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February 28, 2013

Ms. Amy Baker  
Project Manager  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102

**Re: Notice to Proceed (NTP) Request #4 to Conduct an Additional Geotechnical Investigation along the Underground Transmission Alignment**

Dear Ms. Baker:

On June 21, 2012, the California Public Utilities Commission (CPUC) selected the East County (ECO) Substation Alternative Site combined with the ECO Partial Underground 138 kilovolt (kV) Transmission Route Alternative (Decision A.09-08-003) as the approved ECO Substation Project (Project). The decision grants San Diego Gas & Electric Company (SDG&E) a Permit to Construct and conditionally authorizes construction of the Project after the implementation of pre-construction mitigation measures. A Notice of Determination was submitted to the State Clearinghouse on June 21, 2012, indicating the CPUC's approval of the Project.

**Purpose**

The CPUC issued NTP #3 on February 1, 2013 to perform geotechnical investigations at 23 locations along the underground transmission alignments. SDG&E is formally requesting authorization to perform one additional geotechnical investigation—GEO 11B—in order to finalize the design of the underground transmission alignment from the Boulevard Substation to the Riser Pole identified as steel pole (SP) 38. The location where the testing will occur is depicted in Attachment A: Geotechnical Test Boring Location. No activities associated with construction of the underground alignments will occur until authorization has been received under a separate NTP. The geotechnical investigation is briefly summarized in this NTP request.

**Pre-Construction Mitigation Measures**

All of the pre-construction mitigation measures applicable to the geotechnical investigation have been completed or will be implemented immediately prior to beginning work. A list of all of the pre-construction mitigation measures that apply to the geotechnical investigation and its status are included in Attachment B: Pre-Construction Status Report of this NTP request.

**Activity Summary**

The geotechnical investigation study will consist of one small-diameter (approximately six-inch) boring. The boring—GEO 11B—will be located along an unnamed private dirt road between boring locations GEO 11 and GEO 11A. The boring location is shown in Attachment A: Geotechnical Test Boring Location. No soil samples will be taken. A geologist will record the soil types encountered during the boring operation. The immediate workspace for the bore hole will be approximately five feet by five feet (approximately 25 square feet), and the total estimated work area surrounding the boring location—including space for work crews and equipment—will be approximately 40 feet by 10 feet (approximately 400 square feet). The bore hole will be backfilled following drilling activities.

A truck-mounted drill rig will be utilized to conduct the boring. In addition, three to four light- to medium-duty vehicles will be required to transport crews. The drill rig dimensions are approximately five to eight feet wide, 30 feet high, and 30 feet long. The drill will advance an approximately six-inch auger to a maximum depth of forty feet below the existing grade.

Drilling will be conducted along the existing roadway in a previously disturbed area. No grading or vegetation clearing is proposed as part of this activity, and the boring location has been reviewed by the environmental team. An environmental resource monitor, and fire-prevention crew and equipment will be on site during the work. No biological, cultural, or water resources will be impacted by these activities.

It is anticipated that the total duration of this activity will be one day. Drilling at the boring location will start at 7:00 a.m. and activities will be finished no later than 7:00 p.m. It is anticipated that drilling at the new boring location will be completed within one to two hours, depending on the depth and drilling conditions.

## **Summary of Resource Impacts**

### *Visual Resources*

The geotechnical investigation will not result in any permanent impacts to visual resources because all work will be conducted within or in the vicinity of the existing dirt road. In addition, work will be temporary and short-term, lasting approximately one day. Therefore, impacts to visual resources will not occur.

### *Air Quality*

The Project's Dust Control Plan, which was approved by the CPUC on October 12, 2012, will be implemented during the geotechnical investigation. In addition, the geotechnical investigation will only require one drill rig and two to three support vehicles, and traffic will not increase beyond the numbers analyzed in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS). Thus, impacts to air quality will be minimized in accordance with the requirements of the Project's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and no impacts to air quality—beyond those analyzed in the EIR/EIS—will occur.

### *Biological Resources*

Literature and database searches, as well as general biological surveys, were conducted for the Project in 2008 to support the preparation of the Proponent's Environmental Assessment (PEA). Additional rare plant surveys were conducted for the Project in 2009, 2010, 2011, and 2012. The rare plant survey results were submitted to the CPUC on October 24, 2012. The proposed work activity is located in areas of bare ground or disturbance, and no vegetation removal will be required. Any adjacent locations of rare plant occurrences will be flagged for avoidance prior to drilling activities. Biological monitors will be on site to ensure that impacts to resources are avoided. The hole created by the geotechnical boring will be backfilled following drilling activities; therefore, no open excavations will remain overnight. Thus, potential impacts to biological resources will be minimized in accordance with the MMCRP requirements, and no impacts to biological resources—beyond those analyzed in the EIR/EIS—will occur.

### *Cultural Resources*

A cultural resources study was conducted for the Project in August 2009. A copy of the cultural resources report was submitted to the CPUC as part of the PEA on August 10, 2009. The geotechnical boring will be conducted within the existing road. The boring location is not located within 100 feet of a cultural site; thus, a cultural resource monitor will not be present during the boring activity. Therefore, no impacts to cultural resources are anticipated.

### *Geology, Mineral Resources, and Soils*

The Geotechnical Investigation Report, which includes an assessment of soil characteristics, was submitted to the CPUC on August 1, 2012. The geotechnical boring will be conducted within the existing dirt road. In

addition, the boring location will be temporary, and the hole created will be backfilled following drilling activities. No grading or vegetation removal will be required. No soil stockpiles will be left overnight. Therefore, no impacts related to geology, mineral resources, or soils—beyond those analyzed in the EIR/EIS—will occur.

#### *Hazards and Hazardous Materials*

A limited Phase I Environmental Site Assessment (ESA) was performed in 2008 for the 138 kV transmission line route. The Phase I ESA was submitted to the CPUC as an attachment to the PEA on August 10, 2009. No known hazardous materials sites are located in the boring location. If any contaminated soils are encountered during the geotechnical investigation, contractors will stop work and notify the designated environmental field representative, as specified in the Project's MMCRP. Therefore, no impacts related to hazards or hazardous materials beyond those analyzed in the EIR/EIS are anticipated.

#### *Fire and Fuels Management*

No vegetation removal, tree trimming, or grading will be conducted during the geotechnical investigation. In addition, the Project's Fire Prevention Plans will be implemented during drilling in accordance with the MMCRP requirements. Therefore, no fire-related hazards beyond those analyzed in the EIR/EIS will occur as a result of the geotechnical investigation.

#### *Water Resources*

No work will occur within drainages. The hole will be backfilled or covered the same day of drilling, and any soil stockpiles left in place overnight will be covered and secured in accordance with the MMCRP requirements. In addition, the only water needed to perform the geotechnical investigation will be associated with dust control, and no wastewater will be generated. Therefore, no impacts to hydrological resources beyond those analyzed in the EIR/EIS will occur as a result of the geotechnical investigation.

#### *Land Use and Planning*

No change in the current land use of the underground transmission alignment will occur, as all of the work will be conducted within the existing dirt access road, and no permanent structures will be installed. A public notice mailer, approved by the CPUC on January 16, 2013 and included as Attachment D: Public Notice Mailer to NTP Request #3, was mailed on January 18, 2013, in accordance with the Project's Construction Notification Plan. The Construction Notification Plan was approved by the CPUC on October 31, 2012. Therefore, no impacts associated with land use and planning will occur as a result of the geotechnical investigation.

#### *Noise*

As previously discussed, the geotechnical investigation will not increase the number of construction vehicles beyond what was analyzed in the Final EIR/EIS.

#### *Public Services and Utilities*

The majority of the geotechnical investigation will be conducted entirely within the road shoulder and will not increase the number of construction vehicles beyond what was analyzed in the Final EIR/EIS. In addition, the geotechnical investigation will be short in duration, lasting approximately one day. No lane closures will be required. Therefore, no impacts to emergency response services, school facilities, or recreational facilities are expected to occur. In addition, SDG&E will coordinate with all applicable utility providers and contact Underground Service Alert as appropriate prior to the boring activity; therefore, no underground utilities will be impacted.

#### *Wilderness and Recreation*

The geotechnical investigation will be conducted within an existing road. There are no recreational resources located within or near the proposed boring location and the geotechnical investigation will be

temporary and short term; therefore, the geotechnical investigation will not result in any impacts to recreation.

*Transportation and Traffic*

The CPUC approved the ECO Substation Traffic Control Plan on January 25, 2013. Traffic control requirements will be minimal and will consist of advance warning signs and cones around the work area. No road closures will be required. If necessary, the drill rig will stop work and move to allow traffic to pass safely. In addition, activities will be short in duration, lasting approximately one day; therefore, no permanent impacts to traffic or public transit will occur.

We respectfully request authorization of this NTP request by March 5, 2013 in order to meet the construction schedule and ensure that the design of the underground transmission alignments are complete prior to construction of that component of the Project. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 503-5006.

Sincerely,



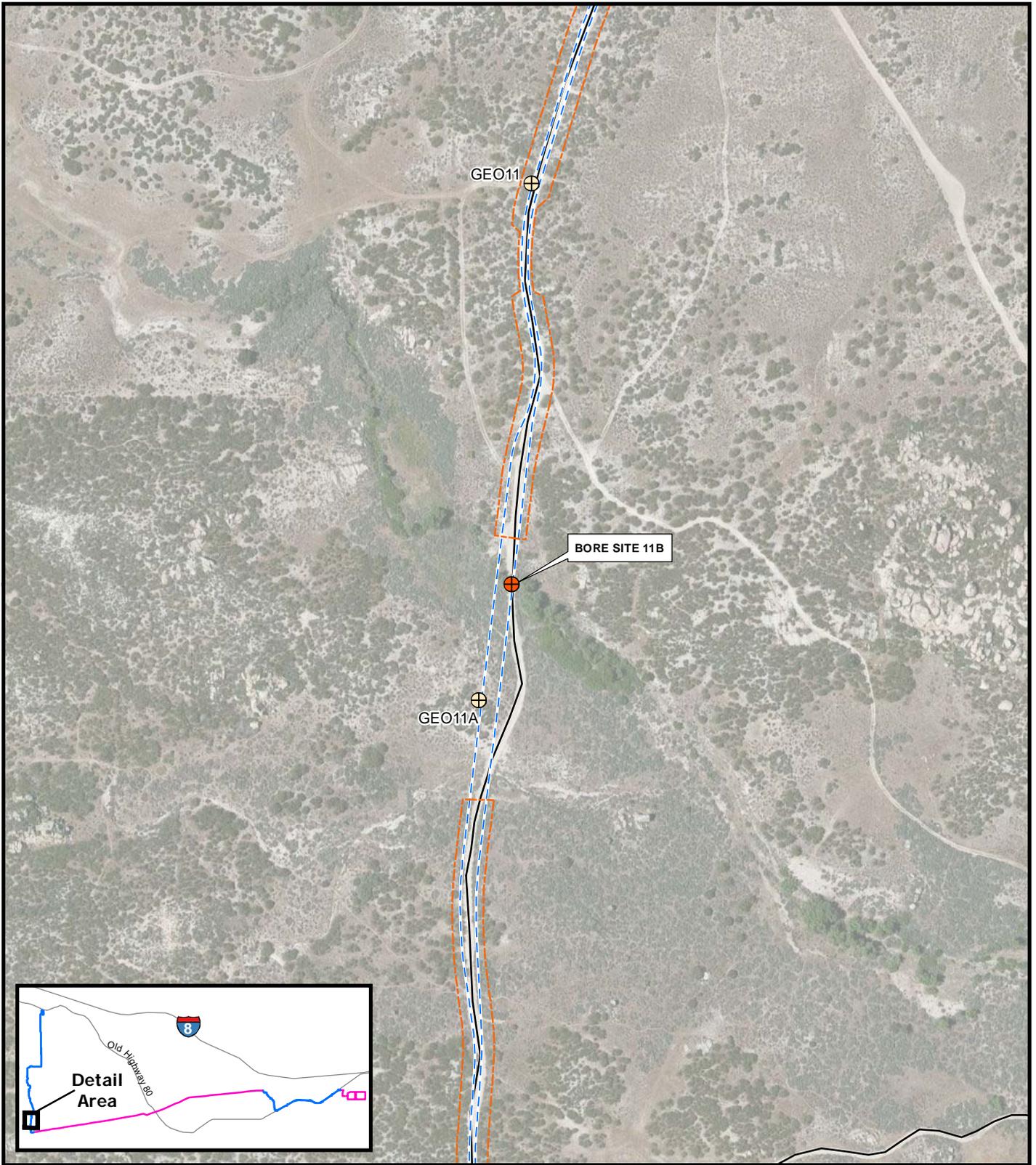
Don Houston  
Environmental Project Manager  
San Diego Gas & Electric Company

Attachment A: Geotechnical Test Boring Location  
Attachment B: Pre-Construction Status Report

cc: Anne Marie McGraw, Insignia Environmental  
Jeffrey Coward, Insignia Environmental  
Kirstie Reynolds, San Diego Gas & Electric Company  
David Hochart, Dudek

**ATTACHMENT A: GEOTECHNICAL TEST BORING LOCATION**





**Attachment A:  
Geotechnical Test Boring Location**

**East County Substation Project**

-  Proposed Geotechnical Bore Site
-  Approved Geotechnical Bore Site
-  Proposed 138 kV Underground
-  Existing Access Road Centerline
-  Permanent Right-of-Way



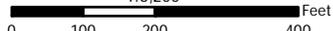
SDGE  
A Sempra Energy utility



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**ATTACHMENT B: PRE-CONSTRUCTION STATUS REPORT**



**Attachment B: Pre-Construction Status Report**

 To Be Implemented During Construction  
 Pending OR To Be Implemented Immediately Prior to Construction

 Complete  
 Not Applicable

Mitigation Measure Number	Measure Text	Comments	Status
BIO-01a	All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified on the final engineering plans. The limits of the approved work space shall be delineated with stakes and/or flagging that shall be maintained throughout the construction period. An environmental monitor shall complete regular observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported.	SDG&E submitted GIS data showing the limits of approved work space to the CPUC on November 27, 2012. The limits of the approved work space for geotechnical work will be delineated with stakes and/or flagging immediately prior to construction. Environmental monitors will be present during construction to ensure that all work is completed within the approved work limits.	To be Implemented Immediately Prior to Construction
BIO-01b	Prior to construction, all developer, contractor, and subcontractor personnel shall receive training regarding the appropriate work practices necessary to implement the mitigation measures and comply with environmental regulations, including plant and wildlife species avoidance, impact minimization, and best management practices. Sign-in sheets and hard hat decals shall be provided that document contractor training has been completed for construction personnel.	<p>The brochure, wallet card, cultural awareness video, hard-hat decal, and sign-in sheet were approved by the CPUC on December 10, 2012 and by the BLM on December 17, 2012. The CPUC approved the Safe Worker Environmental Awareness Program Truck Driver Training handout on January 8, 2013.</p> <p>The environmental awareness education program for construction staff was implemented in February 2013, immediately prior to construction. SDG&amp;E submitted the completed sign-in sheets to the CPUC on February 7, 2013. Construction personnel who have not received education prior to construction will receive it immediately prior to them commencing work on the Project.</p> <p>SDG&amp;E will continue to submit completed sign-in sheets to the CPUC during construction.</p>	To be Implemented During Construction
BIO-01d, Task 2	A habitat restoration specialist will be designated and approved by the California Public Utilities Commission and Bureau of Land Management and will determine the most appropriate method of restoration.	The habitat restoration specialist was approved by the CPUC and BLM on April 19, 2012.	Complete
BIO-01d, Task 3	Restoration techniques may include: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The Habitat Restoration Plan shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project.	The Habitat Restoration Plan (HRP) was approved by the CDFW on December 11, 2012, by the USFWS on December 21, 2012, and by the CPUC on December 27, 2012. The HRP will be implemented during and following construction.	To be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
BIO-03a	A Noxious Weeds and Invasive Species Control Plan shall be prepared and reviewed by the California Public Utilities Commission/Bureau of Land Management and applicable permitting agencies. On BLM lands, the plan shall be consistent with an Integrated Pest Management approach per the Vegetation Treatments on Bureau of Land Management Lands in 17 Western States Programmatic Environmental Report (2007).	The final Noxious Weeds and Invasive Species Control Plan was approved by the CPUC on November 29, 2012.	Complete
BIO-04a	(j) Prepare and file with the San Diego Air Pollution Control District, Bureau of Land Management and California Public Utilities Commission a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. This plan shall be developed consistent with the requirements of Mitigation Measure AQ-1.	The CPUC approved the Dust Control Plan on October 12, 2012. The Dust Control Plan was submitted to the SDAPCD on October 16, 2012. The BLM indicated on August 29, 2012 that they do not need to review the Dust Control Plan.	Complete
BIO-05a	Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging.	A qualified biologist was approved by the CPUC on April 12, 2012. Surveys for special-status plant species were conducted between April 19 and May 3 and August 28 and August 30. All locations were recorded using a GPS unit. The rare plant survey results were submitted to the CPUC on October 24, 2012. The 2012 Rare Plant Survey Report was submitted to the CPUC on November 13, 2012. All special-status plant species in close proximity to the geotechnical boring locations will be flagged immediately prior to construction.	To be Implemented Immediately Prior to Construction
ECO-BIO-08	Prior to construction, all SDG&E, contractor, and subcontractor Project personnel will receive training regarding the appropriate work practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations, including appropriate wildlife avoidance; impact minimization procedures; the importance of these resources, and the purpose and necessity of protecting them; and methods for protecting sensitive ecological resources. The training will include BMPs to reduce the potential for erosion and sedimentation during construction of the Project.	<p>The intent and requirements of ECO-BIO-08 will be satisfied through the implementation of environmental awareness education for all construction staff prior to construction, which is required by BIO-01b.</p> <p>The environmental awareness education program for construction staff was implemented in February 2013, immediately prior to construction. SDG&amp;E submitted the completed sign-in sheets to the CPUC on February 7, 2013. Construction personnel who have not received education prior to construction will receive it immediately prior to them commencing work on the Project.</p> <p>SDG&amp;E will continue to submit completed sign-in sheets to the CPUC during construction.</p>	To be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
VIS-03f	Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed. Topsoil located in areas to be restored shall be conserved during excavation and reused as cover on disturbed areas to facilitate re-growth of vegetation. Topsoil located in developed or disturbed areas is excluded from this measure.	The plan for revegetation of temporarily disturbed areas is described in the HRP. Refer to BIO-01d regarding the status of agency review and approval of the HRP. The HRP will be implemented during and following boring activities, as necessary.	To be Implemented During Construction
LU-01a	<p>Forty-five days prior to construction, SDG&amp;E shall prepare and submit a Construction Notification Plan to the BLM and CPUC for approval. The Plan shall identify the procedures that will be used to inform property owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include text of proposed public notices and advertisements. The Plan shall address at a minimum two of the following components:</p> <ul style="list-style-type: none"> <li>· Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice shall identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential properties. The notice shall state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. SDG&amp;E shall mail the notice to all residents or property owners within 1,000 feet of project components. If construction delays of more than 7 days occur, an additional notice shall be prepared and distributed.</li> <li>· Newspaper advertisements. Fifteen days prior to construction within a route segment, notices shall be placed in local newspapers and bulletins, including Spanish language newspapers and bulletins. The notice shall state when and where construction will occur and provide information about the public liaison person and hotline. If construction is delayed for more than 7 days, an additional round of newspaper notices shall be placed to discuss the status and schedule of construction.</li> <li>· Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, post offices, rest stops, community centers, and other public venues to inform affected residents of the purpose and schedule of construction activities.</li> <li>· Public liaison person and toll-free information hotline. SDG&amp;E shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbances. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SDG&amp;E shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.</li> </ul>	<p>The Construction Notification Plan was approved by the CPUC on October 31, 2012. The BLM indicated on August 29, 2012 that they do not need to review the Construction Notification Plan prior to construction.</p> <p>A public notice mailer was included as Attachment D: Public Notice Mailer to Notice to Proceed (NTP) Request #3, which was approved by the CPUC on February 1, 2013. SDG&amp;E will mail the approved notice immediately prior to construction.</p>	To be Implemented Immediately Prior to Construction

Mitigation Measure Number	Measure Text	Comments	Status
CUL-01a	<p>A Historic Properties Treatment Plan-Cultural Resources Management Plan (HPTP-CRMP) shall be prepared to avoid or mitigate impacts for significant cultural resources pursuant to Section 106 Guidelines. An MOA shall be developed among all federal, state, and local agencies to implement the HPTP-CRMP. As part of the HPTP-CRMP, recorded cultural resources that can be avoided shall be listed and demarcated during construction as Environmentally Sensitive Areas (ESAs). All recommended NRHP- and/or CRHR-eligible resources that would not be affected by direct impacts, but are within 100 feet of direct impact areas, shall be designated as ESAs. Protective fencing or other markers shall be erected and maintained on SDG&amp;E-owned property, easements, or ROW to protect ESAs from inadvertent trespass for the duration of construction in the vicinity (the ESA fencing should demarcate the limits of the construction areas and where people have to stay within the easement, ROW, or SDG&amp;E-owned property). An archaeologist shall monitor during ground-disturbing activities at all cultural resource ESAs. The HPTP-CRMP shall also define any additional areas that are considered to be of high sensitivity for discovery of buried NRHP-eligible historic properties and CRHR-eligible historic resources, including burials, cremations, or sacred features. These areas of high sensitivity shall also be monitored by qualified archaeologists during construction.</p>	<p>The Research Design for Archaeological Data Recovery at CA-SDI-7074 (HPTP) was approved by the BLM on August 10, 2012. The MOA was signed by all signatory parties on August 10, 2012. The final HPTP was incorporated into the final MOA, which was provided to the CPUC in August of 2012. The CRMP was approved by the BLM on August 10, 2012. The CRMP was submitted to the CPUC on September 24, 2012. No NRHP- or CRHR-eligible sites or sites treated as eligible have been recorded within the geotechnical investigation location. In the event that cultural resources are discovered during geotechnical boring activities, the requirements of the HPTP and CRMP will be implemented and archaeological monitoring will be implemented, as necessary.</p>	<p>To be Implemented During Construction</p>
CUL-01c	<p>All construction personnel shall be trained regarding the recognition of possible buried cultural remains and protection of all cultural resources, including prehistoric and historic resources during construction, prior to the initiation of construction or ground-disturbing activities. SDG&amp;E shall complete training for all construction personnel and retain documentation showing when training of personnel was completed. Training shall inform all construction personnel of the procedures to be followed upon the discovery of archaeological materials, including Native American burials. Training shall inform all construction personnel that shall be avoided, and that travel and construction activity shall be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of artifacts or other cultural materials on or off the ROW by SDG&amp;E, its representatives, or employees shall not be allowed. Violators shall be subject to prosecution under the appropriate State and federal laws, and violations shall be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction:</p> <ul style="list-style-type: none"> <li>· All construction contracts shall require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits, their responsibility to avoid and protect all cultural resources, and the penalties for collection, vandalism, or inadvertent destruction of cultural resources.</li> <li>· SDG&amp;E shall provide training for supervisory construction personnel describing the potential for exposing cultural resources and procedures and notifications required in the event of discoveries by project personnel or archaeological monitors. Supervisors shall also be briefed on the consequences of intentional or inadvertent damage to cultural resources. Supervisory personnel shall enforce restrictions on collection or disturbance of artifacts or other cultural resources</li> </ul>	<p>SDG&amp;E coordinated with the BLM regarding the cultural awareness video and materials on November 13, 2012. SDG&amp;E provided the cultural awareness video to the BLM on December 10, 2012. The brochure, wallet card, cultural awareness video, sign-in sheet, and hard-hat decal were approved by the CPUC on December 10, 2012 and by the BLM on December 17, 2012. The CPUC approved the SWEAP Truck Driver Training handout on January 8, 2013.</p> <p>The environmental awareness education program for construction staff was implemented in February 2013, immediately prior to construction. SDG&amp;E submitted the completed sign-in sheets to the CPUC on February 7, 2013. Construction personnel who have not received education prior to construction will receive it immediately prior to them commencing work on the Project.</p> <p>SDG&amp;E will continue to submit completed sign-in sheets to the CPUC during construction.</p>	<p>To be Implemented During Construction</p>
CUL-02	<p>All location of known Native American human remains shall be avoided through project design and designation as ESAs if within 100 feet of project components.</p>	<p>No Native American human remains have been identified in the Project area. If any Native American human remains are discovered, they will be avoided during construction.</p>	<p>To be Implemented During Construction</p>

Mitigation Measure Number	Measure Text	Comments	Status
ECO-CUL-02	At least 120 days prior to construction, a cultural/historical resource consultant will be retained by SDG&E to complete an analysis and assessment of the potential to disturb resources that were identified during the initial studies from major ground-disturbing activities. The analysis and assessment will be prepared to meet the requirements of the CEQA and NEPA. Project component sites that require testing for significance determination will be treated on a case-by-case basis using all applicable criteria.	SDG&E has contracted with ASM Affiliates under Insignia Environmental to provide qualified archaeologists for the Project. Potentially CRHR/NRHP eligible sites were analyzed and assessed in the August 2011 Eligibility Report prepared by ASM Affiliates. The fieldwork portion of the East County Substation Data Recovery Project was completed in accordance with the HPTP, and the BLM approved the completion of the data recovery on December 21, 2012. Documentation of the BLM's approval was included as Attachment C: BLM Data Recovery Approval to NTP Request #3, which was approved by the CPUC on February 1, 2013.	Complete
PALEO-01e	<p>Prior to the initiation of construction or ground-disturbing activities, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The project shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials. Training shall inform all construction personnel that Environmentally Sensitive Areas include areas determined to be paleontologically sensitive, as defined on the paleontological sensitivity maps for the project, and must be avoided, and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the ROW by the project, its representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate state and federal laws, and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop-work order. The following issues shall be addressed in training or in preparation for construction:</p> <ul style="list-style-type: none"> <li>· All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.</li> <li>· The project shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential Environmentally Sensitive Areas, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils.</li> <li>· Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be diverted, and the project paleontologist shall be notified. Once the find has been inspected and a preliminary assessment made, the project paleontologist will notify the lead agency and other appropriate land managers and proceed with data recovery in accordance with the approved Treatment Plan consistent with Mitigation Measure PALEO-1B (Develop Paleontological Monitoring and Treatment Plan).</li> </ul>	<p>SDG&amp;E submitted the contract language to the CPUC on September 4, 2012. The brochure, wallet card, hard-hat decal, sign-in sheet, and paleontological resources awareness materials were approved by the CPUC on December 10, 2012 and by the BLM on December 17, 2012. The CPUC approved the SWEAP Truck Driver Training handout on January 8, 2013.</p> <p>The environmental awareness education program for construction staff was implemented in February 2013, immediately prior to construction. SDG&amp;E submitted the completed sign-in sheets to the CPUC on February 7, 2013. Construction personnel who have not received education prior to construction will receive it immediately prior to them commencing work on the Project.</p> <p>SDG&amp;E will continue to submit completed sign-in sheets to the CPUC during construction.</p>	To be Implemented During Construction
ECO-NOI-02	SDG&E will provide notice of the construction plans to all property owners within 300 feet of the Project by mail at least one week prior to the start of construction activities. The announcement will state the construction start date, anticipated completion date, and hours of operation, and well as provide a telephone contact number for receiving questions or complaints during construction.	The Construction Notification Plan was approved by the CPUC on October 31, 2012. The BLM indicated on August 29, 2012 that they do not need to review the Construction Notification Plan prior to construction. Property owners will be notified of construction plans one week prior to the start of construction in this location.	To be Implemented Immediately Prior to Construction

Mitigation Measure Number	Measure Text	Comments	Status
TRA-01	<p>At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> <li>· SDG&amp;E shall encourage carpooling to the construction site to reduce personal vehicle traffic in the project area to the greatest extent possible.</li> <li>· SDG&amp;E will consider the specific object sizes, weights, origin, destination, and unique handling requirements, and evaluate alternative transportation approaches.</li> <li>· Measures such as informational signs and flaggers shall be implemented when equipment may result in blocked roadways, and traffic cones or similar shall be implemented to identify any necessary changes in temporary lane configuration.</li> <li>· Flaggers and directional guidance for bicyclists along Old Highway 80 shall be used.</li> <li>· All Caltrans' standards for utility encroachments shall be met.</li> <li>· The plan shall be prepared in accordance with Caltrans' Manual on Uniform Traffic Control Devices and the Work Area Traffic Control Handbook (WATCH) Manual.</li> <li>· Clearances or overhead crossings shall conform to regulations of the CPUC and BLM, and the number of crossings shall be minimized.</li> <li>· New installations under an existing roadbed shall be made by the boring-and-jacking method. No trenching under the traveled way will occur.</li> <li>· For freeways and expressways, the placement of longitudinal encroachments is prohibited within controlled-access rights-of-way (ROWS).</li> <li>· Utilities shall not be located in median areas.</li> <li>· Transverse crossings shall be normal (90°) to the highway alignment where practical. If impractical, skews of up to 30° from normal may be allowed.</li> <li>· Supports for overhead lines crossing freeways shall be located outside the controlled-access ROW and not on cut-or-fill slopes, and shall not impair sight distances. All installations shall be placed as close to the ROW line as possible. Aboveground utilities shall be outside of the clear recovery zone (20 feet from edge-of-travel way for conventional highways and 30 feet for freeways and expressways). Allowance shall be made for future widening of the highways.</li> <li>· New installations shall not impair sight distances.</li> <li>· SDG&amp;E shall coordinate in advance with the applicants for the other two connected actions. This effort shall include coordinating the timing of construction of the various projects to reduce potential conflicts.</li> <li>· SDG&amp;E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. The County will then notify respective police, fire, ambulance, and paramedic services. SDG&amp;E shall notify counties and cities of the proposed locations, nature, timing, and duration of any construction activities, and advise of any access restrictions that could impact their effectiveness.</li> </ul> <p>SDG&amp;E shall provide a draft copy of the Traffic Control Plan to the agencies listed for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to SDG&amp;E, and plan revisions will address each comment to the satisfaction of the commenting agency. The final plan will be submitted to the CPUC and BLM with input from commenting agencies and provided to</p>	<p>The CPUC approved the ECO Substation Traffic Control Plan on January 25, 2013. Traffic control measures will be implemented as specified in the Traffic Control Plan during construction.</p>	<p>To be Implemented During Construction</p>

Mitigation Measure Number	Measure Text	Comments	Status
	SDG&E for implementation during all construction activities.		
TRA-02	If damage to roads occurs, SDG&E shall coordinate repairs with the affected public agencies to ensure that any impacts to area roads are adequately repaired at SDG&E's cost. Roads disturbed by construction activities or construction vehicles shall be properly restored to ensure long-term protection of road surfaces. Care shall be taken to prevent damage to roadside drainage structures. Roadside drainage structures and road drainage features (e.g., rolling dips) shall be protected by regrading and reconstructing roads to drain properly. Said measures shall be incorporated into an access agreement/easement with the applicable governing agency prior to construction.	The CPUC approved the ECO Substation Traffic Control Plan on January 25, 2013. Traffic control measures will be implemented as specified in the Traffic Control Plan during construction. If damage to roads occurs during construction, SDG&E will repair roads in coordination with San Diego County.	To be Implemented During Construction
GEO-02	The design-level geotechnical studies to be performed by SDG&E shall identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates. Appropriate design measures shall be utilized for protection of reinforcement, concrete, and metal-structural components against corrosion, including use of corrosion-resistant materials and coatings, increased thickness of project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems. The geotechnical studies shall also identify areas with potentially expansive or collapsible soils and include appropriate design features, including excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill, ground-treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Studies shall conform to industry standards of care and ASTM standards for field and laboratory testing. Design shall conform to applicable sections of the County of San Diego grading codes, CBC, and the standard specifications for public works construction. The geotechnical studies prepared by a certified geologist shall be submitted to CPUC and BLM 60 days prior to construction of proposed structures.	The Geotechnical Investigation Report, which includes an assessment of soil characteristics, was submitted to the CPUC on August 1, 2012. SDG&E has conducted geotechnical studies to finalize the design of the 138 kV Underground Transmission Line, in accordance with NTP Request #3. Additional design-level geotechnical studies will be conducted under this NTP once approved by the CPUC.	To be Implemented During Construction
GEO-03	The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction measures that meet CBC and IEEE design parameters shall be incorporated into the project designs. Appropriate measures for project facilities could include construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in underground cables to allow ground deformations without damage to structures. The geotechnical investigations prepared by a certified geologist shall be submitted to CPUC and BLM 60 days prior to construction of proposed structures.	Refer to GEO-02 regarding the status of the geotechnical studies.	To be Implemented During Construction
HAZ-01a, Task 1	<p>Prior to approval of final construction plans, SDG&amp;E shall prepare an HMMP for the construction phase of the project, which shall be reviewed and approved by the appropriate agency, and shall include the following components:</p> <ul style="list-style-type: none"> <li>The plan shall identify all hazardous materials that will be present on any portion of the construction site, including, but not limited to, fuels, solvents, and petroleum products. The plan shall address storage, use, transportation, and disposal of each hazardous material anticipated to be used at the site. The plan shall establish inspection procedures, storage requirements, storage quantity limits, inventory control, nonhazardous product substitutes, and disposition of excess materials.</li> <li>The plan shall identify secondary containment and spill prevention countermeasures, as well as a contingency plan to identify potential spill hazards, how to prevent their occurrence, and responses for different quantities of spills that may occur. Secondary containment and countermeasures shall be in place throughout construction so that if any leaks or spills occur, responses will be made immediately.</li> <li>The plan shall identify materials (and their locations) that will be on site and readily accessible to clean up small spills (i.e., spill kit, absorbent pads, and shovels). Such emergency spill supplies and equipment shall be clearly marked and located adjacent to all areas of work and in construction staging areas. The plan shall identify the spill-response materials that must be maintained in vehicles and substation sites during construction and procedures for notification to the appropriate authorities.</li> <li>The plan shall identify adequate safety and fire suppression devices for construction-related activities involving toxic, flammable, or explosive materials (including refueling construction vehicles and equipment). Such devices shall be readily accessible on the project site, as specified by the County's Fire Department and per the Uniform Building Code and Uniform Fire Code. The plan shall be included as part of all contractor specifications and final construction plans to the satisfaction of the appropriate agency. The plan shall also identify requirements for notices to federal and local emergency response authorities and shall include emergency response plans. The plan shall be submitted to BLM and CPUC at least 30 days prior to construction.</li> </ul>	The CPUC approved the Hazardous Materials and Waste Management Plan on October 31, 2012. The BLM indicated on August 29, 2012 that they do not need to review the plan prior to construction. The plan will be implemented during construction.	To Be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
HAZ-01a, Task 2	Prior to construction, all contractor and subcontractor personnel shall receive training regarding the components of the HMMP, as well as applicable environmental laws and regulations related to hazardous materials handling, storage, and spill prevention and response measures.	<p>The requirements of the HMMP have been incorporated into the environmental awareness education program. The brochure, wallet card, sign-in sheet, and hard-hat decal were approved by the CPUC on December 10, 2012. The CPUC approved the SWEAP Truck Driver Training handout on January 8, 2013.</p> <p>The environmental awareness education program for construction staff was implemented in February 2013, immediately prior to construction. SDG&amp;E submitted the completed sign-in sheets to the CPUC on February 7, 2013. Construction personnel who have not received education prior to construction will receive it immediately prior to them commencing work on the Project.</p> <p>SDG&amp;E will continue to submit completed sign-in sheets to the CPUC during construction.</p>	To Be Implemented During Construction
HAZ-01a, Task 3	SDG&E shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to the plan for all construction activities.	SDG&E has designated Kevin Dickison as the Designated Field Representative (Hazardous Materials). The environmental field representative or his designee will be on site during construction to ensure adherence to the Hazardous Materials and Waste Management Plan.	To be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
HAZ-01b, Task 1	<p>Prior to approval of final construction plans, SDG&amp;E shall prepare a Health and Safety Program for each applicable phase of the project (i.e., construction, operation, and decommissioning). The program shall be developed to protect both workers and the general public during all phases of the project. The program shall be implemented to educate construction workers about the hazards associated with the particular project site and the safety measures that must be taken to prevent injury. The program shall include standards regarding occupational safety, safe work practices for each task, hazard training requirements for workers, and mechanisms for documentation and reporting.</p> <p>Regarding occupational health and safety, the program should identify all applicable federal and state occupational safety standards; establish safe work practices for each task (e.g., requirements for personal protective equipment and safety harnesses; OSHA standard practices for safe use of explosives and blasting agents; and measures for reducing occupational EMF exposures); establish fire safety evacuation procedures; and define safety performance standards (e.g., electrical system standards and lightning protection standards). The program should include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. The program should include worker training regarding how to identify potentially contaminated soils and/or groundwater. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies shall be established.</p> <p>The program should identify requirements for temporary fencing around staging areas, storage yards, and excavation areas during construction or decommissioning activities. Such fencing should be designed to restrict transient traffic, off-highway vehicle (OHV) use, and the general public from accessing areas under construction and should be removed once construction or decommissioning activities are complete. The program should also identify appropriate measures to be taken during operation of the project to limit public access to hazardous facilities (e.g., permanent fencing, locked access). In order to inform workers and the general public of the dangers of abandoned mines, pamphlets with the "Stay Out-Stay Alive" information used by federal and state governments should be distributed as part of the program.</p> <p>The program shall be submitted to BLM and CPUC at least 30 days prior to construction.</p>	<p>The CPUC approved the Health and Safety Program and Safety Assessment on December 13, 2012. The Health and Safety Program and Safety Assessment will be implemented during construction.</p>	<p>To be Implemented During Construction</p>
HAZ-01b, Task 2	<p>SDG&amp;E shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to the program for all construction activities.</p>	<p>SDG&amp;E has designated Kevin Dickison as the Designated Field Representative (Hazardous Materials). The environmental field representative or his designee will be on site during construction to ensure adherence to the Health and Safety Program and Safety Assessment.</p>	<p>To be Implemented During Construction</p>
HAZ-01c, Task 1	<p>Prior to approval of final construction plans, SDG&amp;E shall prepare a Waste Management Plan, which shall determine waste procedures, waste storage locations, waste-specific management and disposal requirements, inspection procedures, and waste minimization procedures.</p> <p>The plan shall be submitted to CPUC and BLM at least 30 days prior to construction.</p>	<p>The Waste Management Plan has been combined with the Hazardous Material Management Plan required by Mitigation Measure HAZ-01a. The CPUC approved the Hazardous Materials and Waste Management Plan on October 31, 2012. The BLM indicated on August 29, 2012 that they do not need to review the plan prior to construction. The plan will be implemented during construction.</p>	<p>To be Implemented During Construction</p>

Mitigation Measure Number	Measure Text	Comments	Status
HAZ-01c, Task 2	SDG&E shall designate an environmental field representative who shall be on site to observe, enforce, and document adherence to the plan for all construction activities.	SDG&E has designated Kevin Dickison as the Designated Field Representative (Hazardous Materials). The environmental field representative or his designee will be on site during construction to ensure adherence to the Hazardous Materials and Waste Management Plan.	To be Implemented During Construction
HAZ-02b	<p>If soil or groundwater contamination is suspected or encountered during grading or excavation activities (e.g., unusual soil discoloration or strong odor), SDG&amp;E's contractors or subcontractors shall immediately stop work and notify the designated environmental field representative. All work in the area of suspected contamination shall cease, the work area shall be cordoned off, and the environmental field representative shall implement appropriate health and safety procedures. Work outside the suspected area may continue as determined by the environmental field representative.</p> <p>Preliminary samples of the soil, groundwater, or suspected material shall be taken by OSHA-trained individuals and sent to a California Certified Laboratory for characterization. If the sample testing determines that contamination is not present, work shall continue at the previously suspected site. If contamination is found above regulatory limits, however, the appropriate regulatory agency (e.g., RWQCB or Certified Unified Program Agency (CUPA)) responsible for responding to and providing environmental oversight of the region shall be notified in accordance with state or local regulations. In addition, SDG&amp;E shall contact the appropriate regulatory agencies for the State of California (e.g., DTSC or RWQCB) and the County to plan options for handling, treating, and/or disposing of materials.</p> <p>Documentation of the suspected contamination shall be made in the form of a report, identifying the location and potential contamination, as well as the process used for sampling. Results of laboratory testing and recommended resolutions for handling and excavating materials found to exceed regulatory requirements shall be submitted to the BLM and CPUC for review and approval.</p>	The CPUC confirmed this is not a pre-construction requirement on December 14, 2012. This measure will be implemented during construction.	To be Implemented During Construction
HAZ-04a	Prior to commencing construction activities, SDG&E shall conduct a safety assessment to describe potential safety issues associated with the project, how safety prevention measures would be implemented, where medical aid kits would be located, the appropriate response action for each safety hazard, and procedures for notifying the appropriate authorities. The assessment shall address issues such as site access, construction hazards, safe work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control.	The CPUC approved the Health and Safety Program and Safety Assessment on December 13, 2012. The Health and Safety Program and Safety Assessment will be implemented during construction.	To be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
HYD-03	<p>Prior to construction SDG&amp;E will prepare comprehensive documentation that identifies one or more confirmed, reliable water sources that when combined meet the project's full water supply construction needs. Documentation will consist of the following:</p> <ul style="list-style-type: none"> <li>· Preparation of a groundwater study. For well water that is to be used, the applicant will commission a groundwater study by a qualified hydrogeologist to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner's permission) in the vicinity of proposed well location/water sources. The groundwater study will evaluate aquifer properties and aquifer storage. The groundwater study will estimate short and long-term well water supplies from each well proposed to be used, and documentation indicating that each well is capable of producing the total amount of water to be supplied for construction from each well. The groundwater study will estimate short- and long-term impacts of the use of the well(s) on the local groundwater production (short-term extraction for construction water and ongoing O&amp;M water), on all project wells, and on other wells in the project area. The groundwater study will include an assessment of the potential for subsidence brought on by project-related water use in the area. The applicant will provide demonstration of compliance with all applicable laws and regulations and will obtain a County of San Diego Major Use Permit for use of any proposed well prior to construction.</li> <li>· Documentation of Purchased Water Source(s). For water that is to be purchased from one or more water/utility district(s), the applicant shall provide written documentation from such district(s) indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The Sweetwater Authority has provided written confirmation of water availability to support the project.</li> </ul> <p>Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project.</p>	<p>The Construction Water Supply Plan was approved by the CPUC with additional documentation on January 31, 2013. The BLM indicated on August 29, 2012 that they will not need to review the Construction Water Supply Plan prior to construction.</p>	Complete
FF-01	<p>San Diego Gas &amp; Electric Company (SDG&amp;E) shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of the CPUC. SDG&amp;E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the CPUC prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&amp;E. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> <li>· Procedures for minimizing potential ignition (vegetation clearing, fuel modification establishment, parking requirements; smoking restrictions, hot work restrictions); Red Flag Warning restrictions; Fire coordinator role and responsibility; Fire suppression equipment on site at all times work is occurring; Requirements of Title 14 of the California Code of Regulations (CCR), Article 8 #918 "Fire Protection" for private land portions; Access road widening (28-foot County roads, 18-foot-wide spur roads); Applicable components of the SDG&amp;E Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009); Emergency response and reporting procedures; Emergency contact information; Worker education materials; kick-off and tailgate meeting schedules; Other information as provided by CAL FIRE, SDRFPD, SDCFA, CPUC, and Bureau of Land Management (BLM).</li> </ul> <p>Additional restrictions will include the following:</p> <ul style="list-style-type: none"> <li>· During the construction phase of the project, SDG&amp;E shall implement ongoing fire patrols. SDG&amp;E shall maintain fire patrols during construction hours and for 1 hour after end of daily construction, and hotwork</li> <li>· Fire Suppression Resource Inventory - In addition to 14 CCR 918.1(a), (b), and (c), SDG&amp;E shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the CAL FIRE, SDRFPD, and SDCFA.</li> <li>· During Red Flag Warning events, as issued daily by the National Weather Service in state responsibility areas (SRAs) and local responsibility areas (LRA), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under Hot Work Procedure.</li> <li>· SDG&amp;E and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF.</li> </ul>	<p>SDG&amp;E submitted the Construction Fire Prevention/Protection Plan with the SDRFPD approval letter to the CPUC on December 19, 2012. SDG&amp;E submitted SDCFA and CAL FIRE approval letters for the Construction Fire Prevention/Protection Plan to the CPUC on February 8, 2013. The Construction Fire Prevention/Protection Plan will be implemented during construction..</p>	To Be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
	<ul style="list-style-type: none"> <li>· All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition.</li> <li>· Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crewmembers as-needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect.</li> <li>· Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each crew member shall at all times be within 100 feet of a vehicle containing equipment necessary for fire suppression as outlined in the final Construction Fire Prevention/Protection Plan.</li> </ul> <p>SDG&amp;E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the CAL FIRE, SDRFPD, and SDCFA for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to SDG&amp;E and revisions to the plan will address each comment to the satisfaction of the CPUC. The final plan will be approved by the CPUC with input from CAL FIRE, SDRFPD, SDCFA, and BLM, as desired, prior to the initiation of construction activities and provided to SDG&amp;E for implementation during all construction prior to the initiation of construction activities.</p>		

Mitigation Measure Number	Measure Text	Comments	Status
FF-02	<p>Revise the Wildland Fire Prevention and Fire Safety Electric Standard Practice Plan (2009) to create the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operational Maintenance Plan. The revised plan will address the ECO Substation Project and will be implemented during all operational maintenance work associated with the project for the life of the project. Important fire safety concepts that will be included in this document are as follows:</p> <ul style="list-style-type: none"> <li>· Implement existing practices including Electric Standard Practice 113.1, Maintenance of existing Remote Automated Weather Stations and territory-wide weather system monitoring, adjusted system reclosing policies (patrols), replacement of wood poles with steel in priority areas, and additional measures as may be developed, participation in San Diego County FireSafe Council and other public outreach.</li> <li>· Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans) Fuel modification buffers required by the Fire Protection Plan (FPP)</li> <li>· When vegetation work will occur (prior to any other work activity)</li> <li>· Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread</li> <li>· Coordination procedures with fire authority</li> <li>· Integration of the project's Construction Fire Prevention/Protection Plan content</li> <li>· Personnel training and fire suppression equipment</li> <li>· Fire safety coordinator role as manager of fire prevention and protection procedures, coordinator with fire authority and educator</li> <li>· Communication protocols</li> <li>· Incorporation of CAL FIRE, San Diego Rural Fire Protection District (SDRFPD), and SDCFA reviewed and approved Response Plan mapping and assessment.</li> <li>· Other information as provided by CAL FIRE, SDRFPD, SDCFA, BLM, and CPUC</li> </ul> <p>SDG&amp;E will provide a draft copy of the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operational; Maintenance Plan to CAL FIRE, SDRFPD, SDCFA, BLM, and CPUC for comment a minimum of 90 days prior to the start of any construction activities. The comments will be provided back to SDG&amp;E and plan revisions will address each comment to the satisfaction of the CPUC. The final plan will be approved by the CPUC prior to energizing the project and provided to SDG&amp;E for implementation during all operational maintenance activities.</p>	<p>The Wildland Fire Prevention and Fire Safety Electric Standard Practice 113.1, which was revised in consultation with relevant agencies, was approved by the CPUC on February 1, 2013. The plan will be implemented during construction.</p>	<p>To Be Implemented During Construction</p>

Mitigation Measure Number	Measure Text	Comments	Status
FF-03, Task 1	<p>Provide assistance to SDRFPD and SDCFA to improve the response and firefighting effectiveness near electrical substations, transmission lines, and aerial infrastructure based on project fire risk and protection needs. Assistance by SDG&amp;E shall include providing funding for one SDCFA Fire Code Specialist II position to enforce existing fire code requirements, including but not limited to implementing required fuel management requirements (e.g., defensible space), in priority areas to be identified by the SDCFA for the life of the project. All fuel management activities shall be in accordance with CEQA Guidelines Section 15304 (i), which indicates that the minor land alternation activities will not have a significant effect on the environment, as the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. In addition, SDG&amp;E is to provide funding to allow SDCFA to employ up to four volunteer/reserve firefighters as part-time code inspectors on a stipend basis for up to 90 days per year for the life of the project. The funding for the SDCFA Fire Code Specialist II position and the four volunteer/reserve firefighters as part-time code inspectors will be provided through proportional contributions, to be determined by CPUC and BLM, from SDG&amp;E (and the other applicants) to the SDCFA prior to construction.</p>	<p>A signed MOU between the SDRFPD and SDG&amp;E, dated November 2012, was provided to the CPUC on January 28, 2013. The MOU includes a payment schedule with the initial payment scheduled for six months following the commencement of construction. SDG&amp;E will provide evidence of funding to the SDRFPD to the CPUC during construction.</p> <p>A signed MOU between the SDCFA and SDG&amp;E, dated January 2013, was provided to the CPUC on January 28, 2013. SDG&amp;E provided the first annual contribution to the SDCFA and submitted proof of payment to the CPUC on January 29, 2013. The CPUC concurred that the pre-construction components of this measure were satisfied on January 30, 2013. SDG&amp;E will submit annual contributions to the SDCFA and provide evidence of funding to the CPUC during construction.</p>	To be Implemented During Construction
FF-03, Task 2	<p>A fixed annual fire mitigation fee of approximately \$116,600 will be provided by SDG&amp;E to SDRFPD for mitigation funding. The funding will be utilized to assist with the purchase and maintenance of a Type I engine with an aqueous film forming foam (AFF) apparatus with a deck gun to apply a heavy stream. In addition, the funding will be utilized to provide for a third volunteer stipend to staff the engine with firefighters and training for electrical firefighting for 10 personnel (2 per year on a 5-year rotation). The fire mitigation fee will be paid annually during the life of the project and terminated upon decommissioning of the substation and related facilities.</p>	<p>A signed MOU between the SDRFPD and SDG&amp;E, dated November 2012, was provided to the CPUC on January 28, 2013. The MOU includes a payment schedule with the initial payment scheduled for six months following the commencement of construction and the annual payment of \$116,600 scheduled on the annual anniversary of the initial payment date. SDG&amp;E will provide an annual fee of \$116,600 to the SDRFPD and provide evidence of payment to the CPUC during construction.</p>	To be Implemented During Construction
FF-04	<p>A draft Fire Protection Plan (FPP) will be submitted to CAL FIRE, SDRFPD, and SDCFA at least 90 days before the start of any construction activities. Comment on the draft FPP shall be provided to SDG&amp;E and SDG&amp;E shall resolve each comment in consultation with each responsible agency. The final FPP shall be approved by the CPUC prior to the initiation of construction activities. The FPP will include, at minimum, the following:</p> <ul style="list-style-type: none"> <li>· San Diego County FPP Content Requirements (<a href="http://www.sdcounty.ca.gov/dplu/docs/Fire-Report-Format.pdf">http://www.sdcounty.ca.gov/dplu/docs/Fire-Report-Format.pdf</a>)</li> <li>· Rural Fire Protection District Content Requirements: Provisions for fire safety and prevention; Water supply; Fire suppression/detection systems - built-in detection system with notification; Secondary containment; Site security and access; Emergency shut-down provisions</li> <li>· Integration into plans prepared to satisfy Mitigation Measures FF-1 and FF-2</li> </ul> <p>The FPP will be incorporated into MM FF-1, the Construction Fire Prevention/Protection Plan, and MM FF-2, the Wildland Fire Prevention and Fire Safety Electric Standard Practice (2009)7 Operational Maintenance Plan. The Customized Fire Protection Plan will incorporate clarifications and additional ECO Substation Project APMs described in Section B of this EIR/EIS.</p>	<p>The SDRFPD approved the Fire Protection Plan on November 7, 2012. SDG&amp;E submitted the SDRFPD-approved Fire Protection Plan to the CPUC with the SDRFPD approval letter on November 12, 2012. The CPUC provided comments on January 9, 2013. SDG&amp;E provided responses to the CPUC's comments on January 16, 2013. SDG&amp;E submitted SDCFA and CAL FIRE approval letters for the Fire Protection Plan to the CPUC on February 8, 2013. The Fire Protection Plan will be implemented during construction.</p>	To be Implemented During Construction

Mitigation Measure Number	Measure Text	Comments	Status
FF-06	Provide funding for Boulevard/Jacumba/La Posta FireSafe Council with a clarified focus of coordinating a Community Wildfire Protection Plan (CWPP) and Evacuation Plan. Funding for the Boulevard/Jacumba/La Posta FireSafe Council will enable this newly formed organization a means to proactively complete these plans, provisions for applying for grant funding, and ultimately, for implementing fuel reduction and evacuation plans. Funding will be a lump sum, one-time amount with SDG&E providing fair share of CWPP and Evacuation Plan preparation.	SDG&E submitted a proposal for funding the Boulevard/Jacumba/La Posta FireSafe Council to the CPUC on November 12, 2012. The CPUC received concurrence of the funding amount from the BLM on January 15, 2013. SDG&E submitted proof of payment to the FireSafe Council to the CPUC on January 24, 2013.	Complete