

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 28, 2010

Mr. Alan F. Colton  
Manager – Environmental Services  
Sunrise Powerlink Transmission Project  
8315 Century Park Court, CP21G  
San Diego, CA 92123-1550

RE: SDG&E Sunrise Powerlink Transmission Line Project - Notice to Proceed (NTP #7)

Dear Mr. Colton,

On May 28, 2010, San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence with construction of the White Star Communication Facility Upgrades of the Sunrise Powerlink Project.

The SDG&E Sunrise Powerlink Transmission Line Project was evaluated in accordance with the National Environmental Policy Act and California Environmental Quality Act. The mitigation measures and applicant-proposed measures (APMs) described in the Final Environmental Impact Report/Statement were adopted by the CPUC and BLM as conditions of project approvals. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during implementation. The CPUC voted on December 18, 2008 to approve the Final Environmentally Superior Southern Route ([Decision D.08-12-058](#)) and a [Notice of Determination](#) was submitted to the State Clearinghouse (SCH#2006091071). The BLM issued a [Record of Decision](#) approving the same route on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture; and Forest Service on the Cleveland National Forest; the Forest Service issued its Record of Decision and Supplemental Information report on July 9, 2010. The area requested under this NTP does not fall under Forest Service jurisdiction.

The Sunrise Powerlink Project will be constructed in 26 segments, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/sunrise.htm>). Within the 26 project segments, SDG&E will submit multiple separate requests for Notice to Proceed (NTPs) during the construction process, as is typical for transmission line projects. Given that the Sunrise Powerlink Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SDG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter and the attached Compliance Status Table document the CPUC's thorough evaluation of all activities covered in this NTP. The evaluation process ensures that all mitigation measures and Biological Opinion conditions applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision and in BLM's Record of Decision.

NTP #7 for the White Star Communication Facility Upgrades is granted by CPUC for the proposed activities based on the factors described below.

**SDG&E NTP Request.** Excerpts from the SDG&E NTP request dated May 18, 2010 are presented below with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**. Additional information was provided by SDG&E on June 17 and June 30, 2010. This information has been incorporated into the following:

SDG&E requests a Notice to Proceed from the CPUC for use of the White Star Communication Facility Upgrades. These upgrades are necessary to alleviate existing operational issues and to support the future addition of the Sunrise Powerlink line to the existing SDG&E system. White Star Communication Facility Upgrades is not directly connected to the proposed Sunrise Transmission Line.

The upgrades will occur at the existing White Star Communication Facility, which is owned and operated by the County of San Diego. SDG&E has an easement along the eastern portion of the county's facility, where a SDG&E-owned and operated communication facility currently exists. Upgrades will occur at this previously developed site bordered by Tierra Del Sol Road to the east, the White Star Communication Facility to the west, and open space to the north and south. Upgrades at the White Star facility will include installation of a new 75-foot steel monopole and removal of the two existing 75-foot wood poles. The new steel pole will sit atop a 54-inch-diameter foundation and will be located approximately 15 feet south of the existing equipment shelter. Three new microwave antenna dishes will be mounted on the new steel pole. The existing equipment shelter will be used to house new microwave communications equipment. The existing propane tank will be replaced with a new propane tank, and the existing back-up generator will continue to be used. Minimal ground disturbance will be required to complete the upgrades and work will occur within a non-vegetated, previously disturbed site. There is ample parking to accommodate the small crew necessary to complete the work and no road closures will be required. Installation of the new steel monopole will include augering the foundation hole to depth of 15.5 feet, and placing rebar, anchor bolts, and a base plate in the foundation hole. Concrete will then be poured and allowed to cure for seven days before the new steel monopole is erected and the antennas mounted. The upgrades are expected to take approximately 10 days to complete.

Per the Chambers' June 25, 2010 biological survey report, the existing site conditions on and adjacent to the proposed work site are not consistent with the needs of the sensitive wildlife species that may occur in the general vicinity (i.e., the area lacked Quino checkerspot (*Euphydryas editha quino*) host plants, bouldery terrain for peninsular bighorn sheep (*Ovis canadensis*), and water bodies or riparian areas for a host of sensitive species). Therefore, the proposed work is expected to have no impacts to sensitive wildlife species. However, a biological monitor should be present during work activities to ensure that nesting birds are not affected and that the work area is contained to as small an area as possible. **(Biological monitoring is required during nesting season.)**

A project specific Fire Prevention and Response Plan (FPRP) was acknowledged\* by CAL Fire Chief (the plan has been CPUC approved). A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP. (\*In regard to the FPRP the Cal Fire Chief provided "The signatory reviewing officials are acknowledging that SDG&E has a Construction Fire Prevention Plan that is appropriate and necessary to mitigate fire hazard and risk for the SRPL construction and maintenance activities. They do not accept any responsibility for SDG&E interpretation or implementation of this Plan during the construction and maintenance of the SRPL or for any resulting actions associated with these activities.")

### **CPUC Evaluation of Mitigation Implementation**

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological and cultural resources, those additional conditions are defined in this section.

Please see also the attached Compliance Status Table documenting pre-construction requirements identified in the Final EIR/EIS. Note that entries shaded in yellow are outstanding and must be completed prior to the start of construction. Entries shaded in purple are to be conducted during or after construction. Entries shaded in gray have either been fulfilled or are not applicable to this action.

Following the discussion of biological, cultural, and paleontological resources, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SDG&E. In these cases, the conditions will not also appear in the Compliance Status Table.

**Biological Resources.** This section presents background on biological resources that occur at or near the site. This summary of biological issues was provided by SDG&E in the initial NTP request and the supplemental information provided in June 2010 is included this summary of biological issues. The CPUC biological consultant conducted reviews of the initial NTP request and follow-up materials for completeness and compliance with Project mitigation requirements.

SDG&E requests that the White Star Communication Facility Upgrades NTP be conditioned for conducting pre-construction surveys for nesting birds (Mitigation Measure B-8a) within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction that would occur between January 15 and August 15. In addition nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction that would occur between January 1 and September 15. **Survey results shall be submitted to the CPUC, United States Fish and Wildlife Service [USFWS], and California Department of Fish and Game [CDFG] prior to construction.**

The conditions of the Weed Control Plan approved September 8, 2010 (Mitigation Measure B-3a) will be implemented during the set-up and utilization of the White Star Communication Facility Upgrades to prevent the establishment and spread of non-native and invasive plant species on the site or into adjacent undisturbed habitats during the project activity period.

Per the Chambers' June 25, 2010 biological survey report, the existing site conditions on and adjacent to the proposed work site are not consistent with the needs of the sensitive wildlife species that may occur in the general vicinity. Therefore, the proposed work is expected to have no impacts to sensitive wildlife species. In addition, since construction activities will be limited to previously disturbed/developed areas; therefore, no impacts to rare plants would occur.

**Cultural Resources.** The White Star Communication Facility Upgrades were addressed in the *Cultural Resources Technical Report for the East County Substation Project* submitted to SDG&E in August, 2009. The report was reviewed by the CPUC cultural resources consultant and comments were provided on June 8, 2010. Per the report, there is no potential to encounter cultural resources during the White Star Communication Facility Upgrades. The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.

**Paleontological Resources.** Based on the Recirculated Draft EIR / Supplemental Draft EIS, dated October 2008, there is no potential to encounter paleontological resources at the White Star Communication Facility. No NTP conditions are recommended.

The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.

### Conditions of NTP Approval

The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Grey entries have either been fulfilled or are not applicable to this action. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. All temporary facilities (i.e., trailers, fencing, etc.) shall be removed from the facility at the completion of construction.
4. No clearing or disturbance to vegetation shall occur inside or outside of approved work areas.
5. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and September 15.
6. "Survey sweeps" will occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, a biological monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC.
7. If the application of water is needed to abate dust in construction areas and on dirt roads, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan will be implemented and enforced throughout the upgrade activities.
8. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
9. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor shall be notified immediately.

10. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.
11. The Weed Control Plan (Mitigation Measure B-3a) will be implemented during the set-up and utilization of the White Star Communication Facility Upgrades to prevent the establishment and spread of non-native and invasive plant species on the site or into adjacent undisturbed habitats during the project activity period.
12. Verification of noticing as required under Mitigation Measures L-1a and LU-APM-1 shall be submitted to the CPUC prior to construction. Advance notification will be made to the Cal Fire facility, the County of San Diego and identified residents or property owners within 1,000 feet, per the Construction Notification Plan, which was approved by the CPUC on March 1, 2010. Documentation demonstrating compliance with mitigation measure LU-APM-1 will be submitted after notification has been conducted.
13. Upgrades at the White Star Communication Facility require a building permit. An application has been submitted and is pending approval by the County of San Diego. Upon receipt, this permit will be submitted to the CPUC.
14. All complaints received by SDG&E in regard to the facility shall be logged and reported immediately to the CPUC.
15. As proposed, the SDG&E Environmental Monitoring Program will be implemented during construction which will include implementation of the applicable environmental plans (as defined in HS-APM-1, HS-APM-2, HS-APM 3, HS-APM-8 and HS-APM-10. SDG&E will designate an Environmental Field Representative for the White Star Communication Facility Upgrades. The Representative will be on site to observe and document adherence to the applicable environmental plans.
16. In regard to the Hazard Communication Plan to fully satisfy the intent of mitigation measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.
17. Should groundwater be unexpectedly encountered and dewatering required, SDG&E will implement mitigation measures WQ-APM-6 and WQ-APM-8. Per Mitigation Measure H-1a, if groundwater is encountered it will be handled according to federal, state and local regulations. Groundwater will be pumped into either a tank truck or a baker tank and tested for proper disposal. If required, a groundwater disposal permit will be obtained.
18. A SWPPP applicable to the White Star Communication Facility Upgrades shall be submitted to the CPUC and implemented where appropriate prior to construction. An NPDES storm water discharge permit for construction activities will be obtained. SDG&E will implement and install appropriate BMPs prior to construction to control erosion of soil and prevent storm water sediment, such as silt fencing or straw bales. BMPs will be maintained during construction.
19. SDG&E shall not use groundwater supply wells for project water sources.

Please contact me if you have any questions or concerns.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

cc: Mary Jo Borak, CPUC CEQA Team Manager  
Nicholas Sher, CPUC Legal Division  
Daniel Steward, BLM El Centro Field Office  
Tom Zale, BLM El Centro Field Office  
Holly Roberts, BLM Palm Spring South Coast Field Office  
Robert Hawkins, U.S. Forest Service  
Cliff Harvey, State Water Resources Control Board  
Eric Porter, USFWS  
Doreen Stadtlander, USFWS  
Paul Schlitt, CDFG  
Heather Pert, CDFG  
Kelly Fisher, CDFG  
Erin Wilson, CDFG  
Susan Lee, Aspen Environmental Group  
Vida Strong, Aspen Environmental Group  
Anne Coronado, Aspen Environmental Group  
Hedy Koczwarra, Aspen Environmental Group  
Don Haines, San Diego Gas and Electric Company  
Tina Carter, San Diego Gas and Electric Company

## Sunrise Powerlink Project NTP 5 Compliance Table

Pre-Construction Compliance Status Table -White Star Communication Facility Upgrade (09-28-10)	
Mitigation Measure and APM	Status
Please note that the full text of the mitigation measure conditions are not provided in this table. Complete measures can found in the EIR/EIS and MMCRRP.	Please note that cells highlighted in grey have been fulfilled or are not applicable.
Abbreviated conditions of the USFWS Biological Opinion are shown in green highlights.	Cells highlighted in yellow are conditions of the NTP and shall be fulfilled with documentation submitted to the CPUC prior to construction.
	Cells highlighted in purple will be fulfilled during or after construction.
<b>Biological Resources</b>	
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	NA: Construction activities will take place on previously disturbed areas free of vegetation.
B-1c: Conduct biological monitoring	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site and periodic inspections will be performed. Weekly monitoring reports will be submitted.
B-1k: Re-seed disturbed areas after a transmission line-caused fire	NA
B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187	NA
B-2a: Provide restoration/compensation for impacted jurisdictional areas	NA. Per the NTP request, upgrades at the White Star Communication Facility will take place within a previously disturbed and developed site. There are no ACOE, Regional Water Board, State Water Board, or CDFG jurisdictional areas located onsite.
B-3a: Prepare and implement a Weed Control Plan	The Weed Control Plan was approved 09/08/10. The conditions of the approved Weed Control Plan shall be implemented during construction.
B-5a: Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, construction activities will occur only within the previously disturbed facility; there are no special status plant populations within the White Star Communication Facilities.
G-CM-32 Prior to construction activities, SDG&E will conduct on-the-ground surveys (following Service protocols where they exist) for the following listed species where such surveys had not been conducted in 2007 and 2008, or for those species for which surveys in 2007 and 2008 were not reliable due to lack of sufficient rainfall. San Diego Thornmint ( <i>Acanthomintha ilicifolia</i> ), San Bernardino Bluegrass ( <i>Poa atropurpurea</i> ), Willowy Monardella ( <i>Monardella viminea</i> ), Quino Checkerspot Butterfly ( <i>Euphydryas editha quino</i> ), Arroyo Toad ( <i>Bufo californicus</i> ), Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> ), Least Bell's Vireo ( <i>Vireo bellii pusillus</i> ), Coastal California Gnatcatcher ( <i>Polioptila californica californica</i> ), Stephen's Kangaroo Rat ( <i>Dipodomys stephensi</i> )	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-1 San Diego Thornmint. No impacts will occur to the thornmint population at and adjacent to MP 116 or to any thornmint occurrences between MP 114 and 119...In other areas where suitable thornmint habitat (i.e., gabbro and calcareous soils and a slope of 0 to 25 percent) exists, the area to be impacted will be surveyed for thornmint before any impacts may occur, per G-CM-32.	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-2 Impacts to San Diego thornmint will first be avoided where feasible, and where not feasible due to physical or safety constraints, impacts will be compensated through salvage and relocation via a restoration program...The CPUC, BLM, USFS and Wildlife Agencies will decide whether the applicant can restore San Diego thornmint populations or will acquire habitat with San Diego thornmint...	NA. See SS-CM-1

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
B-7a Cover all steep-walled trenches or excavations used during construction to prevent the entrapment of wildlife (e.g. reptiles and small mammals)	Per the NTP request, steep-walled trenches or excavations will be covered or fencing will be installed to prevent the entrapment of wildlife during construction. A qualified biological monitor will inspect any open excavations as required. Should a dead or injured listed species be found in a trench or excavation or anywhere in the construction zone or along an access road, the qualified biologist shall contact the CPUC, BLM, State Parks (for activities in ABDSP), USDA Forest Service (for alternatives with activities on National Forest lands), and the Wildlife Agencies within 48 hours of the finding. The qualified biologist shall report the species found, the location of the finding, the cause of death (if known), and shall submit a photograph and any other pertinent information. Workers will be instructed to look under vehicles for wildlife before movement and to report mortality or injury of a listed species within 48 hours. No vehicles or equipment will be moved until the animal has left or is removed by a qualified biologist.
B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Range wide Management Strategy	NA
B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat	NA
SS-CM-22 Construction activities (including the use of helicopters) in bighorn sheep designated critical habitat will be limited to outside the lambing season (January 1 through June 30) and the period of greatest water need (June 1 through September 30) as defined in the Recovery Plan...	NA
SS-CM-23 Compensation for the loss of occupied bighorn sheep habitat will be implemented...	NA
SS-CM-24 A biological consultant approved by the Wildlife Agencies will be retained by SDG&E to collect data on bighorn sheep movements in the area during the construction phase. Prior to construction the biologist shall submit a bighorn sheep monitoring plan that meets the approval of the Wildlife Agencies...	NA
SS-CM-25 To help reconnect desert bighorn sheep subpopulations and at least partially offset impacts to the overall population caused by the project, SDG&E will: Fund the design and construction of an overpass or underpass, or tunnel to facilitate desert bighorn sheep movement across a highway...Fund, design, and construct a system of fences to prevent bighorn sheep from crossing on the surface of westbound Interstate 8...Fund removal of tamarisk, fountain grass, other invasive species, and hazardous fences for the life of the project...	NA
B-7d: Conduct burrowing owl surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. Burrowing owl surveys not required outside of Imperial County.
B-7e: Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. This measure is not applicable, as there is no suitable habitat for least Bell's vireo and southwestern willow flycatcher.
SS-CM-16 During construction, all grading or brushing taking place within riparian habitats occupied by the vireo will be conducted outside the vireo breeding season (defined as March 15 through September 15)...	NA: See B-7e
SS-CM-17 To avoid impacts to vireo, towers, pads, pull stations, access roads, staging areas, and fly facilities will be located outside of riparian vegetation, including occupied vireo habitat, where feasible..	NA: See B-7e
SS-CM-18 To minimize adverse impacts from loss of occupied habitat in the Cleveland National Forest, and to minimize predation and parasitism, SDG&E will develop and implement a brown-headed cowbird ( <i>Molothrus ater</i> ) trapping program, in consultation with the USFS.	NA
B-7h: Implement appropriate avoidance/ minimization strategies for eagle nests	NA. No suitable eagle habitat exists within or adjacent to the White Star Communication Facility Upgrades.
B-7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, there are no Quino checkerspot butterflies or their associated habitat within the facility.
SS-CM-3 A biologist permitted by the Service will delineate suitable/occupied (quino) habitat areas that will be impacted by project construction...	See B-7i
SS-CM-4 A pre-construction, Service protocol presence/absence survey for the adult Quino will be conducted within the delineated suitable/occupied habitat in the construction zone...	See B-7i
SS-CM-5 Any Service-approved restoration (plan) of impacted (quino) habitat will be conducted in areas with appropriate topographical and biological features to be determined by the Service, BLM, USFS and SDG&E...	See B-7i

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
SS-CM-6 Due the extreme importance of the Quino population located in the Jacumba Unit of Quino critical habitat, SDG&E will consult with the Service regarding the final design and siting of all permanent and temporary impacts (e.g., towers, pads, access roads, staging areas, pull down areas, helipads, and fuel modification zones) within Quino critical habitat...	See B-7i
SS-CM-7 No new construction will occur during the Quino flight season within 1 km (1 mi) of any known or newly discovered Quino occurrence. If it is not feasible to construct outside of the flight season in these instances, SDG&E must obtain written consent from the Service to proceed with construction.	See B-7i
B-7j: Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There is no suitable habitat for arroyo toad.
SS-CM-8 A pre-construction, Service protocol, survey will be conducted for the arroyo toad by a biologist approved by the Service to handle the toad) in all areas of the project located within suitable arroyo toad breeding habitat. The removal of toad riparian breeding habitat will occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles.	See B-7j
SS-CM-9 SDG&E will develop an arroyo toad translocation monitoring program to be implemented during all construction activities that have the potential to adversely affect the arroyo toad...	See B-7j
SS-CM-10 To offset the loss of occupied and suitable arroyo toad habitat within the project area, and to offset indirect effects of the project on arroyo habitat, SDG&E will develop and implement an arroyo toad predator control program on USFS lands. The scope and methods for this program will be developed in consultation with the Service and USFS.	See B-7j
SS-CM-11 Compensation for the loss of arroyo toad-occupied habitat will be implemented... Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7j
SS-CM-15 Towers, pads, pull stations, access roads, staging areas, and fly facilities will not be located within suitable/potential arroyo toad upland aestivation and riparian breeding habitat to the extent feasible...	See B-7j
B-7l: Conduct coastal California gnatcatcher surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There is no suitable habitat for California gnatcatcher.
SS-CM-19 All brushing or grading taking place within occupied habitat of the gnatcatcher 500 ft of any gnatcatcher sightings during construction will be conducted outside of the gnatcatcher breeding season (2-15 through 8-31). When conducting all other construction activities during the gnatcatcher breeding season, within occupied habitat, the following avoidance measures will apply. Vegetation clearing outside of the breeding season (10-1 through 2-14) will take place in the presence of a biological monitor approved by the Service... A Service-approved biologist will survey for gnatcatchers within 10 days prior to initiating activities in an area. The results of the survey will be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities...If an active nest is located, 300-ft no-construction buffer will be established around each nest site... The applicant will contact the Wildlife Agencies to determine the appropriate buffer zone...However, if construction must take place within 300-ft buffer, a qualified acoustician will monitor noise..	See B-7i
SS-CM-20 Compensation for the loss of occupied gnatcatcher habitat will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
SS-CM-21 Compensation for the loss of unoccupied designated critical habitat for the gnatcatcher will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Per the NTP request, although the facility and adjacent dirt area are devoid of vegetation, birds may nest within the facility on existing equipment and structures. For construction between January 15 and September 15, within 10 calendar days prior to construction, a qualified biologist will conduct avian breeding surveys. Results of the surveys will be submitted to the CPUC and Wildlife Agencies for review and approval. If active nests are located, a suitable buffer will be established. If project construction cannot occur completely outside the general avian breeding season, then pre-construction surveys will be conducted in the following manner: 1. 100-foot pre-construction surveys will be conducted for non-listed bird species prior to occupancy/use. 2. 500-foot pre-construction surveys for listed bird species, including raptors.
B-9a: Survey for bat nursery colonies	See BIO-APM-28
B-10a: Utilize collision-reducing techniques in installation of transmission lines	This location is designated as a construction facility and transmission lines will not be installed as part of this work. Therefore, this mitigation measure does not apply.
B-11a: Prepare and implement a Raven Control Plan	NA
B-12a: Conduct maintenance activities outside the general avian breeding season	NA
B-12b: Conduct maintenance when arroyo toads are least active	NA
B-12c: Maintain access roads and clear vegetation in Quino checkerspot butterfly habitat	See B-7i
BIO-APM-1: Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted. Implement with B-1a, B-1b, B-2a, B-5a, B-7d, B-7e, B-7g, B-7i, B-7j, B-k, B-7l, B-7m, and B-7o	NA. Per the NTP request, habitat for sensitive plants and animal species does not exist within or surrounding the site. Construction activities will take place within the existing facility. There is no vegetation or suitable habitat present within the facility and no impacts to biological resources will occur as a result of the upgrade activities.
BIO-APM-2: Train personnel regarding the appropriate work practices necessary to effectively implement the biological APMs.	The Safe Worker and Environmental Awareness Program (SWEAP) video will be shown to all project personnel and enforced throughout all phases of the Project, and includes appropriate work practices to effectively implement the biological resources and applicant proposed mitigation measures (APMs).
BIO-APM-3: Restrict vehicle movement to existing and constructed roads. Implement with B-5a, B-7a, B-8a, B-9a, B-12a, B-12b, and B-12c	During construction. Per the NTP request, facility is located on Tierra Del Sol Road. Vehicle traffic will be restricted to this existing, paved road.
BIO-APM-4: Comply with project area limits during construction and survey activities	Per the NTP request, all vehicles shall remain on existing roads. Construction activities will be limited to pre-disturbed areas within the facility.
BIO-APM-5: Configure access roads in compliance with hydrological resources guidelines. Implement with B-1a, B-2a, B-5a, and B-8a	NA
BIO-APM-6: Comply with all applicable environmental laws and regulations. Implement with B-1a, B-5a, B-8a, and B-12a	During construction and operation of this site, SDG&E will comply with all the necessary environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat. The SWEAP video was approved by the CPUC on March 4, 2010. This SWEAP will be shown to all project personnel to ensure compliance with all applicable laws and regulations, addressing the protection of wildlife and its habitat.
BIO-APM-7: Littering is not allowed. Implement with B-6a, B-8a, and B-12a	The SWEAP video addresses the fact that no littering is allowed, including food waste, other waste or any type of debris.
BIO-APM-8: Delineate sensitive plant population boundaries. Implement with B-5a	NA. There are no sensitive plant populations that exist within the facility.
G-CM-33 Prior to construction, plant population boundaries designated as listed or proposed by the Wildlife Agencies and other resources designated as listed or proposed by SDG&E and other resource agencies will be clearly delineated with visible flagging or fencing, which will remain in place for the duration of construction...Where these areas cannot be avoided, focused surveys for covered plant species will be performed. Notification of presence of any covered plant species to be removed in the work area will occur within ten (10) working days prior to construction activity, during which time the Wildlife Agencies may remove such plant(s) or recommend measures to minimize or reduce the impact...	See B-1a. There are no sensitive plant populations that exist within the facility fence-lines.
BIO-APM-9: Follow brush clearing guidelines. Implement with B-8a and B-12a	NA
BIO-APM-10: No wildlife, including rattlesnakes, may be harmed except to protect life and limb. Firearms shall be prohibited. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. The SWEAP also addresses that firearms are prohibited in all project areas, except for security personnel.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
BIO-APM-11: Feeding of wildlife is not allowed. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that feeding wildlife is prohibited.
BIO-APM-12: Do not bring pets. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that project personnel are not allowed to bring pets to any project area, minimizing harassment or killing of wildlife and prevention of introduction of animal diseases to wildlife populations.
BIO-APM-13: Plant or wildlife species may not be collected for pets or any other reason. Implement with B-5a and B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that prohibit collecting plant or wildlife species for pets or any other reason.
BIO-APM-14: Comply with removal of wildlife and transportation guidelines. Implement with B-7a	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Follow APMs during emergency repairs. Implement with B-1a and B-2a	NA
BIO-APM-16: Follow sensitive tree trimming guidelines. Implement with B-1a, B-2a, B-8a, and B-12a	NA. No tree trimming will occur at the construction site.
BIO-APM-17: Permanently close any new access roads or spur roads constructed as part of the project that are not required as permanent access. Implement with B-1a	NA. No access roads will be constructed.
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features. Implement with B-2a and B-5a, B-8a, and B-9a	NA. No access roads will be constructed. Per NTP request, there are no sensitive features or endangered species or their sensitive habitat within the facility areas.
G-CM-27 To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location...Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks. Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	NA. See BIO-APM-18 above
BIO-APM-19: Implement restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM	See B-1a
BIO-APM-20: Leave vegetation in place in construction areas where re-contouring is not required. Implement with B-1a	See B-1a
BIO-APM-21: Comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981). Implement with B-10a	Per NTP request, SDG&E has designed structures in conformance with "Suggested Practices for Raptor Protection on Power Lines."
BIO-APM-22: Salvage may include removal and stockpiling for replanting. Implement with B-5a	NA
BIO-APM-23: Remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Implement with B-1a and B-3a	NA
BIO-APM-24: Prevent livestock or wildlife from falling through covers. Implement with B-7a	NA
BIO-APM-25: Revegetate disturbed soils. Implement with B-1a and B-3a	NA
BIO-APM-26: Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles. Implement with B-7a	Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles during construction.
BIO-APM-27: Remove all existing raptor nests from structures that would be affected by Project construction. Implement with B-8a	Per NTP request, existing raptor nests have not been observed in or near the facility. If unoccupied nests are found prior to construction and outside of the raptor breeding season, SDG&E will remove nests that would be affected by construction activities.
BIO-APM-28: Remove potential roost trees	NA. There are no potential bat roost trees on site.
BIO-APM-29: Reduce construction night lighting on sensitive habitats. Implement with B-7a and B-9a	Surveys for nesting birds shall be conducted within 10-days prior to construction and reported to the CPUC. See B-8a.
<b>Visual Resources</b>	
V-1a: Reduce visibility of construction activities and equipment	NA.
V-1b: Reduce construction night lighting impacts	Per the NTP request, no night work is anticipated. No permanent lighting will be installed. If night work is required, a variance will be required.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
V-2a: Reduce in-line views of land scars	NA. Access to this facility will be made via existing roads. No new access roads will be constructed for utilization of the facility.
V-2b: Reduce visual contrast from unnatural vegetation lines	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2c: Reduce color contrast of land scars on non-Forest lands	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2d: Construction by helicopter	NA
V-2f: Reduce land scarring and vegetation clearance impacts on USFS-administered lands	NA
V-3a: Reduce visual contrast of towers and conductors	NA.
V-7a: Reduce visual contrast associated with ancillary facilities	NA. Colors and textures of all upgraded equipment will match existing equipment, therefore a Surface Treatment Plan will not be required.
V-7b: Screen ancillary facilities	NA
V-21a: Reduce night lighting impacts	NA. Per the NTP request, no night work is anticipated.
V-45a Prepare and implement Scenery Conservation Plan	NA
V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures	NA
V-68a: Eliminate sky lining of ridgeline towers and conductors	NA
VR-APM-1: Place structures at the maximum feasible distance from highway, canyon, and trail crossings.	NA. No crossings proposed.
VR-APM-2: Use dulled metal finish on transmission structures and non-specular conductors in visually sensitive areas. Implement with V-3b	NA
VR-APM-3: Match the spacing of structures where the line parallels existing transmission lines	NA
VR-APM-4: No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits. Implement with V-1c	The SWEAP video will be shown to all project personnel, and includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-5: Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence. Implement with V-3c	NA
VR-APM-6: In scenic view areas place structures to avoid sensitive features and/or allow conductor to clearly span the features. (Need SDG&E input)	NA
<b>Land Use</b>	
L-1a: Prepare Construction Notification Plan	A Construction Notification Plan was submitted to the CPUC and approved 3-1-10.
L-1c: Coordinate with MCAS Miramar	NA
L-2b: Revise project elements to minimize land use conflicts	NA. SDG&E is leasing the property for this construction site, and will not present a land use conflict or physically divide a community.
LU-APM-1: Provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and SDG&E will appoint a public affairs officer to address public concerns or questions. Implement with L-1d	Advance notification will be made to the Cal Fire facility, the County of San Diego and identified residents or property owners within 1,000 feet, per the Construction Notification Plan, which was approved by the CPUC on March 1, 2010. Documentation demonstrating compliance with mitigation measure LU-APM-1 will be submitted after notification has been conducted. SDG&E is coordinating with the San Diego County regarding this site. A Plan Check application was submitted to San Diego County on May 5, 2010. A copy of the Plan Check receipt was submitted with request.
LU-APM-2: Place new transmission structures more than 330 feet from an existing residence. Implement with L-1d	NA. No new transmission structures will be built.
LU-APM-4: Notify property owners and tenants in advance of construction activities. Provide alternative access if feasible. Implement with L-1e	NA. Work will be conducted within SDG&E's existing easement/existing communication facility. Construction activities associated with the White Communication Facility upgrades will not obstruct access to property owners or tenants.
LU-APM-5: Coordinate construction activities with appropriate water management representatives. (Need SDG&E input). Implement with L-1a	NA. The facility is not located near irrigation canals or flood management structures.
LU-APM-6: Flag ROW boundary and limits of construction activity inside and outside the ROW in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided. Implement with L-1f	See B-1a.
LU-APM-7: Install project facilities along the edges or borders of private property, open space parks, and recreation areas	NA. All work will occur within the existing easement/existing communication site. No work will occur within private property, open space parks, or recreation areas.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
LU-APM-8: Continue coordination efforts with the Counties of Imperial and San Diego General Plan Updates and the City of San Diego General Plan Updates to include the Proposed Project in their respective General Plans.	Coordination efforts are ongoing between SDG&E and San Diego County to assure the Project is included in the General Plan Update. Application for the building permit required for the installation of the new 75' steel monopole has been submitted and is pending approval by the County of San Diego. However, installation of the new monopole is an upgrade to the existing facility and will not change the current land use in future General Plan updates.
LU-APM-9: Obtain all necessary and/or appropriate ministerial land use permits	Upgrades at the White Star Communication Facility require a building permit. An application has been submitted and is pending approval by the County of San Diego. Upon receipt, this permit will be submitted to the CPUC.
LU-APM-10: Match structure locations with existing transmission facilities. (Need SDG&E input)	NA. Upgrades at the White Star Communication Facility do not involve installation of transmission structures.
<b>Wilderness and Recreation</b>	
WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area	NA.
WR-1b: Provide temporary detours for trail users	NA
WR-1c: Coordinate with local agencies to identify alternative recreation areas	NA
WR-2a: Develop a reroute for the BCD Alternative Revision to reduce effects on recreation	NA
WR-2b: Evaluate and Implement PCT Route Revision	NA
WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.	NA
R-APM-2a: Provide advance notice of restriction of conflicts with access routes to recreational use areas. Implement with WR-1a	NA
R-APM-2b: No construction that affects trail use will be conducted in that area on federal holidays. Implement with WR-1a	NA
R-APM-2c: Coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department. Implement with WR-1a	NA
R-APM-2d: Post signs directing vehicles to alternative park access and parking in the event construction temporarily obstructs parking areas near trailheads. Implement with WR-1a	NA
R-APM-2e: Post signs advising recreation users of construction activities and directing them to alternative trails or bikeways on both sides of all trail intersections. Implement with WR-1a	NA
R-APM-2f: Post signs advising equestrians of construction timeframes where helicopters are used for construction, at all equestrian trail-access points within the vicinity of the flight paths. Implement with WR-1a	NA
R-APM-3a: Construction-related traffic shall be restricted to routes approved by the authorized agencies	NA
<b>Agriculture</b>	
AG-1a: Avoid interference with agricultural operations	NA. There are no agricultural fields located within or adjacent to the White Star Communication Facility Upgrades.
AG-1b: Restore compacted soil	NA
AG-1c: Coordinate with grazing operators	NA
AG-3b: Consult with and inform aerial applicators	NA
LU-APM-3: Compensate farmers for losses of crops along ROW. Implement with L-1d	NA
<b>Cultural Resources</b>	
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	A Cultural Resource Study which included the White Star Communication Facility was submitted August, 2009. The report was reviewed by the CPUC cultural resources consultant and comments were provided on June 8, 2010. Per the report, there is no potential to encounter cultural resources at the White Star Communication Facility. The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.
C-1b: Avoid and protect potentially significant resources	See C-1a.
C-1c: Develop and implement Historic Properties Treatment Plan	The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
C-1d: Conduct data recovery to reduce adverse effects	See details in C-1a and C-1c.
C-1e: Monitor construction at known ESAs	See details in C-1a and C-1c.
C-1f: Train construction personnel	The approved SWEAP video will be shown to all project personnel, and includes instructions on recognition and protection of cultural resources.
C-1g Avoid and protect Old Highway 80 (P-37-024023)	NA
C-2a: Properly treat human remains	Per the NTP request there are no known Native American human remains located within this previously disturbed and developed site. Unanticipated archeological materials discovered during construction will be treated as described the project Historic Properties Management Plan (HPMP).
C-3a: Monitor construction in areas of high sensitivity for buried resources	See details in C-1a and C-1c.
C-4a: Complete consultation with Native American and other Traditional Groups	NA. Per the NTP request, consultation with the Native American Heritage Commission was completed for the White Star Communication Facility as part of SDG&E East County Substation Project. No Traditional Cultural Properties or other resources of Native American concern were identified as part of this process.
C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties	During construction. Per the NTP request, there are no known NRHP- and/or CRHR-eligible resources within the White Star Communication Facility. However, if NRHP- and/or CRHR-eligible resources are discovered during construction, this mitigation measure would be implemented 30 days prior to operation of the project.
C-6a: Reduce adverse visual intrusions to historic built environment properties	NA
C-6e: Reduce adverse visual intrusions to portions of Old Highway 80	NA
C-6f: Reduce adverse visual intrusions to the Desert View Tower view shed	NA
CR-APM-1: Instruct construction personnel on the protection and avoidance of cultural resources. Implement with PAL-1e	Per the NTP request, the SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. Additionally, the construction contract will address state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them will be signed by each individual. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
CR-APM-2: Flag archeological sites that are eligible or potentially eligible for the National Register	See details in C-1b. No sites identified.
CR-APM-3: Report any previously unidentified cultural resource (historic or prehistoric site or object) discovered	The SWEAP video will be shown to all project personnel, and includes instructions on what to do in case a cultural resource is discovered during construction activities.
CR-APM-4: Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, and reconstruction of a historical resource consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines	NA. See C-4a.
CR-APM-5: Follow the guidance described for: Preservation in-place for mitigating impacts to archaeological sites, and preparation of data recovery plans	Per the NTP request, this mitigation measure will be implemented during construction. There are no known cultural resources at the White Star Communication Facility. If unanticipated cultural resources are discovered, the guidelines for cultural resources will be implemented.
CR-APM-6: Avoid, fence, or barricade historic properties, contributing portions and sensitive features for protection	NA. No sites identified.
CR-APM-7: Control erosion, sedimentation, or indirect displacement. Implement with C-2a, C-3a, C-4a, and C-5a	See details in C-1a and C-1c.
CR-APM-8: Avoid and protect elements of the landscape that are essential to the historic setting of the property	NA. No sites identified.
CR-APM-9: Install permanent fencing or barriers; or control/restrict access to the historic property	NA. No sites identified.
CR-APM-10: Locate project structures so that conductors span linear historic properties; underground placement of pipelines and conductors will be bored under linear properties to avoid disturbance or intrusion	NA. No sites identified.
CR-APM-11: Implement standard practices for cultural and paleontological resources on private lands	See details in C-1a and C-1c.
CR-APM-12: Conduct cultural surveys for staging areas that have not yet been identified	NA
<b>Paleontological Resources</b>	

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
PAL-1a: Inventory and evaluate paleontological resources in Final APE	NA. Based on the Recirculated Draft EIR / Supplemental Draft EIS, dated October 2008, there is no potential to encounter paleontological resources at the White Star Communication Facility. The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1b: Develop Paleontological Monitoring and Treatment Plan	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1c: Monitor construction for paleontology	NA. Per CPUC review, no monitor is required.
PAL-1d: Conduct paleontological data recovery	See PAL-1b
PAL-1e: Train construction personnel	The SWEAP video will be shown to all project personnel, and includes instructions on recognition of possible subsurface paleontological resources.
GEO-APM-9: Implement appropriate mitigation efforts if paleontological resources are encountered. Implement with PAL-1d	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
<b>Noise</b>	
N-1a: Implement Best Management Practices for construction noise	See LU-APM-1
N-2a: Avoid blasting where damage to structures could occur (SDG&E to define blasting)	NA
N-3a: Respond to complaints of corona noise	NA
NOI-APM-1: Provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads; and establish a toll free telephone number for receiving questions/complaints. Implement with L-1a	NA. There are no known sensitive receptors and residences within 300 feet of this facility.
<b>Transportation and Traffic</b>	
T-1a: Restrict lane closures	In the event that lane closures are required, closures will not occur between 6:30 and 9:30 a.m. and between 3:30 and 6:30 p.m. unless an encroachment permit is acquired. Documentation of coordination with emergency service providers must be provided to the CPUC prior to any lane closures.
T-4a: Ensure pedestrian and bicycle circulation and safety.	NA. Pedestrian and bicycle facilities will not be affected with the occupancy of this facility.
T-5a: Repair roadways damaged by construction activities	Will occur during construction if applicable.
T-7a: Notify public of potential short-term elimination of parking spaces	NA. It is not anticipated construction at this site will eliminate parking spaces.
T-9a: Prepare Construction Transportation Management Plan	NA. The project-wide Traffic Impact Study determined that there will be no significant traffic impacts for set-up and utilization of this facility. The existing circulation system and intersection controls will function adequately. As a result, a CTMP will not be required.
T-11b: Consult with and inform U.S. Customs and Border Patrol	NA. This yard will not include the installation of transmission towers or lines.
T-APM-2a: Obtain required permits for temporary lane closures	NA. No lane closures anticipated.
T-APM-2b: Submit detour plans. Implement with T-1b	NA. No detours are planned.
T-APM-4a: Coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	SDG&E shall coordinate with emergency service providers prior to activities that would restrict movements of emergency vehicles. Documentation of coordination with emergency service providers shall be submitted to the CPUC. SDG&E will notify and provide required information to counties and cities. A Plan Check Application was submitted to San Diego County on May 5, 2010.
T-APM-5a: Consult with County Education Offices, School Districts to coordinate construction activities adjacent to school bus stops	NA. Construction activities are not adjacent to school bus or bus transit stops.
T-APM-6a: Comply with county parking ordinances or approved traffic control plan	See T-1a and T-7a
T-APM-6b: Prohibit parking on San Diego County-maintained roads and highways unless otherwise noted at specific locations; comply with the County of San Diego Department of Public Works Traffic Guidelines, 2001 whenever possible, or an approved traffic control plan	Parking will comply with the County of San Diego Department of Public Works Traffic Guidelines (2001) for parking along San Diego County maintained roads and highways.
T-APM-8a: Obtain required permits for entering railroad ROW	NA
T-APM-9a: Underground all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway. (Need SDG&E input)	NA
T-APM-10a: Provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure access to properties when not actively constructing the underground cable alignment	NA
<b>Public Health and Safety</b>	

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
P-1a: Implement Environmental Monitoring Program	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. As identified in the Environmental Monitoring Plan, the Environmental Field Representative/Lead Monitoring Manager for this Project is Steve Riggs (Burns & McDonnell). The SWEAP video, which was approved by the CPUC on March 15, 2010, includes discussion of the implementation of the Environmental Monitoring Program, maintenance of emergency spill supplies and equipment, the proper use of hazardous materials, development of a Hazardous Communication Plan, development of applicable environmental safety plans associated with hazardous materials, assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project, proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations, and environmental training regarding potential exposure. The SWEAP video will be shown to all Project personnel and enforced throughout all phases of the Project.
P-1b: Maintain emergency spill supplies and equipment	Maintain emergency spill supplies and equipment. Hazardous material spill kits will be maintained onsite for response to small spills. The SWEAP video will be shown to all project personnel, and includes instructions on emergency spill response, including emergency spill supplies and equipment. Detailed information for responding to accidental spills will be provided in Emergency Response information included in the site Storm Water Pollution Prevention Plan must be submitted prior to construction.
P-2a: Test for residual pesticides/herbicides on currently or historically farmed land	NA. There is no farmed land at this facility.
P-3a: Appoint individuals with correct training for sampling, data review, and regulatory coordination	Individuals with correct training for sampling, data review, and regulatory coordination will be appointed during construction.
P-3b: Documentation of compliance with measures for encountering unknown contamination	Documentation of compliance with measures for encountering unknown contamination will occur during construction.
P-7a: Evaluate contaminated sites	A Phase I ESA was submitted to the CPUC for review on December 2, 2009. However, the project-wide assessment did not include the White Star Communication Facility. Therefore, a subsequent limited Phase I ESA was performed for the White Star Communication Facility by Geosyntec on May 25, 2010. Results of the study were submitted with the request.
HS-APM-1: Train personnel involved in using hazardous materials. Develop a Hazardous Communication Plan. Implement with P-1a	All personnel involved in using hazardous materials will be trained in the proper use and safety procedures for the chemical per the approved Hazard Communication Plan and by watching a SWEAP video. All personnel involved in using hazardous materials will be equipped with the necessary Personal Protection Equipment (PPE). The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Train personnel in refueling vehicles. Implement with P-1a	Refueling will only be performed by operators trained in refueling of vehicles or equipment. Refueling shall be performed in a designated area, with secondary containment, by a mobile refueling tanker (2,500-3,000 gallon capacity). This refueling tanker will be stored offsite.
HS-APM-3: Develop applicable environmental safety plans associated with hazardous materials. Implement with P-1a	A Hazard Communication Plan (HazCom) has been developed and approved by the CPUC for this project.
HS-APM-4: Develop a site specific blasting plan of tower footing	NA. Blasting is not anticipated at this site.
HS-APM-5: Investigate all Government Code §65962.5 sites or other known contamination sites along the transmission line ROW.	A Phase I ESA was submitted to the CPUC for review on December 2, 2009. However, the project-wide assessment did not include the White Star Communication Facility. Therefore, a subsequent limited Phase I ESA was performed for the White Star Communication Facility by Geosyntec on May 25, 2010. No evidence of recognized environmental conditions was identified for the site. Results of the study were submitted with the request.
HS-APM-6: Investigate any known or potential areas for Unexploded Ordinance (UXO) used by the military along the ROW	NA. Per the NTP request, the site has been previously excavated. There is no known or potential for UXO, as this area was not utilized for military purposes.
HS-APM-7: Train personnel involved in excavation and grading or for ROW clearing to recognized UXO and/or potential soil, surface water, and groundwater potential contamination sites	NA. See HS-APM-6.
HS-APM-8: Assign an Environmental Field Representative and/or General Contractor for Health & Safety. Implement with P-1a	The Environmental Monitoring Plan submitted to the CPUC on May 10, 2010 identifies the Environmental Field Representative assigned to the project. SDG&E has assigned a Health & Safety Officer to the project.
HS-APM-9: Contact airport representative and/or Federal Aviation Administration Authorities regarding work within all existing and proposed transmission line corridors within 2 miles of an airport	NA. The scope of work is for upgrades to an existing facility and not construction along the proposed transmission line corridor.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
HS-APM-10: Store and dispose of hazardous waste and solid waste in accordance with federal, State, and local regulations. Implement with P-1a	All hazardous waste and solid waste will be stored and disposed of in accordance with Federal, State and local regulations. SDG&E requirements for waste disposal will meet or exceed State requirements for waste disposal facilities. Hazardous material minimization shall be employed whenever feasible.
HS-APM-11: Develop Fire Prevention and Response Plan (FPRP). Assign a project Fire Marshal to enforce all provisions of the FPRP	An approved project specific Fire Plan for Construction, Operations and Maintenance has been developed and acknowledged by the CAL Fire Chief. A Fire Marshall has been hired for the project and is assigned to enforce the Fire Plan.
HS-APM-12: Develop a Traffic Control Plan	NA. Construction will occur within the limits of the facility.
HS-APM-14: Construction workers shall undergo environmental training regarding potential exposure	The SWEAP video will be shown to all project personnel, and includes procedures regarding potential exposure of hazardous materials in accordance with Federal, State, and local authorities.
HS-APM-15: Stop work and notify Health and Safety Officer if during excavation soil or groundwater contamination is suspected	If, during excavation (trenching), soil or groundwater contamination is suspected, work near the immediate excavation will be terminated and appropriate health and safety procedures implemented. An OSHA-trained person will be designated to conduct sample collection or investigation activities, if needed.
HS-APM-16: Terminate and cordoned off work if soil or groundwater contamination is suspected	See HS-APM-15.
HS-APM-17: Notify regulatory agency if the sample testing determines that contamination is found above regulatory limits	See HS-APM-15.
PS-1a: Limit the conductor surface electric gradient	NA. No conductors will be used at the site and communication upgrades will not interfere with radio or television frequencies.
PS-1b: Document and resolve electronic interference complaints	NA. Upgrades will not interfere with radio or television frequencies.
PS-2a: Implement grounding measures	NA. No conductors will be used at the site.
<b>Air Quality</b>	
AQ-1a: Suppress dust at all work or staging areas and on public roads	A Dust Control Plan was approved by the CPUC on January 20, 2010 for the entire project. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities at this site.
AQ-1b: Use low-emission construction equipment	SDG&E will use available Tier 3 equipment, minimizing the use of Tier 2 equipment at the facility. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. Equipment run logs will be maintained on a daily basis to satisfy mitigation measures and periodically submitted to the CPUC.
AQ-1h: Obtain NOx and particulate matter emission offsets	Construction-phase activities and emissions would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity de minimis thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would be satisfied based upon these lower emissions.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	During construction, SDG&E will offset Construction-Phase Greenhouse Gas Emissions with Carbon Credits as per documentation submitted to the CPUC Aug. 27, 2009.
AQ-4c: Avoid sulfur hexafluoride emissions	NA. The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. Per the NTP request, there will be no SF6 emissions at the facility.
AQ-APM-1: Comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]). File a Dust Control Plan with the ICAPCD	See AQ-1a
AQ-APM-2: Control fugitive dust	A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities.
AQ-APM-3: Minimize mud and dust from being transported onto paved roadway surfaces, pave, and gravel	A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities.
AQ-APM-4: Carpool to the job site	The SWEAP video will be shown to all project personnel, and includes promoting carpooling to the job site.
AQ-APM-5: Minimize unnecessary construction vehicle idling time	The SWEAP video will be shown to all project personnel, and includes vehicle idling.
<b>Hydrology and Water Resources</b>	
H-1a: Prepare Substation Grading and Drainage Plan; construct during the dry season	If groundwater is encountered it will be handled according to federal, state and local regulations. Groundwater will be pumped into either a tank truck or a baker tank and tested for proper disposal. If required, a groundwater disposal permit will be obtained.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
H-1a (CC): Construct during the dry season	NA
H-1b: Construction in Los Peñasquitos Canyon Preserve to be in the dry season; SWPPP to be reviewed and approved by San Diego County and City of San Diego	NA
H-1k: Comply with Forest Service conditions	NA
H-1l: Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment-Control Plan	NA
H-2d: Maintain vehicles and equipment	Vehicles and equipment will be maintained during construction.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	NA. There will be no blasting at this facility. A Blasting Plan will not be required.
H-5a: Install substation runoff control	NA
H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property	NA
H-7a: Develop Hazardous Substance Control and Emergency Response Plan for project operation	NA. Per Section 2.12.2 of the Re-circulated Draft EIR, contaminants will not be stored at the White Star Communication Facility and accidental releases of contaminants from project facilities would not occur and no mitigation is required.
H-8a: Bury power line below 100-year scour depth	NA
WQ-APM-1: Minimize disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks	NA. There will be no disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks.
WQ-APM-2: Place structures so as to avoid sensitive features such as watercourses, or to allow conductors to clearly span the features, within limits of safety and standard structure design	NA. Per the NTP request, there are no sensitive water features in the construction area.
WQ-APM-3: Clearly mark where construction equipment and vehicles are not allowed on-site; and train personnel	NA. There are no sensitive water features inside the site.
WQ-APM-4: Maintain adequate distance from stream banks and beds; use existing bridges to cross major streams and culverts in most dry intermittent streams; Span surface water, riparian areas and floodplains; prepare and implement a Storm Water Pollution Prevention Plan (SWPPP)	An NPDES storm water discharge permit for construction activities will be obtained. A SWPPP is required for the site. SDG&E will implement and install appropriate BMPs prior to construction to control erosion of soil and prevent storm water sediment, such as silt fencing or straw bales. BMPs will be maintained during construction.
WQ-APM-5: Construct any stream crossings at low flow periods; and if necessary, develop a site-specific mitigation and restoration plan	NA. There will be no stream crossings at this location.
WQ-APM-6: Avoid designated surface water protection areas	NA. Per the NTP request, groundwater is not anticipated to be encountered during installation of the new monopole. As determined in the attached Geotechnical Investigation (dated March 2010), groundwater was not encountered during a test bore that reached a depth of 31.5 feet below ground surface. Excavation for the new monopole foundation will be approximately 15 feet deep; therefore, groundwater is not expected. However, should groundwater be unexpectedly encountered and dewatering required, SDG&E would implement this mitigation measure.
WQ-APM-8: Obtain and comply with required permits for any groundwater discharged to surface waters or storm drains	If dewatering is required during excavation, it will be contained and disposed of according to regulations.
WQ-APM-9: Prohibit storage of fuels and hazardous materials within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells	During construction. Storage of fuels and hazardous materials will be prohibited within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells.
WQ-APM-10: At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, comply with burial depth requirements. Implement with H-6a	NA. There are no stream banks inside or surrounding the site.
WQ-APM-11: Test groundwater levels along underground portion of the project drilling pilot borings	NA
WQ-APM-13: Do not disposed of hazardous materials onto the ground, the underlying groundwater, or any surface water	Hazardous waste will be disposed in enclosed containment and removed to a hazardous waste facility permitted or authorized to treat, store, or dispose of such materials. In the event of a release of hazardous materials to the ground, it will be promptly cleaned up in accordance with applicable local, State and Federal regulations. Trash will be contained in totally enclosed receptacles.
WQ-APM-14: Secure required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization	See WQ-APM-4.
WQ-APM-15: Construct access roads to avoid streambeds	NA. The facility is located on Tierra Del Sol Road. Vehicle traffic will be restricted to this existing paved road.
WQ-APM-16: Conduct site-specific assessments for each affected site	NA. There are no sensitive water resource features such as wetlands or waters of the State located in or near the site.
<b>Geology, Minerals, and Soils</b>	
G-2a: Protect desert pavement	NA

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	Per the NTP request, a design-level geotechnical study was conducted by Toro International on March 10, 2010. The report is titled Geotechnical Investigation for Gas Company Monopole and Equipment Shelter and includes a summary of the survey results. CPUC has reviewed and approved the report.
G-4a: Reduce effects of ground shaking	Per the NTP request, the White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the White Star Communication Facility is suitable for development provided the report geotechnical recommendations are implemented.
G-4b: Conduct geotechnical investigations for liquefaction	Per the NTP request, the White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the subsurface soil at the White Star Communication Facility is not likely to liquefy during an earthquake.
G-5a: Minimize project structures within active fault zones	Per the NTP request, the White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the nearest active fault is the Elsinore-Coyote Mountain Fault which is approximately 17 miles from the White Star Communication Facility.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	Per the NTP request, the White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. The White Star Communication Facility site is flat and not located on or near a slope.
G-9a: Coordinate with quarry operations	NA
GEO-APM-1: No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable	NA. The site is accessed from the existing Tierra del Sol Road. No other access roads are needed to complete the work.
GEO-APM-2: Comply with soil disturbance guidelines	During construction.
GEO-APM-3: Avoid placing structures in areas of high shrink/swell potential	NA. Per the NTP request, the White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the White Star Communication Facility soils primarily consist of sand and silt which does not contain shrink/swell characteristics.
GEO-APM-4: Place structures in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock	NA. See GEO-APM-3.
GEO-APM-5: Avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation	NA
GEO-APM-6: Conduct surface restoration for erosion control and re-vegetation	SDG&E will implement the project's SWPPP during construction of the White Star Communication Facility.
GEO-APM-8: Remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage; and position structures to span over potential landslide areas	NA. There are no boulders or hills within the facility construction area..
<b>Socioeconomics</b>	
S-2a: Notify public of utility service interruption	NA
S-2b: Protect underground utilities	NA
S-3a: Recycle construction waste	SDG&E and/or its construction contractor shall recycle a minimum of 90% of inerts and 70% of all other materials generated during construction activities. Documentation from the recycling and/or landfill facilities used for construction will be provided to the CPUC.
S-3b: Use reclaimed water	The Water Resources Availability Study, as discussed in the Project Modification Report, determined that sufficient supplies of surface water, reclaimed water, and potable water would be available to meet Project demand.
PSU-APM-1: Coordinate with all utility providers with facilities located within or adjacent to ensure that design does not conflict with other facilities	NA. Per the NTP request, the communication tower is replacing existing poles and is consistent with the current use at the site.
PSU-APM-2: Notify Underground Service Alert a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines	SDG&E will contact Underground Service Alert 48 hours prior to any ground-disturbing activities.

## Sunrise Powerlink Project NTP 5 Compliance Table

Mitigation Measure and APM	Status
PSU-APM-3: Coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized	Per the NTP request, a Traffic Impact Analysis was performed and incorporates coordination of construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized. SDG&E submitted the Traffic Impact Analysis to CPUC. No lane closures are anticipated to complete the work. SDG&E will coordinate with emergency services; construction schedules and activities are not anticipated to disrupt emergency and police service response times.
<b>Fire and Fuels Management</b>	
F-1a: Develop and implement a Construction Fire Prevention Plan	During construction. A Construction Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on Jan. 20, 2010.
F-1b: Amend and implement Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007)	A Construction Fire Plan, acknowledged by the CAL FIRE Chief, was approved by the CPUC on January 20, 2010. Therefore, the preconstruction component of this measure is complete. The plan will need to be revisited and updated every five years.
F-1c: Ensure coordination for emergency fire suppression	NA. Construction activities will be limited to the facility and will not obstruct firefighting equipment or crews or emergency fire suppression efforts
F-1d: Remove hazards from the work area	If present, dead and decaying vegetation will be removed from the facility prior to set up or chipped and spread onsite in piles no higher than six inches.
F-1e: Contribute to defensible space grants fund	Fire agency proposal for both Defensible Space (F-1e) and Power line Firefighting Mitigation Fund (F-3a) were approved 3-7-10. Post-construction task.
F-2a: Establish and maintain adequate line clearances	See F-1a
F-2b: Install existing conductors on steel poles	See F-1a
F-2c: Perform climbing inspections	Post-construction task.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. Post-construction task.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	Per the NTP request, SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU. It will be implemented prior to energization.