

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 12, 2018

Mr. Andy Flajole  
Environmental Services Project Manager  
NextEra Energy Transmission West, LLC  
700 Universe Blvd., UST/JB  
Juno Beach, FL 33408

RE: Suncrest Dynamic Reactive Power Support Project Notice to Proceed

Dear Mr. Flajole,

This letter serves as your Notice to Proceed (NTP) for the Suncrest Dynamic Reactive Power Support Project (Project). Provided that the conditions described in Section 3 of this letter are met, NextEra Energy Transmission West, LLC (NEET West) may begin construction activities for the Project. As described briefly in Section 3 of this letter, and more fully in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), NEET West is required to fully implement and document compliance with the mitigation measures (MMs) and Applicant Proposed Measures (APMs) identified in the Project's Final Environmental Impact Report (FEIR), as well as any permit conditions. Protocols and procedures for ensuring compliance are described in the MMCRP, and must be adhered to by NEET West and its contractors.

### **1. Overview of NTP Request and Mitigation Measure Compliance Documentation Submitted to Date**

On October 19, 2018, NEET West submitted a NTP request to the California Public Utilities Commission (CPUC) to initiate construction activities for the Project. NEET West stated that it intended to construct the Project in two concurrent phases: (1) construction of the approximately 6-acre static var compensator (SVC) facility, and (2) construction of the approximately 1-mile-long, 230-kilovolt (kV) electric transmission line, which will interconnect with the existing San Diego Gas and Electric Company (SDG&E) Suncrest Substation.

NEET West's NTP request letter stated that construction of the Project is scheduled to begin January 28, 2019 and is scheduled to be completed by approximately December 30, 2019. Subsequent discussions with NEET West during preparation of the MMCRP identified a more detailed construction schedule that provides estimated dates and durations for specific construction phases/activities; refer to Tables 1 and 2 of the MMCRP for this detailed schedule. While construction is scheduled to start on January 28, 2019, NEET West's NTP request letter requested authorization to conduct geotechnical borings within the 6-acre SVC facility footprint prior to January 28, 2019. The geotechnical borings would inform the needs and requirements of a Blasting Plan, if blasting is required for construction of the Project.

Under separate cover, on October 19, 2018, NEET West submitted the following plans and reports pursuant to MMs identified in the Project's FEIR:

- Rare Plant Survey Report (MM BIO-2)
- Hermes Copper Butterfly Habitat Assessment Report (MM BIO-8)
- Bat Survey Report (MM BIO-13)
- Hazardous Materials and Waste Management Plan (MM HAZ-1)
- Construction Fire Protection Plan (MM HAZ-3)
- Construction Noise Minimization Plan (MM NOI-1)

Subsequently, on November 2, 2018, NEET West submitted the following additional plans and materials pursuant to applicable FEIR MMs:

- Construction Demolition and Debris Management Plan (MM PUB/UTL-1)
- Traffic Management Plan (MM TR-2)
- Worker Environmental Awareness Training program materials (MM BIO-10)
- Storm Water Pollution Prevention Plan (SWPPP) (National Pollutant Discharge Elimination System [NPDES] Construction General Permit)

NEET West's NTP letter stated that NEET West planned to submit the following documentation between the NTP and start of construction:

- Updated Appendix A: Construction Work Area Drawings
- Geotechnical work compliance report (MM GEO-1)
- Blasting Plan (MM HAZ-2)
- Preconstruction survey memorandums for nesting birds and other wildlife species no more than 14 days prior to construction (MMs BIO-6, BIO-13)
- Landowner notification letter and mailing list (residents within 500 feet) at least 7 days prior to construction (MM NOI-1)
- WDID number to document the SWPPP as active (NPDES Construction General Permit)
- Off-road Equipment Logs or equivalent to verify Tier 3 and/or Tier 2 California Emissions Standards as applicable (respectively MM AQ-1, APM AIR-4)
- Resumes for cultural Principal Investigator & Lead Biologist/Inspector (MMs CR-1 & BIO-11)
- Documentation of Fire Services Agreement (MM PUB/UTL-1)
- Documentation of coordination with emergency service providers (MM TR-3)

NEET West stated that habitat restoration plans and compensation for impacts, if required, per MMs BIO-4, BIO-16, and BIO-18 would be prepared prior to construction end once impacts, if any, are known.

## **2. CPUC Review of the NTP Request Letter and Mitigation Measure Compliance Documentation Submitted to Date**

In accordance with its authority as the Lead Agency under the California Environmental Quality Act (CEQA), CPUC reviewed NEET West's NTP request letter and associated submittal materials to ensure that the requested activities are consistent with what was evaluated in the FEIR, and that the MMs and APMs identified in the FEIR's Mitigation Monitoring and Reporting Program (MMRP) commensurate with the current phase of the Project are being fully implemented. CPUC's review has indicated that NEET West's requested activities are consistent with the FEIR, and that all of the plans, reports, and associated documentation submitted to date are adequate and in accordance with the Project's MMRP (see Attachment 1). Attachment 1 to this NTP letter is the current version of MMCRP Appendix B: Mitigation Measures Tracking Table. This table documents the status of specific monitoring and reporting actions that were identified in the MMRP, and will be continuously updated throughout the Project compliance period.

The proposed geotechnical borings referenced in the NTP request letter were included in the Project FEIR as part of MM GEO-1. Therefore, these borings were considered under CEQA, and would not result in any new significant impacts, provided that the conditions described in Section 3 are adhered to.

## **3. NTP Conditions of Approval**

Due to the relatively limited size of the Project footprint and the concurrent nature of many of the construction activities, only one NTP will be issued for this Project. Therefore, this NTP applies to the entirety of the Project and all work areas identified in MMCRP Appendix A. NEET West's NTP request is approved by the CPUC with the following conditions:

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1. All Project MMs, APMs, permit conditions, and applicable regulatory requirements shall be fully implemented. Specifically, all pre-construction monitoring and reporting actions identified in MMCRP Appendix B (see Attachment 1; pre-construction actions are identified by red coding) shall be completed by NEET West, and verified as completed by CPUC, prior to initiation of any construction activities.
2. The Project MMCRP must be fully implemented, and the protocols and procedures identified in the MMCRP must be followed prior to, during, and following Project construction.
3. Any minor refinements to the Project design (e.g., vault location) must be described fully in a Minor Project Refinement Form (MMCRP Appendix E). CPUC must review and approve the completed Minor Project Refinement Form prior to NEET West constructing the modified Project elements. Requirements for minor project refinements (e.g., may not result in new significant impacts or impacts not evaluated in the FEIR) are described in the MMCRP.
4. For geotechnical boring activities that may commence prior to the January 28, 2019 start date referenced in the NTP request letter, a biological monitor must be present on-site to inform the crew of approved construction limits (i.e., the limits of disturbance evaluated in the EIR and shown in the Construction Work Area Drawings included with the NTP request); monitor geotechnical crews while on-site; provide a tailboard environmental training prior to the initiation of geotechnical work, and oversee compliance with MMRP conditions. NEET West must notify CPUC 7 days in advance of the planned geotechnical work, so that CPUC may arrange for its own biological and/or environmental monitor(s) to be present during the activities. Following the geotechnical work, a compliance report must be prepared and provided to the CPUC.
5. Prior to construction, NEET West must submit all applicable permits to the CPUC.
6. Copies of all relevant permits, compliance plans, the MMCRP, and this NTP shall be available on site for the duration of construction activities.

Please contact me at (916) 823-4748 or [Robert.Peterson@cpuc.ca.gov](mailto:Robert.Peterson@cpuc.ca.gov) if you have any questions or concerns regarding this NTP.













Sincerely,





















Robert Peterson  
Project Manager  
Energy Division, CEQA Unit











cc: Molly Sterkel, CPUC Program Manager  
Lonn Maier, CPUC Supervisor  
Jack Mulligan, CPUC Attorney  
Tom Engels, Horizon Water and Environment  
Patrick Donaldson, Horizon Water and Environment  
Matt McCord, NEET West  
Adrienne Charbonneau, NEET West  
Megan Peterson, SWCA  
Lincoln Allen, SWCA











Attachment: MMCRP Appendix B, Mitigation Measure Tracking Table (Version 12/7/18)

Version Date: December 7, 2018		Suncrest Dynamic Reactive Power Support Project Appendix B: Mitigation Measures / Applicant Proposed Measures Compliance Tracking Table		
Color Codes:	Measure Implemented Prior to Construction			
	Measure Implemented During Construction			
	Measure Implemented Following Construction			
Impact	Applicant Proposed Measure (APM) or Mitigation Measure	Monitoring and Reporting Action	NEET West Sign-off As Complete	CPUC Sign-off As Reviewed and Complete
<b>Aesthetics</b>				
<b>AES-1</b>   	<b>Use Design and Architectural Features on Project Structures to Complement the Surrounding Visual Landscape.</b> NEET West or their contractor(s) shall implement the following measures to the extent feasible: <ul style="list-style-type: none"> <li>Material and paint colors should be selected that are compatible with the existing colors of the surrounding area (i.e., dull grey, light brown, or dull green) in order to minimize visual contrast.</li> <li>Natural materials should be selected that blend with the natural surroundings and avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment.</li> <li>Dulled metal finish transmission structures and non- specular conductors (within the SVC and for the overhead span to interconnect into Suncrest Substation) shall be used for the Proposed Project.</li> <li>Non-specular conductors shall be treated to reduce reflectivity and have a smooth matte gray finish that blends unobtrusively with the environment.</li> </ul>	 1. Incorporate requirements into Project design and bid documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that dulled metal finish transmission structures and non-specular conductors are used, and that all requirements are implemented.		
		 3. Confirm that materials and paint colors do not contrast substantially with the surrounding landscape.		
<b>AES-2</b>   	<b>Light and Glare Reduction.</b> Temporary construction and permanent SVC lighting shall be the lowest illumination allowed for human safety and security, selectively placed, shielded and downward facing to minimize nighttime glare.	 1. Confirm that measure is incorporated into contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that temporary construction lighting is lowest allowed, and is shielded and downward-facing.		
		 3. Confirm that permanent SVC lighting is lowest illumination allowed, and shielded and downward-facing.		










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<b>Air Quality</b>				
<b>AIR-1</b> 	<b>Fugitive Dust Control.</b> During construction, water or non-toxic soil stabilizers will be applied in sufficient quantities on access roads, staging areas, work areas, and on stockpiles to control fugitive dust.	 1. Confirm water or non-toxic soil stabilizers are applied to access roads, staging areas, work areas, and stockpiles.		
<b>AIR-2</b> 	<b>Speed Limits.</b> During construction, vehicle speeds will be limited to 15 miles per hour on unpaved roads or work areas and vehicles should be turned around in established or designated areas only.	 1. Confirm vehicles are operated to maintain a 15-mile-per-hour speed limit and are turned around in designated areas.		
<b>AIR-3</b> 	<b>Vehicle Use and Idling Time.</b> To the extent feasible construction vehicle use and idling time will be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up that limit their availability for use following startup. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The Proposed Project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as part of preconstruction conferences. Those briefings will include discussion of a "common sense" approach to vehicle use.	 1. Confirm that a "common-sense" approach is applied to vehicle usage and idling times are minimized.		
<b>AIR-4</b> 	<b>Construction Equipment Emissions.</b> Low-emission construction equipment will be utilized during construction of the Proposed Project. Construction equipment will be maintained per manufacturer specifications. All off-road construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program shall meet at a minimum the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in Cal. Code Regs., tit. 13 § 2423(b)(1).	 1. Confirm that construction equipment are maintained per manufacturer specifications and are either registered under the CARB Statewide Portable Equipment Registration Program or meet at a minimum the Tier 2 California Emissions Standards for Off-Road Compression-Ignition Engines.		









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<b>AIR-5</b> 	<b>Loss of Sulfur Hexafluoride (SF6).</b> In operation of the SVC, NEET West will maintain the 230-kv circuit breaker so that the loss of SF6 is less than 0.5 percent per year. To assess the loss of SF6, NEET West will conduct monthly inspections and maintain the records of such inspections. NEET West will also participate in the U.S. Environmental Protection Agency's voluntary SF6 Emission Reduction Partnership for Electric Power Systems.	 1. Confirm that the loss SF <sub>6</sub> is less than 0.5 percent per year through NEET West monthly reporting.		
		 2. Confirm participation in the U.S. Environmental Protection Agency's voluntary SF <sub>6</sub> Emission Reduction Partnership for Electric Power Systems.		
<b>AQ-1</b>  	<b>Off-Road Equipment Control.</b> NEET West or their contractor(s) shall implement the following measure: <ul style="list-style-type: none"> <li>All off-road equipment engines that are 50 horsepower or greater shall meet or exceed U.S. Environmental Protection Agency/California Air Resources Board Tier 3 emissions standards.</li> <li>Exceptions to the Tier 3 requirement shall be allowed for specialty equipment that will be used for no more than 5 days; provided that a due diligence search, which includes at least three (3) appropriate equipment rental firms could not procure the necessary equipment type with a Tier 3 compliant or better engine.</li> </ul>	 1. Ensure requirement is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that off-road construction equipment meets applicable standards.		
<b>Biological Resources</b>				
<b>BIO-1</b>  	<b>Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants.</b> NEET West or their contractor(s) shall implement the following measures: <ul style="list-style-type: none"> <li>To the extent feasible, the Proposed Project shall avoid or minimize impacts on known occurrences of felt-leaved monardella (as shown on Figure 7-6 of this EIR). Avoidance and minimization measures may include adjustments of the project design to avoid special-status plants.</li> </ul>	 1. Incorporate measure into Project design plans and specifications.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>













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		 2. Confirm that felt-leaved monardella occurrences are avoided, or, if avoidance is infeasible, that impacts are minimized.		
<b>BIO-2</b> 	<b>Perform Focused Surveys for Special-Status Plants.</b> NEET West or their contractor(s) shall implement the following measures: Within 1 year before commencement of ground-disturbing activities, a qualified botanist shall perform surveys for special-status plant species with the potential to occur at the site. Floristic surveys will be performed according to the Protocols for Surveying and Evaluating Impacts to Specials Status Native Plant Populations and Natural Communities (California Department of Fish and Game 2009 or current version). Floristic surveys will be performed during the appropriate bloom period(s) for each species. If special- status plants are detected within the construction zone or within a 100-foot radius of the construction zone, Mitigation Measure BIO-3 shall be implemented.	 1. Retain a qualified botanist to perform surveys.	<b>COMPLETED: A qualified botanist was retained in April 2017.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that special-status plant/floristic surveys are completed in accordance with the measure.	NEET West/SWCA completed special status plant surveys April 24-26 and August 8-10, 2018 during the appropriate blooming periods for each species.  <b>COMPLETED: Rare Plant Survey submitted to CPUC October 19, 2018</b>	<b>REVIEWED AND ACCEPTED: Rare Plant Survey Report meets requirements of MM BIO-2.</b>
		 3. If special-status plants are detected within the construction zone or within 100-foot radius, confirm implementation of Mitigation Measure BIO-3.	Exclusion fencing will be installed per BIO-3 prior to construction to avoid and minimize impacts to special status plant populations during construction.	This approach is acceptable. CPUC will confirm installation of exclusion fencing prior to initiation of construction activities.
<b>BIO-3</b>   	<b>Avoid or Minimize Impacts on Special-Status Plant Species during Construction.</b> If special-status plants are detected within the construction zone or within a 100-foot radius of the construction zone while implementing Mitigation Measure BIO-2, NEET West or the contractor(s) shall install exclusion fencing to protect plants that remain in place. Locations of special-status plant populations shall be clearly identified in the field by staking, flagging, or fencing. 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 qualified botanist. If the botanist determines that special-status plants may have been adversely affected, NEET West shall implement measures to compensate for the impact as described in Mitigation Measure BIO-4.	 1. Ensure measure is included in Project contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. If necessary, based on Mitigation Measure BIO-2 surveys, confirm that exclusion fencing is installed to protect plants in place.	Prior to beginning construction, exclusion fencing will be installed to avoid and minimize impacts to rare plants.	This approach is acceptable. CPUC will confirm installation of exclusion fencing prior to initiation of construction activities.








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		 3. If necessary, based on Mitigation Measure BIO-2 surveys, ensure that identified plants are monitored throughout the duration of construction.		
		 4. If botanist determines that special-status species have been adversely affected, confirm implementation of Mitigation Measure BIO-4.		
<b>BIO-4</b>  	<b>Compensate for Impacts to Special-Status Plant Species.</b> If avoidance of special-status plants is not feasible, NEET West shall implement measures to compensate for impacts on special-status plants. Compensation may be provided by purchasing credits at an approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species, collecting and dispersing seed of annual species, and other conservation strategies that shall restore and protect the viability of the local population. Because of the differences in plant growth forms and life histories, conservation measures would be developed on a species-specific basis based on input from CDFW and would be consistent with the East San Diego County Multiple Species Conservation Plan (MSCP) planning process. If compensation measures are implemented, monitoring plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. Monitoring shall assess vegetative density, population size, natural recruitment, and plant health and vigor. Monitoring results may trigger management actions such as collection and sowing of additional seed, tillage/disturbance within existing populations to induce establishment, installation of container plants, and control of other competing vegetation to ensure successful plant establishment and survival. The determination of success will be based on whether there has been a substantial reduction (greater than 20 percent) in the size or abundance of the population compared to baseline conditions. The site shall be evaluated at the end of the 5-year monitoring period to determine whether the mitigation has met the success criteria.	 1. Retain a qualified biologist, if needed, and if it is decided to provide compensation through transplanting, collecting, and dispersing seed, or other strategies (rather than through purchasing credits at an approved mitigation bank). Or 		
		 2. Confirm implementation of adequate compensation strategy. Or 		
		 3. Confirm monitoring is conducted for 5-year period following implementation, and that monitoring assesses appropriate metrics identified in mitigation measure.		
		 4. Evaluate compensation plant population at the end of the 5-year period and confirm achievement of success criteria.		



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		 5. If mitigation is not deemed successful following 5-year monitoring period, implement corrective actions to ensure successful mitigation is achieved.			
<b>BIO-5</b>  	<b>Avoid Impacts on Nesting Birds.</b> Whenever possible, NEET West or their contractor(s) shall avoid impacts on native nesting birds by not initiating Proposed Project activities that involve clearing vegetation, generating mechanical noise, or ground disturbance during the typical breeding season from February 1 to August 31.	 1. Confirm that measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. Confirm that breeding season limitation for applicable activities is adhered to.			
<b>BIO-6</b> 	<b>Implement Preconstruction Surveys for Birds Protected under the Migratory Bird Treaty Act (MBTA).</b> If construction is scheduled to commence during the non- nesting season (September 1 to January 31), no preconstruction surveys for nesting birds are required. If construction begins between February 1 and August 31, NEET West or their contractor(s) shall ensure that surveys for nesting birds are to be conducted by a qualified biologist within a 500-foot radius of the construction area. The survey shall be conducted no more than 14 days prior to construction. If the biologist determines that the area surveyed does not contain any active nests, then construction activities may commence without any further mitigation. If active nests are found, CDFW and U.S. Fish and Wildlife Service (USFWS) will be notified and no-work buffers around nests shall be established that are sufficient to ensure that breeding is not likely to be disrupted or adversely affected by construction. Buffers for non-special-status birds protected under the MBTA shall be 250 feet around the nest. Special status birds are not anticipated to nest within 500 feet of the Proposed Project, but if active special status bird nest are detected, no-work buffer shall be 500 feet around the nest. Buffers will be maintained until the young have fledged or the nests become inactive.	 1. Retain a qualified biologist to conduct preconstruction surveys.	A qualified biologist will be retained prior to construction to conduct preconstruction nesting bird surveys during the nesting bird season.	CPUC will verify retention of a qualified biologist prior to initiation of construction.	
		 2. If construction is scheduled to commence during the nesting season, confirm that preconstruction surveys for nesting birds are conducted in accordance with this measure.			Construction is slated to begin at or near the commencement of the nesting bird season. A qualified biologist will conduct preconstruction nesting bird surveys ahead of construction.  Survey report will be provided to CPUC at least one week prior to construction.
		 3. If active nests are found, ensure that CDFW and USFWS are notified and no-work buffers are established in accordance with this measure.			If active nests are found, NEET West/SWCA will coordinate with the CPUC and resource agencies as required.

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<b>BIO-7</b>  	<b>Structures Constructed to Minimize Impacts to Raptors and other Avian Life.</b> NEET West or their contractor(s) shall construct structures to conform to "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc. 1981) to minimize impacts to raptors. NEET West or their contractor(s) shall construct all aboveground power transmission lines to the Avian Power Line Interaction Committee (APLIC) Guidelines recommendations: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012 (APLIC 2006, 2012).	 1. Incorporate appropriate design into project plans.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that constructed structures conform to APLIC standards.		
<b>BIO-8</b> 	<b>Survey for Potential Hermes Copper Habitat.</b> Prior to the start of vegetation clearing for the Project, a survey shall be conducted to determine the presence or absence of potentially suitable Hermes copper habitat within the Project footprint. Potentially suitable habitat is defined as mature (woody) spiny redberry shrub(s) within 15 feet of California buckwheat. If Hermes copper habitat is mapped within the project footprint and will be affected by Project activities, then Mitigation Measure BIO-9 shall be implemented.	 1. Retain a qualified biologist to conduct survey.	<b>COMPLETED: Qualified biologists and botanists were retained in 2017 to conduct Hermes Copper butterfly surveys.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that surveys shows no suitable habitat for Hermes copper butterfly within the Project footprint.		
		 3. If survey shows positive findings for butterfly habitat in Project footprint, confirm implementation of Mitigation Measure BIO-9.	No Hermes Copper butterfly habitat was found within (or immediately adjacent to) the project footprint during surveys. If Hermes copper butterfly habitat is found at a later date, then measure BIO-9 will be implemented.	This approach is acceptable. Hermes copper butterfly habitat was found in close proximity to project footprint, so potential for habitat to occur within footprint at a later date should be closely monitored.











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<b>BIO-9</b> 	<b>Mitigate for Impacts to Hermes Copper Butterfly Habitat.</b> NEET West or their contractor(s) shall implement the following measures: <ul style="list-style-type: none"> <li>If areas mapped as Hermes Copper butterfly habitat are adversely affected by the Proposed Project, NEET West shall mitigate permanent impacts at a 1:1 ratio for unoccupied habitat and 3:1 ratio for occupied habitat. Habitat should be considered occupied if it is within 150 meters of a Hermes copper sighting (County of San Diego 2010).</li> </ul>	 1. If surveys under Mitigation Measure BIO-8 show positive findings for Hermes copper butterfly habitat within the Project footprint, ensure impacts are mitigated in accordance with this measure.	No Hermes Copper butterfly habitat was found within (or immediately adjacent to) the project footprint during surveys. If Hermes copper butterfly habitat is found at a later date, then measure BIO-9 will be implemented.	This approach is acceptable. Hermes copper butterfly habitat was found in close proximity to project footprint, so potential for habitat to occur within footprint at a later date should be closely monitored.
<b>BIO-10</b> 	<b>Educational Training.</b> NEET West or their contractor(s) shall ensure that before conducting construction activities all Proposed Project personnel shall participate in an educational training session conducted by a qualified biologist. All on-site personnel shall be informed about relevant special-status species and their habitat, conservation goals, identification, and procedures to follow in the event of a possible sighting. Personnel who miss the first training session or are hired later in the season must participate in a make-up session before conducting Project activities. A record of the personnel that attended the training shall be kept by the qualified biologist.	 1. Retain a qualified biologist to conduct educational training.	A qualified biologist will be retained to conduct educational training prior to the beginning of construction.  <b>COMPLETED: Worker Environmental Awareness Program submitted to CPUC November 02, 2018</b>	Please submit resume for qualified biologist who will conduct educational training prior to construction.  <b>Submitted Worker Environmental Awareness Program presentation has been REVIEWED AND ACCEPTED.</b>
		 2. Confirm that all on-site construction personnel undergo training consistent with this mitigation measure.  And 	All on-site construction personnel will undergo training that is consistent with measure BIO-10.	This approach is acceptable. Please provide verification to CPUC that personnel have undergone training prior to engaging in construction activities.
		 3. Confirm that the qualified biologist and/or environmental inspector retains a record of Project personnel that have attended the training.  And 	Records of Project personnel that have attended environmental training(s) will be kept in accordance with measure BIO-10.	This approach is acceptable. CPUC will review records of Project personnel who have attended environmental training(s) once provided.
<b>BIO-11</b>  	<b>Biological Monitor.</b> NEET West or their contractor(s) shall employ a qualified biologist or environmental inspector who is familiar with the biological resources and issues at the Proposed Project to conduct monitoring during all construction-related ground-disturbing activities that may impact sensitive biological resources. These activities would include but not necessarily be limited to: initial clearing and vegetation removal; perimeter fence installation and excavation; and movement of construction equipment and other activities outside of fenced/paved areas within wildlife habitat. The biological monitor/environmental inspector shall flag or otherwise clearly mark environmentally sensitive areas with appropriate buffers, within which construction is not allowed. The monitor/inspector shall have the authority to stop work activities upon the discovery of sensitive biological resources, and allow construction to proceed after the identification and	 1. Retain a qualified biologist or environmental monitor familiar with resources and issues at the Project site.	A qualified biologist or environmental monitor familiar with resources and issues at the Project site will be retained prior to the beginning of construction.	This approach is acceptable. Please provide resumes for the qualified individual(s) prior to construction.
		 2. Confirm that biological monitor/inspector has authority to stop work if sensitive biological resources are found and has in place pre-approved steps to	The qualified biological monitor/inspector will have authority to stop work if sensitive biological resources are found. Pre-approved steps to follow in event of the discovery of sensitive biological resources	This approach is acceptable.











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	implementation of steps required to avoid or minimize impacts to sensitive resources. Such steps shall be pre- approved by CDFW and/or USFWS, as applicable given the species' status.	follow in event of such a discovery.	will be in place prior to the start of construction.	
		 3. Confirm that monitoring is conducted in accordance with this measure and environmentally sensitive areas are clearly marked with appropriate buffers.		
<b>BIO-12</b>  	<b>Vehicle Use of Existing Roads.</b> NEET West or their contractor(s) shall restrict all Proposed Project vehicle movement to existing roads as a part of the Proposed Project, except when not feasible due to physical or safety constraints. When it is not feasible to keep vehicles on existing access roads or avoid construction of access driveways during the nesting, breeding, or migration season, NEET West shall perform a site survey in the area where the work is to occur. This survey shall be performed to determine presence or absence of special-status nesting birds or other special-status species in the work area.  Parking or driving on unpaved areas underneath oak trees shall not be allowed in order to protect root structures. In addition, a 15-mile-per-hour speed limit shall be observed on roads in the Proposed Project area to reduce dust and allow reptiles and small mammals to disperse.	 1. Confirm measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that requirement is followed and project vehicle movement is limited to existing roads to the extent feasible.		
		 3. If it is not feasible to keep vehicles on existing access roads, confirm that site survey is performed in accordance with this measure.		
		 4. Confirm that vehicles are not parked or driven on unpaved areas underneath oak trees, and that a 15 mile-per-hour speed limit is observed on Project roads.		










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**Suncrest Dynamic Reactive Power Support Project**  
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<b>BIO-13</b> 	<b>Preconstruction Sweeps for Biological Resources.</b> Prior to initial vegetation clearance, grubbing, and ground- disturbing activities, NEET West or their contractor(s) shall ensure that a qualified biologist shall conduct pre- construction sweeps of the Project site for special-status wildlife and plants. During these surveys, the biologist shall: <ol style="list-style-type: none"> <li>Ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge);</li> <li>Survey for bat roosts by performing a daytime pedestrian survey to inspect potential habitat within 100 feet of the Proposed Project limits for indications of bat use (e.g., occupancy, guano, staining, smells, or sounds) and a night roost/emergence survey. The survey must be performed by a qualified bat biologist. If the bat biologist determines that habitat within the survey area is used, as a bat roost, and may be affected by construction, then specific measures will be developed and implemented to minimize impacts on the roost. Such measures may include minimizing construction activity near the roost during the maternity season (May 1- August 15) or other measures developed by a qualified bat biologist that will minimize the disturbance to a level that would not cause long-term roost abandonment or failure of a maternity roost.</li> <li>In the event of an unanticipated discovery of a special-status ground-dwelling animal, a biologist holding the appropriate State and/or federal permits shall recover and relocate the animal to adjacent suitable habitat within the Proposed Project at least 200 feet from the limits of grading; and,</li> <li>In the event of the discovery of a previously unknown special-status plant, the area will be marked as an environmentally sensitive area, and avoided to the maximum extent practicable. If avoidance is not possible, NEET West will implement Mitigation Measure BIO 4.</li> </ol>	 1. Retain qualified biologist to conduct preconstruction sweeps.	A qualified biologist will be retained to conduct preconstruction sweeps prior to initial vegetation clearance, grubbing, and ground- disturbing activities.	This approach is acceptable. Please provide resume for qualified biologist prior to construction.
		 And  2. Confirm that potential habitats on Project site are made inaccessible to wildlife (e.g., burrows removed).	As necessary, the onsite biologist will ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge).	This approach is acceptable. Please provide documentation to CPUC that potential habitats have been made inaccessible to wildlife.
		 3. Confirm that pre-construction bat survey is performed and appropriate avoidance and minimization measures are performed in the event of a roost discovery.	A qualified bat biologist was retained in August 2018. The qualified biologist conducted bat roost and emergence surveys on August 8, 2018.  <b>COMPLETED: Bat Survey Report submitted to CPUC on October 19, 2018.</b>	<b>REVIEWED AND ACCEPTED: Bat Survey Report meets requirements of MM BIO-13.</b>
		 And  4. In the event of discovery of special-status ground-dwelling animal, confirm biologist appropriately recovers and relocates the animal.	As necessary, if there is an unanticipated discovery of a special-status ground-dwelling animal, a qualified biologist holding the appropriate State and/or federal permits will recover and relocate the animal as required.	This approach is acceptable. Provide CPUC with documentation for any animal relocations, should they be necessary.
		 5. In the event of the discovery of a special-status plant, confirm that the area is marked and avoided to the extent possible.	As necessary, in the event of the discovery of a special-status plant, a qualified biologist will confirm the area is marked and avoided to the extent practicable.	This approach is acceptable. Please provide documentation to CPUC to confirm any special-status plants have been marked and avoided.
		 And  6. In the event avoidance of an identified special-status plant is not feasible, confirm implementation of Mitigation Measure BIO-4.	As necessary, in the event that avoidance of an identified special-status plant is not feasible, project will confirm the implementation of Mitigation Measure BIO-4.	This approach is acceptable.








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<b>BIO-14</b>  	<b>Inspect Excavations for Trapped Wildlife.</b> NEET West or their contractor(s) shall inspect all steep-walled trenches or excavations used during construction twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in a trench or excavation, the on-site biological resource monitor shall be contacted immediately to remove them if they cannot escape unimpeded. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency may be employed to remove the wildlife and transport them safely to other suitable habitats.  Steep-walled trenches and excavations shall be fenced and/or covered at the end of each workday, to prevent wildlife from becoming entrapped and for safety purposes. Alternatively, escape ramps shall be installed in trenches or excavation to allow wildlife to exit on their own volition.	 1. Ensure that measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that steep-walled trenches and excavations are inspected twice daily for entrapped wildlife in accordance with this measure.		
		 3. If wildlife is located in a trench or excavation, ensure that wildlife is removed and relocated by appropriate means.		
		 4. Confirm that steep-walled trenches and excavations are fenced and covered at the end of each day, or that escape ramps are installed in trenches and excavations to allow wildlife to exit on their own volition.		
<b>BIO-15</b>  	<b>Minimize Night Lighting.</b> NEET West or their contractor(s) shall minimize construction night lighting on adjacent habitats. Exterior lighting within the Proposed Project area adjacent to habitat shall be the lowest illumination allowed for human safety and security, selectively placed, shielded, and directed downward to the maximum extent practicable. Vehicle traffic associated with Proposed Project activities shall be kept to a minimum volume and speed to prevent mortality of nocturnal wildlife species.	 1. Ensure that measure is incorporate into contract documents and Project design.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that exterior lighting within the Project area adjacent to habitat is lowest illumination allowed and directed downward to the maximum extent practicable.		










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		 3. Confirm that Project vehicle traffic kept to a minimum volume and speed.		
<b>BIO-16</b>  	<b>Restoration and Revegetation.</b> NEET West shall develop a Restoration and Revegetation Plan to guide restoration activities on the Project site that promotes locally appropriate native plant growth and eliminates non-native and invasive species. The Restoration Plan shall identify measures and success criteria specific to each impacted plant community at the Proposed Project. The total area to be planted, and species composition, shall be tailored for each impacted plant community based on existing standards and precedents. The Restoration Plan shall identify success criteria for each habitat type and develop monitoring measures to ensure that success criteria will be met. The Restoration Plan shall be consistent with the East San Diego County MSCP planning process. Monitoring results shall be provided to CDFW on a basis determined in the Restoration Plan. Disturbed soils shall be revegetated with an appropriate weed-free, native seed mix. All areas designated for temporary impacts shall be revegetated with a seed blend that includes native grasses, forbs, and shrub species characteristic of the plant community receiving the temporary impact. Revegetation activities shall be undertaken as soon as construction activities have been completed to minimize colonization by non-native weedy species and to ensure compliance with the Proposed Project's Storm Water Pollution Prevention Plan (SWPPP). Herbicides, if required during the restoration period, shall be applied using hand-held applicators for spot-treatment and shall not be used within 100 feet of drainages or sensitive plant populations.	 1. Confirm development of a Restoration and Revegetation Plan that meets requirements identified in this mitigation measure.		
		 2. Confirm implementation of the Restoration and Revegetation Plan, and revegetation of disturbed soils.		
		 3. Ensure that herbicides are applied in accordance with this measure.		
<b>BIO-17</b>  	<b>Minimize Area of Disturbance of Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association Habitat.</b> NEET West or their contractor(s) shall ensure that the disturbance or removal of vegetation shall not exceed the minimum necessary to complete construction and shall only occur within the defined work area.	 1. Confirm measure is incorporated into contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>









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		 2. Confirm that vegetation removal/disturbance is minimized and only occurs within the defined work area.		
<b>BIO-18</b>  	<b>Develop and Implement a Restoration Plan for Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association Habitat Disturbed during Construction.</b> NEET West or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat. The Restoration Plan shall be consistent with the East San Diego County MSCH planning process. Monitoring results shall be provided to CDFW on a basis determined in the Restoration Plan. At a minimum, for any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species. For any permanent impact, Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat shall be mitigated at a minimum, at a ratio of 1.1:1 (replacement to impact). Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association restoration or compensation may be completed at the Project Site, in the vicinity, or at a conservation bank with a service area that covers the Project site. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years.	 1. Confirm development of a Restoration Plan for Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat disturbed during construction.		
		 2. Confirm implementation of Restoration Plan and mitigation of temporary and/or permanent impacts in accordance with the measure.		
		 3. Confirm revegetated or restored areas are maintained and monitored to ensure 65 percent survival of woody plantings after 5 years.		
<b>Cultural Resources</b>				
<b>CR-1</b>  	<b>Conduct archaeological sensitivity training and construction monitoring.</b> Prior to initiation of ground-disturbing activities, NEET West shall arrange for construction crews to receive training about the kinds of archaeological materials that could be present within the project site and the protocols to be followed should any such materials be uncovered during construction. Training materials shall be developed by an archaeologist who meets the U.S.	 1. Ensure measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>









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	<p>Secretary of the Interior's professional standards. Training may be require during different phases of construction to educate new construction personnel.</p> <p>The presence of archaeological sites both within the Proposed Project SVC area and along the Bell Bluff Truck Trail indicates that the area is sensitive for archaeological resources. As a result, a qualified archaeological monitor shall be retained to conduct full time monitoring of initial ground disturbing activities associated with the project. A Native American monitor shall also participate in observing initial ground-disturbing activities. The archaeological monitor will work under the supervision of the principal investigator. The duration and timing of the monitoring will be determined by the CPUC, with recommendations provided by the principal investigator. If the principal investigator determines that monitoring is no longer warranted, he or she may recommend to the CPUC that monitoring cease early. In addition, if the principal investigator determines that an increase in monitoring is warranted, he or she may recommend to the CPUC that full-time monitoring continue beyond initial ground disturbance. If any prehistoric or historic-era features, or human remains, are exposed during construction, the archaeological monitor shall have the authority to stop work in the vicinity of the finds and implement the actions identified in Mitigation Measure CR-2.</p>	 2. Retain a qualified archaeologist to conduct worker training and monitor ground-disturbing activities.	<p>Prior to the start of construction, a qualified archaeologist will be retained to conduct worker training and—as necessary—to monitor ground-disturbing activities during construction.</p> <p><b>COMPLETED: Worker Environmental Awareness Program submitted to CPUC November 02, 2018</b></p>	<p>This approach is acceptable. Please provide resume for qualified archaeologist for review and verification prior to construction.</p> <p><b>REVIEWED AND ACCEPTED: Worker Environmental Awareness Program materials meet requirements of Mitigation Measure CR-1.</b></p>
		 3. Retain Native American monitor to conduct monitoring of ground-disturbing activities.	<p>A Native American monitor will be retained prior to the beginning of construction, and—as necessary—to monitor ground-disturbing activities during construction.</p>	<p>This approach is acceptable. Please provide documentation that Native American monitor has been retained prior to construction.</p>
		 4. Conduct construction crew training regarding archaeological materials that could be present in the project area.	<p>Prior to initiation of ground-disturbing activities, NEET West will arrange for construction crews to receive training regarding archaeological materials that could be present in the project area.</p>	<p>This approach is acceptable. Please provide documentation to CPUC that construction crews have received proper training.</p>
		 5. Confirm that ground disturbing activities are monitored by archaeologist and Native American monitor.		
		 6. In the event that cultural resources are encountered, ensure that work stops immediately, and Mitigation Measure CR-2 is implemented.		










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<b>CR-2</b>  	<p><b>Immediately halt construction if cultural resources are discovered, evaluate all identified cultural resources for eligibility for inclusion in the California Register of Historic Places (CRHR) and implement appropriate mitigation measures for eligible resources.</b></p> <p>Not all Cultural resources are visible on the ground surface. Construction activities, including possible blasting, at the SVC would require excavation up to approximately 18 feet deep. Excavation for the installation of the transmission line along Bell Bluff Truck Trail would be up to approximately 9 feet deep. These activities have the potential to uncover buried cultural resources. If any 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 any project construction activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the CPUC shall be notified within 24 hours.</p> <p>All cultural resources accidentally uncovered during construction within the project site shall be evaluated for eligibility for inclusion in the CRHR. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in Public Resources Code section 5024.1 or CEQA section 21083.2(g), mitigation measures shall be developed and implemented in accordance with CEQA guidelines section 15126.4(b) before construction resumes.</p> <p>For resources eligible for listing in the CRHR that would be rendered ineligible by the effects of project construction, or a Tribal Cultural Resource (TCR), additional mitigation measures shall be implemented. Mitigation measures for archaeological resources may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties, such as Native American tribes. Native American consultation is required if an archaeological site is determined to be a TCR. Implementation of the approved mitigation would be required before resume any construction activities with potential to affect identified eligible resources at the site.</p> <p>Furthermore, archaeological resources may also contain previously unidentified human remains. Although it would be unlikely for human remains to be disturbed during construction, given the previously disturbed nature and geology of the location, the possibility, though remote, exists that burials could be encountered. If human remains are encountered Mitigation Measure CR-3 would be implemented during construction to ensure that potential impacts to these resources are less than significant with mitigation.</p>	 1. Confirm that measure is incorporated into contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. In the event that cultural resources are identified during excavation and related activities, confirm that work stops immediately.			
		 3. Ensure all accidentally uncovered cultural resources are evaluated for inclusion in the CRHR.			
		 4. If resources are identified to meet the CRHR eligibility criteria, develop and implement appropriate mitigation measures.			
		 5. If resources eligible for listing would be rendered ineligible by the effects of project construction, implement additional mitigation measures in accordance with this measure.			










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<b>CR-3</b>  	<b>Immediately halt construction if human remains are discovered and implement applicable provisions of the California Health and Safety Code.</b> If human remains are accidentally discovered during the Proposed Project's construction activities, the requirements of California Health and Safety Code section 7050.5 shall be followed. Potentially damaging excavation shall halt in the project site of the remains, with a minimum radius of 100 feet, and the County Coroner shall be notified. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code § 7050.5[b]). If the Coroner determines that the remains are those of a Native American, he or she must contact Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). Pursuant to the provisions of Public Resources Code section 5097.98, the NAHC shall identify a Most Likely Descendent (MLD). The MLD designated by the NAHC shall have at least 48 hours to inspect the site and propose treatment and disposition of the remains and any associated grave goods. NEET West shall work with the MLD to ensure that the remains are removed to a protected location and treated with dignity.	 1. Confirm that measure is included in project plans and specifications.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. In the event that human remains are encountered, follow California Health and Safety Code requirements and contact the County Coroner.			
		 3. Confirm that any discoveries of human remains are evaluated and addressed properly as outlined in the measure.			
<b>Geology, Soils, and Seismicity</b>					
<b>GEO-1</b>  	<b>Implement Recommendations in the Project Geotechnical Investigation Report.</b> NEET West and/or its contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the Proposed Project by Kleinfelder, dated September 2015 (see Appendix H, Geotechnical Investigation Report). These include recommendations for a geotechnical engineer to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, and to observe and test site preparation and fill placement.	 1. Ensure that geotechnical investigation report recommendations are incorporated into Project design.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. Ensure that geotechnical investigation report recommendations are followed during Project construction.			

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<b>Hazards and Hazardous Materials</b>					
<b>HAZ-1</b> 	<b>Hazardous Materials and Waste Management Plan (HMWMP)</b> NEET West and/or its contractor(s) shall prepare and implement a HMWMP. The HMWMP may include components or requirements which are part of compliance documents for other applicable federal and state hazardous materials regulations. The HMWMP shall include the following information: <ul style="list-style-type: none"> <li>• A list of hazardous materials present on-site during construction and operation, to be updated as needed along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements;</li> <li>• A Hazardous Materials Communication (i.e., HAZCOM) Plan;</li> <li>• Assignments and responsibilities of Proposed Project Health and Safety roles;</li> <li>• Standards for any secondary containment and countermeasures that will be required for hazardous materials;</li> <li>• Spill response procedures based on product and quantity. The procedures shall include materials to be used, location of such materials within the Proposed Project area, and disposal protocols; and</li> <li>• Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This will include termination of work within the area of suspected contamination sampling by an OSHA trained individual, and testing at a certified laboratory.</li> </ul> A copy of the HMWMP shall be provided to the CPUC for recordkeeping prior to the start of construction. HMWMP updates shall be made and submitted as needed if construction activities change whereas the existing HMWMP does not adequately address the Proposed Project.	 1. Ensure measure is included in the contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 And  And 	 2. Confirm preparation and implementation of a HMWMP.	<b>COMPLETED: Hazardous Materials and Waste Management Plan submitted to CPUC October 19, 2018</b>	<b>REVIEWED AND ACCEPTED: HMWMP meets requirements of Mitigation Measure HAZ-1.</b>  During and following construction, please provide documentation to CPUC that HMWMP is being/has been fully implemented.
			 3. Confirm HMWMP includes all components/information identified in the mitigation measure.	<b>COMPLETED: The project's HMWMP contains all components/information identified in measure HAZ-1.</b>	<b>REVIEWED AND ACCEPTED: HMWMP includes the components/information identified in Mitigation Measure HAZ-1.</b>











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<b>HAZ-2</b>  	<b>Prepare and Implement Blasting Plan</b> NEET West shall conduct a pre-blast survey, prepare a blasting plan, and obtain appropriate blasting and explosive permits prior to conducting any blasting activities during Project construction. NEET West shall submit a written report of the pre-blast survey and final blasting plan to CPUC and the County of San Diego and receive approval from that agency prior to any rock removal activity. The pre-blast survey and blasting plan shall meet the following conditions: <ul style="list-style-type: none"> <li>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 NEET West. Notification that blasting will 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.</li> <li>The final blasting plan shall outline safe and lawful procedures for transport, handling, and storage of explosives. The blasting plan shall identify where on the site explosives will be stored and explain what safety precautions will be taken in transporting and handling explosives to prevent potential accidental explosions or release of hazardous materials into the environment.</li> <li>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.</li> <li>The final blasting plan shall identify fire-safe blasting procedures and measures to prevent possible ignition of wildfires during blasting activities.</li> <li>The blasting plan shall include measures to prevent contamination of groundwater including proper drilling, explosive handling and loading procedures; observing the entire blasting procedures; and handling and storage of blasted rock, as follows:               <ol style="list-style-type: none"> <li>Loading Practices. The following blasthole loading practices to minimize environmental effects shall be followed:                   <ol style="list-style-type: none"> <li>Drilling logs shall be maintained by the driller and communicated directly to the blaster. The logs shall indicate depths and lengths of voids, cavities, and fault zones, or other weak zones encountered as well as groundwater.</li> <li>Explosive products shall be managed on-site so that they are either used in the borehole, returned to the delivery vehicle, or placed in secure containers for off-site disposal.</li> </ol> </li> </ol> </li> </ul>	 <ol style="list-style-type: none"> <li>Confirm preparation of blasting plan.</li> </ol>	Prior to conducting any blasting activities during Project construction, a pre-blast survey will be conducted, and a blasting plan will be developed.  Blasting Plan will be submitted to CPUC at least 7 days prior to blasting activities.	This approach is acceptable. CPUC must review and approve the blasting plan prior to initiation of blasting activities.
		 <ol style="list-style-type: none"> <li>Confirm that all appropriate blasting and explosive permits are obtained prior to conducting blasting activities.</li> </ol>	Prior to conducting any blasting activities during Project construction, the appropriate blasting and explosive permits will be obtained.  Blasting permits will be submitted to CPUC at least 7 days prior to blasting activities.	This approach is acceptable. CPUC must receive and review blasting permits prior to initiation of blasting activities.











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	<ul style="list-style-type: none"> <li>c. Spillage around the borehole shall either be placed in the borehold or cleaned up and returned to an appropriate vehicle for handling or placement in secure containers for off-site disposal.</li> <li>d. Loaded explosives shall be detonated as soon as possible and shall not be left in the blastholes overnight, unless weather or other safety concerns reasonably dictate that detonation be postponed.</li> <li>e. Loading equipment shall be cleaned in an area where wastewater can be properly contained and handled in a manner that prevents release of contaminants to the environment</li> <li>f. Explosives shall be loaded to maintain good continuity in the column load to promote complete detonation. Industry accepted loading practices for priming, stemming, decking, and column rise need to be attended to.</li> </ul> <p>2. Explosive Selection. The following measures shall be followed to reduce the potential for groundwater contamination when explosives are used:</p> <ul style="list-style-type: none"> <li>a. Explosive products shall be selected that are appropriate for the site conditions and safe blast execution.</li> <li>b. Explosive products shall be selected that have the appropriate water resistance for the site conditions present to minimize the potential for hazardous effect of the product upon groundwater.</li> </ul> <p>3. Prevention of misfires. Appropriate practices shall be developed and implemented to prevent misfires.</p> <p>4. Muck pile management. Muck piles (the blasted pieces of rock) and rock piles shall be managed in a manner to reduce the potential for contamination by implementing the following measures:</p> <ul style="list-style-type: none"> <li>a. Remove the muck pile from the blast area as soon as reasonably possible.</li> <li>b. Manage the interaction of blasted rock piles and stormwater to prevent contamination of water supply wells or surface water.</li> </ul> <ul style="list-style-type: none"> <li>• The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed SVC, riser pole and underground transmission line structures. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. NEET West, or its subcontractor (as appropriate) shall keep a record of each blast for one year from the date of the last blast.</li> <li>• The blasting plan shall incorporate provisions to post signage along roads and trails within a minimum of 1000 feet of the identified blast site. Precautions such as fencing or taping will be incorporated that limit access to recreationalists and the general public.</li> </ul>	<p> 3. Ensure pre-blast survey and blasting plan includes all components/meets all requirements identified in this measure.</p> <p> 4. Confirm that blasting is conducted in accordance with requirements of the blasting plan.</p>	<p>The Project team will confirm the pre-blast survey and blasting plan includes all components and meets all requirements identified in measure HAZ-2.</p>	<p>This approach is acceptable. CPUC will need to review and confirm that the pre-blast survey and blasting plan includes all components and meets all requirements identified in Mitigation Measure HAZ-2.</p>











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<b>HAZ-3</b>  	<b>Prepare and Implement a Construction Fire Protection Plan (CFPP)</b> NEET West and/or its contractor(s) shall prepare and implement the Project's CFPP in accordance with applicable sections of the San Diego County Consolidated Fire Code. The document will address fire prevention measures that will be employed during the construction phase, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The CFPP shall be prepared, reviewed, and approved by the San Diego County Fire Authority (SDCFA) and California Department of Forestry and Fire Protection (CAL FIRE) a minimum of 45 days prior to commencement of construction activities.	 1. Ensure that measure is included in the contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm preparation of CFPP in accordance with applicable regulations and the Project's FPP.	<b>COMPLETED: Construction Fire Prevention Plan submitted to CPUC October 19, 2018</b>	<b>REVIEWED AND ACCEPTED: CFPP meets requirements of MM HAZ-3.</b>
		 3. Confirm review and approval of CFPP by SDCFA and CAL FIRE.	<b>COMPLETED: The project's CFPP was approved by the SDCFA (which includes the CAL FIRE San Diego Unit). The CFPP approval verifications were provided to CPUC on November 30, 2018.</b>	<b>REVIEWED AND ACCEPTED: CPUC confirms that CFPP was accepted by SDCFA (which includes Cal Fire San Diego Unit).</b>
		 4. Confirm requirements of CFPP are fully implemented.		
<b>HAZ-4</b>  	<b>Fire Safe Working Conditions and Best Management Practices.</b> NEET West and/or its contractor(s) shall implement the following measures during construction and operation to reduce the potential for ignitions and minimize fire-related hazards (these measures may be included in the CFPP, as appropriate): <ul style="list-style-type: none"> <li>All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for incipient stage fire suppression.</li> <li>Smoking will be confined to vehicles or approved smoking areas where fire suppression equipment and appropriate disposal facilities are present. All smoking materials will be disposed of in appropriate disposal bins.</li> <li>All on-road vehicle parking will be restricted to paved or graveled surfaces unless parking is required during an emergency or required for worker safety.</li> </ul>	 1. Ensure that Best Management Practices (BMPs) are included in the contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>












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	<ul style="list-style-type: none"> <li>Require spark arrestors on all off-road equipment.</li> <li>Restrict work activities during Red Flag Warnings issued by the National Weather Service to the extent possible. Where it is not possible to stop or restrict work activities due to safety or time sensitive activities, work activities will be limited to those needed to complete the current task and establish safe working conditions. During Red Flag Warnings a crew member will be assigned to fire watch for each separate and distinct active work area.</li> <li>Weather and fire danger will be monitored on a daily basis.</li> <li>Fire suppression equipment such as backpack water pumps or water buffaloes will be kept on-site at a minimum of 50 feet from each separate and distinct active work area.</li> </ul>	 2. Confirm that all BMPs are implemented fully, including equipping vehicles and equipment with spark arrestors and ensuring fire suppression equipment is available. And 		
<b>HAZ-5</b>  	<b>Follow Requirements and Recommendations Identified in the Fire Protection Plan (FPP)</b> NEET West and/or its contractor(s) shall follow all of the requirements and recommendations contained in the FPP prepared for the Proposed Project by Dudek, dated December 2016. These requirements include, but are not limited to, design and implementation of defensible space around the proposed SVC facility according to the parameters described in the FPP; conducting training sessions with local fire station personnel and providing technical support to fire personnel regarding electrical fire and firefighting at energized facilities; appropriate design of driveways and access roads to allow for safe and efficient fire personnel and equipment access; development and implementation of appropriate protocols for de-energizing the proposed facilities; inclusion of a 10,000 gallon water storage tank accessible to firefighters at the SVC site, and arrangement of electrical equipment on the SVC site to maintain adequate setbacks from vegetated areas.	 1. Ensure that defensible space and other design parameters identified in the FPP are incorporated into the Project design.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that training sessions with local fire station personnel and other non-design FPP measures are implemented.		
<b>Hydrology and Water Quality</b>				
<b>Permit Requirement*</b>  	Prepare and Implement a Stormwater Pollution Prevention Plan in accordance with the California State Water Resources Control Board's General Construction Stormwater Permit. Prepare Permit Registration Documents, Sediment and Waterbody Risk Calculations, and Post-Construction Water Balance Worksheet. Submit via SWRCB's online SMARTS database.	 1. Confirm SWPPP is prepared in accordance with General Construction Permit requirements.	<b>COMPLETED: Stormwater Pollution Prevention Plan submitted to CPUC November 02, 2018</b>  The SWPPP WDID number to document the SWPPP as active (NPDES Construction General Permit) will be provided to CPUC within 1 week of the beginning of construction.	<b>REVIEWED AND ACCEPTED: SWPPP was submitted and appears to meet requirements of Construction General Permit.</b>  CPUC will review SWPPP WDID number prior to construction.











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		 2. Confirm that SWPPP requirements are fully implemented during construction.		
<b>HYD/WQ-1</b>  	<b>Implement Construction Best Management Practices for Erosion Control</b> NEET West and/or its contractor(s) shall implement the following measures during Proposed Project construction, or shall implement alternative measures that are equally or more effective: <ul style="list-style-type: none"> <li>• Implement practices to reduce erosion of exposed soil and stockpiles, including watering for dust control, establishing perimeter silt fences, and/or placing fiber rolls.</li> <li>• Minimize soil disturbance areas.</li> <li>• Implement practices to maintain water quality, including silt fences, stabilized construction entrances, and storm-drain inlet protection.</li> <li>• Where feasible, limit construction to dry periods.</li> <li>• Prevent standing water from forming and remaining in depressions, excavations, trenches or any other areas for more than 96 hours.</li> <li>• Revegetate disturbed areas.</li> </ul> The performance standard for these erosion control measures is to use the best available technology that is economically achievable. These measures may be included in SWPPP requirements, as appropriate.	 1. Confirm that BMPs are included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm that all BMPs are implemented fully, and that erosion control measures use the best available technology that is economically achievable.		
<b>HYD/WQ-2</b>   	<b>Avoidance and Minimization of Impacts to Existing Culverts and Stormwater Conveyance Features</b> The Proposed Project will be designed to avoid existing stormwater conveyance structures to the extent feasible. Specific avoidance strategies include: <ul style="list-style-type: none"> <li>• Siting splice vault structures and the riser pole structure within or immediately adjacent to Bell Bluff Truck Trail or in uplands outside of existing drainage features and the storm water conveyance system along Bell Bluff Truck Trail.</li> <li>• Where feasible based on geotechnical investigation, avoiding culverts within Bell Bluff Truck Trail during construction of the underground transmission line by bracing or stabilizing culvert structures and excavating beneath the culvert structures to maintain culvert function.</li> </ul>	 1. Incorporate avoidance and minimization of impacts to existing culverts into Project design.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. If avoidance of existing culverts/stormwater conveyance structures is infeasible, ensure work does not occur within 48 hours of forecasted rain event of 0.5 inches or greater.		

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	Where it is infeasible to avoid impacts to existing culverts or other stormwater conveyance structures, work will not occur within 48 hours of a forecasted rain event of 0.5 inches or greater and temporary piping will be onsite to maintain any unexpected water flow. Prior to removing or impacting any existing culverts during construction, NEET West shall obtain all necessary regulatory approvals/permits from the appropriate agency (e.g., U.S. Army Corps of Engineers, CDFW, or Regional Water Quality Control Board) with jurisdiction over the features.  Following construction, NEET West shall reinstall any temporarily removed culverts or other stormwater conveyance structures and restore work areas to preconstruction conditions.	 3. If existing culverts/stormwater conveyance structures must be impacted, ensure all necessary permits are obtained. Or 	If existing culverts/stormwater conveyance structures must be impacted, necessary permits will be obtained.	This approach is acceptable. Please provide permits to CPUC, in the event culverts/stormwater conveyance structures are impacted.
		 4. If existing culverts/stormwater conveyance structures have been temporarily removed or impacted, reinstall and/or restore such features following construction. Or 		
Noise and Vibration				
<b>NOI-1</b>  	<b>Construction-Noise Mitigation Plan</b> NEET West and/or its contractors shall develop and implement a construction-noise mitigation plan in close coordination with adjacent noise-sensitive land uses so that construction activities can be scheduled to minimize noise disturbance. The plan must be approved by the CPUC prior to the initiation of construction activities. The construction-noise mitigation plan shall consider the following available controls to reduce construction-noise levels to as low as practicable. <ul style="list-style-type: none"> <li>Equip all internal combustion-driven equipment with mufflers that are in good condition and appropriate for the equipment.</li> <li>Construct temporary sound barriers using plywood or similar material bearing the same sound attenuating effectiveness as plywood between portions of the construction sites and sensitive receptors. These temporary sound barriers, which could also consist of construction grade sound blankets/curtains, should be at least 12 feet in height. Sound barriers shall be used during activities involving use of a rock drill, scraper, and/or blasting. Alternatively, if a rock drill was not required for the project, construction equipment with a reference noise level of 89 dB or less could be used and would not require construction of temporary sound barriers.</li> <li>Residences or noise-sensitive land uses within 500 feet of the construction site should be notified in writing of construction at least seven (7) days prior to the onset of construction activities. A "construction liaison" contact person should be designated in the notifications; he/she would be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. The phone number of the liaison should be conspicuously posted at the construction site.</li> </ul>	 1. Confirm development of a construction-noise mitigation plan that meets requirements of this measure.	<b>COMPLETED: Construction Noise Mitigation Plan submitted to CPUC October 19, 2018</b>	<b>REVIEWED AND ACCEPTED: Construction-Noise Mitigation Plan meets requirements of MM NOI-1.</b>
		 2. Confirm equipment and vehicles are equipped with proper noise-reducing features, and are in good operating condition.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 3. Confirm proper notification of residents and sensitive receptors within 500 feet of Project site.	Notification documentation will be provided to the CPUC at least 7 days prior to the beginning of construction.	This approach is acceptable. CPUC will review notification documentation when submitted.
		 4. Ensure that construction liaison is identified to receive noise complaints.	Prior to the start of construction, a construction liaison will be identified to receive noise complaints.	This approach is acceptable.

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		 5. Confirm that temporary sound barriers are used to shield sensitive receptors from construction noise, particularly during use of rock drill, scraper, and/or blasting.		
<b>Public Services and Utilities</b>				
<b>PUB/UTL-1</b>  	<b>Fund Fair Share toward Any Necessary Fire Protection Service Improvements.</b> NEET West shall coordinate with the County of San Diego, CAL FIRE, and U.S Forest Service (USFS) to determine if any additional apparatus, equipment, personnel, or facilities are necessary to provide adequate fire service to the Proposed Project. If recommended improvements or upgrades to facilities, and/or additional apparatus, equipment, or personnel are identified, NEET West shall contribute its fair share toward the attributed costs. The Proposed Project's, or NEET West's, fair share will be proportionate to its contribution to the need for improvements.	 1. Confirm coordination with County of San Diego, CAL FIRE, and USFS.	NEET West will provide CPUC with confirmation of coordination with County of San Diego, CAL FIRE, and USFS toward Any Necessary Fire Protection Service Improvements as a result of the project.	This approach is acceptable. CPUC will review documentation of coordination with fire agencies when provided, and before construction.
		 2. If these agencies recommend improvements or upgrades, contribute the Project's fair share toward the needed improvements.		
<b>PUB/UTL-2</b>   	<b>Diversion of Solid Waste in Accordance with San Diego County's Construction and Demolition Debris Recycling Ordinance</b> NEET West and/or its contractors shall follow the requirements specified in the County of San Diego's Construction and Demolition Debris Recycling Ordinance. This will include recycling of 90 percent of inerts and 70 percent of all other construction demolition debris materials, and preparation of a Construction and Demolition Debris Management Plan (DMP). In accordance with Section 68.511 of the San Diego County Code, the DMP shall provide the following information: <ol style="list-style-type: none"> <li>The type of project;</li> <li>The total square footage of the project;</li> <li>The estimated volume or weight of project construction and demolition debris, by material type that the project will generate;</li> </ol>	 1. Ensure measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. Confirm preparation of a DMP in accordance with applicable sections of the San Diego County Code.		

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	4. The maximum volume or weight of construction and demolition debris that can feasibly be diverted via reuse or recycling; 5. The estimated volume or weight of construction demolition debris that will be disposed of in a landfill; and 6. The name and address of any person and/or recycling facility the applicant proposes to use to collect, process or receive construction and/or demolition debris the project will generate.	 3. Ensure that construction debris is diverted from the landfill in accordance with this measure. And 			
<b>Transportation and Traffic</b>					
<b>TR-1</b>  	<b>Maintain Traffic Flow</b> NEET West or their contractor(s) shall implement the following measures: <ul style="list-style-type: none"> <li>To the extent feasible, work shall be staged and conducted in a manner that maintains two-way traffic flow on roadways in the vicinity of the work site.</li> <li>Heavy equipment and haul traffic shall be prohibited in residential areas to the greatest extent feasible. When no other route to and from the site is available, heavy equipment and haul traffic through residential areas shall be restricted to the hours of 7 am-7 p.m., Monday through Friday.</li> <li>If heavy equipment or hauling is required beyond the hours above, NEET West or their contractor would provide notice to adjacent property owners 48 hours in advance of such activities.</li> </ul>	 1. Confirm that measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. Confirm that work is staged and conducted in a manner that maintains two-way traffic flow, to the extent feasible.			
		 3. Confirm that heavy equipment movement and haul traffic conforms to the requirements of this measure.			
<b>TR-2</b>  	<b>Minimize Effects of Temporary Roadway Disturbances.</b> NEET West or their contractor(s) shall implement the following measures: <ul style="list-style-type: none"> <li>Prepare and implement a Traffic Control Plan (TCP) to describe procedures to guide traffic (such as signage and flaggers), safeguard construction workers, provide safe passage of traffic, and minimize traffic impacts, as necessary, through the duration of construction. In the event that closure of any portion of the private Bell Bluff Truck Trail were to become necessary, notification shall be provided to SDG&amp;E at least 5 days in advance of anticipated closures.</li> </ul>	 1. Confirm measure is included in contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>	
		 2. Confirm preparation of a TCP that complies with requirements of this measure.			

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		 3. If closure of any portion of Bell Bluff Truck Trail becomes necessary, confirm proper notification.		
		 4. Ensure implementation of adequate traffic control devices, signage, etc.		
<b>TR-3</b>  	<b>Emergency Coordination and Access Considerations</b> NEET West or their contractor(s) shall implement the following measures: <ul style="list-style-type: none"> <li>When work is conducted on the private portion of Bell Bluff Truck Trail and may have the potential to affect traffic flow, work shall be coordinated with local emergency service providers as necessary, to ensure that emergency response is not impeded.</li> <li>If closure of any portion of the private Bell Bluff Truck Trail is necessary during Project construction, NEET West shall have staff available on-site at all times to place plates over open trenches, move construction equipment, or clear any other obstructions to allow for 24-hour emergency vehicle access to SDG&amp;E facilities.</li> </ul>	 1. Ensure measure is incorporated into contract documents.	<b>COMPLETED: MMRP was provided as part of project bid documents.</b>	<b>REVIEWED AND ACCEPTED</b>
		 2. If necessary, ensure proper coordination with emergency service providers to ensure access and response is not impeded.		
		 3. Confirm emergency access for driveways and private roads is maintained to the extent feasible.		
		 4. Confirm that staff is available on-site at all times to place plates over open trenches, take other appropriate access to allow for 24-hour emergency vehicle access to SDG&E facilities.		

\* **NOTE:** Preparation of the Stormwater Pollution Prevention Plan is not a Mitigation Measure, but rather a permit requirement.