A.13-09-014 SDG&E 10/9/14 Response
Salt Creek Substation Project PTC
ED-SDGE-017

#	Request	SDG&E Response
1.	Prior to the site visit on Friday we discussed the City of Chula Vista's requests for additional KOPs. Michelle mentioned that SDG&E had met with the City of Chula Vista when you were developing your KOPs and the City had requested additional KOPs that SDG&E had evaluated, but determined did not provide a good view of the project. Please provide the photos from those additional KOPS, a map, and any other information that you collected to reject those KOPs from further analysis.	KOP locations were determined in coordination with the City of Chula Vista. KOPs 12, 13, and 14 were not included in the final visual analysis, because it was difficult to see the project area in the image due to the distance from the substation site. These KOPs are attached to this data request as attachments (see **DR-17 Attachment 1a through 3b**), along with a map depicting the location where the images were taken (see **DR-17 Attachment 4**). These KOPs have not been adjusted to the 50 mm angle, but can be adjusted if the CPUC determines that they would like to include them in the analysis.
2.	Burrowing Owl Plan and clarifying language regarding SDG&E disking plans, etc.	The Burrowing Owl Mitigation Plan is attached to this data request (see **DR-17 Attachment 5**). As you noted, this plan has been reviewed and approved by the CDFW. Based on the draft schedule provided by Connie Chen on September 22, 2014, SDG&E doesn't anticipate a need for site disking to discourage burrowing owls during the breeding season in advance of construction.
3.	Telecom addition - Revised project description with microwave addition.	The microwave dish for the proposed Salt Creek Substation will be approximately 3 feet in diameter and will be mounted on a dull galvanized steel pole within the substation. Approximate dimensions on the pole are 20 feet tall from ground level and 20 inches in diameter. Reference attachment "**DR-17 Attachment 6 [DR3.3-1 Microwave Pole Location]**" for a representative sketch of the microwave pole location.

Attachments 1a through 3b

Attachment 4


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Key Observation Points
Salt Creek Substation
November 6, 2012

Attachment 5

SALT CREEK SUBSTATION AND POWER LINE PROJECT
BURROWING OWL
MONITORING AND MITIGATION PLAN

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September 2014

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1.0 INTRODUCTION

1.1 PURPOSE OF THE PLAN

This Burrowing Owl Monitoring and Mitigation Plan (Plan) describes the actions to be taken to protect resident, nesting, and/or transient western burrowing owls (*Athene cunicularia hypugea*; WBO) that occur within and in the vicinity of the proposed San Diego Gas and Electric (SDG&E) Salt Creek Substation and 69 kilovolt (kV) power tie-line 6965 Project (Project). The primary purpose of this Plan is to provide a strategy that will facilitate the protection of WBO, a California Species of Special Concern.

The Plan describes an effective and feasible strategy that will avoid, minimize, and mitigate potential Project impacts to WBO, including implementation of buffers around occupied burrows that can be avoided and passive relocation of WBO from the Project footprint, if necessary. A multi-tiered approach is proposed to prevent or reduce impacts during construction and operation of the Project. While avoidance measures often focus on protecting animals in situ by making adjustments to construction activities near occupied burrows, moving individuals out of harm's way to off-site locations is sometimes the best alternative. Because WBO have been documented on the site of the proposed substation, it may be necessary to move individuals out of harm's way if they are present in this area immediately prior to commencement of construction activities. Finally, the Plan proposes compensation to mitigate for WBO impacts that cannot be avoided or adequately minimized.

Specific objectives for WBO protection addressed by this Plan are to:

- Provide avoidance measures to protect WBO during Project implementation, including avoidance of occupied burrows during construction activities, if necessary.
- Describe the strategy and methodology for passive relocation of WBO within the Project footprint.
- Assess the success of the WBO passive relocation effort through monitoring.
- Implement mitigation measures for WBO.

The multitiered approach described in this Plan includes preactivity surveys to determine if WBO are present within the Project's construction footprint prior to construction, monitoring to ensure protection of any WBO that are avoided, relocating WBO that cannot be avoided during construction activities, and monitoring for WBO that may return to the Project footprint. The

schedule for passively relocating individual birds will be outside the nesting season and in advance of the anticipated construction start date. The sections below describe the recommended avoidance and minimization measures, relocation methods, and measures to address the likelihood of WBO to move back to the Project site. In addition, compensation for unavoidable impacts to WBO, including permanent loss of suitable burrows and foraging habitat, is proposed to be fulfilled through the purchased conveyance land credits in the Otay Ranch Preserve.

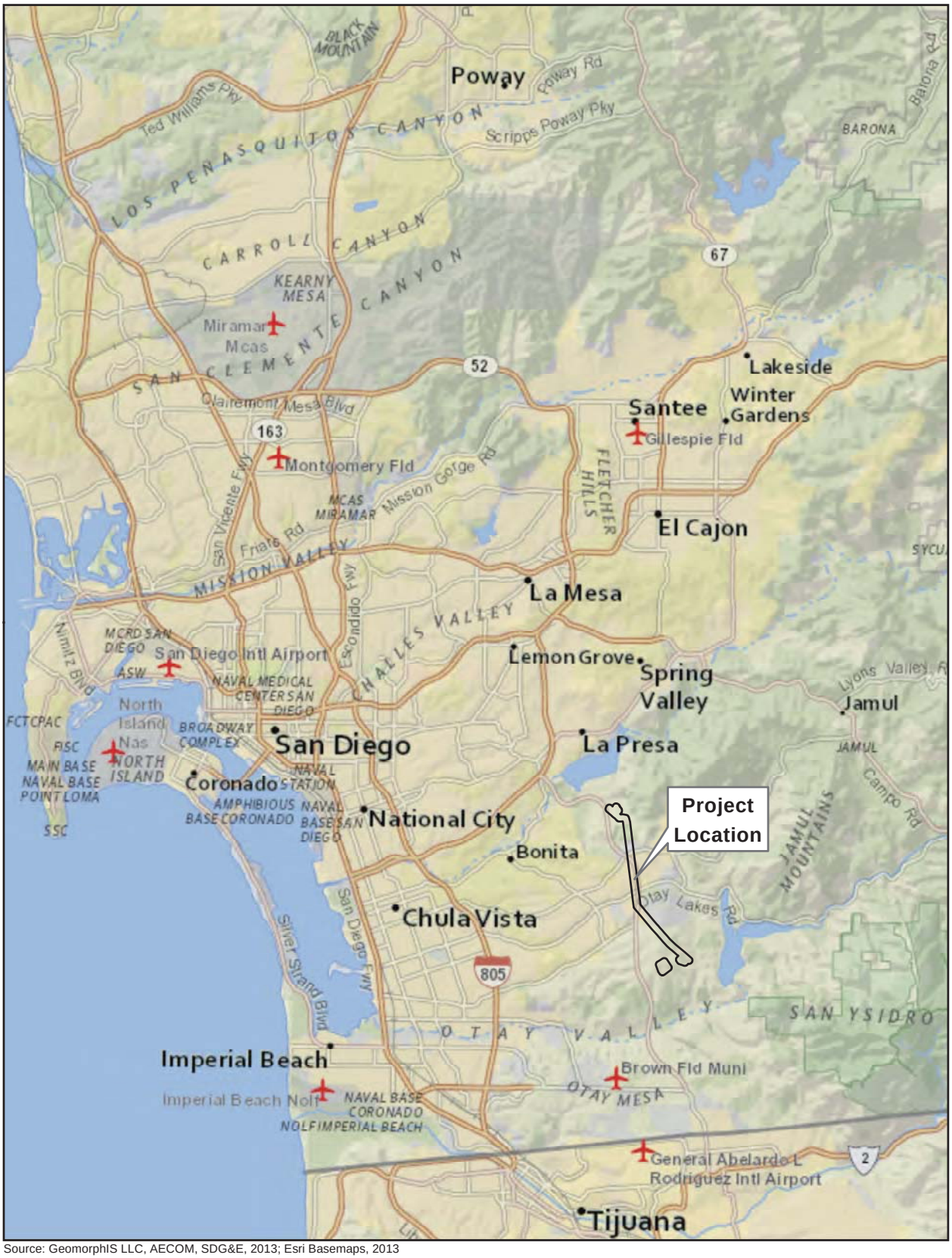
Operations and maintenance measures are not discussed in this Plan because SDG&E will implement their *Operational Protocols* outlined in the *SDG&E Subregional Natural Community Conservation Plan* (NCCP) (SDG&E 1995), to avoid and minimize impacts to WBO during future operation and maintenance of the Project (see Appendix A). These protocols include preactivity studies to evaluate biological resources that may be impacted by operation and maintenance activities and to propose measures to avoid and minimize impacts. These protocols also include a biological monitor on-site to implement measures to avoid and minimize impacts to biological resources.

1.2 PROJECT BACKGROUND

The proposed Project includes the installation of a new substation (proposed Salt Creek Substation), a new 69kV power tie-line from the existing Miguel Substation (Existing Substation) to the proposed Salt Creek Substation, and modifications to the Existing Substation. The primary objectives of the proposed Project are to provide additional capacity to serve existing area load and future customer-driven electrical load growth, and to provide the necessary distribution and transmission network to prevent long-term outages or disruptions of service to existing customers in the southeastern portion of SDG&E's service territory.

1.2.1 Project Location

The proposed Project site is located approximately 15 miles (24 kilometers) southeast of downtown San Diego and 5 miles (8 kilometers) north of the international border with Mexico (Figure 1). The proposed Salt Creek Substation and the majority of the proposed power line are located in the eastern portion of the City of Chula Vista, California (Figure 2). Approximately 4,700 linear feet (1,432 meters) of the northernmost portion of the proposed power line is located in the unincorporated portion of San Diego County on SDG&E fee-owned land surrounding the existing substation. The proposed Salt Creek Substation is located adjacent to and southeasterly of Hunte Parkway, where SDG&E's existing transmission corridor crosses Hunte Parkway. The Existing Substation is located east of State Route (SR) 125 in the unincorporated portion of San Diego County, bounded by San Miguel Road to the north and the City of Chula Vista to the south.



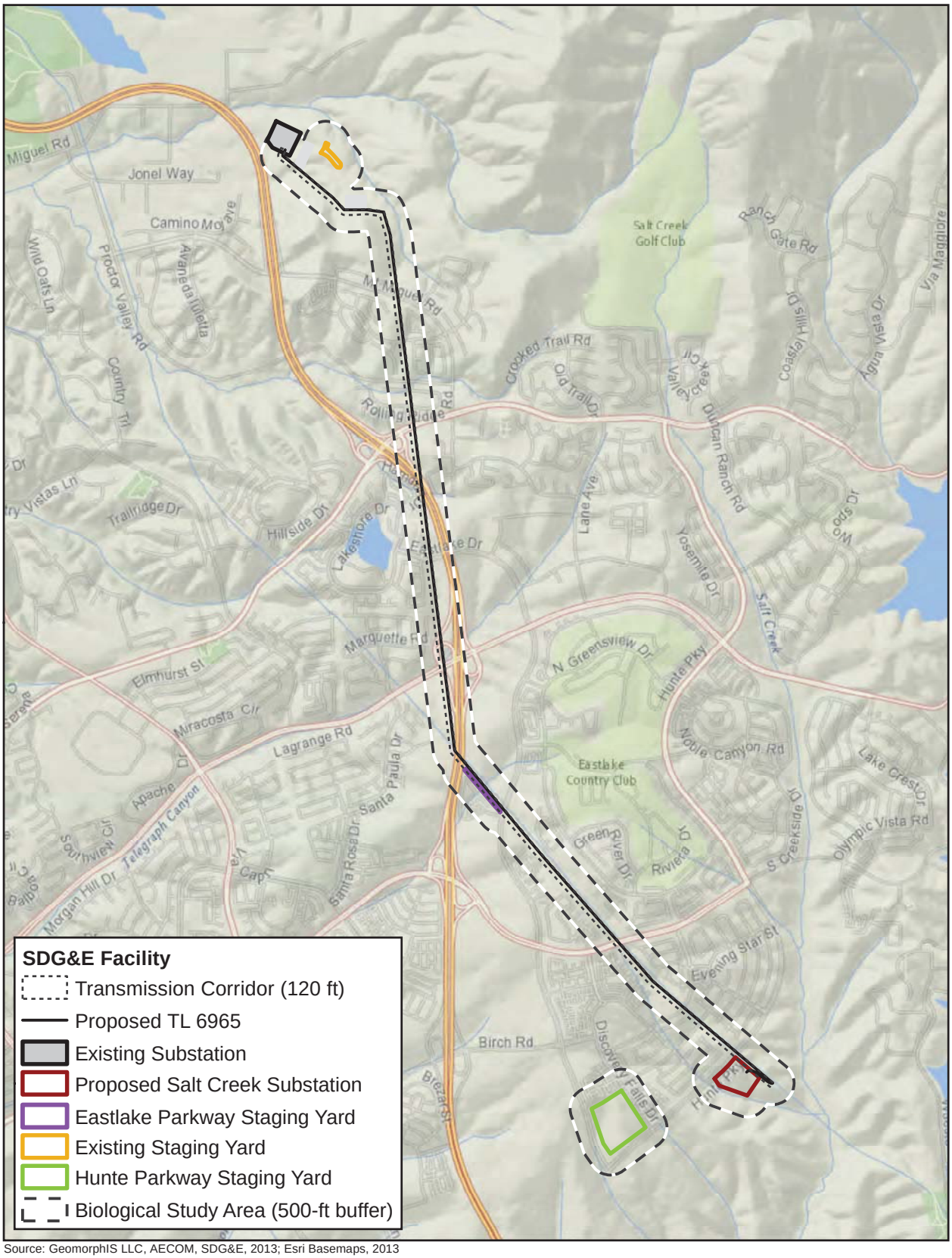
Source: GeomorphIS LLC, AECOM, SDG&E, 2013; Esri Basemaps, 2013

0 2 4 Miles

Scale: 1:250,000 1 inch = 4 miles

Figure 1
Regional Map

SDG&E is providing this map with the understanding that the map is not survey grade.



Source: GeomorphIS LLC, AECOM, SDG&E, 2013; Esri Basemaps, 2013

0 0.5 1 Mile

Scale: 1:40,800 1 inch = 1 mile

Figure 2
Project Components and Vicnity Map

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SDG&E is providing this map with the understanding that the map is not survey grade.

1.2.2 Project Description

The proposed Project includes four primary components:

- Construction and operation of a 120-megavolt ampere 69/12kV proposed Salt Creek Substation, including construction and operation of underground 12kV distribution circuits.
- Power lines, including construction and operation of a 5-mile-long (8-kilometer-long) overhead 69kV power line 6965 (TL 6965), from the Existing Substation to the proposed Salt Creek Substation, and construction and operation of a 69kV power line loop-in (TL 6910) to the proposed Salt Creek Substation. TL 6965 would use approximately 48 pole structures (49 poles), including eight existing poles (seven associated with TL 643 and one associated with TL 6910). Approximately 40 new structures (41 poles) would be erected on the new 69kV power line, including 29 galvanized steel pole structures (30 poles) (one H-frame double-pole structure), 10 galvanized engineered foundation poles, and one engineered foundation cable pole. Additionally, the TL 6910 loop-in would require installation of two new steel cable poles.
- Modifications at the Existing Substation, including installation of a new 69kV power line position.
- Three temporary staging yards identified for the proposed Project; one at the Existing Substation (Existing Staging Yard), a second on the north side of Hunte Parkway between Discovery Falls, Eastlake Parkway, and Crossroads Street (Hunte Parkway Staging Yard), and a third within the transmission corridor between Eastlake Parkway and SR-125 (Eastlake Parkway Staging Yard). Five alternate staging yard sites at the Olympic Training Center facility, south of Olympic Parkway, have also been identified.

1.3 ROLES AND RESPONSIBILITIES

A Qualified Biologist(s) will be responsible for implementing and overseeing WBO avoidance and minimization measures. The Qualified Biologist should have at least a B.A. or B.S. in wildlife biology, wildlife ecology, ornithology, or wildlife management, and two seasons of experience working with WBO. Alternatively, the Qualified Biologist should have been mentored or supervised for at least one field season by a biologist with extensive field experience with WBO and two seasons of experience working with WBO. Experience may include banding,

behavioral monitoring, protocol surveys, and/or eviction (also referred to as "passive relocation" or "burrow exclusion"). At least one Qualified Biologist with burrow excavation experience will be present during passive relocation activities. The Qualified Biologist should be well versed in identifying WBO individuals; vocalizations; suitable burrows; and sign, including, perches, feathers, pellets, scat, and prey remains.

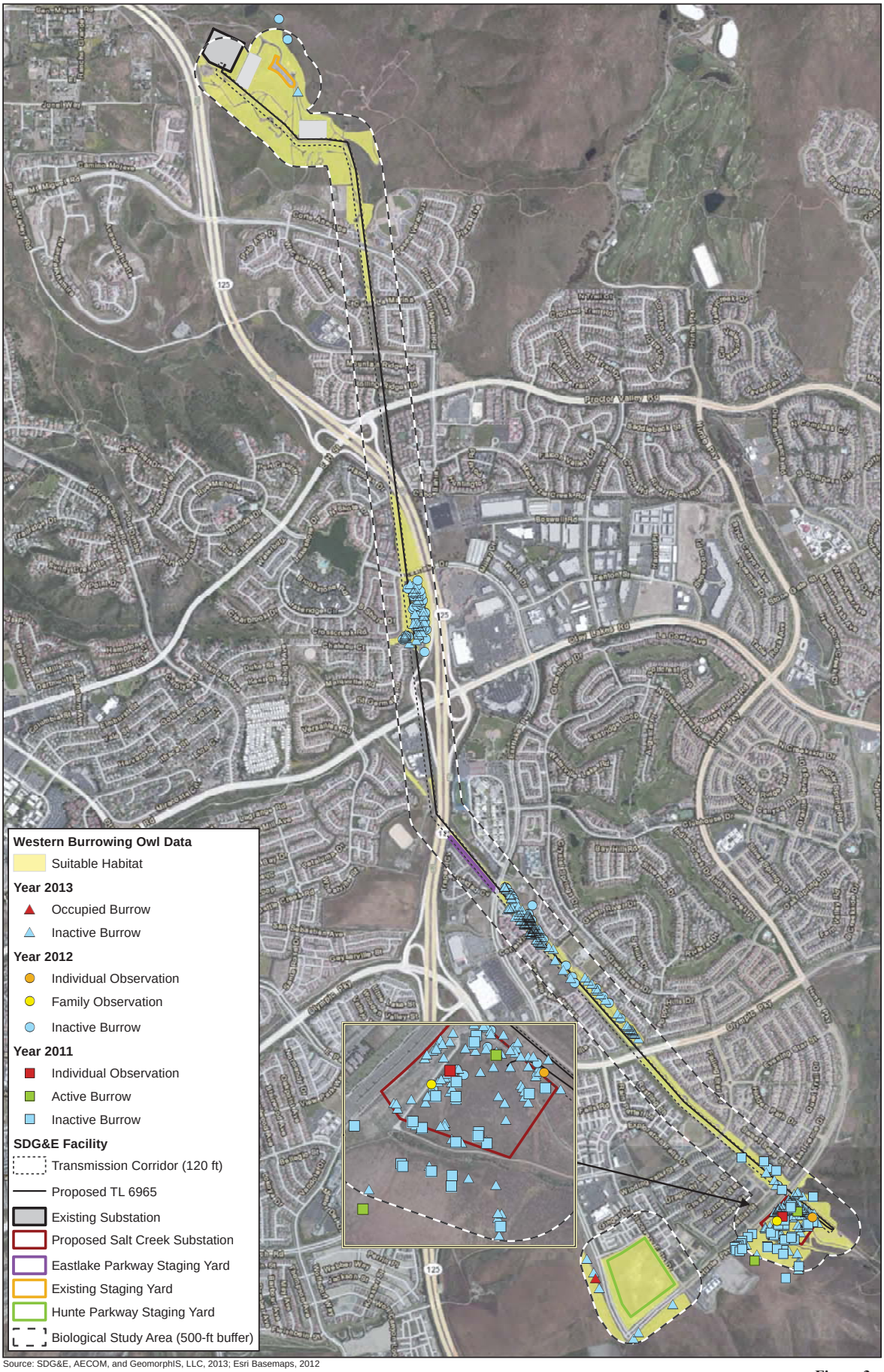
1.4 2011–2013 SURVEY RESULTS

Surveys for WBO were conducted for the proposed Project in 2011, 2012, and 2013, according to protocol established by the California Burrowing Owl Consortium (CBOC 1993) or the California Department of Fish and Wildlife (CDFW) *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), depending on the year in which the surveys occurred.

The initial phase of surveys in each year included an assessment to identify areas of suitable WBO habitat in which subsequent survey efforts would focus. The total acreage of suitable burrowing owl habitat identified in 2013 was 235.67 acres (95.37 hectares) (Figure 3). Characteristics of habitat deemed suitable included open, native and nonnative annual grassland; numerous fossorial mammal burrows; and several adequate perch sites (e.g., fence posts, fencing, dirt mounds, berms, and debris piles). Vegetation communities considered suitable for WBO included open coastal sage scrub, native and nonnative annual grassland, landscape/ornamental, and disturbed habitats.

Breeding (February 1 through August 31) and non-breeding (September 1 through January 31) season surveys were conducted in 2011 within the footprint of the proposed Salt Creek Substation and a surrounding 500-foot (150-meter) buffer. Breeding season surveys were conducted in 2012 within the transmission corridor, staging yards, and a 500-foot (150-meter) survey buffer around these proposed Project features; the majority of the proposed Salt Creek Substation footprint is within this survey buffer and was therefore also surveyed in 2012. Breeding season surveys were conducted in 2013 within the entire Project Area, including the proposed Salt Creek Substation, transmission corridor, staging yards, and a surrounding 500-foot (150-meter) buffer.

During each survey, WBO individuals and suitable WBO burrows were recorded using GPS. Suitable burrows were defined as burrows greater than approximately 4 inches (10 centimeters) in diameter (height and width) and greater than approximately 60 inches (150 centimeters) in depth (Johnson et al. 2010). If a burrow was of adequate diameter and the end of the burrow could not be seen, it was considered suitable. It was not feasible to measure the depth of each



Source: SDG&E, AECOM, and GeomorphIS, LLC, 2013; Esri Basemaps, 2012

0 875 1,750 Feet

Scale: 1:21,000 1 inch = 1,750 feet

Figure 3
2011 - 2013 Western Burrowing Owl Data

SDG&E is providing this map with the understanding that the map is not survey grade.

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burrow. Any burrow not meeting these parameters was deemed unsuitable for WBO. At each suitable WBO burrow, presence of WBO sign (e.g., pellets, prey remains, whitewash, decorations, tracks) and number of WBO present at the burrow were recorded for each survey visit. Each suitable burrow was classified as follows:

- Occupied – at least one WBO individual was observed to be present at the burrow;
- Active – a burrow with fresh WBO sign, but no WBO individual was present at the time of the survey;
- Inactive – suitable for WBO but no WBO individuals or fresh sign were observed

The 2011 breeding season WBO surveys within the Salt Creek Substation and a 500-foot (150-meter) buffer documented 38 suitable WBO burrows (Figure 3). No WBO or WBO sign were detected at any burrows. Thus, the 38 suitable WBO burrows were considered inactive in spring 2011. During non-breeding season surveys in December, one occupied burrow (i.e., one WBO individual owl at burrow), two active burrows (i.e., burrows contained WBO sign), and 35 inactive burrows were documented. The two active burrows detected were most likely alternate burrows being used by the one observed individual. Only one of the two active burrows showed any significant, fresh sign during the duration of the winter surveys. The presence of one WBO individual indicated that the Salt Creek Substation was likely used by WBO for wintering, post-breeding dispersal, or as a migratory stopover site during winter 2011. Because no sign of WBO activity was found at any burrow during surveys in the breeding season, it was determined that no breeding took place within the Salt Creek Substation in 2011.

The 2012 breeding season WBO surveys within the transmission corridor, staging yards, and a 500-foot (150-meter) buffer around these features documented 86 suitable WBO burrows or burrow clusters, primarily in the central and southern portions of the transmission corridor (Figure 3). No individuals or recent sign of WBO occupation were detected during these surveys. Two incidental WBO observations were, however, made during 2012 during surveys for other special status species (Figure 3). An individual adult WBO was observed in March, and a WBO family group (adult with an unknown number of juveniles) was observed in late July 2012. The March sighting was made south of Hunte Parkway on the southern terminus of the transmission corridor, adjacent to the footprint of the proposed Salt Creek Substation. The sighting of the family group was in the western portion of the proposed Salt Creek Substation footprint, within 150 feet (45 meters) of the WBO detected during the 2011 winter survey.

The 2013 breeding season WBO surveys within the entire Project Area documented 229 suitable burrows, or burrow clusters. Of these, 228 were documented as inactive and one burrow was documented as occupied (Figure 3). The occupied burrow was recorded as such due to the

presence of an individual adult WBO at the burrow during the initial survey in early April. There was no sign of juvenile WBO, and no WBO were observed at this burrow during subsequent surveys completed May through July. The occupied burrow was located west of the Hunte Parkway Staging Yard, within the 500-foot (150-meter) buffer. This sighting was on the opposite side of Eastlake Parkway from the proposed staging yard. During a joint site visit with SDG&E, AECOM, and CDFW on July 12, 2013, CDFW biologist Kyle Dutro noted that a WBO pair had been relocated for another project from the same location as the AECOM WBO sighting. However, it cannot be confirmed if these individuals were the same or different individuals.

In summary, during 2011 through 2013 surveys for the proposed Project, WBO were detected within the proposed Salt Creek Substation and west of the Hunte Parkway Staging Yard (Table 1). The WBO suitable habitat within the proposed Salt Creek Substation and adjacent transmission corridor (south of Hunte Parkway) are occupied WBO foraging and/or breeding habitat due to the presence of adult and juvenile WBO, and suitable burrows in the substation. It is not expected that WBO forage or breed within the transmission corridor north of Hunte Parkway due to the narrow, fragmented habitat surrounded by high density urban development. The Hunte Parkway Staging Yard has been previously graded and consists of compact soil unsuitable for burrowing. No suitable burrows for WBO nesting or refuge have been found in the staging yard due to the hard packed soil and absence of fossorial mammals. To this end, the Hunte Parkway Staging Yard may have provided suitable foraging habitat for the WBO detected to the west of Eastlake Parkway, but did not provide suitable breeding habitat.

Table 1. Western Burrowing Owl Observations (2011-2013)

Survey Year	Number of Adult Owls	Location	Impact Type[1]
2011	1	Salt Creek Substation	Permanent direct
2012	1	Transmission Corridor	Temporary direct
	1 (with juveniles present)	Salt Creek Substation	Permanent direct
2013	1	500-foot Buffer	Temporary indirect (construction only)

[1] Direct: Direct impacts are caused by the project and occur at the same time and place as the project (e.g., impacts within Project impact footprint).
Indirect: Indirect impacts may occur later in time or at a place that is farther removed in distance from the project (e.g., impacts outside the Project impact footprint).
Permanent: All impacts that result in the irreversible impacts or removal of WBO resources are considered permanent (e.g., removal of an occupied burrow).
Temporary: Any impacts considered to have reversible effects on WBO resources can be viewed as temporary (e.g., construction noise that ends at the cessation of construction).

2.0 AVOIDANCE AND MINIMIZATION

This section describes the specific procedures and methods to be used to achieve the purpose and objectives of this Plan (see Section 1.1), including take avoidance surveys, impact avoidance and minimization measures, and passive relocation protocols. All avoidance and minimization activities will be overseen by a Qualified Biologist.

A worker's education awareness program (WEAP) will be implemented, as appropriate, for Project personnel associated with construction activities. The WEAP will include training that provides a description and photos of WBO, discussion of the federal and state laws pertaining to WBO, and a description of the impact avoidance and minimization measures that will be implemented, including avoidance buffers and regular inspection of piping and other construction material to ensure it is properly covered or capped.

2.1 TAKE AVOIDANCE SURVEY

Per CDFW guidance (CDFG 2012), a take avoidance survey (i.e., preconstruction clearance survey) will be conducted by Qualified Biologists to determine presence or absence of WBO prior to initiating construction activities. The take avoidance survey will be completed per CDFW protocol guidance (CDFG 2012), with the exception of the number of survey visits. Only one visit will be conducted for the initial take avoidance survey. The Project footprint will be demarcated via Global Positioning System by the Project engineers and/or Qualified Biologist prior to the commencement of the survey. If any WBO are detected, additional measures will be implemented as described below.

Construction of the Salt Creek Project is anticipated to require approximately 18 to 24 months. Given the total duration of construction and the size of the Project, it is expected that take avoidance surveys will be conducted in phases, in order to stay within the required survey windows associated with construction activities. Additionally, the initial take avoidance survey strategy will vary depending on the location of the construction.

For the Project area north of Hunte Parkway, Qualified Biologists will complete an initial take avoidance survey within WBO suitable habitat in the Project area north of Hunte Parkway and a surrounding 100-foot (30-meter) buffer no less than 14 days and no more than 30 days prior to initiating construction activities to determine if WBO are present. This protocol will be followed regardless of the timing of the construction start date within this area (i.e., WBO breeding season versus non-breeding season).

For the Project area south of Hunte Parkway, Qualified Biologists will complete an initial take avoidance survey within WBO suitable habitat and a 100-foot (30-meter) buffer south of Hunte Parkway as follows:

- *Start date of construction occurs during the WBO non-breeding season (September 1 through January 31):* If construction start date coincides with the WBO non-breeding season, the initial take avoidance survey will be conducted no less than 14 days and no more than 30 days prior to initiating construction activities to determine if WBO are present.
- *Construction start date occurs during WBO breeding season (February 1 through August 31):* If construction start date coincides with the WBO breeding season, the initial take avoidance survey will be conducted *prior* to the start of the breeding season (i.e., prior to February 1) in order to allow for adequate time to exclude WBO prior to the breeding season should they be present.

If more than 30 days pass between the take avoidance survey and initiation of Project activities, additional take avoidance surveys may be required, depending on what actions have been implemented to deter WBO from moving into the Project footprint. A final take avoidance survey will be conducted in WBO suitable habitat within the Project footprint including a 100-foot (30-meter) buffer 24 hours prior to initiation of construction activities.

2.2 AVOIDANCE AND MINIMIZATION MEASURES

This section outlines measures to be implemented at each suitable WBO burrow detected during the take avoidance survey. Measures will vary pending the occupancy status (unoccupied or occupied) of each suitable burrow.

2.2.1 Occupied Burrows

If a burrow with fresh WBO sign is observed within the Project footprint during the take avoidance surveys, the burrow and any surrounding burrows will be monitored to determine occupancy. If burrows are determined to be occupied, appropriate construction buffers or setback distances will be determined by the Qualified Biologist on a case by case basis, depending on the season in which disturbance would occur, the type of disturbance, and other factors that could influence susceptibility to disturbance (e.g., topography, vegetation, existing disturbance levels, etc.). “Shelter in place” techniques will be used if necessary to create a visual and auditory barrier between construction activities and the occupied burrow. Techniques will include placing

hay bales, fencing, or another physical barrier between the occupied burrow and construction activities. The Qualified Biologist will determine if and/or when shelter in place is necessary and feasible for implementation. CDFW will be notified as soon as it is apparent that construction buffers and/or shelter in place techniques may be necessary and kept in the loop throughout the process.

During the nonbreeding season, individual WBOs that will be directly impacted by the Project may be passively relocated as described in Section 2.3, with concurrence from CDFW. During the breeding season, disturbance of individual WBO at occupied burrows found within the Project footprint will be avoided through implementation of appropriate buffers until it is confirmed with a scope camera that they are no longer occupied by adults or young. When the breeding season concludes or burrows are no longer occupied, passive relocation and/or excavation measures (described in Section 2.3) will be implemented to collapse burrows and ensure WBO do not reoccupy the area prior to Project construction. A final take avoidance survey will be conducted in WBO suitable habitat within the Project footprint 24 hours prior to initiation of construction activities.

2.2.2 Unoccupied Burrows

Because WBO have been documented on the proposed substation footprint, unoccupied suitable WBO burrows that are identified within the proposed Salt Creek Substation footprint and adjacent portion of the transmission line footprint (south of Hunte Parkway) during the take avoidance survey will be disked, graded, or otherwise disturbed to make them inhospitable to WBO and fossorial mammals. Disking or grading to mechanically disturb the site for avoiding impacts to WBO is not considered the start of Project construction for the Burrowing Owl Monitoring and Mitigation Plan. Unoccupied suitable burrows within the Project footprint will be disturbed to minimize potential for suitable burrows to become reestablished and WBO to move into the area prior to construction. Unoccupied burrows will be disturbed immediately (within approximately 3 days) following take avoidance surveys. A Qualified Biologist will be present to monitor mechanical disturbance of the site. Unoccupied burrows within buffers for occupied burrows (see Section 2.2.1) will not be disturbed unless the Qualified Biologist determines the disturbance will not affect the occupied burrow.

The remainder of the transmission line footprint (north of Hunte Parkway) and the staging yards have shown no evidence of WBO occupation during the 3 years of surveys. These areas are not expected to be inhabited by WBO because of the isolated and fragmented nature of the habitat. As mentioned in Section 2.1, a Qualified Biologist will complete an initial take avoidance survey

in WBO suitable habitat within the Project footprint north of Hunte Parkway no less than 14 days and no more than 30 days prior to initiating construction activities to ensure suitable WBO burrows in this area are still unoccupied. Unoccupied suitable WBO burrows within the transmission line footprint (north of Hunte Parkway) and staging yards will not be mechanically disturbed or removed and no additional work will be required.

2.3 PASSIVE RELOCATION

Passive relocation will only occur between September 1 and January 31 (i.e., non-breeding season), unless otherwise authorized by CDFW. CDFW will be notified as soon as it is apparent that passive relocation may be necessary and kept in the loop throughout the process. If relocation occurs immediately before or after the breeding season, focused monitoring of the WBO will be conducted to ensure egg-laying has not begun and/or that juveniles from the occupied burrows are foraging independently and capable of independent survival prior to relocation efforts.

If a WBO individual or an occupied WBO burrow is identified during take avoidance surveys or during construction monitoring, the area will be assessed by a Qualified Biologist prior to passive relocation efforts to evaluate the feasibility of passive relocation. The residency status of the WBO and use of burrows or other features on-site will be examined to the extent feasible. Although passive relocation does not result in control of directing the evicted WBO to a specific recipient area, the Qualified Biologists will verify that there is an acceptable area within a reasonable distance that provides the necessary subsidies to support the evicted WBO with the goal to minimize the stress of relocation. The Qualified Biologist will:

1. Determine if the WBO is associated with a burrow on-site.
2. Assess the presence of primary and satellite burrows that may be associated with the WBO detection.
3. Assess the area for other structures that may support WBO (e.g., pipes, culverts).
4. Determine if there are sufficient burrows outside the impact footprint (i.e., within 500-foot buffer) that would be acceptable for the WBO to take refuge in during the relocation process.
5. Verify that potential offsite refuge burrows are not currently occupied.
6. Assess the need for creation of artificial burrows if necessary.
7. Identify burrows and/or other structures in the impact footprint (i.e., within SDG&E property or right-of-way) that may need to be collapsed, removed, or blocked.

Once passive relocation is determined to be practicable, it will be implemented by a Qualified Biologist via use of one-way doors that allow WBO to leave the burrow but prohibit reentrance, as described by Trulio (1995) and Clark and Plumpton (2005). One-way doors will be installed at the entrance to the active burrow and other potential burrow surrogates within 164 feet (50 meters) of the active burrow as determined by the Qualified Biologist. One-way doors will be left in place for up to 4 days to ensure WBO have left the burrow before excavation. The doors will be monitored twice daily to ensure they are functioning properly. The Qualified Biologist will check for evidence that WBO are inside by looking for WBO sign immediately inside the door.

Burrow excavations will be completed by Qualified Biologist(s), at least one of which has prior experience with excavating WBO burrows. After passive relocation has been completed and the burrows are no longer occupied, burrows with one-way doors will be excavated using hand tools and refilled to prevent reoccupation. To the extent feasible, piping will be used to maintain an escape route and to prevent collapse until the entire burrow has been excavated and it can be determined that no WBO are present inside. Burrows will only be hand excavated after monitoring and examination with a scope camera confirm they are vacant. Following burrow excavation, the area will be disked or graded or otherwise disturbed immediately (i.e., next day) to ensure it is inhospitable to WBO and fossorial mammals until construction activities commence. A Qualified Biologists will be present to monitor mechanical disturbance of the site.

2.4 MONITORING

Monitoring will be conducted by the Qualified Biologist to ensure avoidance and minimization measures are implemented in accordance with this plan and CDFW guidelines.

2.4.1 Areas Left Idle after Burrowing Owl Exclusion

Following removal of unoccupied burrows within the proposed Salt Creek Substation footprint and adjacent portion of the transmission line, weekly monitoring will be conducted to ensure this area remains absent of suitable burrows and that WBO do not move into the area prior to initiation of construction activities. Areas in which passive relocation is conducted will be monitored twice weekly to ensure they remain inhospitable to WBO and fossorial mammals and that WBO do not move back into the area prior to construction.

If the start of construction will not occur for more than 30 days after excavation of unoccupied burrows within the Salt Creek Substation footprint and adjacent portion of the transmission line footprint, then the area may be disked, graded, or otherwise disturbed as necessary approximately every 4 weeks until the start of construction to keep the site inhospitable to WBO

and fossorial mammals. Weekly monitoring will cease once construction begins within proposed Salt Creek Substation footprint and adjacent portion of the transmission line.

2.4.2 Occupied Burrows to Be Avoided

Monitoring will be conducted to ensure the appropriate buffers, as determined by the Qualified Biologist, are adhered to by construction personnel and that it is adequate to provide the necessary protection. When construction activities commence adjacent to the buffer area, Qualified Biologist will be present on-site full time to monitor the behavior of WBO for at least 3 days. The Qualified Biologist will have the authority to increase the setback distance if there are signs of disturbance, such as changes in behavior as a result of construction or other indications of distress by WBO.

If the type of construction activity adjacent to the buffer increases in intensity, an additional 3-day monitoring period will be implemented to ensure the buffer is adequate under the changed circumstances. Conversely, it may be appropriate to reevaluate and potentially reduce the buffer if construction disturbance levels diminish substantially. If a buffer reduction is implemented, monitoring will be conducted for at least 3 days to ensure the buffer is adequate.

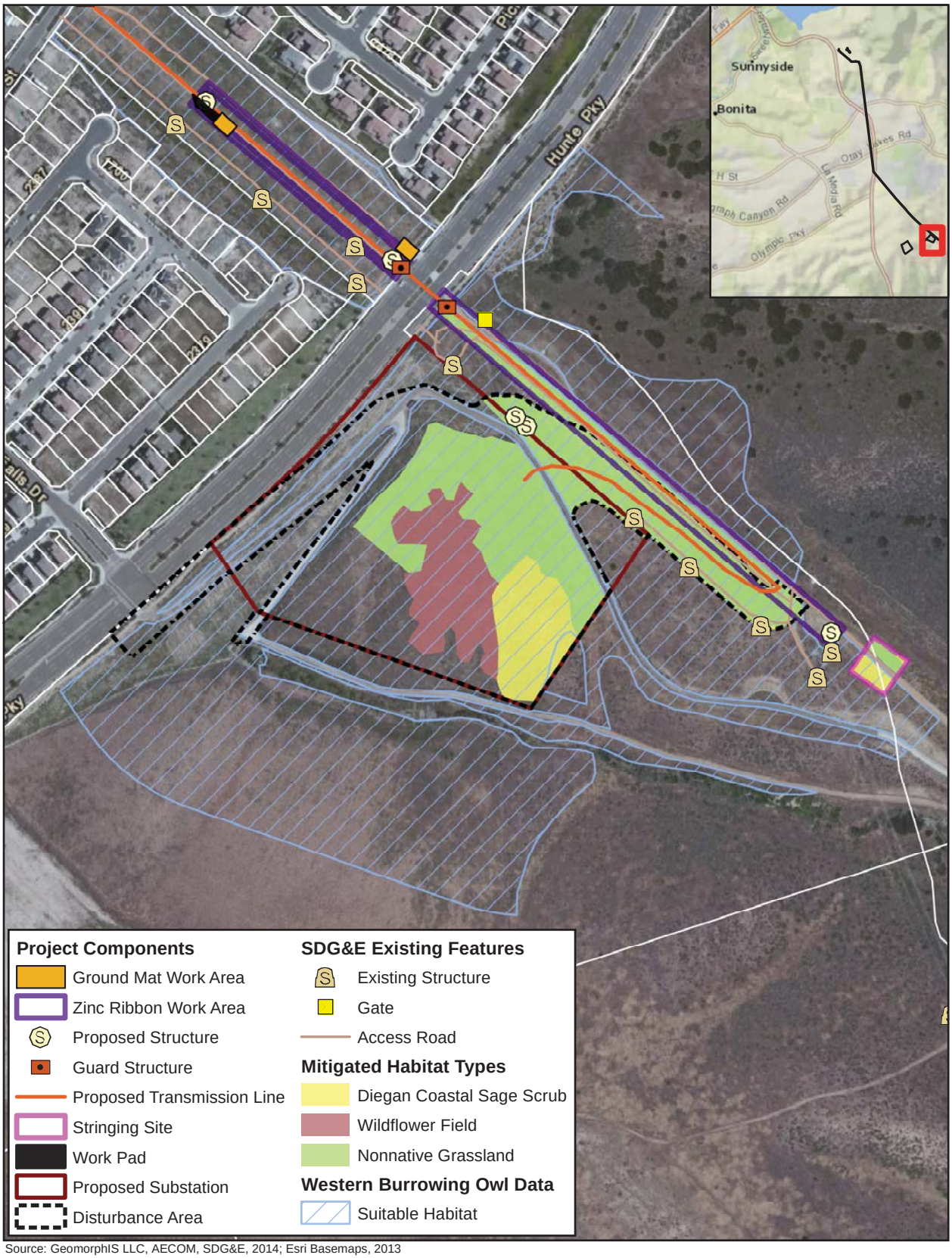
3.0 MITIGATION

Mitigation provided to offset the proposed Project's impacts to WBO includes enhancement and/or mitigation for loss of habitat using purchased conveyance land credits in the Otay Ranch Preserve

3.1 SALT CREEK SUBSTATION, TL 6965 AND TL 6910 LOOP IN

The proposed Salt Creek Substation is located within Otay Ranch, an approximately 22,899-acre (9,267-hectare) planned community in the eastern portion of the City of Chula Vista (City of Chula Vista 1993; 1996). The Otay Ranch Resource Management Plan (RMP), developed prior to the City of Chula Vista's Multiple Species Conservation Plan, provides mitigation by requiring development projects occurring in Otay Ranch to convey/purchase 1.188 acres (0.481 hectare) of land for every acre of developable land, to assemble the Otay Ranch Preserve. Based on calculations by the City of Chula Vista, 2.3 acres (0.93 hectare) of slopes created with construction of Hunte Parkway were previously conveyed as part of the Hunte Parkway construction project and therefore did not require conveyance again by SDG&E. Thus, a total of 9.34 acres (3.76 hectares) of the 11.64-acre (4.71-hectare) property required mitigation at the 1.188-acre (0.481-hectare) conveyance requirement. Since SDG&E purchased the land for development of the proposed substation, SDG&E was required to fulfill the 1.188-acre (0.481-hectare) conveyance requirement under the Otay Ranch RMP. SDG&E purchased 11.0959 acres (4.4904 hectares) of conveyance land Preserve Credits from JPB (James P. Baldwin) Development, LLC in June 2011 (Cameron 2011) in conjunction with purchasing the 11.64-acre (4.71-hectare) Salt Creek Substation property.

The WBO suitable habitat within the proposed Salt Creek Substation and adjacent transmission corridor (south of Hunte Parkway) is occupied WBO foraging and/or breeding habitat (see Section 1.4). Impacts will result from construction of the proposed substation and installation and/or temporary use of the underground transmission line, one guard structure, three steel cable poles, one zinc ribbon work area, and one stringing site within the transmission corridor south of Hunte Parkway (Figure 4). Permanent and temporary impacts to WBO suitable habitat as a result of construction activities will be approximately 12.30 acres (4.98 hectares). Of this total, SDG&E will mitigate for 9.62 acres (3.89 hectares) of permanent and temporary impacts to coastal sage scrub and nonnative grassland (including wildflower field) habitat, per SDG&E's Subregional NCCP, at a ratio of 1:1 (Figure 4). No habitat-based mitigation is required for impacts to bare ground, disturbed habitat, or landscaped/ornamental habitat per SDG&E's Subregional NCCP. SDG&E proposes to use the purchased conveyance land credits in the Otay



Source: GeomorphIS LLC, AECOM, SDG&E, 2014; Esri Basemaps, 2013

0 350 700 Feet

Scale: 1:4,200 1 inch = 350 feet

Figure 4
Land Disturbance

SDG&E is providing this map with the understanding that the map is not survey grade.

Path: C:\Projects\AECOM\SaltCreek_Substation\GIS\Map_MXD\Fig4_Substation_Disturb-Comp.mxd, 8/21/2014, E D Goff

Ranch Preserve as habitat-based mitigation for impacts to WBO suitable habitat. The purchased conveyance land Preserve Credits will be used by the City of Chula Vista to assemble the Otay Ranch Preserve which ultimately will preserve 56% of WBO habitat in Otay Ranch (City of Chula Vista 1996).

3.2 EXISTING SUBSTATION MODIFICATIONS

All modification activities will occur within the existing substation footprint, which consists of paved and gravel-covered areas. No suitable WBO habitat occurs within the existing substation footprint. As a result, direct impacts to WBO will not occur during modifications to the Existing Substation.

3.3 STAGING YARDS

No suitable WBO burrows occur within the Existing Staging Yard, Hunte Parkway Staging Yard, or Eastlake Parkway Staging Yard. The Hunte Parkway Staging Yard may have provided suitable foraging habitat for WBO (see Section 1.4). Approximately 6.5 acres (2.63 hectares) of a 22-acre (8.90-hectare) previously graded Hunte Parkway Staging Yard will be used for staging purposes during construction of the Proposed Project. Impacts to grassland habitat (i.e., WBO foraging habitat) within the staging yard will be temporary because use of the staging yard will terminate after construction of the proposed Project is completed. No mitigation is proposed for temporary impacts to foraging habitat within the Hunte Parkway Staging Yard. Impacts to vegetation communities within the Hunte Parkway staging yard were mitigated previously under a separate project.

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4.0 REPORTING

Reports will be prepared to document results of take avoidance surveys and all subsequent applicable phases of avoidance and minimization to be implemented if occupied burrows are found. These reports will detail results and make recommendations for future implementation, monitoring, and reporting.

4.1 TAKE AVOIDANCE SURVEY REPORT

Following completion of the take avoidance survey, a letter report will be prepared and submitted to CDFW that includes the following items, in accordance with CDFW guidelines for survey reports:

- Date, start, and end time of surveys and a description of weather conditions;
- Name(s) of surveyor(s) and qualifications;
- A discussion of how the timing of the survey affected the comprehensiveness and detection probability;
- A description of survey methods used;
- A description and justification of the area surveyed relative to the Project area;
- Number and age class of owls detected, number of occupied burrows, and description of WBO sign detected at burrows;
- A description of WBO behavior during the surveys;
- A detailed map (1:24,000 or closer) showing locations of all WBO observed, suitable burrows, and occupied burrows;
- Signed field forms; and
- Recent color photographs of the Project site.

4.2 AVOIDANCE AND MINIMIZATION MEASURES AND PASSIVE RELOCATION

Prior to the beginning of construction activities (does not include mechanical disturbance to disturb the site for avoiding impacts to WBO), a letter report will be prepared and submitted to CDFW documenting implementation of avoidance and minimization measures (including mechanical disturbance) and WBO passive relocation, if applicable. Should occupied burrows be avoided with buffers, a letter report will be completed following each 3-day monitoring period associated with initiation of construction activities. The following potential activities will be described in these letter reports:

- Implementation of WBO passive relocation measures;
- Destruction of unoccupied burrows;
- Implementation of measures to make the Project site inhospitable to WBO and fossorial mammals;
- Monitoring for colonizing and/or returning WBO prior to construction;
- Completion of a final take avoidance survey within 24 hours prior to initiation of construction activities; and
- Establishment and monitoring of protective buffers for occupied burrows that will be avoided.
- Dates that each avoidance and minimization measure was implemented.
- Results of monitoring conducted to demonstrate effectiveness of the measures.
- Dates and description of the initial construction activities.

5.0 REFERENCES

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APPENDIX A

OPERATIONAL PROTOCOLS FROM SDG&E'S SUBREGIONAL NATURAL COMMUNITY CONSERVATION PLAN

7.1 Operational Protocols

Operational protocols represent an environmentally sensitive approach to traditional utility construction, maintenance and repair Activities recognizing that slight adjustments in construction techniques can yield major benefits for the environment. The appropriate Operational Protocols for each individual project will be determined and documented by the Environmental Surveyor. The information regarding the qualifications and responsibilities of the environmental surveyor is contained in Appendix B. The following mitigation measures shall be adhered to by SDG&E.

7.1.1 General Behavior for All Field Personnel

1. Vehicles must be kept on access roads. A 15 mile-per-hour speed limit shall be observed on dirt access roads to allow reptile species to disperse. Vehicles must be turned around in established or designated areas only.

2. No wildlife, including rattlesnakes, may be harmed, except to protect life and limb.

3. Firearms shall be prohibited on the rights-of-way except for those used by security personnel.

4. Feeding of wildlife is not allowed.

5. SDG&E personnel are not allowed to bring pets on the rights-of-way in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive domestic animal diseases to native wildlife populations.

6. Parking or driving underneath oak trees is not allowed in order to protect root structures except in established traffic areas.

7. Plant or wildlife species may not be collected for pets or any other reason.

8. Littering is not allowed. SDG&E shall not deposit or leave any food or waste on the rights-of-way or adjacent property.

9. Wild Fires shall be prevented or minimized by exercising care when driving and by not parking vehicles where catalytic converters can ignite dry vegetation. In times of high fire hazard, it may be necessary for trucks to carry water and shovels, or fire extinguishers in the field. The use of shields, protective mats, or other fire prevention methods shall be used during grinding and welding to prevent or minimize the potential for fire. Care should be exhibited when smoking in natural habitats.

10. Field crews shall refer environmental issues including wildlife relocation, dead or sick wildlife, hazardous waste, or questions about avoiding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may need to be brought in by Environmental Surveyor for assistance with wildlife relocations.

7.1.2 Training

11. All SDG&E personnel working within the project area shall participate in an employee training program conducted by SDG&E, with annual updates. The program will consist of a brief discussion of endangered species biology and the legal protections afforded to Covered Species; a discussion of the biology of the Covered Species protected under this Subregional Plan; the habitat requirements of these Covered Species; their status under the Endangered Species Acts; measures being taken for the protection of Covered Species and their habitats under this Subregional Plan; and a review of the Operational Protocols. A fact sheet conveying this information will also be distributed to all employees working in the project area.

12. Designated SDG&E staff will conduct selected reviews of SDG&E operations. Any proposed modifications to Operational Protocols, procedures or conditions will be promptly provided to CDFG and USFWS for their review and input for required permit or Subregional Plan amendments.

7.1.3 Preactivity Studies

13. The Environmental Surveyor shall conduct preactivity studies for all activities occurring off of access roads in natural areas. The scope of these studies is included in Appendix A. The Environmental Surveyor will complete a preactivity study form contained in Appendix A, including recommendations for review by a biologist and construction monitoring as appropriate. Biologists should be called in when there is the potential for unavoidable impacts to Covered Species. The forms are for information only, and will not require CDFG or USFWS approval. These forms shall be faxed to CDFG and USFWS, along with phone notification, who will reply within 5 working days, indicating if they would like to review the project and/or suggest recommendations for post project monitoring. If a biologist is required, he/she will be contacted concurrent to notification to CDFG and USFWS. SDG&E's project may proceed during this time if necessary, in compliance with the recommendations of the biologist (For narrow endemic species see mitigation IV following Table 3.1). USFWS survey protocols performed by qualified biologists will be required for new projects which are defined as projects requiring CEQA review.

In those situations where the Environmental Surveyor cannot make a definitive species

identification, an on-call biologist will be brought in. When the biologist is called, he or she will be contacted concurrently with CDFG and USFWS. The biologist will make the determination of the species in question and recommend avoidance or mitigation approaches to the Environmental Surveyor and a decision will be made. In those situations where more than one visit may be necessary to identify a given species, such as certain birds, no more than three site visits shall be required. It is expected that the typical USFWS search protocols will not be utilized in most situations due to the Plan's avoidance priority. Background information necessary to complete the annual report shall be collected on the preactivity study form and used by SDG&E to prepare the annual report.

14. In order to ensure that habitats are not inadvertently impacted, the Environmental Surveyor shall determine the extent of habitat and flag boundaries of habitats which must be avoided. When necessary, the Environmental Surveyor should also demark appropriate equipment laydown areas, vehicle turn around areas, and pads for placement of large construction equipment such as cranes, bucket trucks, augers, etc. When appropriate, the Environmental Surveyor shall make office and/or field presentations to field staff to review and become familiar with natural resources to be protected on a project specific basis.

15. SDG&E will maintain a library of rare plant locations known to SDG&E occurring within easements and fee owned properties. "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, pre-activity surveys, or biological surveys conducted for environmental compliance on a project site (e.g. initial study), but there is no requirement for development of original biological data. Plant inventories shall be consulted as part of pre-activity survey procedures.

7.1.4 Maintenance, Repair and Construction of Facilities

16. Maintenance, repair and construction Activities shall be designed and implemented to minimize new disturbance, erosion on manufactured and other slopes, and off-site degradation from accelerated sedimentation, and to reduce maintenance and repair costs.

17. Routine maintenance of all Facilities includes visual inspections on a regular basis, conducted from vehicles driven on the access roads where possible. If it is necessary to inspect areas which cannot be seen from the roads, the inspection shall be done on foot, or from the air.

18. When the view of a gas transmission line marker becomes obscured by vegetation on a regular basis requiring repeated habitat removal, consideration shall be given to the replacement of markers with taller versions.

19. Erosion will be minimized on access roads and other locations primarily with water bars. The water bars are mounds of soil shaped to direct flow and prevent erosion.

20. Hydrologic impacts will be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water by use of Best Management Practices.

21. When siting new facilities, every effort will be made to cross the wetland habitat perpendicular to the watercourse, spanning the watercourse to minimize the amount of disturbance to riparian areas (See Figure 4).

22. Gas and other facilities cross streambeds and require maintenance and repair. During such times water may be temporarily diverted as long as after disturbance natural drainage patterns are restored to minimize the impact of the disturbance and help to reestablish or enhance the native habitat. Erosion control during construction in the form of intermittent check dams and culverts should also be considered to prevent alteration to natural drainage patterns and prevent siltation.

23. Impacts to wetlands shall be minimized by avoiding pushing soil or brush into washes or ravines.

24. During work on facilities, all trucks, tools, and equipment should be kept on existing access roads or cleared areas, to the extent possible.

25. Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable.

26. Insulator washing is allowed from access roads if other applicable protocols are followed.

27. Brush clearing around facilities for fire protection shall not be conducted from March through August without prior approval by the Environmental Surveyor. The Environmental Surveyor will make sure that the habitat contains no active nests, burrows, or dens prior to clearing.

28. In the event SDG&E identifies a covered species of plant within a 10' radius around power poles, which is the area required to be cleared for fire protection purposes, SDG&E shall notify USFWS (for ESA listed plants), and CDFG (for CESA listed plants), in writing, of the plant's identity and location and of the proposed Activity, which will result in a Take of such plant. Notification will occur ten (10) working days prior to such Activity, during which time USFWS or CDFG may remove such plant(s). If neither USFWS or CDFG have removed such plant(s) within the ten (10) working days following the notice, SDG&E may proceed to complete its fire clearing and cause a Take of such plant(s).

    When fire clearing is necessary in instances other than around power poles, and the potential for impacts to Covered Species exists, SDG&E will follow the preactivity study and notification procedures in Operational Protocol number 13.

29. Wire stringing is allowed year round in sensitive habitats if conductor is not allowed to drag on ground or in brush and vehicles remain on access roads.

30. Maintenance of cut and fill slopes shall consist primarily of erosion repair. In situations where revegetation would improve the success of erosion control, planting or seeding with native hydroseed mix may be done on slopes.

31. Spoils created during maintenance operations shall be disposed of only on previously disturbed areas designated by the Environmental Surveyor or used immediately to fill eroded areas. Cleared vegetation shall be hauled off the rights-of-way to a permitted disposal location.

32. Within 6 months of Plan approval, environmentally sensitive tree trimming locations will be identified in the tree trim computer data base system utilized by tree trim contractors. (This data base also tracks the date of each tree trim, type of tree, where threatening dogs reside, etc.). The Environmental Surveyor should be contacted to perform a preactivity survey when trimming is planned in environmentally sensitive areas. Whenever possible, trees in environmentally sensitive areas (determined by CDFG and SDG&E) will be scheduled for trimming in the non-sensitive times.

33. No new Facilities and Activities shall be planned which disturb vernal pools, their watersheds, or impact their natural regeneration. Continued historic maintenance of existing infrastructure utilizing existing access roads is allowed to continue in areas containing vernal pool habitat. New construction of overhead infrastructure which spans vernal pool habitats is allowed as long as the placement of facilities or the associated construction activities in no way impact the vernal pools.

34. If any previously unidentified dens, burrows, or plants are located on any project site after the preactivity survey, the Environmental Surveyor shall be contacted. Environmental Surveyor will determine how to best avoid or minimize impacting the resource by considering such methods as project or work plan redevelopment, equipment placement or construction method modification, seasonal/time of day limitations, etc...

35. The Environmental Surveyor shall conduct monitoring as recommended in the preactivity survey report. At completion of work, the Environmental Surveyor shall check to verify compliance, including observing that flagged areas have been avoided and that reclamation has been properly implemented. Also at completion of work, the Environmental Surveyor is responsible for removing all habitat flagging from the construction site.

36. The Environmental Surveyor shall conduct checks on mowing procedures, to ensure that mowing is limited to a 12-foot wide area on straight portions of the road (slightly wider on radius turns), and that the mowing height is no less than 4 inches.

37. Supplies or equipment where wildlife could hide (e.g., pipes, culverts, pole holes) shall be inspected prior to moving or working on them to reduce the potential for injury to wildlife. Supplies or equipment that cannot be inspected or from which animals could not be removed shall be capped or otherwise covered at the end of each work day. Old piping or other supplies that have been left open, shall not be capped until inspected and any species found in it allowed to escape. Ramping shall be provided in open trenches when necessary. If an animal is found entrapped in supplies or equipment, such as a pipe section, the supplies or equipment shall be avoided and the animal(s) left to leave on its own accord, except as otherwise authorized by CDFG.

38. All steep-walled trenches or excavations used during construction shall be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife are located in the trench or excavation, the Environmental Surveyor shall be called immediately to remove them if they cannot escape unimpeded.

39. Large amounts of fugitive dust could interfere with photosynthesis. Fugitive dust created during clearing, grading, earth-moving, excavation or other construction activities will be controlled by regular watering. At all times, fugitive dust emissions will be controlled by limiting on-site vehicle speed to 15 miles per hour.

40. Before using pesticides in areas where burrowing owls may be found, a pre-activity survey will be conducted.

7.1.5 Maintenance of access roads shall consist of:

41. Repair of erosion by grading, addition of fill, and compacting. In each case of repair, the total area of disturbance shall be minimized by careful access and use of appropriately sized equipment. Repairs shall be done after preactivity surveys conducted by the Environmental Surveyor and in accordance with the recommendations regarding construction monitoring and relevant protocols. Consideration should be given to source of erosion problem, when source is within control of SDG&E.

42. Vegetation control through grading should be used only where the vegetation obscures the inspection of facilities, access may be entirely lost, or the threat of Facility failure or fire hazard exists. The graded access road area should not exceed 12'-wide on straight portions (radius turns may be slightly wider) (See Figure 23).

43. Mowing habitat can be an effective method for protecting the vegetative understory while at the same time creating access to a work area. Mowing should be used when permanent access is not required since, with time, total revegetation is expected. If mowing is in response to a permanent access need, but the alternative of grading is undesirable because of downstream siltation potential, it should be recognized that periodic mowing will be necessary to maintain permanent access.

44. Maintenance work on access roads should not expand the existing road bed (See Figure 23).

45. Material for filling in road ruts should never be obtained from the sides of the road which contain habitat without approval from Environmental Surveyor..

7.1.6 Construction of new access roads shall comply with the following:

46. SDG&E access roads will be designed and constructed according to the SDG&E *Guide for Encroachment on Transmission Rights-of-Way (4/91).*

47. Access roads will be made available to managers of the regional preserve system subject to coordination with SDG&E.

48. New access roads shall be designed to be placed in previously disturbed areas and areas which require the least amount of grading in sensitive areas during construction whenever possible (See Figure 5). Preference shall be given to the use of stub roads rather than linking facilities tangentially.

49. SDG&E will consider providing access control on access roads leading into the regional preserve system where such control provides benefit to sensitive resources.

50. New access road construction is allowed year round. Every effort shall be made to avoid constructing roads during the nesting season. During the nesting season, the presence or absence of nesting species shall be determined by a biologist and appropriate avoidance and minimization recommendations followed.

7.1.7 Construction and Maintenance of Access Roads Through Streambeds

51. Construction of new access roads through streambeds requires a Streambed Alteration Agreement from CDFG and/or consultation with the Army Corps of Engineers.

52. Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed without the installation of appropriately sized culverts. The use of geotextile matting should be considered when it would protect wetland species.

53. Staging/storage areas for equipment and materials shall be located outside of riparian areas. (See Figure 23).

7.1.8 Survey Work

54. Brush clearing for foot paths or line-of-sight cutting is not allowed from March through August in sensitive habitats without prior approval from the Environmental Surveyor, who will ensure that activity does not adversely affect a sensitive species.

55. SDG&E survey personnel must keep vehicles on existing access roads. No clearing of brush for panel point placement is allowed from March through August without prior approval from the Environmental Surveyor.

56. Hiking off roads or paths for survey data collection is allowed year round so long as other protocols are met.

7.1.9 Emergency Repairs

57. During a system emergency, unnecessary carelessness which results in environmental damage is prohibited.

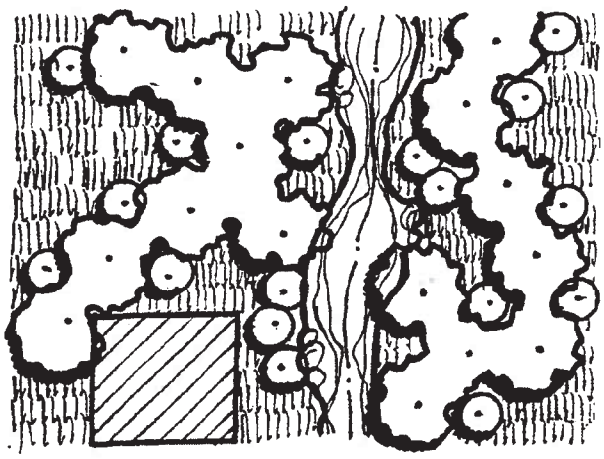
58. Emergency repair of facilities is required in situations which potentially or immediately threaten the integrity of the SDG&E system, such as pipe leaks, or downed lines, slumps, slides, major subsidence, etc. During emergency repairs the Operational Protocols contained in this Subregional Plan shall continued to be followed to fullest extent possible.

59. Once the emergency has stabilized, any unavoidable environmental damage will be reported to the Environmental Surveyor by the foreman. The Environmental Surveyor will develop a mitigation plan and ensure its implementation is consistent with this Subregional Plan.

7.1.10 Activities of Underlying Fee Owners

60. Most SDG&E rights-of-way are held in easement only. The activities of underlying fee owners cannot be controlled by SDG&E and are not covered by this Subregional Plan.

61. When sensitive habitat exists on either side of a utility right-of-way, SDG&E will not oppose underlying fee owners dedicating said property to conservation purposes. Underlying fee owners are expected to comply with applicable federal, state, and local regulations.



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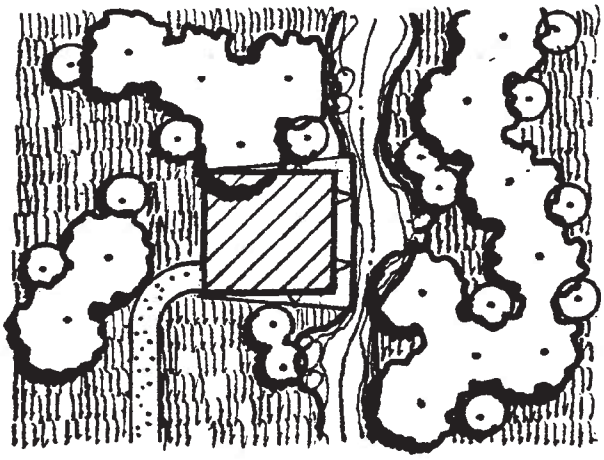

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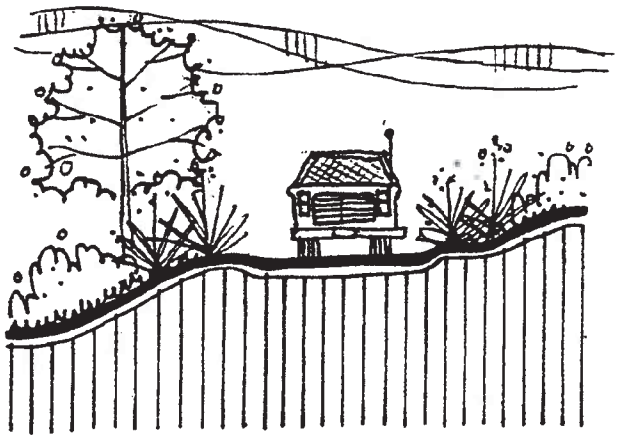
CONSTRUCTION STAGING/STORAGE AREAS SHOULD BE LOCATED OUTSIDE OF STREAMS



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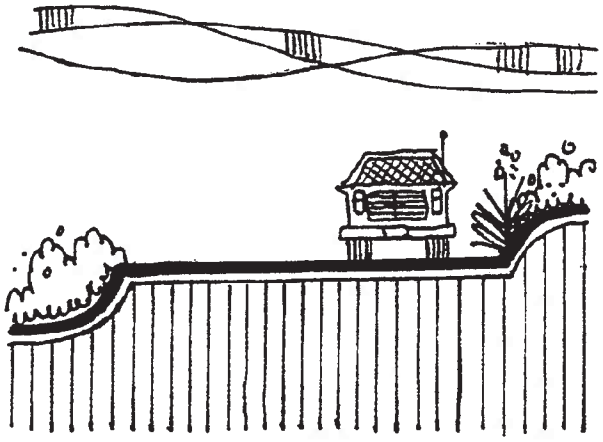

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ACCESS ROAD MAINTENANCE SHOULD NOT EXPAND THE EXISTING ROAD BED

FIGURE

Operational Protocol Diagrams

23

Attachment 6

Figure 3-6: Preliminary Grading and Drainage Plan