Subject: Notice to Proceed (NTP) - East County Substation Project – Construction Activities Associated with Geotechnical Investigations on Bureau of Land Management (BLM) Lands (Application No. 09.08.003).

Dear Mr. Houston:

San Diego Gas & Electric (SDG&E) has requested concurrence from the California Public Utilities Commission (CPUC) to commence geotechnical investigations on BLM lands in accordance with the NTP approved by BLM on February 5, 2013. The covered activities on BLM lands include geotechnical testing to provide a further understanding of the geotechnical conditions onsite. The information collected from the geotechnical testing will be utilized to determine the final design for the 138 kV transmission line that would transmit electricity from the SDG&E East County Substation to the SDG&E rebuilt Boulevard Substation.

The geotechnical testing is intended to be used by SDG&E to finalize the engineering design and meet the requirements of Mitigation Measure GEO-3 included in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the East County Substation Project. Mitigation Measure GEO-3 requires completion of design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards.

The geotechnical testing will consist of one six-inch bore along the northern limits of Old Highway 80. The location is within a disturbed road shoulder immediately adjacent to Old Highway 80. The geotechnical boring will obtain samples at various depths ranging from 3 to 20 feet and will be backfilled following drilling activities. No grading or vegetation clearing is proposed as part of this geotechnical investigation; therefore, no native vegetation will be impacted.

The East County Substation project was evaluated in accordance with the California Environmental Quality Act and a Permit to Construct (PTC) was granted by the CPUC on June...
21, 2012 (Decision 12-06-039). **A NTP is granted by CPUC for the proposed construction activities based on the following factors:**

- The Final EIR/EIS prepared for the East County Substation project defined required mitigation measures to be implemented prior to project construction. The relevant mitigation measures for construction activities associated with the East County Substation site are summarized in Attachment A and shall be implemented by SDG&E and its designated contractor. SDG&E’s compliance with the pre-construction component for each measure is noted in the status table.

- All construction activities will be conducted within areas identified and included in the Final EIR/EIS for the East County Substation Project.

- SDG&E shall implement all terms and conditions identified in Exhibit 2 of the BLM NTP dated February 5, 2013.

- Copies of all relevant permits, compliance plans (i.e., MMCRP, etc.), and this NTP shall be available on-site for the duration of construction activities. Copies of permits shall be provided to the CPUC upon request.

- All crew personnel shall be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log shall be maintained on-site with the names of all crew personnel trained and submitted to the CPUC on a weekly basis.

- SDG&E shall provide CPUC with written notification prior to any nest removal that occurs during construction. The notification provided to CPUC shall include information regarding bird deterrent methods in place, species, location of the nest, nest stage, observed nesting behavior, observation times and duration, and other, species-specific information relevant to determining nest stage. The nest shall not be removed by SDG&E until receiving concurrence for nest removal by the CPUC.

Sincerely,

/s/ Amy Baker

Amy Baker
CPUC Environmental Project Manager

cc:  D. Hochart, Dudek
     K. Carwana, Dudek
     K. Reynolds, SDG&E

Att:  Attachment A – Mitigation Measures
ATTACHMENT A

Mitigation Measures
BIO-1a

Limit all construction and construction-related activities to the minimum necessary area as defined by the final engineering plans. 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 staked and/or flagged that will 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. During and after construction, entrances to access roads will be gated to prevent the unauthorized use of these construction access roads by the general public. Signs prohibiting unauthorized use of the access roads shall be posted on these gates. In addition, to control unauthorized use of project access roads by off road vehicle enthusiasts, the applicants shall provide funding to land management agencies responsible for areas set aside for habitat conservation to provide for off-road vehicle enforcement patrols. The responsible land management agencies will formulate what funding is required to control unauthorized use of project access roads.

BIO-1b

Conduct contractor training for all construction personnel. 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 aversion, impact minimization, and best management practices. Signs in sheets and hard hat decals shall be provided that document contractor training has been completed for construction personnel.

BIO-1c

Conduct biological construction monitoring. An authorized biological monitor must be present at the construction sites during all ground disturbing and vegetation removal activities. The monitor shall survey the construction sites and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground disturbing and vegetation removal construction phases. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.

BIO-1d

Restore all temporary construction areas pursuant to a Habitat Restoration Plan. At temporary work areas not subject to long term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan. 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. Restoration techniques may include: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and restoration of species considered desert native plants shall be conducted in compliance with the California Endangered Species Act. The Habitat Restoration Plan will include success criteria and monitoring specifications, and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. All temporary construction access roads shall be permanently closed and restored. Topsoil located in areas to be rotation will be conserved and stockpiled during the excavation process for use in the restoration. Wherever possible, vegetation will be left in place to avoid excessive root damage to allow for natural recruitment following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the CPUC or BLM (depending on the location of the impact). Restoration of temporary impact areas is not possible to the satisfaction of the CPUC or BLM, the temporary impact shall be considered a permanent impact and compensated for as required (see NMT-1c).

BIO-1e

Provide habitat compensation or restoration for permanent impacts to native vegetation communities. Permanent impact to all native vegetation communities shall be compensated through a combination habitat compensation and habitat restoration at a minimum of 1:1 ratio or as required by the permitting agencies. Habitat compensation shall be accomplished through agency-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the ECO Substation Project. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided restoration that is demonstrated to be feasible and the restoration effort is feasible. The permit issued to a Habit- Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. All construction habitat restoration, all construction materials shall be completely removed from the site. All temporary construction access roads shall be permanently closed and restored. Topsoil located in areas to be rotation will be conserved and stockpiled during the excavation process for use in the restoration. Wherever possible, vegetation will be left in place to avoid excessive root damage to allow for natural recruitment following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the CPUC or BLM (depending on the location of the impact). Restoration of temporary impact areas is not possible to the satisfaction of the CPUC or BLM, the temporary impact shall be considered a permanent impact and compensated for as required (see NMT-1c).

BIO-1f

Implement fire prevention best management practices during construction and operation activities. Fire prevention best management practices will be implemented during construction and operation of the project as specified by the Construction Fire Prevention/Protection Plan (to be developed as required under Mitigation Measure FF-2) and Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance Plan (to be revised as required under Mitigation Measure FF-2).

BIO-1g

Prepare and implement a Stormwater Pollution Prevention Plan. Prepare a Stormwater Pollution Prevention Plan pursuant to the specifications described in Mitigation Measure HY-1.

BIO-2a

Limit temporary and permanent impacts to jurisdictional waters as necessary as defined by the following limits:

- Obtain and implement the terms and conditions of a Water Quality Permit for unavoidable impacts to jurisdictional waters and wetlands.
- 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 staked and/or flagged that will be maintained throughout the construction period. The project applicant shall obtain applicable permits for unavoidable impacts to jurisdictional waters and wetlands.
- 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 staked and/or flagged that will be maintained throughout the construction period. The project applicant shall obtain applicable permits for unavoidable impacts to jurisdictional waters and wetlands.

BIO-2b

Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to jurisdictional waters shall be compensated through a combination habitat creation (i.e., establishment), enhancement, preservation, and/or restoration at a minimum of 1:1 ratio or as required by the permitting agencies. Habitat creation and/or enhancement, preservation, and/or restoration shall be implemented by the applicant in accordance with the proposed wetland mitigation plan approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the CPUC or BLM (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the CPUC or BLM, the temporary impact shall be considered a permanent impact and compensated for as required. All habitat creation and restoration used as mitigation for the Proposed ECO Substation Project on public lands shall be designated as jurisdictional features prior to project construction. The terms and conditions of these authorizations shall be implemented.

BIO-2c

Where drainage crossings are unavoidable, construct access roads at right angles to drainages. Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.

BIO-2d

Propaganda and invasive species control plans 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 plan can be implemented during all phases of project construction and operation. The plan shall include best management practices to avoid and

N/A to covered activities in NTP Request.

BIO-2e

No access roads will be constructed.

BIO-2f

Propagate and invasive species Control Plan. This 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 plan can be implemented during all phases of project construction and operation. The plan shall include best management practices to avoid and

N/A to covered activities in NTP Request.

Notes

- NTP Request Attachment A
- BIO-1a: The limits of the approved work space shall be staked and/or flagged that will be maintained throughout the construction period.
- BIO-1b: Environmental monitors will be present during construction to ensure that all work is completed within the approved work limits.
- BIO-1c: SGDEA provided biocological monitor resumes on 12.20.12 and have been approved by the CPUC.
- BIO-1d: Applicable, pre-construction requirements met.
- BIO-1e: Applicable, pre-construction requirements met.
- BIO-1f: Construction Fire Prevention/Protection Plan (MM-F-1) (November 2012) approved by the USACE, CPUC, and CDFG.
- BIO-1g: N/A to covered activities in NTP Request.
- BIO-2a: USACE 404 Permit issued on September 19, 2012.
- BIO-2c: CDFG 1600 Agreement issued on November 17, 2012.
- BIO-2d: Habitat Mitigation and Monitoring Plan (HMP) (November 2011) approved by the USACE, CPUC, and CDFG.
- BIO-2e: Habitat Mitigation and Monitoring Plan (HMP) (November 2012) approved by the USACE, CPUC, and CDFG.
minimize the direct or indirect effect of the establishment and spread of invasive plant species during construction. Implementation of specific protective measures shall be required during construction, such as clearing vehicles prior to off-road use, using weed-free imported soil material, restricted vegetation/cover crop management, monitoring and controlling the spread of weed populations along the construction access and transmission line right-of-ways. Vehicles used in transportation shall be cleared in advance of operation prior to off-road maintenance. Existing vegetation shall be cleared only from areas scheduled for immediate construction work and only for the width needed for active construction activities. Noxious weed management shall be conducted annually to prevent the establishment and spread of invasive plant species. The shall include weed abatement efforts, targeted at plants listed as the most recent ‘X’ or ‘Red Alert’ list. Only herbicides approved by BLM in California will be used on BLM lands. Herbicide application can only occur on BLM lands with an approved Pesticide Use Proposal (PUP). Pesticide use should be limited in non-sensitive坚持不懈 and should only be applied in accordance with label and application permit directions and restrictions for terrestrial and aquatic applications.

**BIO-4a Prepare and implement a Dust Control Plan.** The project proponent shall: (a) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging if construction activity causes persistent visible emissions of fugitive dust beyond the work area; (b) pre-water sites up to 48 hours in advance of control to control dust; (c) reduce the amount of disturbed area where feasible; (d) spray all dirt stockpile areas daily as needed; (e) cover loads in haul trucks or maintain at least 6 inches of free-board when traveling on public roads; (f) pre-moisten, prior to transport, import and export dirt, sand, or loose materials; (g) sweep streets daily (with water sweepers) if visible soil material is carried on public streets or public trucks and equipment before entering public streets; (h) plant vegetative ground cover in disturbed areas to meet the criteria of the revegetation plan; (i) apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for 14 consecutive days); and (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 will be implemented and monitored at all locations of the project. This plan shall be consistent with the requirements of Mitigation Measure A2-1.

**BIO-5a Install fencing or flagging around identified special-status plant species populations in the construction areas.** 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. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities.

**BIO-5b Implement special-status species plant compensation.** Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the CPUC or BLM. Land preservation must be completed within 18 months of permit issuance. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. All salvage and relocation plans shall be approved by the permitting agencies prior to project construction. All salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the CPUC or BLM, off-site preservation shall be required.

**BIO-7a Cover and/or provide escape routes for wildlife from construction areas and monitor these areas daily.** All steep slopes and excavations during construction shall be inspected twice daily (i.e., morning and evening) by a qualified biologist to monitor for wildlife entrapment. Large/steep excavations shall be covered and/or fenced nightly to prevent wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife refuge route.

**BIO-7b Enforce speed limits in and around all construction areas.** Vehicles shall not exceed 15 miles per hour on unpaved roads and the right-of-way accessing the construction site or 10 miles per hour during the night. No pre-construction submittals required. Measure to be implemented as defined during construction.

**BIO-7c Minimize night construction lighting adjacent to native habitats.** Lighting of construction areas at night shall be the minimum necessary for personnel safety and shall be low illumination, selectively placed, and directed/shielded/appropriately to minimize lighting in adjacent native habitats. No pre-construction submittals required. Measure to be implemented as defined during construction.

**BIO-7d Prohibit filling and remov trash from construction areas daily.** Filling shall not be allowed by the project personnel. All food-related trash and garbage shall be removed from the construction sites on a daily basis. No pre-construction submittals required. Measure to be implemented as defined during construction.

**BIO-7e Prohibit the harm, harassment, collection of, or feeding of, wildlife.** Project personnel shall not harm, harass, collect, or feed wildlife. No pets shall be allowed in the construction areas.

**BIO-7f Obtain and implement the terms of agency permit(s) with jurisdiction for special-state or federal species if listed.** If applicable, the necessary application shall include a biological opinion through Section 7 consultation between the appropriate federal agency (e.g., U.S. Fish and Wildlife Service or USFWS), the California Department of Fish and Game for impacts to state listed/wildlife species resulting from this project, if applicable. The terms and conditions included in these authorizations shall be implemented, which may include seasonal restrictions, relocation, and monitoring/reporting specifications, and/or habitat compensation through restoration or acquisition of suitable habitat.

**BIO-9 Conduct protocol surveys for Quino checkerspot butterfly within 1 year prior to project construction activities in occupied habitat.** SDG&E shall conduct pre-construction protocol surveys for Quino checkerspot butterfly within 1 year prior to project construction activities, as or required by U.S. Fish and Wildlife Service, in any area known to support the species. Surveys shall be conducted by a qualified, permitted biologist in accordance with this most current accepted protocol survey protocol. Results shall be reported to the U.S. Fish and Wildlife Service within 45 days of the completion of the survey. The surveys that were conducted in the spring of 2010 will be valid for the project in 2012 as long as construction commences before May 2012. If construction is not scheduled to commence before May 2012, SDG&E will contact the U.S. Fish and Wildlife Service to discuss whether additional surveys are warranted.

**BIO-7f Provide compensation for temporary and permanent impacts to Quino checkerspot butterfly habitat through conservation and/or restoration.** Temporary and permanent impact to Quino checkerspot butterfly shall be compensated through a combination of habitat conservation and restoration. Temporary and permanent impact to Quino checkerspot butterfly shall be compensated through a combination of habitat conservation and restoration at a minimum of a 2:1 mitigation ratio for non-critical habitat and a minimum of a 5:1 mitigation ratio for critical habitat, or as required by the permitting agency. Habitat conservation shall be accomplished through U.S. Fish and Wildlife Service-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as habitat conservation provided that the restoration effort is demonstrated to be feasible and biologically appropriate to the project, shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the Proposed PROJECT on public lands shall be located in a manner designed for resource protection and management. All habitat compensation and restoration used as mitigation for the Proposed PROJECT on private lands shall include long-term management and legal protection assurances.

**BIO-7i Final design of transmission towers and access roads through Quino checkerspot butterfly critical habitat shall maximally avoid host plants for Quino checkerspot butterfly.** The final design of the ECO Project through Quino checkerspot butterfly shall maximally avoid and minimize habitat resources used by the species. SDG&E shall conduct an initial survey within the project area to identify Quino checkerspot butterfly habitat and other design modifications and obtain agency approval of the final design through this area.
## BIO-7

**Conduct pre-construction nesting bird surveys and implement appropriate avoidance measures for identified nesting birds.**

This project will involve the removal of existing vegetation, and the Project Applicant will conduct pre-construction surveys to identify nesting birds in the project area. The project will be conducted according to the best management practices as outlined in the California Department of Fish and Game and U.S. Fish and Wildlife Service’s guidelines. SDG&E will submit surveys that meet the requirements of the NCCP to determine the presence/absence of active nests in or adjacent to the project area. If active nests are identified, appropriate avoidance measures would be identified and implemented to prevent disturbance to the nesting birds. If federal or state listed nesting birds are identified, the project proponent shall contact the U.S. Fish and Wildlife Service and California Department of Fish and Game to determine the appropriate course of action.

### BIO-10a

**Design all transmission towers and lines to conform with Avian Power Line Interaction Committee standards.**

The Proposed Project shall implement recommendations by the Avian Power Line Interaction Committee (2008), which will protect raptors and other birds from electrocution. These measures are sufficient to protect even the largest birds that may perch or roost on transmission lines or towers from electrocution.

### BIO-10b

**Develop and implement the project-specific National Marine Life Protection Plan (NMLP) and an Evolutionary Conservation Plan.**

The Project Applicant will develop and implement an Evolutionary Conservation Plan related to avian, transmission tower, and facilities impacts from electrocution and collision of birds. An Evolutionary Conservation Plan will be developed jointly with the U.S. Fish and Wildlife Service and California Department of Fish and Game and shall provide the framework necessary for implementing a program to prevent bird mortality and document actions. The Evolutionary Conservation Plan shall include the following components:

- **Compliance document:** All facilities and tower sites shall be designed and built to conform with all applicable APLIC (Avian Power Line Interaction Committee) standards.
- **Eviction plan:** An eviction plan shall be developed and implemented in accordance with the requirements of the NCCP.
- **Rehabilitation plan:** A Rehabilitation Plan shall be developed and implemented in accordance with the requirements of the NCCP.
- **Monitoring and Reporting Plan:** A Monitoring and Reporting Plan detailing the information to be collected for incorporation into a regular Nest Monitoring Log (NML) with sufficient details to enable USFWS and CDFG to monitor SDG&E’s compliance with Fish and Game Code Sections 59.100 et. al and Sections 6322 and 6322 of the California Fish and Game Code.

- **Duration and timing of disturbance**
- **Visibility of disturbance**
- **Type and extent of disturbance (e.g., noise levels and quality)**
- **Geographic location**
- **Nesting chronologies**
- **Nesting buffer widths for nests within the project corridor/footprint to employ based on the sensitivity levels of specific species or guilds of avian species.**
- **A detailed explanation of how the buffer widths were determined**
- **No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity related to the Proposed Project.**
- **No access roads will be constructed during geotechnical activities.**

### BIO-11a

**Conduct management activities prior to vegetation disturbance in the bird nesting season or conduct pre-construction nesting bird surveys.**

Management activities with the potential to result in direct or indirect habitat disturbance, most notably vegetation management, shall be conducted outside of the bird nesting season to the maximum extent practicable. Where avoidance is not possible, the project proponent shall conduct pre-construction nesting bird surveys consistent with the requirements of the NCCP to determine the presence/absence of active nests in or adjacent to construction areas. If active nests are identified, appropriate avoidance measures would be identified and implemented to prevent disturbance to the nesting birds. If federal or state listed nesting birds are identified, the project proponent shall contact the U.S. Fish and Wildlife Service and California Department of Fish and Game to determine the appropriate course of action.

### VIS-1a

**Reduce impacts at scenic highway and trail crossings.**

At highway and trail crossings, structures shall be placed at the maximum feasible distance from the crossing to reduce visual impacts as long as such significant resources are not negatively affected.

### VIS-1b

**Reduce impacts at scenic view areas.**

In scenic view areas (the Jewel Valley Trail and the Jewel Valley Road Pathway) transmission line structures would be placed to avoid sensitive features and/or allow conduits to be built being flushed from view by vegetation.

### VIS-3a

**Reduce visibility of construction activities and equipment.**

If visible from nearby roads, residences, gathering areas, or recreational areas, facilities, or trails, stationary construction sites and staging areas and temporary work sites shall be visually screened using temporary screening fences. Fencing will be of an appropriate design and color for each specific location. Where practical, construction staging and storage will be screened with temporary fencing from close-range residential views. Additionally, construction in areas visible from recreation facilities and areas during holidays and periods of heavy recreational use shall be avoided. SDG&E shall submit construction plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days before the start of construction.

### VIS-3b

**Reduce construction night-lighting impacts.**

SDG&E shall design and install all lighting at construction and storage yards and at staging areas and yards such that illumination of the project facilities, vegetation, and night-time activities are minimized. The Construction Lighting Mitigation Plan shall be reviewed for consistency with the County of San Diego Light Pollution Code (Section 59.100 et. al) and Sections 6322 and 6322 of the Zoning Ordinance to ensure outdoor light fixtures emitting light into the night sky do not result in a detrimental effect on astronomical research and to ensure protected glare and light trespass is minimized. SDG&E will submit a Construction Lighting Mitigation Plan to the CPUC and BLM for review and approval at least 90 days before the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SDG&E shall not order any exterior lighting fixtures or components until the Construction Lighting Mitigation Plan is approved by the CPUC and BLM. The Plan shall include but is not necessarily limited to the following:

- **Lighting:** Lighting shall be designed so that exterior light fixtures are hooded, with lights directed downward or towards the area to be illuminated, and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary.

### VIS-3c

**Reduce construction impacts to natural features.**

No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity related to the Proposed Project.

### VIS-3d

**Reduce in-line views of land scars.**

Construct access or spur roads at appropriate angles from the originating primary travel facilities to minimize extended in-line views of newly graded terrain, when feasible. Contour construction line views of newly graded terrain, when feasible. Contour

### Notes

- **Applicability / Status**
- **Notes**

<table>
<thead>
<tr>
<th>IM No.</th>
<th>Mitigation Measure</th>
<th>Applicability / Status</th>
<th>Notes</th>
</tr>
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<tbody>
<tr>
<td>BIO-7</td>
<td>Conduct pre-construction nesting bird surveys and implement appropriate avoidance measures for identified nesting birds.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>N/A to covered activities in NTP Request.</td>
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<tr>
<td>BIO-10a</td>
<td>Design all transmission towers and lines to conform with Avian Power Line Interaction Committee standards.</td>
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<td>Conduct management activities prior to vegetation disturbance in the bird nesting season or conduct pre-construction nesting bird surveys.</td>
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<td>VIS-1a</td>
<td>Reduce impacts at scenic highway and trail crossings.</td>
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<td>VIS-1b</td>
<td>Reduce impacts at scenic view areas.</td>
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<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>VIS-3a</td>
<td>Reduce visibility of construction activities and equipment.</td>
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<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>VIS-3b</td>
<td>Reduce construction night-lighting impacts.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>VIS-3c</td>
<td>Reduce construction impacts to natural features.</td>
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<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>VIS-3d</td>
<td>Reduce in-line views of land scars.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No access roads will be constructed during geotechnical.</td>
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<tr>
<td>VI.3-1</td>
<td>Reduce visual contrast from unintentional vegetation lines.</td>
<td>N/A requested</td>
<td>activities</td>
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<tr>
<td>VI.3-2</td>
<td>Minimize vegetation removal only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed.</td>
<td>N/A requested</td>
<td>activities</td>
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<td>VI.3-3</td>
<td>Reduce potential visual contrast of transmission structures.</td>
<td>N/A requested</td>
<td>activities</td>
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<td>VI.3-4</td>
<td>Reduce potential transmission conductor visibility and visual contrast.</td>
<td>N/A requested</td>
<td>activities</td>
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<td>VI.3-5</td>
<td>Reduce potential visual contrast from transmission structure spacing.</td>
<td>N/A requested</td>
<td>activities</td>
</tr>
<tr>
<td>VI.3-6</td>
<td>Reduce visual impacts resulting from native tree removal.</td>
<td>N/A requested</td>
<td>activities</td>
</tr>
<tr>
<td>VI.3-7</td>
<td>Reduce long-term night lighting impacts from substations and ancillary facilities.</td>
<td>N/A requested</td>
<td>activities</td>
</tr>
</tbody>
</table>
Avoid and Protect Significant Resources. SDG&E shall design and implement a long-term management plan to protect NRHP-eligible, CRHR-eligible sites or sites treated as eligible for project management purposes from direct impacts of project operation and maintenance and from indirect impacts (such as erosion and access) that could result from the presence of the project. The plan shall be developed in consultation with the CPUC and other consulting parties to design measures that shall be effective against project maintenance impacts, such as vegetation clearing and road and lower maintenance, and project-related vehicular impacts. The plan 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 posted 3 days prior to the public construction activity. Notices shall provide information on alternative recreation areas that may be used during the closure of these facilities.

Applicable, pre-construction requirements met. See NTP-2 conditions of approval.

Prepare Construction Notification Plan. SDG&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:

- Public notice maker. A public notice maker 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 recreational 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&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.
- 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 newspaper notices shall be placed to discuss the status and schedule of construction.
- 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.
- Public liaison person and toll-free information hotline. SDG&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&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callsers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.

Applicable, pre-construction requirements met. See conditions of approval.

Notification of property owners and provide access. To facilitate access to properties obstructed by construction activities, SDG&E shall notify property owners and tenants at least 24 hours in advance of construction activities and shall provide alternative access if required.

Applicable, pre-construction requirements met. See conditions of approval.

Revise project elements to minimize land use conflicts. At least 48 hours prior to completing final transmission line design for the approved route, SDG&E shall notify landowners of parcels through which the alignment would pass regarding the specific location of the ROW, individual towers, staging areas, access roads, or other facilities associated with the project that would occur on the subject property. The notified parties shall be provided at least 30 days in which to identify conflicts with any planned development on the subject property and to work with SDG&E to identify potential rectifies of the alignment that would be mutually acceptable to SDG&E and the landowner. Property owners whose land may be divided into potentially unenclosed parcels through which the alignment would pass shall be defined as ESAs. Protective fences or other barriers shall be erected and maintained on SDG&E-own property, easements, or ROW to protect ESAs from inadvertent trespass for the duration of construction in the vicinity of the project. The ESA fencing should demarcate the limits of the construction and/or access area. SDG&E shall establish a toll-free information hotline. The notice shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callsers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.

Applicable, pre-construction requirements met. See conditions of approval.

Develop and Implement a Historic Properties Treatment Plan-Cultural Resources Management Plan. 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 Environmental Sensitive Areas (ESAs). All recommended NHPRP- and/or CRHR-eligible sites or sites treated as eligible for project management purposes shall be avoided or mitigated. CRHR-eligible sites or sites treated as eligible for project management purposes shall be avoided as they relate to the history of the area. A Native American monitor shall be identified as they relate to the history of the area. A Native American monitor may be required at culturally sensitive locations specified by the lead agency following government-to-government consultation with Native American tribes. The monitoring plan in the CRMP shall indicate where Native American monitors shall be required.

Applicable, pre-construction requirements met. See Appendix E to the Memorandum of Agreement (MOA).

Preparation of Cultural Resources Management Plan (CRMP). SDG&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:

- Public notice maker. A public notice maker 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 recreational 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&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.
- 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 newspaper notices shall be placed to discuss the status and schedule of construction.
- 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.
- Public liaison person and toll-free information hotline. SDG&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&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callsers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.

Applicable, pre-construction requirements met. See conditions of approval.
<table>
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<tr>
<th>MM No.</th>
<th>Mitigation Measure</th>
<th>Applicability / Status</th>
<th>Notes</th>
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<tr>
<td>CUL-1.6</td>
<td>Construction Monitoring: Prior to issuance of grading permit(s), the SDG&amp;E shall retain a qualified archaeologist, in accordance with the Secretary of the Interior's Standards and Guidelines (Secretary’s Standards), (36 CFR 190), and Native American observer to monitor ground-disturbance activities in culturally sensitive areas in an effort to identify any unrecorded resources. A qualified archaeologist shall attend pre-construction meetings, as needed, to make comments and/or suggestions concerning the monitoring program and to discuss excavation plans with the excavation contractor. The requirements for archaeological monitoring shall be noted on the construction plans.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>BLM approved Archeological Field Director and monitors. CPUC approved archeological monitors.</td>
</tr>
<tr>
<td>CUL-1.7</td>
<td>Discovery of Unknown Resources: In the event that previously unknown cultural resources are discovered, the archaeologist shall have the authority to divert or temporarily halt ground disturbance to allow evaluation of the potential significance of the resources. The archaeologist shall follow the NAGPRA procedures, and timelines for assessing eligibility, formulating a mitigation plan, and implementing treatment should avoidance and protection of the resource not be possible. Mitigation plans for unplanned discoveries shall be approved by the BLM and SHPO prior to implementation. The archaeologist in coordination with the BLM shall evaluate the significance of the discovered resources based on eligibility for the NRHP, CRHR, or local laws. Preliminary determinations of NHRP eligibility shall be made by the CPUC and CPUC, in consultation with other appropriate agencies and local governments, and the SHPO.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>See Appendix F to the Memorandum of Agreement (MDA).</td>
</tr>
<tr>
<td>CUL-1.8</td>
<td>Control Unauthorized Access: SDG&amp;E shall coordinate with the authorized officer of the BLM or local landowner/administrator of at least 30 days prior to construction in order to determine if gates shall be installed on access roads, especially trails that would be dually used as access roads, to prevent unauthorized vehicular access to the ROW. Gates installation shall be required at the discretion of the BLM. On trails proposed for dual use as access roads, gates shall be wide enough to allow horses, bicycles, and pedestrians to pass through. SDG&amp;E shall document its coordination efforts with the BLM of the roadway and provide this documentation to the CPUC and BLM 30 days prior to construction. Signs prohibiting unauthorized use of the access roads shall be posted on the installed gates.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>Access control will be determined as part of the long-term management plan as required in MM-CUL-1b.</td>
</tr>
<tr>
<td>CUL-1.9</td>
<td>Funding of Law Enforcement Patrons: To control unauthorized use of project access roads and to provide for the general protection of cultural and natural resources more accessible as a result of the project facilities, SDG&amp;E shall provide funding to CPUC and CPUC for law enforcement patrons for the term of the ROW. The CPUC and BLM will formulate what funding is reasonable to implement the above.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>Funding for law enforcement will be provided via a cost recovery agreement during construction and funding required for long-term management during operations will be determined as part of the long-term management plan as required in MM-CUL-1b.</td>
</tr>
<tr>
<td>CUL-1.10</td>
<td>Continue Consultation with Native Americans and Other Traditional Groups: SDG&amp;E shall provide assistance to the BLM and CPUC, as requested by the BLM and CPUC, to continue required government consultation with interested Native American tribes and individuals (Executive Memorandum of April 29, 1994, and Section 106 of the National Historic Preservation Act) and other traditional groups to identify and assess or mitigate the impact of the approved project on traditional cultural properties or other resources of Native American concern, such as sacred sites and landscapes, or areas of traditional plant gathering for food, medicine, basket weaving, or ceremonial uses. As directed by the BLM and CPUC, SDG&amp;E shall undertake required treatments, studies, or other actions that result from such consultation. Actions that are directed during or after construction shall be defined, detailed, and scheduled in the HPTP-GRMP and implemented by SDG&amp;E and may include the following:</td>
<td>Applicable, pre-construction requirements met.</td>
<td>Measure to be implemented as defined during construction.</td>
</tr>
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</table>
Paleontological Monitoring and Treatment Plan: Following completion and approval of the paleontological resources inventory and prior to construction, SDG&E shall prepare and submit to the CPUC and BLM for approval a Paleontological Monitoring and Treatment Plan (Plan). The Plan shall be developed by a qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements, including BLM and County of San Diego Paleontological Resource guidelines. The qualified paleontologist shall have an MA or PhD in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques. The Plan shall identify construction impact areas of moderate to high sensitivity for encountering significant paleontological resources and the depths at which those resources are likely to be encountered. The Plan shall outline a coordination strategy to ensure that a qualified paleontological monitor will conduct full-time monitoring of all ground disturbance in sediments determined to have a moderate to high sensitivity. Sediments of low, marginal, and undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with zero sensitivity will not require paleontological monitoring. The Qualified Paleontologist shall have a BA in Geology or Paleontology, and a minimum of 1 year of monitoring experience in local sediments. The Plan shall detail the significance criteria to be used to determine which resources will be avoided or recovered for their data potential. The Plan shall also detail methods of recovery, preparation and analysis of specimens; final curation of specimens at a federally accredited repository; data analysis, and reporting. The Plan shall specify that all paleontological work undertaken by the applicant on public land shall be carried out by qualified paleontologists with the appropriate current permits, including, but not limited to, a Paleontological Resources Use Permit (for work on public lands administered by BLM). Notices to proceed shall be issued by the lead agency and other agencies with jurisdiction. Following approval of the Paleontological Monitoring and Treatment Plan, the Qualified Paleontologist shall conduct full-time monitoring of areas identified as high sensitivity areas based on the paleontological sensitivity assessment and Paleontological Monitoring and Treatment Plan consistent with Mitigation Measure PALEO-01b (Develop Paleontological Monitoring and Treatment Plan). SDG&E shall submit to the BLM and CPUC for approval an inventory of significant paleontological resources within the affected area, based on field surveys of areas identified as marginal through high or undetermined paleontological sensitivity potential.

Paleo-1b Inventory and evaluate paleontological resources in the Final APE: Prior to construction, SDG&E shall conduct inventories to the BLM and CPUC for approval an inventory of significant paleontological resources within the affected area, based on field surveys of areas identified as marginal through high or undetermined paleontological sensitivity potential.

Paleo-2 Monitor Construction for Paleontology: Based on the paleontological sensitivity assessment and Paleontological Monitoring and Treatment Plan consistent with Mitigation Measure PALEO-01b (Develop Paleontological Monitoring and Treatment Plan), SDG&E shall conduct full-time construction monitoring by the qualified paleontological monitor in areas determined to have moderate (PFYC - Class 1) or high (PFYC - Class 2) paleontological sensitivity within the ECO Substation. Sediments of low, marginal, (i.e., PFYC - Class 3), or undetermined (PFYC Class 3) sensitivity shall be monitored by a qualified paleontologist on a part-time basis (as determined by the Qualified Paleontologist). Construction activities shall be diverted when data recovery of significant fossils is warranted, as determined by the Qualified Paleontologist.

Paleo-2b Conduct Paleontological Data Recovery: If avoidance of significant paleontological resources is not feasible or appropriate based on project design, treatment (including recovery, specimen preparation, data analysis, curation, and reporting) shall be carried out by the project, in accordance with the approved Treatment Plan per Mitigation Measure PALEO-01b (Develop Paleontological Monitoring and Treatment Plan). Applicable, pre-construction requirements met.

Paleo-3b Train Construction Personnel: 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; 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:

- 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.
- 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.
- 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). Applicable, pre-construction requirements met.
NOI-1  Blasting Plan

SDG&E will prepare a blasting plan that will reduce impacts associated with construction-related noise and vibrations related to blasting. The blasting plan will be site-specific, based on general and exact locations of required blasting and calculations to determine the area affected by the planned blasting. Noise calculations in the blasting plan will account for blasting activities and all supplemental construction equipment. The final blasting plan and pre-blast survey shall meet the requirements provided below, as well as those outlined in Mitigation Measure HAZ-4(j). The blasting plan will include a schedule to demonstrate, where feasible, that blasting construction will occur infrequently enough that it will not exceed the County’s impulsive noise standard because blasting would not occur for more than 25% (15 minutes) during a 1-hour period due to the short time duration of a blast. Where this is not possible, other construction blasting would be coordinated with impacted building occupants to occur in their absence, or at other acceptable times, to avoid nuisance or annoyance complaints. If necessary, the applicant will temporarily relocate impacted residents on an as-needed basis for the duration of the blasting activities. The applicant will be responsible for temporary relocation expenses (i.e., expenses for temporary housing) incurred by impacted residents if relocation is necessary during blasting activities.

To ensure that potentially impacted residents are informed, the applicant will provide notice by mail to all property owners within 300 feet of the project at least 1 week prior to the start of construction activities. Blasting would be completed between 7 a.m. and 7 p.m. to be compliant with County of San Diego noise ordinances. A rock anchoring or pin pile system may be used to reduce the risk of damage near structures during blasting activities. Fair compensation for lost use will be provided to the property owner. Physical damage to potentially vulnerable structures shall be addressed by avoidance of blasting near the structures wherever possible, and, if necessary, non-blasting construction methods will be evaluated. If adversely affected, structures shall be restored to an equivalent condition, and fair compensation for lost use will be provided to the owner.

If necessary, the use of portable noise barriers to reduce excessive noise impacts shall be used between the source and affected occupied properties. Noise barriers that break the line of sight would provide 5 db attenuation. Increasing the height of the barrier would increase the attenuation of the barrier. A 5 dbA to 10 dbA attenuation is considered reasonable.

Supplemental construction equipment, such as drill rigs, may be used to support blasting. At a distance of 80 feet, drill rig noise emissions are approximately 75 dbA Leq. Drill rigs, without mitigation, have the potential to cause temporary noise impacts if used less than 80 feet from the property line of an occupied residence. The blasting plan will provide measures to reduce noise impacts resulting from the use of drill rigs at less than 80 feet from a property line. Such measures may include temporary noise barriers or limited hours of operation to reduce the impact to the within the County standard.

NOI-2  Conductor configuration selection to address noise impacts

As part of the project design selection process, the proper conductor configuration shall be selected so that the corona noise does not exceed the County’s noise ordinance limits along the transmission line corridor measured during worst-case weather conditions of or beyond 6 feet from the boundary of the easement upon which the transmission line is located.

1PA-1  Prep and Implement a Traffic Control Plan. At minimum, the plan will include the following:

- SDG&E shall encourage carpooling to the construction site to reduce personal vehicle traffic in the project area to the greatest extent possible.
- SDG&E will consider the specific object sizes, weights, origin, destination, and unique handling requirements, and evaluate alternative transportation approaches.
- 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 configuration.
- Flaggers and directional guidance for bicyclists along Old Highway 80 shall be used.
- All Caltrans standards for utility encroachments shall be met.
- Clearances or overhead crossings shall conform to regulations of the CPUC and BLM, and the number of crossings shall be minimized.
- New installations under an existing roadway shall be made by the boring and jacking method. No trenching under the traveled way will occur.
- For freeways and expressways, the placement of longitudinal encroachments is prohibited within controlled-access rights-of-way (ROWs).
- Utilities shall not be located in median areas.
- Transverse crossings shall be normal (60°) to the highway alignment where practical. If impractical, skews of up to 30° from normal may be allowed.
- Supports for overhead lines crossing freeways shall be located outside the controlled-access ROW and not on curvilinear or flat towers, and shall not impair sight distances. All installations shall be placed as close as possible to the ROW line. Aboveground utility terminals shall be outside of the clear recovery zone (20 feet from edge-of-right-of-way for conventional highways and 30 feet for freeways and expressways). Allowance shall be made for future widening of the highways.
- New installations shall not impair sight distances.
- SDG&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.
- SDG&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&E shall notify counties and cities of the proposed locations, nature, time, and duration of any construction activities, and advise of any access restrictions that could impact their effectiveness.
- SDG&E shall provide a draft copy of the Traffic Control Plan to the agencies listed for comment a minimum of 60 days prior to the start of any construction activities. The comments will be provided back to SDG&E, and SDG&E 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 SDG&E for implementation during all construction activities.

1PA-2  Repair roadways damaged by construction activities. 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 no cost to SDG&E. Roads disturbed by construction activities or construction vehicles shall be properly restored to ensure long-term protection of roads);
- Care shall be taken to prevent damage to roadside drainage structures. Roadside drainage structures and road drainage features (e.g., milling dips) shall be protected by regrading and reconstructing roads to drain properly. Said measures shall be incorporated into an access management plan with the applicable governing agency prior to construction.

1PA-3  Consult with and inform the FAA, DOG, and U.S. Customs and Border Protection. SDG&E shall consult with the FAA, DOG, and U.S. Customs and Border Protection (San Diego Sector) to avoid potential safety issues associated with proximity to airports, military bases or training areas, and land strips and to determine where Border Protection aircraft operate in the County. Prior to construction, SDG&E shall provide written notification to the FAA, the U.S. Air Force Regional Environmental Coordinator (or appropriate DOD representative), U.S. Customs and Border Protection (San Diego Sector), and to the CPUC and BLM, stating when and where the new transmission lines and towers will be erected, and shall install markers as required by the U.S. Customs and Border Protection or FAA. SDG&E shall also provide all agencies listed above with aerial photos or topographic maps clearly showing the new lines and towers.

HAZ-1a  Hazardous Materials Management Plan. Prior to approval of final construction plans, SDG&E shall prepare an HMACP for the construction phase of the project, which shall be reviewed and approved by the appropriate agency, and shall include the following components:

- 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 disposal of excess materials.
Prior to approval of final construction plans, SDG&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. Applicable, pre-construction requirements met. Health and Safety Program and Safety Assessment December (2012) approved by the CPUC.

Testing for environmental hazards associated with demolition. Prior to demolition of the existing Boulevard substation and surrounding buildings, soil, conduit, equipment, and structures shall be tested for environmental hazards, including oil, lead-based paint, and asbestos. An asbestos and lead-based paint survey shall be performed by a Cal/OSHA certified Asbestos Consultant/Site Surveillance Technician and a California Department of Public Health (CDPH) certified Inspector/Assessor. Sampling Technician, or Program Monitor. The survey shall be performed in accordance with the applicable state guidance to determine asbestos containing materials (ACM), asbestos containing construction materials (ACCM), and lead-based paint (LBP) as defined in the California Code of Regulations. If ACM, ACCM, or LBP is identified, abatement and disposal requirements, inspection procedures, and waste minimization procedures shall be performed in accordance with the applicable federal, state, and local regulations. No activities would be part of this NTP request.

Contingency plan for encountering contaminated soils. If soil or groundwater contamination is suspected or encountered during grading or excavation activities (e.g., unusual soil discoloration or strong odor), SDG&E's environmental field representative 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. Works outside the suspected area may continue as determined by the environmental field representative. 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 the sample testing determines that contamination is present, 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. Works outside the suspected area may continue as determined by the environmental field representative. No activities would be part of this NTP request.

Prior to demolition of the existing Boulevard Substation and surrounding buildings, soil, conduit, equipment, and structures shall be tested for environmental hazards, including oil, lead-based paint, and asbestos. If ACM, ACCM, or LBP is identified, abatement and disposal procedures would be performed in accordance with the applicable federal, state, and local regulations. No activities would be part of this NTP request.

Testing for lead contamination. Soil samples shall be collected and tested from an excavation site within 30 feet of any area identified as a current or historical shooting range to determine the presence of lead and extent of any contamination. The testing and sampling shall be conducted by a California licensed professional and sent to a California Certified Laboratory. A report documenting the areas proposed for sampling and the process used for sampling shall be submitted to the project’s lead agency for review at least 30 days prior to excavation. Results of the laboratory testing and recommended procedures for handling and excavating any materials found to exceed regulatory requirements shall be submitted to the project’s lead agency 30 days prior to excavation. In addition, a Soil/Lead Contamination Handling Plan shall be prepared to address appropriate procedures in the event that lead contamination is discovered as a result of soil testing. This plan shall contain provisions for a lead-awareness program for workers, as well as guidelines for the identification, removal, transport, and disposal of lead-impacted materials. This plan shall also emphasize that all activities within, or in close proximity to, contaminated areas must follow applicable environmental and hazardous waste regulations. This plan shall be submitted to the project’s lead agency 30 days prior to excavation. Documentation of any confirmed or suspected contamination identified during testing or excavation 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 procedures for handling and excavating materials found to exceed regulatory requirements shall be submitted to the CPUC and BLUM for review and approval. No activities would be part of this NTP request.

Safety Assessment. 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 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, safety work practices, security, heavy equipment transportation, traffic management, emergency procedures, and fire control. Applicable, pre-construction requirements met. Health and Safety Program and Safety Assessment December (2012) approved by the CPUC.
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<td>HAZ-4b</td>
<td>Blasting Plan. If blasting is deemed necessary for the construction of project components, SDG&amp;E shall conduct a pre-blast survey and prepare a blasting plan. A written report of the pre-blast survey and blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions, as well as those outlined in Mitigation Measure N01-1:</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No blasting will occur during geotechnical activities.</td>
</tr>
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<td>The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by SDG&amp;E. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.</td>
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<td>The final blasting plan shall address blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</td>
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<td>The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed turbine foundation locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. SDG&amp;E, its general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.</td>
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<td>SDG&amp;E shall respond to and document all complaints received and the responsive action taken. These records shall be made available to the appropriate regulatory agency for review upon request. SDG&amp;E shall refer all unresolved disputes to the approving agency for resolution.</td>
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<td>The written notice shall provide a contact person and telephone number for answering questions regarding the line and guidelines on what activities should be limited or restricted within the ROW.</td>
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<td>HAZ-5a</td>
<td>Spill Prevention Control and Countermeasure Plan. Prior to the facility going online and becoming operational, SDG&amp;E shall prepare an SPCC plan to address proper procedures for storage, handling, spill response, and disposal of hazardous materials for the ongoing operation of the project. The SPCC plan shall meet all requirements outlined in Title 40 of the Code of Federal Regulations, Part 112 (40 CFR Part 112). The SPCC plan shall be reviewed and approved by the appropriate agency’s engineering department and certified by a Registered Professional Engineer.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>The SPCC plan shall identify operating procedures that the facility will implement to prevent oil spills; control measures installed to prevent from leaving the project site; and countermeasures to contain, clean up, and mitigate the effects of an oil spill. A copy of the plan shall be kept on site at the facility and made available for review by the U.S. EPA Regional Administrator during normal business hours. The plan shall be amended as required under 40 CFR Part 112. The plan shall be reviewed, evaluated, and updated (if necessary) every 5 years.</td>
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<td>HAZ-5b</td>
<td>Hazardous Materials Business Plan. Prior to the facility going online and becoming operational, SDG&amp;E shall prepare an HMPP in accordance with all related requirements in California Health and Safety Code, Chapter 6.95, Articles 1 and 2. The HMPP shall contain basic information on the location, type, and quantity of hazardous materials stored or used by the facility, as well as the health risks associated with each hazardous material. The HMPP shall include three components: an inventory and site map, emergency response plan, and employee training. The plan shall be reviewed and recertified every year and amended as required by California Health and Safety Code, Chapter 6.95, Articles 1 and 2.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<tr>
<td>PS-1a</td>
<td>Minimize electromagnetic and public safety communications. The project shall be designed to minimize EMI (e.g., impacts to radar, microwave, television, and radio transmissions) and comply with FCC regulations. Signal strength studies shall be completed prior to construction and conducted when proposed locations have the potential to impact transmissions. Potential interference with public safety communications systems (e.g., radio traffic related to emergency activities) shall be avoided.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<td>In the event the project results in EMI, SDG&amp;E or the facility operator shall work with the owner of the impacted communications system to resolve the problem. Potential measures may include realigning the existing antenna or installing relays to transmit the signal around the project. Additional warning information may also need to be conveyed to aircraft with onboard radar systems so that echoes from project equipment can be quickly recognized.</td>
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<td>PS-1b</td>
<td>Limit conductor surface potential. Prior to construction, SDG&amp;E shall specify and implement designs that limit the conductor surface electric gradient in accordance with the Institute of Electrical and Electronic Engineers (IEEE) Radio Noise Design Guide.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<tr>
<td>PS-1c</td>
<td>Document complaints of broadcast interference. After energizing the transmission line, SDG&amp;E shall respond to and document all radio/television/equipment interference complaints received and the responsive actions taken. These records shall be made available to the appropriate regulatory agency for review upon request. SDG&amp;E shall refer all unresolved disputes to the approving agency.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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<tr>
<td>PS-2</td>
<td>Determine proper grounding procedures and implement appropriate grounding measures. As part of the project siting and construction process, SDG&amp;E’s contractor(s) shall identify objects (such as fences, conductors, and pipelines) that have the potential for induced voltages and work with the affected parties to determine proper grounding procedures (Note: CPUC General Order 95 and the NEISD do not have specific requirements for grounding). SDG&amp;E shall install all necessary grounding measures prior to energizing the line. At least 90 days prior to energizing the line, SDG&amp;E shall notify in writing all property owners within and adjacent to the project’s ROW regarding the date the line is to be energized, subject to the review and approval of the appropriate regulatory agency. The written notice shall provide a contact person and telephone number for answering questions regarding the line and guidelines on what activities should be limited or restricted within the ROW. The written notice shall describe the nature and operation of the line, and SDG&amp;E’s responsibilities with respect to grounding all conducting objects. In addition, the notice shall describe the property owner’s responsibilities with respect to notification for any new objects that may require grounding and guidelines for maintaining the safety of the ROW. SDG&amp;E shall respond to and document all complaints received and the responsive action taken. These records shall be made available to the appropriate regulatory agency for review upon request. SDG&amp;E shall refer all unresolved disputes to the approving agency for resolution.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures will be constructed during geotechnical activities.</td>
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The following measures shall be incorporated to reduce fugitive dust and other criteria pollutant emissions during construction activities:

- Rock aprons or plate edges shall be installed as needed at the intersection of dirt access roads and paved public roadways to clean the tires of equipment prior to leaving the site.
- Rock, active construction areas, unpaved access roads, parking areas, and staging areas shall be watered or stabilized with non-toxic soil stabilizers as needed to control fugitive dust.
- Public streets shall be swept or cleaned with mechanical sweepers to prevent vehicular spillover and traffic area dirt from entering storm drain inlets. Mark all inlets with the words “No Dumping! Flows to Sensitive Habitat” or similar.
- Exposure of soil particles (e.g., sand, dirt, etc.) shall be covered and/or watered or stabilized with non-toxic soil binders as needed to control emissions.
- Trucks transporting bulk materials shall be completely covered unless 2 feet of freeboard space from the top of the container is maintained with no spillage and loss of material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of the bulk material.
- Movement of bulk material handling or transfer shall be stabilized prior to handling or at a point of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
- Traffic speeds on unpaved roads and the ROW shall be limited to 15 miles per hour.
- Vehicle idling time shall be limited to a maximum of 5 minutes for vehicles and construction equipment, except where idling is required for the equipment to perform its task.
- Road graders used during site development activities shall be equipped with a CARB-verified Level 2 diesel emission control strategy or a comparable diesel-control technology that will reduce inhalable particulate matter (PM10) emissions by 50% or more.
- If suitable park-and-ride facilities are available in the project vicinity, construction workers will be encouraged to carpool to the job site to the extent feasible. The ability to develop an effective carpool program for the project would depend upon the proximity of carpool facilities to the job site, the geographical commute departure points of construction workers, and the extent to which carpooling would not adversely affect worker show-up time and the project’s construction schedule.
- All off-road, diesel-powered construction equipment shall be kept in good tune and maintained according to the manufacturer’s specifications.
- Construction equipment shall use electric-powered motors where feasible.
- The construction contractor will prepare and implement a high-wind dust control plan and terminate soil disturbance when winds exceed 25 miles per hour.
- The construction contractor will require 90-day low-NOx tune-ups for off-road equipment.
- Diesel particulate filters shall be utilized on heavy equipment where feasible.
- Construction activities will comply with all applicable SDAPCD rules and regulations.

Where applicable, the following shall apply:

- Identification of pollutant sources and non-stormwater discharges associated with construction activity.
- Specifications for BMPs that shall be implemented during project construction to minimize the potential for accidental releases and runoff from the construction areas, including temporary construction yards, pull sites, and helicopter landing zones. Specifications shall include:
  - A plan for training construction crews.
  - A plan for monitoring and inspecting BMPs and site conditions.
  - A plan for sampling and analysis of pollutants (as necessary).
- Construction impacts shall be minimized to the greatest extent possible.
- Upon completion of construction phases, roadways shall be reduced to minimum widths needed.
- Areas disturbed during construction shall be revegetated to their natural states.
- Roadway cross sections shall be stabilized to the extent feasible. The extent of roadway cross sections that shall be stabilized shall be based on the extent to which roadway cross sections can be stabilized and the extent to which roadway stabilization will not adversely affect worker show-up time and the project’s construction schedule.
-銨DFG guidelines for culverts shall be followed to minimize long-term maintenance and meet a 10-year rain event to minimize trapping of sediment.
- Where applicable, the following shall apply to reduce the release of contaminants to the local surface and groundwater:
  - Areas disturbed during construction shall be revegetated to their natural states.
  - Roadway cross sections shall be stabilized to the extent feasible. The extent of roadway cross sections that shall be stabilized shall be based on the extent to which roadway stabilization will not adversely affect worker show-up time and the project’s construction schedule.
  -銩DFG guidelines for culverts shall be followed to minimize long-term maintenance and meet a 10-year rain event to minimize trapping of sediment.

For leaking or failure of large power transformers, have 100% containment at each power transformer.

Design and incorporate a sediment management BMP to control sediment from the site. All active construction areas, unpaved access roads, parking areas, and staging areas shall be watered or stabilized with non-toxic soil stabilizers as needed to control fugitive dust.

A Stormwater Pollution Prevention Plan shall be prepared to reduce soil erosion during construction. In compliance with the new SWRCB’s NPDES General Permit for Storm Water Associated with Construction Activities (Order No. 2009-009/DWQ, NPDES No. CAS000002, effective July 1, 2015), SDG&E shall prepare a project-specific SWPPP before construction begins, and it shall be kept on site throughout the construction process. The SWPPP shall include the following:

- Identification of pollutant sources and non-stormwater discharges associated with construction activity.
- Specifications for BMPs that shall be implemented during project construction to minimize the potential for accidental releases and runoff from the construction areas, including temporary construction yards, pull sites, and helicopter landing zones. Specifications shall include:
  - A plan for training construction crews.
  - A plan for monitoring and inspecting BMPs and site conditions.
  - A plan for sampling and analysis of pollutants (as necessary).
- Where applicable, the following shall apply:
  - Construction impacts shall be minimized to the greatest extent possible.
  - Upon completion of construction phases, roadways shall be reduced to minimum widths needed.
  - Areas disturbed during construction shall be revegetated to their natural states.
  - Construction roadways shall follow natural contours to the extent practical and be designed to minimize stream crossings, avoid wetlands, and maintain surface water runoff patterns to prevent erosion.
  - Construction revegetation shall be conducted to the extent feasible. The extent of roadway cross sections that shall be stabilized shall be based on the extent to which roadway stabilization will not adversely affect worker show-up time and the project’s construction schedule.
- Where applicable, the following shall apply to reduce the release of contaminants to the local surface and groundwater:
  - Areas disturbed during construction shall be revegetated to their natural states.
  - Roadway cross sections shall be stabilized to the extent feasible. The extent of roadway cross sections that shall be stabilized shall be based on the extent to which roadway stabilization will not adversely affect worker show-up time and the project’s construction schedule.

Limited ground disturbance during geotechnical activities does not require a SWPPP to be prepared.
HYD-3 Identification of sufficient water supply
Prior to construction SDG&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:
- 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 wells/locations/water sources. The groundwater study will estimate short and long-term well water supplies from each well located 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&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.
- 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. Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project.

Applicability / Status: Applicable, pre-construction requirements met.
Notes: Water Supply Plan (January 2013) approved by CPUC.

HYD-4 Preparation of a Stormwater Management Plan. SDG&E shall prepare an SWMP in compliance with the County of San Diego Major Storm Water Management Plan. The SWMP shall be project specific and developed in conjunction with project design. The SWMP shall include site design BMPs that, where applicable, shall:
- Maintain predevelopment rainfall runoff characteristics. The BMPs shall:
  - Locate the project and road improvement alignments to avoid or minimize impacts to receiving waters or to increase the preservation of critical (or problematic) areas such as floodplains, steep slopes, wetlands, and areas with erosion or unstable soil conditions
  - Minimize the project’s impervious footprint.
  - Conserve natural and critical areas, such as floodplains, steep slopes, wetlands, and areas with erosion or unstable soil conditions
  - Where landscape is proposed, drain rooftops, impervious sidewalks, walkways, trails, and pavers into adjacent landscaping
  - Design and locate roadway structures and bridges to reduce the amount of work in live streams, and minimize the construction impacts
  - Implement the following methods to minimize erosion from slopes:
    - Disturb existing slopes only when necessary
    - Minimize cut-and-fill areas to reduce slope lengths
    - Incorporate retaining walls to reduce steepness of slopes or to shorten slopes
    - Provide benches or terraces on high cut-and-fill slopes to reduce concentration of flows
    - Round and shape slopes to reduce concentrated flow
    - Collect concentrated flows in stabilized drains and channels.
- Protect slopes and channels. The BMPs shall:
  - Minimize disturbances to natural drainages
  - Convey runoff safely from the tops of slopes
  - Vegetate slopes with native or drought-tolerant vegetation
  - Stabilize permanent channel crossings
  - Install energy dissipaters, such as riprap, at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion.
  - Energy dissipaters shall be installed in such a way as to minimize impacts to receiving waters.
  - Install other design principles that are comparable and equally effective.
- The SWMP shall also incorporate Low Impact Development Features into the project, including but not limited to:
  - Preserve well-draining soils (Type A or B)
  - Preserve significant trees
  - Set back development envelope from drainages
  - Restrict heavy construction equipment access to planned green/open space areas
  - Re-fill soils compacted by construction vehicles/equipment
  - Collect and reuse upper soil layers of development site containing organic materials
  - Curb cuts to landscaping
  - Use rural seales
  - Use concrete median
  - Use permeable pavements
  - Pitch pavements toward landscaping
  - Use cisterns and rain barrels
  - Downspout to swale
  - Use vegetated roofs
  - Use soil amendments
  - Use native soils
  - Use smart irrigation systems
  - Use street trees (HDR 2009b)

The SWMP shall ensure the project follows CDFG guidelines for culverts to minimize long-term maintenance and meet a 10-year rain event to minimize the trapping of sediment.

Applicability / Status: N/A to covered activities in NTP Request.
Notes: No permanent structures will be constructed during geotechnical activities.

HYD-5 Implementation of creek-crossing procedures. Where creek crossings can be completed during dry season, with no flows present in the creek, seasonally timed restorative open trenching will be completed. This procedure will use minimum trench widths. Trench cut material will not be placed outside of the creek bed and outside of 100-year inundated areas. Trench fill will be compacted and replaced to existing conditions, including matching existing creek bed gradations, and restoring vegetation. Open trenching restoration will be completed prior to any wet season flows, and will include anti-erosion action plans for any unplanned rainfall during.

Applicability / Status: N/A to covered activities in NTP Request.
Notes: No creek crossings proposed as part of the construction activities included in NTP Request.
The applicant shall obtain all required permits prior to completing open trenching through drainages. In any case, fines will be isolated from open trenching by best management practices mandated by the General Construction Permit. Areas of trenching would be restored and/or vegetated at completion of work. Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-hose procedures to avoid herbaceous or waterfowl impacts. This will be achieved in a manner that does not result in sediment-laden discharge or hazardous materials release to the water body. Facilities located within 100 feet of a water resource (i.e., wetland, riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain spill (i.e., a pump with 10-gallon fuel capacity) shall be stored in secondary containment capable of holding 15-gallon spill. A spill kit shall be maintained on site at all times. The plan shall also detail spot spill cleanup management, hazardous materials storage and spill cleanup, site-specific erosion and sediment control, and housekeeping procedures, as described in the SWPPP. The plan shall be submitted to the CPUC, BLM, and ACOE 60 days prior to construction.

The Erosion Control and Sediment Transport Control Plan would be included with the project grading plans submitted to the CDFG and ACOE for review in the event of construction near waterways. In disturbed areas where construction equipment has caused compaction of soils (e.g., staging areas, structure sites, temporary spur roads, etc.), soils would be decompressed as necessary prior to seeding, and reclamation would occur to enhance revegetation and prevent potential for erosion. The plan shall contain specific measures for monitoring frac activity, 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 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 fill, ground treatments, and restriction of surface water run-off from expansive foundation soils. The plan 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, CEQ, and the standard specifications for public works construction. The geotechnical studies prepared by a certified geologist shall be submitted to CPUC and BLU 60 days prior to construction of proposed structures.

Applicability / Status

N/A to covered activities in NTP Request.

No permanent structures will be constructed during geotechnical activities.

N/A to covered activities in NTP Request.

No permanent structures will be constructed during geotechnical activities.

Notice of potential to cause significant adverse impacts, the plan shall be submitted to CPUC and BLU 60 days prior to construction of proposed structures.

N/A to covered activities in NTP Request.

No permanent structures will be constructed during geotechnical activities.

N/A to covered activities in NTP Request.

No permanent structures will be constructed during geotechnical activities.

N/A to covered activities in NTP Request.

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N/A to covered activities in NTP Request.

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N/A to covered activities in NTP Request.
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<tr>
<td>FF-1</td>
<td>Develop and implement a Construction Fire Prevention/Protection Plan.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>Construction Fire Prevention/Protection Plan (November 2012) approved by SDRFD and provided to CPUC.</td>
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San Diego Gas & Electric Company (SDG&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&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&E. At minimum, the plan will include the following:

- 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 II #918 “Fire Protection” for private land portions
- Access road widening (28-foot County roads, 18-foot-wide spur roads)
- 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).

Additional restrictions will include the following:

- During the construction phase of the project, SDG&E shall implement ongoing fire patrol activities. SDG&E shall maintain fire patrols during construction hours and for 1 hour after end of daily construction, and hot work shall cease or be required to operate under Hot Work Procedure.
- Fire Suppression Resource Inventory - In addition to 14 CCR 918 (a), (b), and (c), SDG&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.
- During Red Flag Warning events, as issued daily by the National Weather Service in state responsibility areas (SRAs) and local responsibility areas (LRAs), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under Hot Work Procedure.
- SDG&E and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF.
- 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.
- 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 crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect.
- 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. SDG&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&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&E for implementation during all construction prior to the initiation of construction activities. All construction work on the ECO Substation Project shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.
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| FF-2   | Review 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:  
  - Implementing 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 (patterns), 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.  
  - 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)  
  - When vegetation work will occur (prior to any other work activity)  
  - Timing of vegetation clearance work to reduce likelihood of ignition and fire spread  
  - Coordination procedures with fire authority  
  - Integration of the project’s Construction Fire Prevention/Protection Plan content  
  - Personnel training and fire suppression equipment  
  - Fire safety coordinator role as manager of fire prevention and protection procedures, coordinator with fire authority and educator  
  - Communication protocols  
  - Incorporation of SDG&E, San Diego Rural Fire Protection District (SDRFPD), and SDCFA reviewed and approved Response Plan mapping and assessment.  
  - Other information as provided by CAL FIRE, SDRFPD, SDCFA, BLM, and CPUC  
  - SDG&E and CPUC 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&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&E for implementation during all operational maintenance activities.  
  - Mitigation Measure Bios: 2, the Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance (July 2012) provided to CPUC. | Applicable, pre-construction requirements met. | Wildland Fire Prevention and Fire Safety Electric Standard Practice Operation and Maintenance (July 2012) provided to CPUC. |
| FF-3   | Provide Assistance to San Diego Rural Fire Protection District (SDRFPD) and San Diego County Fire Authority (SDCFA). 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 protection needs. Assistance by SDG&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. Fuel management activities shall be in accordance with CDEQ Guidelines Section 15334 (i), which indicates that the minor land alteration 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&E is to provide funding for SDCFA to employ up to four voluntary/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&E (and the other applicants) to the SDCFA prior to construction. A fixed annual fire mitigation fee of approximately $16,600 will be provided by SDG&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 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. | Applicable, pre-construction requirements met. | Proof of funding provided on January 29, 2013 demonstrating funding has been put in place with SDRFP and SDCFA. |
| FF-4   | Customized Fire Protection Plan for Project. 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&E and SDCFA 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 a minimum, the following:  
  - San Diego County FFP Content Requirements (http://www.sdcounty.ca.gov/dpl2/ourchild/Fire-Report-Format.pdf)  
  - 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  
  - Integration into plans prepared to satisfy Mitigation Measures FF-1 and FF-2  
  - 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) Operational Maintenance Plan. The Customized Fire Protection Plan will incorporate clarifications and additional ECO Substation Project APIs described in Section II of the EIR/EIS. | Applicable, pre-construction requirements met. | Customized Fire Prevention Protection Plan (November 2012) approved by SDRFP and provided to CPUC. |
| FF-6   | Funding for FireSafe Council: Provide funding for Boulevard Jacumba/La Posta FireSafe Council with a clarified focus of coordinating a Community Wildfire Protection Plan (CWPP) and Evaluation 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 Evaluation Plan preparation. | Applicable, pre-construction requirements met. | Proof of funding provided by SDG&E on January 24, 2013. |
| FF-7   | Preparation of Disturbed Area Revegetation Plan. All areas disturbed during construction activities will not be continuously disturbed in the long-term maintenance access right-of-way (ROW) will be provided native plant restoration in order to prevent non-native, weedy plants from establishing. Disturbed areas that will be included in the long-term maintenance program will not be revegetated as any plants that establish in these areas will be removed on an ongoing (at least annual) basis. Mitigation Measure FF-7 corresponds with Mitigation Measure Bio-1d and is not a duplicative plan but will be implemented under the biological monitoring program. It directs that the temporary disturbance areas will be revegetated with native plants common to the area through direction detailed in a Habitat Restoration Plan. The Habitat Restoration Plan will be prepared to restore native habitat and to reduce the potential for non-native plant establishment. The restoration plan will incorporate Noxious Weeds and Invasive Species Control Plan to assist in restoring the construction area to the prior vegetated state and lessen the possibility of establishment of non-native, flammable plant species. A copy of the Revegetation Plan will be provided to the CPUC and BLM. | Applicable, pre-construction requirements met. | Memorandum documenting compliance with pre-construction components of MM-FF-7 provided to CPUC on October 15, 2012. |
Environmental Project Manager following termination of the program. Any noteworthy cultural sites or features encountered will be recorded with the South Coastal Information Center at San Diego State University.

All collected cultural remains will be cleaned, cataloged, and permanently curated with an appropriate institution. All artifacts will be analyzed to identify function and chronology as they relate to the history of the area. Faunal material will be identified as to species. Applicable, pre-construction requirements met. See MM-CUL-1a and MM-CUL-1b.

A monitoring results report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, will be prepared and submitted to SDG&E’s Cultural Resource Specialist and Environmental Project Manager following termination of the program. Any noteworthy cultural sites or features encountered will be recorded with the South Coastal Information Center at San Diego State University with the San Diego University of Man.

Applicable, pre-construction requirements met. See MM-CUL-1a and MM-CUL-1b.

In the event that fossils are encountered, the Project paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The Project paleontologist will consult SDG&E’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The archaeologist, in consultation with SDG&E’s Cultural Resource Specialist, will determine the significance of the discovered resources. SDG&E’s Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts.

Applicable, pre-construction requirements met. Paleoecological Monitoring and Treatment Plan (October 2012) approved by the CPUC and BLM.

Applicable, pre-construction requirements met. Paleoecological Monitoring and Treatment Plan (October 2012) approved by the CPUC and BLM.

In the event that construction activities occur during the times established by the local ordinances (generally between 7 a.m. and 7 p.m. Monday through Saturday), except for the period of those activities will not exceed an hourly average of 45 dB when measured at the boundary of the nearest parcel with an inhabited residence. If activities cannot be limited to meet this noise threshold, SDG&E will communicate the exception to San Diego County in advance of conducting the work that will exceed the threshold. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.

No pre-construction submissions required. Measure to be implemented as defined during construction.

Construction activities will occur during the times established by the local ordinances (generally between 7 a.m. and 7 p.m. Monday through Saturday), except for the period of activities will not exceed an hourly average of 45 dB when measured at the boundary of the nearest parcel with an inhabited residence. If activities cannot be limited to meet this noise threshold, SDG&E will communicate the exception to San Diego County in advance of conducting the work that will exceed the threshold. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.

No pre-construction submissions required. Measure to be implemented as defined during construction.

In the event that construction activities include the recovery of fossil remains, it may be necessary to set up a screen-washing operation on site. When fossils are discovered, the paleontologist (or paleontological monitor) will recover them along with pertinent stratigraphic data. In most cases, this fossil excavation can be completed in a short period of time. Because of the potential for recovery of small fossil remains, the paleontologist will perform fossil recovery procedures that will include partial screen washing (or other techniques). Applicable, pre-construction requirements met.

Applicable, pre-construction requirements met.

In the event that fossils are encountered, the Project paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The Project paleontologist will consult SDG&E’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with SDG&E’s Cultural Resource Specialist will determine the significance of the discovered resources. SDG&E’s Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts.

Applicable, pre-construction requirements met. Paleoecological Monitoring and Treatment Plan (October 2012) approved by the CPUC and BLM.

When project construction has been completed, all disturbed terrain at the Boulevard Substation site will be restored through recontouring, revegetation, and landscaping in accordance with the Boulevard Substation Landscape Concept Plan. To provide screening and reduce potential project visibility, the Boulevard Substation Landscape Concept Plan includes larger shrubs and species that will partially screen views of the substation from Old Highway 80 and from adjacent residential properties.

NA to covered activities in NTP Request.

No permanent structures will be constructed during construction activities included in NTP Request.

No activities will occur at the Boulevard Substation as part of this NTP request.

To reduce the potential project visibility from Old Highway 80, the underground portion of the new 138 kV transmission line will be extended an additional distance of approximately 600 feet to the south, and the steel cable tower bole will be relocated to replace structure SP-2.

Applicable, pre-construction requirements met. Final project design meets requirement.

All collected cultural remains will be cleaned, cataloged, and permanently curated with an appropriate institution. All artifacts will be analyzed to identify function and chronology as they relate to the history of the area. Faunal material will be identified as to species. Applicable, pre-construction requirements met. See MM-CUL-1a and MM-CUL-1b.

A monitoring results report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, will be prepared and submitted to SDG&E’s Cultural Resource Specialist and Environmental Project Manager following termination of the program. Any noteworthy cultural sites or features encountered will be recorded with the South Coastal Information Center at San Diego State University with the San Diego University of Man.

Applicable, pre-construction requirements met. See MM-CUL-1a and MM-CUL-1b.

In the event that cultural resources are discovered, the archaeologist will have the authority to divert or temporarily halt ground disturbance to allow evaluation of potentially significant cultural resources. The archaeologist will consult SDG&E’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The archaeologist, in consultation with SDG&E’s Cultural Resource Specialist, will determine the significance of the discovered resources. SDG&E’s Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts.

Applicable, pre-construction requirements met.

No permanent structures will be constructed during construction.

Applicable, pre-construction requirements met.

In the event that cultural resources are discovered, the archaeologist will have the authority to divert or temporarily halt ground disturbance to allow evaluation of potentially significant cultural resources. The archaeologist will consult SDG&E’s Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The archaeologist, in consultation with SDG&E’s Cultural Resource Specialist, will determine the significance of the discovered resources. SDG&E’s Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts.

Applicable, pre-construction requirements met.

No permanent structures will be constructed during construction.

Applicable, pre-construction requirements met.

No permanent structures will be constructed during construction.

Applicable, pre-construction requirements met.
<table>
<thead>
<tr>
<th>MM No.</th>
<th>Mitigation Measure</th>
<th>Applicability / Status</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>ECO-AIR-12</td>
<td>Routine inspections and preventative maintenance will be performed on all sulfur hexafluoride (SF6) equipment according to the manufacturer’s recommendations. SF6 density will be monitored at all equipment and any changes exceeding the manufacturer’s recommendations will be reported immediately to SDG&amp;E. These activities will be tracked in SDG&amp;E’s substation maintenance software and reported to the California Climate Action Registry and the Assembly Bill 32 mandatory reporting regulation in compliance with the Environmental Protection Agency’s mass-balance equation reporting and tracking method. Substation crews will be trained on these tracking procedures and the significance of SF6 as a greenhouse gas.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No permanent structures are proposed as part of NTP Request.</td>
</tr>
<tr>
<td>ECO-AIR-13</td>
<td>During final design, SDG&amp;E will consider the feasibility of using rooftop photovoltaic panels on the control shelters to help support operating load at the ECO Substation. SDG&amp;E will also investigate utilizing solar tubes for lighting in the control shelters. SDG&amp;E’s Project team will work closely with SDG&amp;E’s Sustainable Communities team to implement green building practices at the ECO Substation.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No structures are proposed as part of NTP Request.</td>
</tr>
<tr>
<td>ECO-HYD-01</td>
<td>SDG&amp;E will compensate for permanent impacts to any waters of the U.S. and state-only waters at a minimum ratio of one to one or as required by the USACE, CDFG, and RWQCB through their respective permitting processes.</td>
<td>Applicable, pre-construction requirements met.</td>
<td>Habitat Mitigation and Monitoring Plan (HMMP) (November 2011) approved by the USACE, USFWS, CDFG and CPUC.</td>
</tr>
<tr>
<td>ECO-HYD-02</td>
<td>If groundwater wells at ECO Substation are drilled within 0.5 mile of any local wells used for residential water supply, the water level in existing wells will be monitored and frequent communications will occur with the owner during construction to ensure that water availability is not adversely affected.</td>
<td>N/A to covered activities in NTP Request.</td>
<td>No groundwater wells are proposed as part of NTP Request.</td>
</tr>
</tbody>
</table>