PRE-CONSTRUCTION STATUS REPORT

Attachment A: Pre-Construction Status Report

- To Be Implemented During Construction
- Pending OR To Be Implemented Immediately Prior to Construction
- To Be Implemented Following Construction
- Complete
- Not Applicable

Report Criteria:

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

LOCATION: TL649

Location: TL649

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-01	01	Focused Surveys for Special-Status Plants	The results of the 2018 floristic surveys shall be submitted to the CPUC for review prior to construction. If special-status plants are detected within 50 feet of approved work areas, Mitigation Measure BIO-5 shall be implemented.	A copy of the 2018 Focused Plant Survey Results for the TL649 Wood-to-Steel Pole Replacement Project was submitted to the CPUC on May 30, 2019.	Pre and During	Complete
Biological Resources	MM-BIO-02	01	Pre-construction Surveys	The CPUC-approved qualified biologist(s) shall conduct pre-construction surveys for all activities occurring off of access roads in sensitive habitats. The pre-construction surveys shall be conducted no earlier than 30 days prior to surface disturbance. The results of the pre-construction surveys shall be documented by the CPUC-approved qualified biologist in a pre-construction survey report. Documentation of the pre-construction survey submittal shall be provided to the California Public Utility Commission (CPUC) for review and approval prior to the start of construction. The results shall be submitted to the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), jointly referred to as regulatory agencies as required by any regulatory permits or approvals. The pre-construction study report shall include the following: -Type, location, and size of project -Date, time, weather, surrounding land uses -Evaluation of type and quality of habitat -Work description and methods for avoidance or minimization of ground disturbance, including biological monitoring during construction -Anticipated impacts and proposed mitigation -Map of location of work area In those situations where the CPUC-approved qualified biologist cannot make a definitive species identification, the biologist shall make a determination based on available evidence and professional expertise.	Pre-construction surveys were conducted in November 2014 and a pre-construction survey report was submitted to the CDFW on May 17, 2019. A verification survey will be conducted within 30 days of initiation of ground disturbance to verify the pre-construction survey report findings. The results of the pre-construction survey will be submitted to the CDFW and USFWS as required. The results of the pre-construction survey will be submitted to the CPUC for review and approval prior to the start of construction.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-02	02	Pre-construction Surveys	In order to ensure that habitats are not adversely affected, the CPUC-approved biologist shall flag boundaries of habitat, which must be avoided. When necessary, the CPUC-approved biologist shall also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment, such as cranes, bucket trucks, and augers. When appropriate, the CPUC-approved biologist shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project site-specific basis.	Sensitive habitat boundaries will be flagged for avoidance prior to the start of construction. The remaining requirements of this mitigation measure will be implemented during construction as required.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-02	03	Pre-construction Surveys	The CPUC-approved biologist shall be contacted to perform a pre-activity survey when vegetation trimming is planned in sensitive habitats. Whenever possible, vegetation in sensitive habitats, such as California sagebrush-California buckwheat scrub and purple needlegrass grassland shall be scheduled for trimming in non-sensitive times (i.e., outside of breeding or nesting seasons).	A pre-activity survey will be conducted prior to vegetation trimming in sensitive habitats. When possible, trimming will be conducted in non-sensitive times.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-02	04	Pre-construction Surveys	SDG&E shall maintain a library of special-status plant species locations; known to SDG&E, occurring within the project survey area. "Known" means a verified population either extant or documented using record data. Information on known sites may come from a variety of record data sources including local agency habitat conservation plans, focused plant surveys, pre-construction surveys, or biological surveys conducted for environmental compliance of the proposed project. Plant inventories shall be consulted as part of pre-construction survey procedures.	SDG&E has set up a special-status plant library that will be maintained until construction is complete.	Pre and During	To Be Implemented During Construction

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-03	01	Environmental Training	All SDG&E personnel working (deliveries of materials excluded) within the project area shall participate in an employee training program conducted by SDG&E, with annual updates. The program shall describe special-status plant and wildlife species and habitats that could occur within the proposed project work areas; protection afforded to these species and their habitats, and; avoidance and minimization measures required to avoid and/or minimize impacts from the project. A fact sheet conveying this shall also be distributed to all employees working in the project area. Each employee shall be given a decal to indicate that he/she has attended the training. Penalties for violations of environmental laws shall also be incorporated into the training session. The roles and responsibilities of a CPUC-approved qualified biologist and other environmental representatives shall be identified in the Mitigation Monitoring and Reporting Plan and discussed during training. A copy of the training and training materials shall be provided to CPUC for review and approval at least 30 days prior to the start of construction. Training logs and sign-in sheets shall be provided to CPUC on a monthly basis. As needed, in-field training shall be provided to new on-site construction personnel by the SDG&E environmental representative or a qualified individual who shall be identified by SDG&E's Project Biologist, or initial training shall be recorded and played for new personnel.	Copies of the training and training material will be submitted to the CPUC for review and approval 30 days prior to the start of construction. A supervisory-level training has tentatively been scheduled for June 28, 2019. Crew trainings will follow on a daily or as needed basis in the field.	Pre and During	Pending
Biological Resources	MM-BIO-05	01	Avoid or Minimize Impacts on Special-Status Plant Species During Construction	All special-status federally and/or State-listed and/or CRPR Rare Plant Rank 1B or 2B species plant populations detected within 50 feet of the approved work area or within a 10-foot radius of access roads shall be staked, flagged, or fenced by a qualified biologist approved by the CPUC. The plants shall be monitored throughout the duration of construction to determine whether the project has resulted in adverse effects (direct or indirect), as determined by a CPUC-approved qualified botanist. If the botanist determines that special-status plants have been adversely affected, SDG&E shall implement measures to compensate for the impacts as described in Mitigation Measure BIO-6.	This measure will be implemented immediately prior to construction and adhered to for the duration of the construction phase.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-06	02	Compensate for Construction-Related Impacts to Special-status Plants	Where salvage and relocation are demonstrated to be feasible and biologically preferred by the wildlife agencies, it shall be conducted pursuant to a CPUC approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. The salvage and relocation plan shall also define the monitoring strategy with a minimum of annual monitoring for 5 years or until success criteria are met. If the salvage and relocation fail to meet the established success criteria after 5 years, maintenance and monitoring shall extend beyond the 5-year period until the criteria are met, or unless otherwise approved by the CPUC. Success criteria shall include a minimum of: A surveyed population size count roughly equal to or greater than the number of individuals transplanted (this total may include both transplanted individuals that have survived as well as any additional supplemental plantings following the initial transplantation that have survived at least two growing seasons), and Less than 5 percent cover of invasive weeds not already pervasive within the project area. Any salvage and relocation plans must be approved by CPUC at least 30 days prior to project construction.	Salvation and relocation is not anticipated to be necessary at this time. However, if it is later discovered that a sensitive plant species cannot be avoided, this mitigation measure will be implemented.	Pre, During, and Post	To Be Implemented During Construction
Biological Resources	MM-BIO-07	02	Implement Fire Prevention Best Management Practices	In the event that a state- or federally listed plant species is located within the area required to be cleared for fire protection purposes, SDG&E shall notify CDFW, in writing, of the plant's identity and location and of the proposed activity, which shall result in a take of such plant. Notification shall occur 10 working days prior to such activity, during which time the U.S. Fish and Wildlife Service (USFWS) or CDFW may remove such plant(s). If neither USFWS nor CDFW have removed such plant(s) within 10 working days following the notice, SDG&E may proceed to complete its fire clearing and cause a take of such plant(s) consistent with SDG&E's take coverage for the federal Endangered Species Act- or California Endangered Species Act-listed plants. When fire clearing is necessary in instances other than around power poles, and the potential for impacts to special-status species exist, SDG&E shall follow the pre-construction survey and notification procedures in Mitigation Measure BIO-2, above. Wire stringing shall be allowed year-round in sensitive habitats if the conductor does not drag on the ground or in brush and vehicles remain on access roads.	This measure will be implemented 10 days prior to any clearing required for fire protection purposes.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-09	01	Survey Work Protocols	Brush clearing for foot path or line-of-sight cutting shall not be allowed from February through September without prior approval from the CPUC-, USFWS-, and CDFW-approved biologist, who would ensure the brush clearing activity, does not adversely affect a special-status species or nesting birds. SDG&E survey personnel shall keep vehicles on existing access roads. Hiking off roads or paths for survey data collection shall be allowed year-round as long as other protocols are met.	This measure will be implemented during all surveys and during construction.	Pre and During	To Be Implemented During Construction

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-14	01	Implement Terms of Agency Permit(s) with Jurisdictional Federal or State-listed Species	The applicant shall utilize the SDG&E LE HCP and/or NCCP for impacts to federally listed wildlife species and state-listed wildlife species resulting from this project, if applicable. Avoidance and minimization measures will be implemented per these permits, including the potential use of helicopters if appropriate. The terms and conditions included in these authorizations shall be implemented, which may include seasonal restrictions, relocation, monitoring/reporting specifications, and/or habitat compensation through restoration or acquisition of suitable habitat.	SDG&E will implement the NCCP and LE HCP in accordance with the applicable protocols.	Pre and During	To Be Implemented During Construction
Biological Resources	MM-BIO-15	01	Special-Status Bat Species Mitigation	Prior to construction, suitable special-status bat habitat shall be assessed by a CPUC approved, qualified biologist in trees within a 50-foot buffer of active work areas and in any structures with suitable special-status bat roosting habitat within a 100-foot buffer of active work areas (e.g., bridges). If an active special-status bat maternity roost is found in a tree or structure, the approved biologist shall define an appropriate limited or no-work exclusion buffer surrounding the special-status bat maternity roost based on the bat species, numbers, and roost type (i.e., individuals, small group, or potential maternal colony), the type of work to occur, and the duration of the work-related disturbance. The limited work or exclusion areas shall remain in effect until the approved biologist determines that the work would no longer be a disturbance to the roost. A reduction in the buffer may be approved by the qualified biologist if there is a change in the type of work to be conducted. The limited work or exclusion buffer shall not apply to construction-related traffic using existing roads where the use of the road is not limited to project-specific use, such as where the public has access or other entities use the road). In addition, the exclusion buffer shall not apply if the roost(s) is/are located in a residential, commercial, or industrial area. The boundaries of the limited or no work buffer shall be clearly marked by the approved biologist. The approved biologist shall inspect construction and roost sites when construction is occurring to ensure the integrity of the limited or no-work buffer and to ensure that the size of the buffer is adequate based on-site conditions and construction generated noise, dust, etc.	Suitable special-status bat habitat will be assessed prior to the start of construction. In the event that special-status bat roosts are discovered, this measure will be implemented as appropriate during construction.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-15	02	Special-Status Bat Species Mitigation	All bat roosts documented during pre-construction surveys shall be reported through the MMRP.	This measure will be implemented in any area with potential bat habitat.	Pre	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-16	01	Avoid and Minimize Impacts to Special-Status Raptors, Passerine Species, and other Birds Protected under the MBTA and Fish and Game Code	If ground and vegetation disturbing activities occur during the nesting bird season (generally between January 15 and August 31, but may be earlier or later depending on species, location, and weather conditions), a survey for nesting birds shall be conducted according to the following provisions: - Nest surveys shall occur within 5 days prior to the start of ground-disturbing construction or vegetation trimming or removal activities. If there is no work in an area for 7 days, it shall be considered a new work area if construction, vegetation trimming, or vegetation removal begins again. - Surveys shall be conducted with sufficient survey duration and intensity of effort necessary for the identification of active nests (a nest containing eggs or chicks). A nest is no longer an "active nest" if abandoned by the adult birds or once fledglings are no longer dependent on the nest. - Surveys shall include nests of protected species within vegetation identified for removal and/or pruning, and within the following buffers of active work areas: 500 feet for raptors and listed passerine birds (including the coastal California gnatcatcher [CAGN] and least Bell's vireo [LBVI]). - ppropriate buffers for non-listed birds protected under the MBTA and Fish and Game Code will be established by the CPUC-approved biologist. - Surveys shall be conducted during locally appropriate dates for nesting seasons determined in consultation with the USFWS and CDFW; note that generally the season is between January 15 and August 31 but may be earlier or later depending on species, location, and weather conditions. - Species-specific nesting seasons for some species are identified below. The surveys shall be conducted by a CPUC-approved qualified biologist. Survey results shall be provided to CPUC. - Work areas within which significant noise is not generated, such as work performed manually, by hand or on foot, and/or that would not cause significant disturbances to nesting birds (e.g., driving on access roads, and activities at staging and laydown areas) do not need to be surveyed prior to use. None of these activities shall result in physical contact with a nest. - If active nests are detected during these surveys, no vegetation removal activities should be conducted until nestlings have fledged or the nest fails. If the activity must occur, the CPUC-approved biologist will establish a buffer zone around the nest and no activities will occur within that zone until nestlings have fledged and left the nest area.	Resumes for qualified biologists were submitted to the CPUC for review and approval on May 22, 2019, and approval is pending. Nesting bird surveys will be conducted immediately prior to construction.	Pre and During	Pending

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-16	08	Avoid and Minimize Impacts to Special-Status Raptors, Passerine Species, and other Birds Protected under the MBTA and Fish and Game Code	<p>Prior to commencing construction activities, SDG&E shall conduct surveys for CAGN and LBVI in accordance with USFWS' Coastal California Gnatcatcher (USFWS 1997) and Least Bell's Vireo Survey Guidelines (USFWS 2001).</p> <p>If CAGN or LBVI are detected during the surveys, SDG&E shall consult with the USFWS to determine appropriate avoidance measures. The performance standard for avoidance shall be no potential impacts to an established CAGN or LBVI nest. This shall be accomplished by establishing a no-disturbance buffer around the active nest. The no-disturbance buffer shall be a minimum of 500 feet, but may be larger depending on site specific conditions and consultation with USFWS.</p>	This measure will be implemented immediately prior to construction.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-16	09	Avoid and Minimize Impacts to Special-Status Raptors, Passerine Species, and other Birds Protected under the MBTA and Fish and Game Code	During the nesting season, pre-construction surveys are required where there is potential for nesting habitat for the coastal CAGN or LBVI within or adjacent to the proposed project area. If an active nest is found, 500-foot nesting buffers are required.	This measure will be implemented immediately prior to construction.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-16	11	Avoid and Minimize Impacts to Special-Status Raptors, Passerine Species, and other Birds Protected under the MBTA and Fish and Game Code	The 2014 survey effort indicated that western burrowing owls (BUOWs) were not nesting in the survey area (see the Burrowing Owl Survey Report in Appendix I of the Biological Technical Survey Report, Chambers 2015 (see Appendix G). However, there is high quality suitable habitat for this species in the survey area, and this species may occur in future years. If this species were present in the survey area, direct and indirect impacts could occur. Implementation of Mitigation Measure BIO-20: Avoid or Minimize Impacts on Burrowing Owls would reduce impacts to a level that is less than significant with mitigation.	If burrowing owls are present within the survey area, MM-BIO-17 will be implemented. (MM-BIO-20 pertains to special-status fairy shrimp.)	Pre	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-17	01	Avoid or Minimize Impacts on Burrowing Owls	SDG&E shall prepare a BUOW Monitoring and Mitigation Plan (BOMMP) consistent with the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). SDG&E shall SDG&E shall prepare a BUOW Monitoring and Mitigation Plan (BOMMP) consistent with the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012). SDG&E shall submit the BOMMP to CDFW and CPUC. SDG&E shall be required to obtain approval from CDFW on the BOMMP prior to construction. SDG&E shall provide the approved BOMMP to the CPUC 30 days prior to construction.	The BOMMP was submitted to the CDFW for review and approval on May 17, 2019. The approved BOMMP will be submitted to the CPUC no fewer than 30 days prior to the start of construction.	Pre	Pending
Biological Resources	MM-BIO-17	02	Avoid or Minimize Impacts on Burrowing Owls	In accordance with the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012) and the BOMMP, SDG&E shall conduct take avoidance pre-construction surveys for the BUOW within 30 days prior to initiating ground disturbance activities.	Take avoidance pre-construction surveys for BUOW will be conducted within 30 days prior to the initiation of ground disturbing activities.	Pre	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-17	03	Avoid or Minimize Impacts on Burrowing Owls	In addition to preconstruction surveys, SDG&E will conduct periodic BUOW surveys in January and February in areas with suitable burrowing owl habitat. If BUOWs are detected, SDG&E shall implement the CDFW-approved BOMMP in coordination with CDFW. The BOMMP shall state that disturbance to active burrows shall be avoided during the nesting season (February 1 through August 31). Buffers shall be established around occupied burrows in accordance with guidance provided in the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012) and the BOMMP. If work in these habitats is delayed or suspended for more than 30 days after the take avoidance pre-construction surveys, the site shall be resurveyed.	Periodic BUOW surveys were conducted in January and February 2019, and one pair of BUOW were detected. SDG&E will implement the measures prescribed in the BOMMP during construction. Additionally, SDG&E will conduct periodic BUOW surveys in January and February 2020, in accordance with this measure. If construction is delayed more than 30 days after BUOW take avoidance pre-construction surveys are conducted, the site will be resurveyed in accordance with this measure.	Pre and During	To Be Implemented Immediately Prior to Construction

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-19	05	Avoid Impacts to Special-Status Fairy Shrimp	SDG&E shall assume presence of special-status fairy shrimp in vernal pool road ruts located between poles 84 and 96. These vernal pools shall be avoided when ponded or wet. Construction access shall be allowed in these vernal pool areas when CPUC-approved biologist determines that the vernal pools are dry. No parking, staging, or other use of the areas that have vernal pools are permitted. Steel plates may be placed over delineated vernal pool road ruts when they are dry in order to avoid and minimize potential impacts or temporary disturbance, to vernal pools from project vehicles To the extent feasible, all construction equipment shall be fueled and maintained at least 100 feet from the nearest vernal pools. No project-related staging, parking or storage shall occur within or directly adjacent to delineated vernal pools.	This measure will be implemented during construction, as appropriate.	Pre and During	To Be Implemented During Construction
Biological Resources	MM-BIO-20	01	Minimize and Compensate for Impacts to Special-Status Fairy Shrimp and Their Habitat	If direct or indirect impacts to habitat (vernal pools and road rut vernal pools) supporting special-status fairy shrimp cannot be avoided then the following measures shall be implemented: -Impacts to jurisdictional vernal pools (with or without special-status shrimp), basins, and road rut vernal pools supporting listed San Diego fairy shrimp shall require mitigation through an off-site approved vernal pool restoration area or restoration plan as described below, and no mitigation would be required for road rut vernal pools that do not support special-status species. -Impacts to jurisdictional vernal pools, with or without covered species present, shall be mitigated at a 3:1 ratio for all impacts. Mitigation may occur onsite provided that a sufficient number of degraded pools exist in the vicinity and have been approved by the CPUC, CDFW and USFWS for restoration and /or enhancement. Otherwise, mitigation shall be implemented offsite at the pre-approved vernal pool restoration area. Mitigation credits, as approved by CPUC, CDFW and USFWS, may be accumulated and used through past or advance creation, restoration, and enhancement of a vernal pool basin area. The areas pre-approved by the CPUC, CDFW and USFWS for creation, restoration, and/or enhancement of vernal pool basin area shall be of high quality (e.g., Carmel Mesa and Otay Mesa) and shall support special-status species affected by the project. Pre-approved vernal pool mitigation areas must be managed and monitored pursuant to a management plan approved by CPUC, CDFW and USFWS. If SDG&E does not mitigate at a pre-approved vernal pool restoration area, then CPUC, CDFW and USFWS concurrence on an acceptable mitigation site is required prior to any impacts to vernal pools. Recognizing that restoration efforts may vary; if impacts to vernal pools are necessary or if unanticipated impacts to vernal pools occur as a part of construction, SDG&E shall prepare a detailed vernal pool restoration plan based on a generalized approach for vernal pool restoration which has been previously approved by CDFW and USFWS. This plan shall be provided prior to impacts to vernal pools or no later than 30 days following an unanticipated impact. If further requirements to this generalized approach are necessary, CPUC, CDFW and USFWS shall respond to the restoration plan within 30 days. No planned impacts to vernal pools shall occur until adequate mitigation for impacts to vernal pools and special-status vernal pool species has been secured off-site or a restoration plan has been approved by the CPUC, CDFW and USFWS for any mitigation outside of pre-approved vernal pool restoration areas.	Impacts to vernal pools will be avoided to the maximum extent possible during construction. In the event that impacts to vernal pools are required, SDG&E will secure vernal pool mitigation credits in accordance with the ratio prescribed in this measure, or will develop a vernal pool restoration plan and submit the plan to the CPUC, CDFW and USFWS for approval no later than 30 days prior to planned impacts to vernal pools.	Pre, During, and Post	To Be Implemented During Construction
Biological Resources	MM-BIO-20	02	Minimize and Compensate for Impacts to Special-Status Fairy Shrimp and Their Habitat	Where access roads containing pools are used, the following measures shall apply during project construction: - The delineation of all jurisdictional pool boundaries (i.e., the pool exclusion/buffer zone) that occur off of roadways shall be staked/flagged prior to the start of work Jurisdictional pools that occur within roadways or road-rut vernal pools will be pre-surveyed, mapped and avoided when wet. A qualified biological monitor shall be present to monitor access road use. - The qualified biological monitor shall have the authority to halt any project activity that is deemed to be affecting, or potentially affecting, a pool. The qualified biological monitor shall consult with the work supervisor, and if necessary, the CDFW and USFWS to resolve the issue. - All staking/flagging shall be removed by the biological monitor following completion of the work. - A minimum of 150 feet shall be provided between pools and all long-term staging. - Implement a stormwater pollution prevention plan (SWPPP) to reduce the potential for sediments and contaminants to enter pools or depressions where vernal pool branchiopods may occur).	A qualified biological monitor will be present during construction to implement the requirements of this measure. Road rut vernal pools were surveyed and mapped in January and February 2019, prior to the start of construction, and will be avoided when wet. All vernal pools located off of roadways were preliminarily flagged in May 2019. A SWPPP has been developed for this Project and will be implemented during construction in accordance with this measure.	Pre and During	To Be Implemented During Construction
Biological Resources	MM-BIO-21	01	Conduct Protocol Surveys for Quino Checkerspot Butterfly	Per SDG&E's Quino Checkerspot Butterfly Low-Effect Habitat Conservation Plan (QCB HCP), a USFWS-permitted biologist shall conduct pre-construction protocol surveys for QCB within 2 years prior to construction activities, or as required by the USFWS, in the project survey area. The permitted biologist shall perform the surveys in accordance with the most currently accepted protocol survey method. Results shall be reported to the USFWS within 45 days of the completion of the survey.	QCB protocol surveys were conducted in 2018, and results of the surveys were reported to the USFWS on October 15, 2018.	Pre	Complete

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Biological Resources	MM-BIO-22	01	Avoid Host Plants for QCB	SDG&E shall avoid host plants, dot-seed plantain (<i>Plantago erecta</i>) and purple owl's clover (<i>Castilleja exserta</i>), to the maximum extent possible. The CPUC approved biological monitor shall flag these plants within construction work areas for avoidance during a pre-construction survey.	QCB host plants will be flagged immediately prior to the start of construction. Impacts to host plants will be avoided to the maximum extent possible during construction.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-24	01	Minimize Area of Disturbance of Sensitive Habitat	The disturbance or removal of vegetation shall not exceed the minimum necessary to complete construction and shall only occur within the defined work area. Boundaries of habitats to be avoided shall be clearly flagged, and turnaround and stringing areas shall be clearly marked.	Habitats to be avoided, turnarounds and stringing areas will be flagged by biological monitors prior to the start of construction. Environmental Inspectors will verify that vegetation removal is kept to the minimum necessary to complete construction and will document compliance with this measure in their daily reports.	Pre and During	To Be Implemented Immediately Prior to Construction
Biological Resources	MM-BIO-25	01	Restore All Temporary Construction Areas Pursuant to a Habitat Restoration Plan.	All temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be mitigated or restored per SDG&E's LE HCP and/or NCCP. If restored, the sites shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. Restoration techniques may include: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. The Habitat Restoration Plan shall include success criteria and monitoring specifications and shall be approved by the CPUC prior to construction of the project.	Restoration will be conducted in accordance with the requirements of the NCCP and LE HCP as described in this measure, and no restoration plan will be prepared.	Pre and Post	N/A
Biological Resources	MM-BIO-26	02	Avoid and Minimize Impacts to Federally Protected Wetlands.	A SWPPP shall be implemented to reduce the potential for sediments and contaminants to enter wetlands and waters.	The Project has been enrolled in Construction General Permit coverage, and a SWPPP was uploaded and certified in SMARTs on May 1, 2019. The SWPPP will be implemented during construction.	Pre and During	To Be Implemented During Construction
Biological Resources	MM-BIO-27	01	Obtain Regulatory Permits for Work Activities Taking Place in Wetlands and Waters of the United States and the State.	Work within areas defined as waters of the U.S. that includes placement of fill shall require a CWA Section 404 permit and Section 401 Water Quality Certification. All work proposed in jurisdictional waters of the U.S. shall be authorized under these permits, and the work shall comply with the general and regional conditions of the permits.	No CWA permits are anticipated to be required to complete construction of TL649. As a result, this measure is not applicable.	Pre	N/A
Cultural and Paleontological Resources	MM-CR-01	01	Prepare and Implement an Archaeological Treatment Plan	Prior to proposed project construction, SDG&E shall prepare an archaeological treatment plan to conduct data recovery excavations in portions of Site CA-SDI-9976 scheduled to be impacted by construction. The treatment plan shall include provisions for monitoring at CA-SDI-9976 during construction by an archaeologist and a Kumeyaay Native American monitor. The implementation of the treatment plan shall be overseen by an archaeologist who meets the Secretary of Interior's professional standards in archaeology under contract to SDG&E, after approval of the plan by CPUC. A report shall be prepared to document the methods used for the data recovery program and the results of the study; the final report shall be submitted to the CPUC and filed with the South Coastal Information Center of the California Historical Resources Information System (CHRIS).	The archaeological treatment plan was submitted to the CPUC for review on March 5, 2019 and approved on April 15, 2019.	Pre	Complete

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Cultural and Paleontological Resources	MM-CR-02	01	Conduct Cultural and Paleontological Resource Training to Workers Prior to Construction	Prior to initiation of ground-disturbing activities, SDG&E, contractor, and subcontractor proposed project personnel shall receive training about the kinds of archaeological and paleontological materials that could be present above and below the ground surface within the project area, and the protocols to be followed, should any such materials be uncovered during construction. Training materials shall be prepared by a professional archaeologist, paleontologist, or paleontological monitor. Training may be required during different phases of construction to educate new construction staff personnel.	The environmental training has been prepared and will be submitted to the CPUC prior to the start of construction. The training includes discussion of cultural and paleontological resources. All construction personnel will receive the environmental training prior to beginning work on the project.	Pre and During	To Be Implemented Immediately Prior to Construction
Cultural and Paleontological Resources	MM-CR-03	01	Immediately Halt Construction if Cultural Resources Are Discovered	The large number of archaeological sites recorded along the proposed project alignment points to the sensitivity of the region for these resources. As a result, initial construction ground disturbance within 50 feet of an archaeological site will be monitored by an archaeologist and Native American monitor under the direction of a Qualified Archaeologist who meets the Secretary of Interior's professional standards in archaeology. If the Qualified Archaeologist determines that the potential for cultural resources is low after initial ground disturbance, the Qualified Archaeologist may determine that monitoring is no longer required in that location. If cultural resources, such as structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic-era artifacts, human remains, or architectural remains are encountered during project construction activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and SDG&E and the CPUC shall be contacted immediately. Isolates will not constitute a discovery.	A Cultural Resources Monitoring Plan has been submitted to the CPUC. This measure will be implemented during construction.	Pre and During	To Be Implemented During Construction
Cultural and Paleontological Resources	MM-CR-06	01	Prepare Treatment Plans for any Tribal Cultural Resources (TCRs)	No TCRs are currently identified within the project area. If TCRs are identified in the proposed project area, the CPUC would consult with the Viejas Band and/or other tribes with a traditional and cultural affiliation to the resource, as appropriate, to develop feasible alternatives to avoid or substantially lessen the impacts on identified TCRs pursuant to PRC 21083.b.2, or in accordance with PRC 21084.3. If necessary, SDG&E would prepare the treatment plan once treatment has been agreed upon by the CPUC, SDG&E, the Viejas Band, and other tribes, as appropriate, for submittal to the CPUC.	This measure will be implemented during construction if it deemed necessary.	Pre and During	To Be Implemented During Construction
Geology and Soils	MM-GEO-01	01	Incorporate Report Recommendations from the Geotechnical Investigation into Design Level Geotechnical Foundation Design Report	SDG&E and/or its design contractor shall require in contract documents that a site-specific, design-level geotechnical foundation investigation and corresponding report be required before final design approval. The geotechnical investigation shall be conducted by a qualified geotechnical engineer, or team of geotechnical engineers, to evaluate subsurface soil and geologic conditions at the project site. The geotechnical report shall be document the results of that investigation and provides conclusions and recommendations that address site specific soil parameters into final pole foundation designs and address ground and slope stability issues at each pole location. Recommendations shall address site and geologic conditions with a focus on the expansion, shrink/swell potential, liquefiable soils, physical instability, and corrosivity of underlying soils, as well as any other geologic hazards that are identified during the course of the investigation. The report shall provide design criteria to address any geotechnical issues and ensure that the proposed project's structures and facilities remain stable. The report may incorporate the findings of previous geotechnical reports (e.g., Geocon Inc. 2014). The design-level geotechnical evaluation report shall be certified by a licensed professional geotechnical engineer or certified engineering geologist and adhere to design requirements set forth in the California Building Code and all applicable state and local code requirements.	A design-level geotechnical foundation investigation was conducted and the results were certified by a licensed professional geotechnical engineer or certified engineering geologist prior to final design approval.	Pre	Pending
Geology and Soils	MM-GEO-01	02	Incorporate Report Recommendations from the Geotechnical Investigation into Design Level Geotechnical Foundation Design Report	All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical evaluation shall be implemented as a condition of project approval.	All recommendations and design criteria provided by the geotechnical report will be implemented.	Pre	Pending

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Hazards and Hazardous Materials	MM-HAZ-02	01	Personnel Training	Prior to the start of construction, all SDG&E, contractor, and subcontractor project personnel shall receive environmental training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to ensure compliance with SDG&E's Project Design Features and Ordinary Construction/Operating Restrictions and applicable hazardous materials-related laws and regulations. Construction workers that would be involved in the handling of hazardous waste shall receive appropriate training as required by CFR, Title 29, Section 1910.120 (e.g., Hazardous Waste Operations and Emergency Response training). Training shall include, but would not be limited to the following: - Review of health and safety plans prepared for the proposed project, including warnings about exposure to hazardous substances that may be used or encountered; - Hazardous materials storage, handling, and disposal procedures; -Hazardous materials spill prevention and response measures (e.g., specified locations for construction vehicle and equipment refueling, daily vehicle and equipment inspections to identify leaking fuels and/or oils as early as possible, and spill containment); and - Availability and use of safety equipment, including personal protective equipment.	Prior to construction, all Project personnel will receive environmental training regarding hazardous materials procedures and protocols.	Pre and During	To Be Implemented Immediately Prior to Construction
Hazards and Hazardous Materials	MM-HAZ-02	02	Personnel Training	A sign-in sheet of project personnel who have received training shall be provided to CPUC on a weekly basis.	Environmental training sign-in sheets will be submitted to the CPUC on a weekly basis.	Pre and During	To Be Implemented During Construction
Hazards and Hazardous Materials	MM-HAZ-03	02	Perform Soil Sampling and Soil Management Procedures	In addition, an unanticipated soil contamination handling plan shall be prepared to address the procedures to be followed if contaminated soils are encountered during testing or excavation activities. This plan shall contain guidelines for the characterization, any necessary removal, transport, and disposal of contaminated soil requiring excavation during construction. The plan shall emphasize that all activities within or in close proximity to contaminated areas shall adhere to all applicable federal, state, and local environmental and hazardous waste laws and regulations.	An unanticipated soil contamination handling plan has been prepared in accordance with this measure. The plan will be implemented during construction in accordance with this measure.	Pre	Complete
Hazards and Hazardous Materials	MM-HAZ-04	01	Prepare and Implement a Project-Specific Construction Fire Prevention Plan	SDG&E shall prepare a project-specific construction fire prevention plan which shall include the following: - A description of the procedures for minimizing fire potential (e.g., vegetation removal and disposal procedures). - The requirements of Title 14, California Forest Practice Rules of the CCR. - Relevant components of the SDG&E Fire Prevention Plan (SDG&E 2014). - The firefighting equipment (e.g., shovels, pulaskis, and backpack pumps) that must be maintained on site and in vehicles for the duration of construction. - The appropriate timing and use of fire-protective mats or shields during grinding and welding operations. - Emergency response and reporting procedures. - Relevant emergency contact information. Prior to construction, SDG&E shall submit the project-specific construction fire prevention plan to the CPUC for record keeping purposes.	The fire prevention plan was submitted to the CPUC on April 15, 2019.	Pre	Complete
Hazards and Hazardous Materials	MM-HAZ-04	02	Prepare and Implement a Project-Specific Construction Fire Prevention Plan	Prior to the start of construction activities, SDG&E shall assess the work areas, access roads, and ROW for wildland fire risk and fire hazard reduction (e.g., vegetation removal and disposal) shall be performed in accordance with the project-specific Construction Fire Prevention Plan.	Prior to the start of construction activities, SDG&E will assess Project work areas for wildland fire risk and conduct fire hazard reduction.	Pre and During	To Be Implemented Immediately Prior to Construction

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Hydrology and Water Quality	MM-HYD/WQ-02	03	Implement Measures to Protect Aquatic Resources During Project Construction	<p>When a pole location or staging yard is located within 25 feet of a drainage feature that qualifies as a federal and/or state jurisdictional aquatic feature, the following constraints shall apply: -A CPUC-approved aquatic resource monitor, with the authority to stop work if necessary, shall be present on site as needed to ensure minimization and avoidance measures are complied with.</p> <p>-Monitoring shall be conducted at aquatic features in particular during BMP installation, spot checking during construction, and at the end of construction.</p> <p>-Prior to construction activity, the aquatic resource monitor or SDG&E Environmental Representative shall provide an Environmental Tailgate meeting to the crew to review all construction restrictions.</p> <p>-Parking of vehicles and staging of equipment shall not occur within jurisdictional aquatic features.</p> <p>-If work is conducted at pole locations during the rainy season (October 1 through May 1), before scheduling proposed project activities, the weather forecast shall be monitored. Work shall not be scheduled if a greater than 40 percent chance of rain is forecasted during the time needed to complete the activity. If rain does occur unexpectedly during proposed project activities, the site shall be secured using BMPs (e.g., fiber rolls) to prevent sedimentation and erosion.</p> <p>-Stockpiled material shall not be placed within the jurisdictional drainage or where it could be washed into the jurisdictional drainage feature during a storm event. If stockpile is within 25 feet of a jurisdictional drainage and left overnight, the stockpile shall be covered with plastic and secured.</p> <p>-Any vegetation that has been mowed or trimmed to provide access or work space shall not be discharged within a jurisdictional drainage or placed where it could be washed into a jurisdictional drainage during a storm event.</p> <p>-At the end of construction, all unused construction material and debris shall be removed and disposed-of at an appropriate licensed facility, and in accordance with all applicable federal, State, and local regulations.</p>	The aquatic resource monitor resume was submitted to the CPUC on May 21, 2019. All other components of this measure will be implemented during construction.	Pre and During	To Be Implemented During Construction
Noise	MM-NOI-02	01	Notify Local Landowners of Construction Activities	Residences and landowners within 100 feet of the proposed project alignment (e.g. those near the stringing site at Sea Lavender Way and near Pole Nos. 4 through 7) shall be provided written notice of the planned construction activity at least two days prior to the commencement of work.	SDG&E will provide notification of construction activities to residences and landowners within 100 feet of the Project at least two days prior to the commencement of work.	Pre and During	To Be Implemented Immediately Prior to Construction
Noise	MM-NOI-02	02	Notify Local Landowners of Construction Activities	In addition, residents and landowners within 100 feet of any planned helicopter use along the alignment shall be provided written notice of the helicopter use at least seven days prior to the commencement of work. The notice shall state the date of planned construction activity in proximity to that landowner's property and the range of hours during which maximum noise levels may be anticipated. If nighttime work is anticipated, the notification outlined in this measure shall be provided at least seven days prior to commencement of work to all residences and landowners located within 500 feet of the anticipated work area.	If helicopter use is required, SDG&E will provide notification to residences and landowners within 100 feet of daytime helicopter use and within 500 feet of nighttime helicopter use at least seven days prior to the commencement of work.	Pre and During	To Be Implemented During Construction
Noise	MM-NOI-03	01	Construction Noise Complaints	The proposed project applicant shall submit to CPUC for review and approval a set of procedures for responding to and tracking complaints received pertaining to construction noise, and shall implement the procedures during construction. At a minimum, the procedures shall include: a) Designation of a Public Liaison dedicated to the project to track and respond to noise complaints for the project; b) Protocols for receiving, responding to, and tracking received noise complaints; and c) Maintenance of a noise complaint log that records received complaints and how complaints were addressed, which shall be submitted to the CPUC for review upon request.	SDG&E submitted procedures for responding to and tracking noise complaints to the CPUC for review and approval on April 15, 2019. CPUC approval is pending.	Pre	Pending
Noise	MM-NOI-05	01	Project-Specific Construction Noise Reduction Measures	For construction activities within 100 feet of residential or other sensitive uses (i.e., residences near the stringing site at Sea Lavender Way, and the residences near Pole Nos. 4 through 7), the project applicant shall submit a Construction Noise Management Plan prepared by a qualified acoustical consultant. The plan shall be submitted to the CPUC for review and approval. The plan shall contain a set of site-specific noise attenuation measures to reduce construction noise to less than 75 dBA during a 12-hour period or to the maximum extent practicable.	SDG&E submitted a Construction Noise Management Plan for construction activities within 100 feet of residential or other sensitive uses to the CPUC for review and approval on April 15, 2019. CPUC approval is pending.	Pre and During	Pending

Measure Category Title	MMNo	TaskNo	Mitigation Measure	Task Text	Comments	Timing	Status
Noise	MM-NOI-06	01	Vibration Impact Assessment	A structural engineer or other qualified professional shall be retained to prepare a vibration impact assessment (assessment) for the water pump station near the project alignment between Pole Nos. 18 and 18.1. The assessment shall take into account project-specific information, such as the composition of the structures, location of the various types of equipment used during each phase of the project, and the soil characteristics in the project area, to determine whether project construction may cause damage to this structure. If the assessment finds that the project may cause damage to this structure, the structural engineer or other qualified professional shall recommend design means and methods of construction to avoid the potential damage, if feasible. The assessment and its recommendations shall be reviewed and approved by the CPUC. If there are no feasible design means and methods to eliminate the potential for damage, the structural engineer or other appropriate professional shall undertake an existing condition study (study) of any structures (or, in case of large buildings, of the portions of the structures) that may experience damage. The study will establish the baseline condition of these structures, including, but not limited to, the location and extent of any visible cracks or spalls. The study shall include written descriptions and photographs. The study shall be reviewed and approved by CPUC.	A structural engineer or other qualified professional prepared a vibration impact assessment for the water pump station between Poles 18 and 18.1, which was submitted to the CPUC for review and approval on April 15, 2019. CPUC approval is pending.	Pre and During	Pending
Transportation and Traffic	MM-TRA-01	01	Implementation of Construction Traffic BMPs	SDG&E shall implement the following BMPs: - Develop circulation and detour plans to minimize impacts to local street circulation. This shall include the use of signing and flagging to guide motor vehicles, bicycles, and pedestrians through and/or around the construction zone. - Schedule closures of collector and arterial roads to occur outside of peak morning and evening commute hours. - Schedule lane closures and obstructions on collector and arterial roads to occur outside of peak morning and evening commute hours. - Include detours for bicycles and pedestrians in all areas potentially affected by project construction. - Install traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. - Prior to any closure of public roadways, notification would be posted and/or circulated to the public within a four-block radius at least 5 days in advance of anticipated closures, or as required by the local jurisdiction. - SDG&E or its contractor shall employ adequate control devices, signage, a detour route, and flaggers, as necessary. - Coordinate with local transit agencies for the temporary relocation of routes or bus stops in work zones as necessary.	These traffic BMPs will be implemented construction, and SDG&E will provide notification of public roadway closures at least five days prior to the closure.	Pre and During	To Be Implemented During Construction