

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 6, 2010

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

RE: SDG&E Sunrise Powerlink Transmission Line Project - Notice to Proceed (NTP #8)

Dear Mr. Colton,

On June 9, 2010 San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence with construction of the Pomerado Substation Upgrades, Segment 22 of the Sunrise Powerlink Project.

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

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

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

NTP #8 for the Pomerado Substation Upgrades is granted by CPUC for the proposed activities based on the factors described below.

**SDG&E NTP Request.** Excerpts from the SDG&E NTP request dated June 9, 2010 are presented below with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**:

Reconductoring of the existing 69 kV transmission line from Sycamore Substation to Elliot Substation was presented in the certified Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS); however, the associated upgrades at the Pomerado Substation necessary to accommodate the reconductoring were not presented. The proposed upgrades to the existing Pomerado Substation were addressed in the revised mapbook and Project Modification Report (PMR) that was submitted to the CPUC on May 14, 2010 (page T-154). As incorporated in the mapbook and PMR, no substantial changes to the effects of the Final Environmentally Superior Southern Route (FESSR) and no new significant impacts would result from these upgrades.

The upgrades are required to accommodate the overall operation of SDG&E's existing electric transmission and distribution system as well as the Project in accordance with California Independent System Operator (CAISO), State and Federal electric power system reliability criteria, and voltage fluctuation concerns.

Installing upgrades at the Pomerado Substation in advance of the 2012 completion date of the Project will maintain system reliability. Construction activities at Pomerado are anticipated to begin upon issuance of a Notice to Proceed from the CPUC and are scheduled to be completed within six months.

The Pomerado Substation is located at 13735 Stowe Drive, Poway, CA, 92064. The enclosed area of the Substation is 1.36 acres in size and is located between Stowe Drive and Blaisdell Place. The Pomerado Substation is located in an industrial area north of Scripps Poway Parkway. The Substation is a previously disturbed and developed site that is owned by SDG&E.

The Pomerado Substation is a 69-kV to 12-kV distribution substation that serves the southern Poway and east Scripps Ranch areas. The Pomerado Substation includes a 69-kV yard with associated 69-kV circuit breakers, potential transformers (PTs), and switches. Additionally, there are three 69-/12-kV transformers, three 12-kV capacitors, and three sections of 12-kV switchgear. There is one control house (approximately 22 feet wide by 40 feet in length or 880 square feet) at the Substation.

#### Proposed Work Activities

The scope of work for the Pomerado Substation facility includes installation of four 69-kV/40 kA circuit breakers and ten 69-kV/2000 A disconnects to accommodate the increased ratings on transmission lines, TL6915 and TL6923. The new circuit breakers and disconnects will be installed throughout the 69-kV yard. Other associated equipment to be installed will include a new aluminum pipe bus, its associated jumpers and hardware. Protection relay panels will also be replaced. Additional lighting will not be installed at the Substation. The new structures and equipment will be similar to the respective structures and equipment already in place at the Substation. A description of the proposed work activities for the Pomerado Substation upgrades are as follows:

Erect Structures and Equipment - Structures will be delivered on a trailer pulled by a semi/tractor trailer rig into the Substation and assembled as much as possible while on the ground. Bolts and insulators will be attached by hand, using wrenches.

Equipment Wiring and Testing - Equipment wiring and testing will occur near the end of each phase of construction. After each piece of equipment is erected and set in place, control wire will be pulled between the equipment and the control house. The control wire will terminate at control panels both inside the equipment and the control house. Once the terminations are complete, crews will test the equipment operation and control functions. Equipment used for this work consists of pick-up trucks to deliver small equipment and testing vans for transporting crews and testing equipment.

All work associated with this Substation upgrade will take place within the existing fence-line of the Substation, on previously disturbed land. There will be no increase in the total acreage of the Substation, and no additional buildings will be constructed.

Pomerado Substation is a developed site and a previously disturbed area. The proposed upgrade work will be conducted entirely in the pre-disturbed areas within the Substation fence-line. Since there are no foundations or conduits being installed, ground disturbance will not be necessary.

#### Geotechnical Testing

The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since no new structures or foundations will be installed. As a result, no ground-disturbing activities are required.

#### Access

Access to the Substation is via two existing driveways located off Stowe Drive and one existing driveway off Blaisdell Place. Stowe Drive is located to the north of Pomerado Substation and Blaisdell Place is located to the south of the Substation. All workers, equipment, and materials will utilize these existing driveways. Deliveries will be routed from I-15, Scripps Poway Parkway, Parkway Centre Drive, and to the entrances off Stowe Drive or Blaisdell Place. These roadways are under jurisdiction of the City of Poway, City of San Diego, and Caltrans. Existing drives will be used on-site.

#### Equipment and Materials

The following equipment and materials are proposed for the Pomerado Substation Upgrades:

Erect Structures and Equipment: large trucks, large crane, semi-trailer truck and pickup trucks, materials, ten 69-kV disconnects, four 69-kV circuit breakers, and associated jumpers, aluminum bus, control cable and protective relay panels.

Equipment Testing and Wiring: testing vans, pickup trucks, hand tools and meters, wiring and protective relay panels.

In addition, as per hazardous communication requirements, Material Safety Data Sheets will be available for any chemicals or hazardous materials to be located on site. It is anticipated that any materials brought on site will either be less than the reporting threshold required by Hazardous Materials Business Plan (HMBP) requirements or transported off-site at the end of the work day. Should there be a need to bring reportable quantities of materials on site for either temporary or permanent storage, the existing HMBP will be amended to include those additional materials. A copy of the HMBP and current Unified Program Facility Permit issued by San Diego County is was provided with the NTP request.

#### Transport of Equipment, Materials, and Personnel

Up to 15 SDG&E employees will be working on the Substation upgrades. Personnel will travel to and from the Pomerado site in SDG&E-owned vehicles from the SDG&E Kearny Transmission Construction and Maintenance facility or from the SDG&E Miramar facility.

The upgrade of the Pomerado Substation will not require temporary closure of any roadway and will not restrict the movement of emergency vehicles. The number of vehicle trips associated with worker commutes and equipment transportation will not result in unstable flow, fluctuations in volumes of traffic, or cause substantial drops in operating speeds on surrounding roadways. Construction will have no effect on aviation facilities or traffic. Construction activities will not disrupt bus or rail transit or impede pedestrian movements, bike trails, or affect the supply of parking spaces. Work activities will not conflict with planned transportation projects in the area, and there will be no deterioration of surrounding roadway surfaces.

Large substation equipment and materials will be delivered to the Substation via semi-trucks, with approximately three deliveries during a six month construction period. Smaller equipment and materials will be delivered from SDG&E's Kearny facility or Miramar facility to the Substation in SDG&E vehicles or smaller flatbed trucks.

#### Drainage

SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Pomerado Substation. *SDG&E's Water Quality Construction BMP Manual* will be referenced for BMP implementation and maintenance. A copy of this document was provided with the NTP request. All BMPs are designed to prevent and avoid sediment within surface water runoff and protect the landscape from erosion in accordance with

WQ-APM-4. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.

#### Rock Surfacing

Any areas within the Substation that are not paved or covered with concrete foundations will be surfaced with an approximate four-inch layer of untreated, ¾-inch nominal crushed run rock. The rock will be applied to the finished grade surface after all upgrades have been completed.

#### Demobilization

Upon completion of the work, the remaining areas of the Pomerado Substation will be restored to as close to pre-construction conditions as feasible. This will include clean-up of the site, removal of unused materials, and collection and proper disposal of any wastes, trash, and debris, regardless of how it was generated.

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

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

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

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

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

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

SDG&E requests that the Pomerado Substation NTP be conditioned for conducting pre-construction surveys for nesting birds (as required in Mitigation Measure B-8a) within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction that would occur between January 15 and August 15. In addition nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction that would occur between January 1 and September 15. **Survey results shall be submitted to the United States Fish and**

**Wildlife Service [USFWS], California Department of Fish and Game [CDFG] and CPUC prior to construction.**

Activities will be limited to previously disturbed/developed areas and will not involve ground disturbance or impact vegetation, including rare plants.

**Cultural Resources.** The Final Inventory Report of the Cultural Resources was accepted on May 28, 2010. The inventory concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Pomerado Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance. The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.

**Paleontological Resources.** Based on the Paleontological Records Search submitted 2-25-10, per CPUC review there is no potential to encounter paleontological resources at the Pomerado Substation. The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.

**Conditions of NTP Approval**

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

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Gray entries have either been fulfilled or are not applicable to this action. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. All temporary facilities (i.e., trailers, fencing, etc.) shall be removed from the facility at the completion of construction.
4. No clearing or disturbance to vegetation shall occur inside or outside of approved work areas.
5. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and September 15.
6. "Survey sweeps" will occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, a biological monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological

monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC.

7. In compliance with Applicant Proposed Measure BIO-APM-27, if construction activities occur during the raptor breeding season (January 1 through September 15), a pre-construction raptor nest survey will be conducted in accordance with Mitigation Measure B-8a. If nests are found prior to construction and during the raptor breeding season, SDG&E will follow the provisions of Mitigation Measure B-8a.
8. If the application of water is needed to abate dust in construction areas and on dirt roads, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan will be implemented and enforced throughout the Substation upgrade activities.
9. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
10. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor shall be notified immediately.
11. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.
12. Verification of noticing as required under Mitigation Measures L-1a and LU-APM-1 shall be submitted to the CPUC prior to construction.
13. All complaints received by SDG&E in regard to the Substation upgrade activities shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting as well as noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, lighting at the site may need to be modified and/or sound attenuation devices may need to be installed etc., depending on the nature of the complaint.
14. After-hours work is not anticipated. In the event of after-hours work (between 7 p.m. and 7 a.m.), per Mitigation Measure N-1, SDG&E will obtain an appropriate variance to accommodate nighttime construction activity.
15. SDG&E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles. Documentation of coordination with emergency service providers shall be submitted to the CPUC prior to construction.
16. In regard to the Hazard Communication Plan to fully satisfy the intent of Mitigation Measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.

17. Should groundwater be unexpectedly encountered and dewatering required, SDG&E will implement APMs WQ-APM-6 and WQ-APM-8.
18. Per the NTP request, National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation, Waste Discharge Identification (WDID) number and the SWPPP will be submitted to the CPUC prior to construction. The SWPPP shall be implemented where appropriate prior to and during construction.
19. SDG&E shall not use groundwater supply wells for project water sources.

Please contact me if you have any questions or concerns.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

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

## Sunrise Powerlink Project NTP 8 Compliance Table

Pre-Construction Compliance Status Table as applied to the Pomerado Substation Upgrades, NTP #8 (10-06-10)	
Mitigation Measure and APM	Status
Please note that the full text of the mitigation measure conditions are not provided in this table. Complete measures can found in the EIR/EIS and MMCPR.	Please note that cells highlighted in grey have been fulfilled or are not applicable.
Abbreviated conditions of the USFWS Biological Opinion are shown in green highlights.	Cells highlighted in yellow are conditions of the NTP and shall be fulfilled with documentation submitted to the CPUC prior to construction.
	Cells highlighted in purple will be fulfilled during or after construction.
<b>Biological Resources</b>	
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Construction activities will take place on previously disturbed areas free of vegetation. The facility boundaries will be flagged/delineated within the existing disturbed portions of the property prior to construction. Project impacts will occur only within the previously disturbed limits of the proposed property. No sensitive vegetation communities will be directly impacted by project construction. Impacts to previously disturbed and developed areas will not require mitigation. No shrub or tree trimming or removal will occur.
B-1c: Conduct biological monitoring	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site for periodic/weekly inspections. Weekly monitoring reports will be submitted to CPUC.
B-1k: Re-seed disturbed areas after a transmission line-caused fire	NA
B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187	NA
B-2a: Provide restoration/compensation for impacted jurisdictional areas	NA. Per the NTP request, upgrades at the Pomerado Substation will take place within a previously disturbed and developed site. There are no ACOE, Regional Water Board, State Water Board, or CDFG jurisdictional areas located onsite.
B-3a: Prepare and implement a Weed Control Plan	NA.
B-5a: Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, construction activities will occur only within the previously disturbed facility; there are no special status plant populations within the construction site.
G-CM-32 Prior to construction activities, SDG&E will conduct on-the-ground surveys (following Service protocols where they exist) for the following listed species where such surveys had not been conducted in 2007 and 2008, or for those species for which surveys in 2007 and 2008 were not reliable due to lack of sufficient rainfall. San Diego Thornmint ( <i>Acanthomintha ilicifolia</i> ), San Bernardino Bluegrass ( <i>Poa atropurpurea</i> ), Willowy Monardella ( <i>Monardella viminea</i> ), Quino Checkerspot Butterfly ( <i>Euphydryas editha quino</i> ), Arroyo Toad ( <i>Bufo californicus</i> ), Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> ), Least Bell's Vireo ( <i>Vireo bellii pusillus</i> ), Coastal California Gnatcatcher ( <i>Poliopitila californica californica</i> ), Stephen's Kangaroo Rat ( <i>Dipodomys stephensi</i> )	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-1 San Diego Thornmint. No impacts will occur to the thornmint population at and adjacent to MP 116 or to any thornmint occurrences between MP 114 and 119...In other areas where suitable thornmint habitat (i.e., gabbro and calcareous soils and a slope of 0 to 25 percent) exists, the area to be impacted will be surveyed for thornmint before any impacts may occur, per G-CM-32.	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-2 Impacts to San Diego thornmint will first be avoided where feasible, and where not feasible due to physical or safety constraints, impacts will be compensated through salvage and relocation via a restoration program...The CPUC, BLM, USFS and Wildlife Agencies will decide whether the applicant can restore San Diego thornmint populations or will acquire habitat with San Diego thornmint...	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
B-7a Cover all steep-walled trenches or excavations used during construction to prevent the entrapment of wildlife (e.g. reptiles and small mammals)	NA. Steep-walled trenches or excavations are not proposed as part of the Pomerado Substation upgrade scope of work.
B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Range wide Management Strategy	NA
B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
SS-CM-22 Construction activities (including the use of helicopters) in bighorn sheep designated critical habitat will be limited to outside the lambing season (January 1 through June 30) and the period of greatest water need (June 1 through September 30) as defined in the Recovery Plan...	NA
SS-CM-23 Compensation for the loss of occupied bighorn sheep habitat will be implemented...	NA
SS-CM-24 A biological consultant approved by the Wildlife Agencies will be retained by SDG&E to collect data on bighorn sheep movements in the area during the construction phase. Prior to construction the biologist shall submit a bighorn sheep monitoring plan that meets the approval of the Wildlife Agencies...	NA
SS-CM-25 To help reconnect desert bighorn sheep subpopulations and at least partially offset impacts to the overall population caused by the project, SDG&E will: Fund the design and construction of an overpass or underpass, or tunnel to facilitate desert bighorn sheep movement across a highway...Fund, design, and construct a system of fences to prevent bighorn sheep from crossing on the surface of westbound Interstate 8...Fund removal of tamarisk, fountain grass, other invasive species, and hazardous fences for the life of the project...	NA
B-7d: Conduct burrowing owl surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. Burrowing owl surveys not required outside of Imperial County. There are no burrowing owls or their associated habitat within the Pomerado Substation; therefore, this mitigation measure is not applicable. Surveys for nesting birds shall be conducted 10 days prior to construction and reported to the CPUC in accordance with Mitigation Measure B-8a. If burrowing owls are discovered during pre-construction nesting bird surveys or during construction, provisions of Mitigation Measure B-7d will be implemented.
B-7e: Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. This measure is not applicable, as there is no suitable habitat for least Bell's vireo and southwestern willow flycatcher in or adjacent to the Pomerado Substation.
SS-CM-16 During construction, all grading or brushing taking place within riparian habitats occupied by the vireo will be conducted outside the vireo breeding season (defined as March 15 through September 15)...	NA See B-7e
SS-CM-17 To avoid impacts to vireo, towers, pads, pull stations, access roads, staging areas, and fly facilities will be located outside of riparian vegetation, including occupied vireo habitat, where feasible..	NA See B-7e
SS-CM-18 To minimize adverse impacts from loss of occupied habitat in the Cleveland National Forest, and to minimize predation and parasitism, SDG&E will develop and implement a brown-headed cowbird ( <i>Molothrus ater</i> ) trapping program, in consultation with the USFS.	NA
B-7h: Implement appropriate avoidance/ minimization strategies for eagle nests	NA. No suitable eagle habitat exists within or adjacent to the Pomerado Substation.
B-7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, there are no Quino checkerspot butterflies or their associated habitat within or adjacent to the Pomerado Substation.
SS-CM-3 A biologist permitted by the Service will delineate suitable/occupied (quino) habitat areas that will be impacted by project construction...	See B-7i
SS-CM-4 A pre-construction, Service protocol presence/absence survey for the adult Quino will be conducted within the delineated suitable/occupied habitat in the construction zone...	See B-7i
SS-CM-5 Any Service-approved restoration (plan) of impacted (quino) habitat will be conducted in areas with appropriate topographical and biological features to be determined by the Service, BLM, USFS and SDG&E.	See B-7i
SS-CM-6 Due the extreme importance of the Quino population located in the Jacumba Unit of Quino critical habitat, SDG&E will consult with the Service regarding the final design and siting of all permanent and temporary impacts (e.g., towers, pads, access roads, staging areas, pull down areas, helipads, and fuel modification zones) within Quino critical habitat...	See B-7i
SS-CM-7 No new construction will occur during the Quino flight season within 1 km (1 mi) of any known or newly discovered Quino occurrence. If it is not feasible to construct outside of the flight season in these instances, SDG&E must obtain written consent from the Service to proceed with construction.	See B-7i
B-7j: Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There is no suitable habitat for arroyo toad within or adjacent to the Pomerado Substation.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
SS-CM-8 A pre-construction, Service protocol, survey will be conducted for the arroyo toad by a biologist approved by the Service to handle the toad) in all areas of the project located within suitable arroyo toad breeding habitat. The removal of toad riparian breeding habitat will occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles.	See B-7j
SS-CM-9 SDG&E will develop an arroyo toad translocation monitoring program to be implemented during all construction activities that have the potential to adversely affect the arroyo toad...	See B-7j
SS-CM-10 To offset the loss of occupied and suitable arroyo toad habitat within the project area, and to offset indirect effects of the project on arroyo habitat, SDG&E will develop and implement an arroyo toad predator control program on USFS lands. The scope and methods for this program will be developed in consultation with the Service and USFS.	See B-7j
SS-CM-11 Compensation for the loss of arroyo toad-occupied habitat will be implemented... Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7j
SS-CM-15 Towers, pads, pull stations, access roads, staging areas, and fly facilities will not be located within suitable/potential arroyo toad upland aestivation and riparian breeding habitat to the extent feasible...	See B-7j
B-7i: Conduct coastal California gnatcatcher surveys, and implement appropriate avoidance/minimization/compensation strategies	NA: No suitable habitat or Ca gnatcatcher identified.
SS-CM-19 All brushing or grading taking place within occupied habitat of the gnatcatcher 500 ft of any gnatcatcher sightings during construction will be conducted outside of the gnatcatcher breeding season (2-15 through 8-31). When conducting all other construction activities during the gnatcatcher breeding season, within occupied habitat, the following avoidance measures will apply. Vegetation clearing outside of the breeding season (10-1 through 2-14) will take place in the presence of a biological monitor approved by the Service... A Service-approved biologist will survey for gnatcatchers within 10 days prior to initiating activities in an area. The results of the survey will be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities...If an active nest is located, 300-ft no-construction buffer will be established around each nest site... The applicant will contact the Wildlife Agencies to determine the appropriate buffer zone...However, if construction must take place within 300-ft buffer, a qualified acoustician will monitor noise..	See B-7i
SS-CM-20 Compensation for the loss of occupied gnatcatcher habitat will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
SS-CM-21 Compensation for the loss of unoccupied designated critical habitat for the gnatcatcher will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Per the NTP request, although the Pomerado Substation is devoid of vegetation, birds may nest within the facility on existing equipment and structures. For construction between January 15 and August 15, within 10 calendar days prior to construction, a qualified biologist will conduct avian breeding surveys. Results of the surveys will be submitted to the CPUC and Wildlife Agencies for review and approval. If active nests are located, a suitable buffer will be established. If project construction cannot occur completely outside the general avian breeding season, then pre-construction surveys will be conducted in the following manner: 1. 100-foot pre-construction surveys will be conducted for non-listed bird species prior to occupancy/use. 2. 500-foot pre-construction surveys for listed bird species, including raptors. If burrowing owls are discovered during pre-construction nesting bird surveys or during construction, provisions of Mitigation Measure B-7d will be implemented.
B-9a: Survey for bat nursery colonies	See BIO-APM-28
B-10a: Utilize collision-reducing techniques in installation of transmission lines	Transmission lines will not be installed as part of the work at Pomerado Substation. Therefore, this mitigation measure does not apply.
B-11a: Prepare and implement a Raven Control Plan	NA
B-12a: Conduct maintenance activities outside the general avian breeding season	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
B-12b: Conduct maintenance when arroyo toads are least active	NA
B-12c: Maintain access roads and clear vegetation in Quino checkerspot butterfly habitat	See B-7i
BIO-APM-1: Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted. Implement with B-1a, B-1b, B-2a, B-5a, B-7d, B-7e, B-7g, B-7i, B-7j, B-k, B-7l, B-7m, and B-7o	NA. Per the NTP request, habitat for sensitive plants and animal species does not exist within or surrounding the Pomerado Substation. Construction activities will take place within the existing facility. There is no vegetation or suitable habitat present within the facility and no impacts to biological resources will occur as a result of the upgrade activities.
BIO-APM-2: Train personnel regarding the appropriate work practices necessary to effectively implement the biological APMs.	The Safe Worker and Environmental Awareness Program (SWEAP) video will be shown to all project personnel and enforced throughout all phases of the Project, and includes appropriate work practices to effectively implement the biological resources and applicant proposed mitigation measures (APMs).
BIO-APM-3: Restrict vehicle movement to existing and constructed roads. Implement with B-5a, B-7a, B-8a, B-9a, B-12a, B-12b, and B-12c	During construction. Vehicle traffic will be restricted to existing, paved roads.
BIO-APM-4: Comply with project area limits during construction and survey activities	All vehicles shall remain on existing roads or inside the Substation boundaries. Construction activities will be limited to pre-disturbed areas within the Substation.
BIO-APM-5: Configure access roads in compliance with hydrological resources guidelines. Implement with B-1a, B-2a, B-5a, and B-8a	NA
BIO-APM-6: Comply with all applicable environmental laws and regulations. Implement with B-1a, B-5a, B-8a, and B-12a	During construction and operation of this site, SDG&E will comply with all the necessary environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat. The SWEAP video was approved by the CPUC on March 4, 2010. This SWEAP will be shown to all project personnel to ensure compliance with all applicable laws and regulations, addressing the protection of wildlife and its habitat.
BIO-APM-7: Littering is not allowed. Implement with B-6a, B-8a, and B-12a	The SWEAP video addresses the fact that no littering is allowed, including food waste, other waste or any type of debris.
BIO-APM-8: Delineate sensitive plant population boundaries. Implement with B-5a	NA. There are no sensitive plant populations that exist within the facility.
G-CM-33 Prior to construction, plant population boundaries designated as listed or proposed by the Wildlife Agencies and other resources designated as listed or proposed by SDG&E and other resource agencies will be clearly delineated with visible flagging or fencing, which will remain in place for the duration of construction...Where these areas cannot be avoided, focused surveys for covered plant species will be performed. Notification of presence of any covered plant species to be removed in the work area will occur within ten (10) working days prior to construction activity, during which time the Wildlife Agencies may remove such plant(s) or recommend measures to minimize or reduce the impact...	See B-1a. There are no sensitive plant populations that exist within the Substation fence-lines.
BIO-APM-9: Follow brush clearing guidelines. Implement with B-8a and B-12a	NA
BIO-APM-10: No wildlife, including rattlesnakes, may be harmed except to protect life and limb; Firearms shall be prohibited. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. The SWEAP also addresses that firearms are prohibited in all project areas, except for security personnel.
BIO-APM-11: Feeding of wildlife is not allowed. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that feeding wildlife is prohibited.
BIO-APM-12: Do not bring pets. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that project personnel are not allowed to bring pets to any project area, minimizing harassment or killing of wildlife and prevention of introduction of animal diseases to wildlife populations.
BIO-APM-13: Plant or wildlife species may not be collected for pets or any other reason. Implement with B-5a and B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that prohibit collecting plant or wildlife species for pets or any other reason.
BIO-APM-14: Comply with removal of wildlife and transportation guidelines. Implement with B-7a	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Follow APMs during emergency repairs. Implement with B-1a and B-2a	NA
BIO-APM-16: Follow sensitive tree trimming guidelines. Implement with B-1a, B-2a, B-8a, and B-12a	NA. No tree trimming will occur at the construction site.
BIO-APM-17: Permanently close any new access roads or spur roads constructed as part of the project that are not required as permanent access. Implement with B-1a	NA. No access roads will be constructed.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features. Implement with B-2a and B-5a, B-8a, and B-9a	NA. No access roads will be constructed. Per NTP request, there are no sensitive features or endangered species or their sensitive habitat within the facility areas.
G-CM-27 To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location...Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks. Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	NA. See BIO-APM-18 above
BIO-APM-19: Implement restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM	See B-1a
BIO-APM-20: Leave vegetation in place in construction areas where re-contouring is not required. Implement with B-1a	See B-1a
BIO-APM-21: Comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981). Implement with B-10a	NA. Per the NTP request, Pomerado Substation upgrade activities do not include installation of additional power lines or new tall support structures.
BIO-APM-22: Salvage may include removal and stockpiling for replanting. Implement with B-5a	NA
BIO-APM-23: Remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Implement with B-1a and B-3a	NA
BIO-APM-24: Prevent livestock or wildlife from falling through covers. Implement with B-7a	NA
BIO-APM-25: Revegetate disturbed soils. Implement with B-1a and B-3a	NA
BIO-APM-26: Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles. Implement with B-7a	NA. No excavation will occur during construction activities.
BIO-APM-27: Remove all existing raptor nests from structures that would be affected by Project construction. Implement with B-8a	Existing raptor nests have not been observed within the substation. If construction activities occur during the raptor breeding season (January 1 through September 15), a pre-construction raptor nest survey will be conducted in accordance with Mitigation Measure B-8a. If nests are found prior to construction and during the raptor breeding season, SDG&E will follow the provisions of Mitigation Measure B-8a.
BIO-APM-28: Remove potential roost trees	NA. There are no potential bat roost trees on site.
BIO-APM-29: Reduce construction night lighting on sensitive habitats. Implement with B-7a and B-9a	Surveys for nesting birds shall be conducted within 10-days prior to construction and reported to the CPUC.
<b>Visual Resources</b>	
V-1a: Reduce visibility of construction activities and equipment	NA. The upgrades will be installed within the existing Substation site. There is an existing eight-foot wall that provides appropriate screening. There will not be additional visual impacts to nearby residences as a result of the upgrades since the Substation is located within an industrial area.
V-1b: Reduce construction night lighting impacts	NA. Per the NTP request, no night work is anticipated. No permanent lighting will be installed.
V-2a: Reduce in-line views of land scars	NA. Access to this facility will be made via existing roads. No new access roads will be constructed for utilization of the facility.
V-2b: Reduce visual contrast from unnatural vegetation lines	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2c: Reduce color contrast of land scars on non-Forest lands	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2d: Construction by helicopter	NA
V-2f: Reduce land scarring and vegetation clearance impacts on USFS-administered lands	NA
V-3a: Reduce visual contrast of towers and conductors	NA.
V-7a: Reduce visual contrast associated with ancillary facilities	NA. Colors and textures of all upgraded equipment will match existing equipment, therefore a Surface Treatment Plan will not be required.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
V-7b: Screen ancillary facilities	NA. Per the NTP request, the upgrades will be installed within the substation site which has an existing eight-foot perimeter wall that serves as screening for the Substation. No new structures will be installed; there will be no additional visual impacts to nearby residences as a result of the upgrades.
V-21a: Reduce night lighting impacts	NA. Per the NTP request, no night work is anticipated.
V-45a Prepare and implement Scenery Conservation Plan	NA
V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures	NA
V-68a: Eliminate sky lining of ridgeline towers and conductors	NA
VR-APM-1: Place structures at the maximum feasible distance from highway, canyon, and trail crossings.	NA. No crossings proposed.
VR-APM-2: Use dulled metal finish on transmission structures and non-specular conductors in visually sensitive areas. Implement with V-3b	NA
VR-APM-3: Match the spacing of structures where the line parallels existing transmission lines	NA
VR-APM-4: No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits. Implement with V-1c	The SWEAP video will be shown to all project personnel, and includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-5: Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence. Implement with V-3c	NA
VR-APM-6: In scenic view areas place structures to avoid sensitive features and/or allow conductor to clearly span the features. (Need SDG&E input)	NA
<b>Land Use</b>	
L-1a: Prepare Construction Notification Plan	A Construction Notification Plan was submitted to the CPUC and approved 3-1-10. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1c: Coordinate with MCAS Miramar	NA
L-2b: Revise project elements to minimize land use conflicts	NA. Construction activities will be limited to the previously disturbed areas within the existing Pomerado Substation fence-line and no new landowners will be affected as part of the scope of work;
LU-APM-1: Provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and SDG&E will appoint a public affairs officer to address public concerns or questions. Implement with L-1d	Property owners and tenants within 300 feet of the Substation will be noticed prior to commencement of construction activities. Verification of such notification will be submitted to the CPUC as per the Construction Notification Plan approved on March 1, 2010.
LU-APM-2: Place new transmission structures more than 330 feet from an existing residence. Implement with L-1d	NA
LU-APM-4: Notify property owners and tenants in advance of construction activities. Provide alternative access if feasible. Implement with L-1e	NA. Construction at this site will take place inside the existing substation and as a result, access to adjacent properties will not be affected.
LU-APM-5: Coordinate construction activities with appropriate water management representatives. (Need SDG&E input). Implement with L-1a	NA. Irrigation canals and flood management structures are not located at the Pomerado Substation.
LU-APM-6: Flag ROW boundary and limits of construction activity inside and outside the ROW in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided. Implement with L-1f	See B-1a.
LU-APM-7: Install project facilities along the edges or borders of private property, open space parks, and recreation areas.	NA.
LU-APM-8: Continue coordination efforts with the Counties of Imperial and San Diego General Plan Updates and the City of San Diego General Plan Updates to include the Proposed Project in their respective General Plans.	NA. The proposed upgrades to the Pomerado Substation do not require an update to the San Diego County General Plan.
LU-APM-9: Obtain all necessary and/or appropriate ministerial land use permits	NA. Per the NTP request, upgrade activities will take place within the existing Pomerado Substation; therefore, ministerial land use permit(s) will not be necessary.
LU-APM-10: Match structure locations with existing transmission facilities. (Need SDG&E input)	NA. No new structures will be built as part of the scope of work for Pomerado Substation upgrades.
<b>Wilderness and Recreation</b>	
WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area	NA.
WR-1b: Provide temporary detours for trail users	NA
WR-1c: Coordinate with local agencies to identify alternative recreation areas	NA
WR-2a: Develop a reroute for the BCD Alternative Revision to reduce effects on recreation	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
WR-2b: Evaluate and Implement PCT Route Revision	NA
WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.	NA
R-APM-2a: Provide advance notice of restriction of conflicts with access routes to recreational use areas. Implement with WR-1a	NA
R-APM-2b: No construction that affects trail use will be conducted in that area on federal holidays. Implement with WR-1a	NA
R-APM-2c: Coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department. Implement with WR-1a	NA
R-APM-2d: Post signs directing vehicles to alternative park access and parking in the event construction temporarily obstructs parking areas near trailheads. Implement with WR-1a	NA
R-APM-2e: Post signs advising recreation users of construction activities and directing them to alternative trails or bikeways on both sides of all trail intersections. Implement with WR-1a	NA
R-APM-2f: Post signs advising equestrians of construction timeframes where helicopters are used for construction, at all equestrian trail-access points within the vicinity of the flight paths. Implement with WR-1a	NA
R-APM-3a: Construction-related traffic shall be restricted to routes approved by the authorized agencies	NA
<b>Agriculture</b>	
AG-1a: Avoid interference with agricultural operations	NA. There are no agricultural fields located within or adjacent to the site.
AG-1b: Restore compacted soil	NA
AG-1c: Coordinate with grazing operators	NA
AG-3b: Consult with and inform aerial applicators	NA
LU-APM-3: Compensate farmers for losses of crops along ROW. Implement with L-1d	NA
<b>Cultural Resources</b>	
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	The Final Inventory Report of the Cultural Resources concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Pomerado Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance. The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.
C-1b: Avoid and protect potentially significant resources	See C-1a.
C-1c: Develop and implement Historic Properties Treatment Plan	NA. Per the NTP request, there are no NRHP- and/or CRHR-eligible resources within the Pomerado Substation.
C-1d: Conduct data recovery to reduce adverse effects	See details in C-1a and C-1c.
C-1e: Monitor construction at known ESAs	See details in C-1a and C-1c.
C-1f: Train construction personnel	The approved SWEAP video will be shown to all project personnel, and includes instructions on recognition and protection of cultural resources.
C-1g Avoid and protect Old Highway 80 (P-37-024023)	NA
C-2a: Properly treat human remains	Per the NTP request there are no known Native American human remains located within this previously disturbed and developed site. Unanticipated archeological materials discovered during construction will be treated as described in the project Historic Properties Management Plan (HPMP).
C-3a: Monitor construction in areas of high sensitivity for buried resources	See details in C-1a and C-1c.
C-4a: Complete consultation with Native American and other Traditional Groups	NA. Per the NTP request, work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties	During construction. Per the NTP request, there are no known NRHP- and/or CRHR-eligible resources within the facility. However, if NRHP- and/or CRHR-eligible resources are discovered during construction, this mitigation measure would be implemented 30 days prior to operation of the project.
C-6a: Reduce adverse visual intrusions to historic built environment properties	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
C-6e: Reduce adverse visual intrusions to portions of Old Highway 80	NA
C-6f: Reduce adverse visual intrusions to the Desert View Tower view shed	NA
CR-APM-1: Instruct construction personnel on the protection and avoidance of cultural resources. Implement with PAL-1e	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. Additionally, the construction contract will address state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them will be signed by each individual. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
CR-APM-2: Flag archeological sites that are eligible or potentially eligible for the National Register	See details in C-1b. No sites identified.
CR-APM-3: Report any previously unidentified cultural resource (historic or prehistoric site or object) discovered	The SWEAP video will be shown to all project personnel, and includes instructions on what to do in case a cultural resource is discovered during construction activities.
CR-APM-4: Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, and reconstruction of a historical resource consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines	NA. See C-4a.
CR-APM-5: Follow the guidance described for: Preservation in-place for mitigating impacts to archaeological sites, and preparation of data recovery plans	Per the NTP request, this mitigation measure will be implemented during construction. There are no known cultural resources within the facility. Unanticipated cultural resources discovered during construction will be treated as described the project Historic Properties Management Plan (HPMP).
CR-APM-6: Avoid, fence, or barricade historic properties, contributing portions and sensitive features for protection	NA. No sites identified.
CR-APM-7: Control erosion, sedimentation, or indirect displacement. Implement with C-2a, C-3a, C-4a, and C-5a	See details in C-1a and C-1c.
CR-APM-8: Avoid and protect elements of the landscape that are essential to the historic setting of the property	NA. No sites identified.
CR-APM-9: Install permanent fencing or barriers; or control/restrict access to the historic property	NA. No sites identified.
CR-APM-10: Locate project structures so that conductors span linear historic properties; underground placement of pipelines and conductors will be bored under linear properties to avoid disturbance or intrusion	NA. No sites identified.
CR-APM-11: Implement standard practices for cultural and paleontological resources on private lands	See details in C-1a and C-1c.
CR-APM-12: Conduct cultural surveys for staging areas that have not yet been identified	NA
<b>Paleontological Resources</b>	
PAL-1a: Inventory and evaluate paleontological resources in Final APE	NA. Based on the Paleontological Records Search submitted 2-25-10, per CPUC review there is no potential to encounter paleontological resources at the Pomerado Substation. The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1b: Develop Paleontological Monitoring and Treatment Plan	NA. Per CPUC review, no monitoring plan is required.
PAL-1c: Monitor construction for paleontology	NA. Per CPUC review, no monitor is required.
PAL-1d: Conduct paleontological data recovery	See PAL-1b
PAL-1e: Train construction personnel	The SWEAP video will be shown to all project personnel, and includes instructions on recognition of possible subsurface paleontological resources.
GEO-APM-9: Implement appropriate mitigation efforts if paleontological resources are encountered. Implement with PAL-1d	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
<b>Noise</b>	
N-1a: Implement Best Management Practices for construction noise	Per the NTP request, upgrade activities will be conducted between the hours of 7:00 a.m. and 7:00 p.m. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC. There are industrial buildings adjacent to the Pomerado Substation. Installation of sound barrier walls or acoustic blankets to shield residences will not be required as there are no noise-sensitive receptors within 200 feet of the Substation.
N-2a: Avoid blasting where damage to structures could occur (SDG&E to define blasting)	NA
N-3a: Respond to complaints of corona noise	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
NOI-APM-1: Provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads; and establish a toll free telephone number for receiving questions/complaints. Implement with I-1a	NA. There are no known sensitive receptors and residences within 300 feet of the Pomerado Substation.
<b>Transportation and Traffic</b>	
T-1a: Restrict lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-4a: Ensure pedestrian and bicycle circulation and safety.	NA. Pedestrian and bicycle facilities will not be affected with the occupancy of this facility.
T-5a: Repair roadways damaged by construction activities	It is not anticipated that upgrade activities at the Pomerado Substation will cause roadway damage. Should damage to roads occur, provisions of this mitigation measure will be implemented.
T-7a: Notify public of potential short-term elimination of parking spaces	NA. It is not anticipated construction at this site will eliminate parking spaces.
T-9a: Prepare Construction Transportation Management Plan	NA. A project-wide Traffic Study was completed on March 3, 2010. The Study revealed that there will not be a significant traffic impact and therefore mitigation is not required for the proposed construction at the Pomerado Substation. The existing circulation system and intersection controls will function adequately.
T-11b: Consult with and inform U.S. Customs and Border Patrol	NA. The Pomerado Substation is not within the area of border patrol aircraft operations along the Interstate Alternative and Modified Route D Alternative.
T-APM-2a: Obtain required permits for temporary lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-APM-2b: Submit detour plans. Implement with T-1b	NA. No detours are planned.
T-APM-4a: Coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	SDG&E shall coordinate with emergency service providers prior to activities that would restrict movements of emergency vehicles. Advance documentation of coordination with emergency service providers shall be submitted to the CPUC.
T-APM-5a: Consult with County Education Offices, School Districts to coordinate construction activities adjacent to school bus stops	NA. Construction activities are not adjacent to school bus or bus transit stops.
T-APM-6a: Comply with county parking ordinances or approved traffic control plan	See T-1a and T-7a
T-APM-6b: Prohibit parking on San Diego County-maintained roads and highways unless otherwise noted at specific locations; comply with the County of San Diego Department of Public Works Traffic Guidelines, 2001 whenever possible, or an approved traffic control plan	Parking will comply with the County of San Diego Department of Public Works Traffic Guidelines (2001) for parking along San Diego County maintained roads and highways.
T-APM-8a: Obtain required permits for entering railroad ROW	NA
T-APM-9a: Underground all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway. (Need SDG&E input)	NA
T-APM-10a: Provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure access to properties when not actively constructing the underground cable alignment	NA
<b>Public Health and Safety</b>	
P-1a: Implement Environmental Monitoring Program	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. As identified in the Environmental Monitoring Plan, the Environmental Field Representative/Lead Monitoring Manager for this Project is Steve Riggs (Burns & McDonnell). The SWEAP video, which was approved by the CPUC on March 15, 2010, includes discussion of the implementation of the Environmental Monitoring Program, maintenance of emergency spill supplies and equipment, the proper use of hazardous materials, development of a Hazardous Communication Plan, development of applicable environmental safety plans associated with hazardous materials, assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project, proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations, and environmental training regarding potential exposure. The SWEAP video will be shown to all Project personnel and enforced throughout all phases of the Project.
P-1b: Maintain emergency spill supplies and equipment	Maintain emergency spill supplies and equipment. Hazardous material spill kits will be maintained onsite for response to small spills. The SWEAP video will be shown to all project personnel, and includes instructions on emergency spill response, including emergency spill supplies and equipment. Detailed information for responding to accidental spills will be provided in Emergency Response information included in the site Storm Water Pollution Prevention Plan must be submitted prior to construction.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
P-2a: Test for residual pesticides/herbicides on currently or historically farmed land	NA. There is no farmed land at this facility.
P-3a: Appoint individuals with correct training for sampling, data review, and regulatory coordination	During construction.
P-3b: Documentation of compliance with measures for encountering unknown contamination	During construction.
P-7a: Evaluate contaminated sites	NA. No ground disturbance will occur.
HS-APM-1: Train personnel involved in using hazardous materials. Develop a Hazardous Communication Plan. Implement with P-1a	All personnel involved in using hazardous materials will be trained in the proper use and safety procedures for the chemical per the approved Hazard Communication Plan and by watching a SWEAP video. All personnel involved in using hazardous materials will be equipped with the necessary Personal Protection Equipment (PPE). The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Train personnel in refueling vehicles. Implement with P-1a	Refueling will only be performed by operators trained in refueling of vehicles or equipment. Refueling shall be performed in a designated area, with secondary containment, by a mobile refueling tanker (2,500-3,000 gallon capacity). This refueling tanker will be stored offsite.
HS-APM-3: Develop applicable environmental safety plans associated with hazardous materials. Implement with P-1a	Per the NTP request, the Pomerado Substation has an existing Spill Prevention Control and Countermeasure Plan (SPCC) which contains emergency response and spill response information (plan submitted with the request). The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC April 2, 2010. The Substation Hazardous Materials Business Plan was included with the request. No new oil-filled equipment will be installed as part of the work activities at the site, so no additional containment will be required and the SPCC Plan will not require changes.
HS-APM-4: Develop a site specific blasting plan of tower footing	NA. Blasting is not anticipated at this site.
HS-APM-5: Investigate all Government Code §65962.5 sites or other known contamination sites along the transmission line ROW.	NA. The Substation is not a Section 65962.5 site or known contamination site.
HS-APM-6: Investigate any known or potential areas for Unexploded Ordinance (UXO) used by the military along the ROW	NA. Per the NTP request, the site has been previously excavated. There is no known or potential for UXO, as this area was not utilized for military purposes.
HS-APM-7: Train personnel involved in excavation and grading or for ROW clearing to recognized UXO and/or potential soil, surface water, and groundwater potential contamination sites	NA. See HS-APM-6.
HS-APM-8: Assign an Environmental Field Representative and/or General Contractor for Health & Safety. Implement with P-1a	The Environmental Monitoring Plan submitted to the CPUC on May 10, 2010 identifies the Environmental Field Representative assigned to the project. SDG&E has assigned a Health & Safety Officer to the project.
HS-APM-9: Contact airport representative and/or Federal Aviation Administration Authorities regarding work within all existing and proposed transmission line corridors within 2 miles of an airport	NA. The scope of work is for upgrades to an existing facility and not construction along the proposed transmission line corridor.
HS-APM-10: Store and dispose of hazardous waste and solid waste in accordance with federal, State, and local regulations. Implement with P-1a	All hazardous waste and solid waste will be stored and disposed of in accordance with Federal, State and local regulations. SDG&E requirements for waste disposal will meet or exceed State requirements for waste disposal facilities. Hazardous material minimization shall be employed whenever feasible.
HS-APM-11: Develop Fire Prevention and Response Plan (FPRP). Assign a project Fire Marshal to enforce all provisions of the FPRP	An approved project specific Fire Plan for Construction, Operations and Maintenance has been developed and acknowledged by the CAL Fire Chief. A Fire Marshall has been hired for the project and is assigned to enforce the Fire Plan.
HS-APM-12: Develop a Traffic Control Plan	NA. Per the NTP request, construction activities will not cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts.
HS-APM-14: Construction workers shall undergo environmental training regarding potential exposure	The SWEAP video will be shown to all project personnel, and includes procedures regarding potential exposure of hazardous materials in accordance with Federal, State, and local authorities.
HS-APM-15: Stop work and notify Health and Safety Officer if during excavation soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities during the Pomerado Substation upgrades associated with this project.
HS-APM-16: Terminate and cordoned off work if soil or groundwater contamination is suspected	See HS-APM-15.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
HS-APM-17: Notify regulatory agency if the sample testing determines that contamination is found above regulatory limits	See HS-APM-15.
PS-1a: Limit the conductor surface electric gradient	NA. No conductors will be used at the site and communication upgrades will not interfere with radio or television frequencies.
PS-1b: Document and resolve electronic interference complaints	NA. Upgrades will not interfere with radio or television frequencies.
PS-2a: Implement grounding measures	NA. No conductors will be used at the site.
<b>Air Quality</b>	
AQ-1a: Suppress dust at all work or staging areas and on public roads	A Dust Control Plan was approved by the CPUC on January 20, 2010 for the entire project. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities at this site.
AQ-1b: Use low-emission construction equipment	SDG&E will use available Tier 3 equipment, minimizing the use of Tier 2 equipment at the facility. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. Equipment run logs will be maintained on a daily basis to satisfy mitigation measures and periodically submitted to the CPUC.
AQ-1h: Obtain NOx and particulate matter emission offsets	Construction-phase activities and emissions would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity de minimis thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would be satisfied based upon these lower emissions.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	During construction, SDG&E will offset Construction-Phase Greenhouse Gas Emissions with Carbon Credits as per documentation submitted to the CPUC Aug. 27, 2009. Per the request, a verification e-mail dated March 10, 2010 indicated that SDG&E purchased Carbon Reduction Tons (CRTs) to satisfy this measure. Quarterly reports will be provided as required.
AQ-4c: Avoid sulfur hexafluoride emissions	NA. The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. Per the NTP request, there will be no SF6 emissions at the facility.
AQ-APM-1: Comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]). File a Dust Control Plan with the ICAPCD	See AQ-1a
AQ-APM-2: Control fugitive dust	A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities.
AQ-APM-3: Minimize mud and dust from being transported onto paved roadway surfaces, pave, and gravel	Per the NTP request, SDG&E will use methods to minimize mud and dust tracking on paved roads.
AQ-APM-4: Carpool to the job site	The SWEAP video will be shown to all project personnel, and includes promoting carpooling to the job site.
AQ-APM-5: Minimize unnecessary construction vehicle idling time	The SWEAP video will be shown to all project personnel, and includes vehicle idling.
<b>Hydrology and Water Resources</b>	
H-1a: Prepare Substation Grading and Drainage Plan; construct during the dry season	NA. There will be no grading or other ground disturbing activities during the Pomerado Substation Upgrades.
H-1a (CC): Construct during the dry season	NA
H-1b: Construction in Los Peñasquitos Canyon Preserve to be in the dry season; SWPPP to be reviewed and approved by San Diego County and City of San Diego	NA
H-1k: Comply with Forest Service conditions	NA
H-1l: Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment-Control Plan	NA
H-2d: Maintain vehicles and equipment	Will occur during construction.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	NA. There will be no blasting at this facility. A Blasting Plan will not be required.
H-5a: Install substation runoff control	NA
H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
H-7a: Develop Hazardous Substance Control and Emergency Response Plan for project operation	Per the NTP request, the existing Pomerado Substation SPCC Plan contains emergency response information to assure quick and safe clean-up of spills as required to address hazardous substance control and emergency response. The SPCC Plan was submitted with the request. The SPCC Plan will not require an update because none of the substation upgrade equipment contain over 55 gallons of oil.
H-8a: Bury power line below 100-year scour depth	NA
WQ-APM-1: Minimize disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks	NA. There will be no disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks.
WQ-APM-2: Place structures so as to avoid sensitive features such as watercourses, or to allow conductors to clearly span the features, within limits of safety and standard structure design	NA. Per the NTP request, there are no sensitive water features in the construction area.
WQ-APM-3: Clearly mark where construction equipment and vehicles are not allowed on-site; and train personnel	NA. There are no sensitive water features inside the site.
WQ-APM-4: Maintain adequate distance from stream banks and beds; use existing bridges to cross major streams and culverts in most dry intermittent streams; Span surface water, riparian areas and floodplains; prepare and implement a Storm Water Pollution Prevention Plan (SWPPP)	Per the NTP request, SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Pomerado Substation. SDG&E's Water Quality Construction BMP Manual will be referenced for BMP implementation and maintenance. A copy of this document was submitted with the request. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.
WQ-APM-5: Construct any stream crossings at low flow periods; and if necessary, develop a site-specific mitigation and restoration plan	NA. There will be no stream crossings at this location.
WQ-APM-6: Avoid designated surface water protection areas	NA. Groundwater supplies will not be used during project construction.
WQ-APM-8: Obtain and comply with required permits for any groundwater discharged to surface waters or storm drains	NA.
WQ-APM-9: Prohibit storage of fuels and hazardous materials within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells	During construction. Storage of fuels and hazardous materials will be prohibited within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells.
WQ-APM-10: At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, comply with burial depth requirements. Implement with H-6a	NA. There are no stream banks inside or surrounding the site.
WQ-APM-11: Test groundwater levels along underground portion of the project drilling pilot borings	NA
WQ-APM-13: Do not disposed of hazardous materials onto the ground, the underlying groundwater, or any surface water	Hazardous waste will be disposed in enclosed containment and removed to a hazardous waste facility permitted or authorized to treat, store, or dispose of such materials. In the event of a release of hazardous materials to the ground, it will be promptly cleaned up in accordance with applicable local, State and Federal regulations. Trash will be contained in totally enclosed receptacles.
WQ-APM-14: Secure required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization	See WQ-APM-4.
WQ-APM-15: Construct access roads to avoid streambeds	NA. Construction access will be provided by existing roads to the Substation.
WQ-APM-16: Conduct site-specific assessments for each affected site	NA. There are no sensitive water resource features such as wetlands or waters of the State located in or near the site.
<b>Geology, Minerals, and Soils</b>	
G-2a: Protect desert pavement	NA
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	NA. Per the NTP request, the design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed.
G-4a: Reduce effects of ground shaking	NA. See G-3a.
G-4b: Conduct geotechnical investigations for liquefaction	NA. See G-3a.
G-5a: Minimize project structures within active fault zones	NA. See G-3a.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	NA. See G-3a.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
G-9a: Coordinate with quarry operations	NA
GEO-APM-1: No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable	NA. Construction access will be provided by existing roads to the Substation.
GEO-APM-2: Comply with soil disturbance guidelines	NA. There will be no grading or other ground disturbing activities during the Pomerado Substation Upgrades.
GEO-APM-3: Avoid placing structures in areas of high shrink/swell potential	NA. No new structures will be installed.
GEO-APM-4: Place structures in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock	NA. See GEO-APM-3.
GEO-APM-5: Avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation	NA. No ground disturbance will occur.
GEO-APM-6: Conduct surface restoration for erosion control and re-vegetation	SDG&E will implement the site SWPPP during construction.
GEO-APM-8: Remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage; and position structures to span over potential landslide areas	NA. There are no boulders or hills within the facility construction area..
<b>Socioeconomics</b>	
S-2a: Notify public of utility service interruption	NA
S-2b: Protect underground utilities	NA
S-3a: Recycle construction waste	SDG&E and/or its construction contractor shall recycle a minimum of 90% of inerts and 70% of all other materials generated during construction activities. Documentation from the recycling and/or landfill facilities used for construction will be provided to CPUC.
S-3b: Use reclaimed water	The Water Resources Availability Study, as discussed in the Project Modification Report, determined that sufficient supplies of surface water, reclaimed water, and potable water would be available to meet Project demand.
PSU-APM-1: Coordinate with all utility providers with facilities located within or adjacent to ensure that design does not conflict with other facilities	NA. No third party utility providers will be affected.
PSU-APM-2: Notify Underground Service Alert a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines	NA. No ground-disturbing activities will occur.
PSU-APM-3: Coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized	SDG&E will coordinate with emergency services. Construction schedules and activities are not anticipated to disrupt emergency and police service response times. Per the NTP request, there will not be lane closures or other activities associated with construction at the Substation that will interfere with emergency and police service response times or access. If lane closures do need to occur, documentation of prior coordination with emergency service providers shall be submitted to the CPUC.
<b>Fire and Fuels Management</b>	
F-1a: Develop and implement a Construction Fire Prevention Plan	During construction. A Construction Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on Jan. 20, 2010.
F-1b: Amend and implement Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007)	A Construction Fire Plan, acknowledged by the CAL FIRE Chief, was approved by the CPUC on January 20, 2010. Therefore, the preconstruction component of this measure is complete. The plan will need to be revisited and updated every five years.
F-1c: Ensure coordination for emergency fire suppression	NA. Construction activities will be limited to the facility and will not obstruct firefighting equipment or crews or emergency fire suppression efforts
F-1d: Remove hazards from the work area	If present, dead and decaying vegetation will be removed from the facility prior to set up or chipped and spread onsite in piles no higher than six inches.
F-1e: Contribute to defensible space grants fund	Fire agency proposal for both Defensible Space (F-1e) and Power line Firefighting Mitigation Fund (F-3a) were approved 3-7-10. Post-construction task.
F-2a: Establish and maintain adequate line clearances	See F-1a
F-2b: Install existing conductors on steel poles	See F-1a
F-2c: Perform climbing inspections	Post-construction task.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. Post-construction task.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	Per the NTP request, SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU. It will be implemented prior to energization.

## Sunrise Powerlink Project NTP 8 Compliance Table

Pre-Construction Compliance Status Table as applied to the Pomerado Substation Upgrades, NTP #8 (10-06-10)	
Mitigation Measure and APM	Status
Please note that the full text of the mitigation measure conditions are not provided in this table. Complete measures can found in the EIR/EIS and MMCPR.	Please note that cells highlighted in grey have been fulfilled or are not applicable.
Abbreviated conditions of the USFWS Biological Opinion are shown in green highlights.	Cells highlighted in yellow are conditions of the NTP and shall be fulfilled with documentation submitted to the CPUC prior to construction.
	Cells highlighted in purple will be fulfilled during or after construction.
<b>Biological Resources</b>	
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Construction activities will take place on previously disturbed areas free of vegetation. The facility boundaries will be flagged/delineated within the existing disturbed portions of the property prior to construction. Project impacts will occur only within the previously disturbed limits of the proposed property. No sensitive vegetation communities will be directly impacted by project construction. Impacts to previously disturbed and developed areas will not require mitigation. No shrub or tree trimming or removal will occur.
B-1c: Conduct biological monitoring	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site for periodic/weekly inspections. Weekly monitoring reports will be submitted to CPUC.
B-1k: Re-seed disturbed areas after a transmission line-caused fire	NA
B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187	NA
B-2a: Provide restoration/compensation for impacted jurisdictional areas	NA. Per the NTP request, upgrades at the Pomerado Substation will take place within a previously disturbed and developed site. There are no ACOE, Regional Water Board, State Water Board, or CDFG jurisdictional areas located onsite.
B-3a: Prepare and implement a Weed Control Plan	NA.
B-5a: Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, construction activities will occur only within the previously disturbed facility; there are no special status plant populations within the construction site.
G-CM-32 Prior to construction activities, SDG&E will conduct on-the-ground surveys (following Service protocols where they exist) for the following listed species where such surveys had not been conducted in 2007 and 2008, or for those species for which surveys in 2007 and 2008 were not reliable due to lack of sufficient rainfall. San Diego Thornmint ( <i>Acanthomintha ilicifolia</i> ), San Bernardino Bluegrass ( <i>Poa atropurpurea</i> ), Willowy Monardella ( <i>Monardella viminea</i> ), Quino Checkerspot Butterfly ( <i>Euphydryas editha quino</i> ), Arroyo Toad ( <i>Bufo californicus</i> ), Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> ), Least Bell's Vireo ( <i>Vireo bellii pusillus</i> ), Coastal California Gnatcatcher ( <i>Poliopitila californica californica</i> ), Stephen's Kangaroo Rat ( <i>Dipodomys stephensi</i> )	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-1 San Diego Thornmint. No impacts will occur to the thornmint population at and adjacent to MP 116 or to any thornmint occurrences between MP 114 and 119...In other areas where suitable thornmint habitat (i.e., gabbro and calcareous soils and a slope of 0 to 25 percent) exists, the area to be impacted will be surveyed for thornmint before any impacts may occur, per G-CM-32.	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
SS-CM-2 Impacts to San Diego thornmint will first be avoided where feasible, and where not feasible due to physical or safety constraints, impacts will be compensated through salvage and relocation via a restoration program...The CPUC, BLM, USFS and Wildlife Agencies will decide whether the applicant can restore San Diego thornmint populations or will acquire habitat with San Diego thornmint...	NA: No sensitive species are expected to occur inside the previously-disturbed construction area.
B-7a Cover all steep-walled trenches or excavations used during construction to prevent the entrapment of wildlife (e.g. reptiles and small mammals)	NA. Steep-walled trenches or excavations are not proposed as part of the Pomerado Substation upgrade scope of work.
B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Range wide Management Strategy	NA
B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
SS-CM-22 Construction activities (including the use of helicopters) in bighorn sheep designated critical habitat will be limited to outside the lambing season (January 1 through June 30) and the period of greatest water need (June 1 through September 30) as defined in the Recovery Plan...	NA
SS-CM-23 Compensation for the loss of occupied bighorn sheep habitat will be implemented...	NA
SS-CM-24 A biological consultant approved by the Wildlife Agencies will be retained by SDG&E to collect data on bighorn sheep movements in the area during the construction phase. Prior to construction the biologist shall submit a bighorn sheep monitoring plan that meets the approval of the Wildlife Agencies...	NA
SS-CM-25 To help reconnect desert bighorn sheep subpopulations and at least partially offset impacts to the overall population caused by the project, SDG&E will: Fund the design and construction of an overpass or underpass, or tunnel to facilitate desert bighorn sheep movement across a highway...Fund, design, and construct a system of fences to prevent bighorn sheep from crossing on the surface of westbound Interstate 8...Fund removal of tamarisk, fountain grass, other invasive species, and hazardous fences for the life of the project...	NA
B-7d: Conduct burrowing owl surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. Burrowing owl surveys not required outside of Imperial County. There are no burrowing owls or their associated habitat within the Pomerado Substation; therefore, this mitigation measure is not applicable. Surveys for nesting birds shall be conducted 10 days prior to construction and reported to the CPUC in accordance with Mitigation Measure B-8a. If burrowing owls are discovered during pre-construction nesting bird surveys or during construction, provisions of Mitigation Measure B-7d will be implemented.
B-7e: Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. This measure is not applicable, as there is no suitable habitat for least Bell's vireo and southwestern willow flycatcher in or adjacent to the Pomerado Substation.
SS-CM-16 During construction, all grading or brushing taking place within riparian habitats occupied by the vireo will be conducted outside the vireo breeding season (defined as March 15 through September 15)...	NA See B-7e
SS-CM-17 To avoid impacts to vireo, towers, pads, pull stations, access roads, staging areas, and fly facilities will be located outside of riparian vegetation, including occupied vireo habitat, where feasible..	NA See B-7e
SS-CM-18 To minimize adverse impacts from loss of occupied habitat in the Cleveland National Forest, and to minimize predation and parasitism, SDG&E will develop and implement a brown-headed cowbird ( <i>Molothrus ater</i> ) trapping program, in consultation with the USFS.	NA
B-7h: Implement appropriate avoidance/ minimization strategies for eagle nests	NA. No suitable eagle habitat exists within or adjacent to the Pomerado Substation.
B-7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Per the NTP request, there are no Quino checkerspot butterflies or their associated habitat within or adjacent to the Pomerado Substation.
SS-CM-3 A biologist permitted by the Service will delineate suitable/occupied (quino) habitat areas that will be impacted by project construction...	See B-7i
SS-CM-4 A pre-construction, Service protocol presence/absence survey for the adult Quino will be conducted within the delineated suitable/occupied habitat in the construction zone...	See B-7i
SS-CM-5 Any Service-approved restoration (plan) of impacted (quino) habitat will be conducted in areas with appropriate topographical and biological features to be determined by the Service, BLM, USFS and SDG&E.	See B-7i
SS-CM-6 Due the extreme importance of the Quino population located in the Jacumba Unit of Quino critical habitat, SDG&E will consult with the Service regarding the final design and siting of all permanent and temporary impacts (e.g., towers, pads, access roads, staging areas, pull down areas, helipads, and fuel modification zones) within Quino critical habitat...	See B-7i
SS-CM-7 No new construction will occur during the Quino flight season within 1 km (1 mi) of any known or newly discovered Quino occurrence. If it is not feasible to construct outside of the flight season in these instances, SDG&E must obtain written consent from the Service to proceed with construction.	See B-7i
B-7j: Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There is no suitable habitat for arroyo toad within or adjacent to the Pomerado Substation.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
SS-CM-8 A pre-construction, Service protocol, survey will be conducted for the arroyo toad by a biologist approved by the Service to handle the toad) in all areas of the project located within suitable arroyo toad breeding habitat. The removal of toad riparian breeding habitat will occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles.	See B-7j
SS-CM-9 SDG&E will develop an arroyo toad translocation monitoring program to be implemented during all construction activities that have the potential to adversely affect the arroyo toad...	See B-7j
SS-CM-10 To offset the loss of occupied and suitable arroyo toad habitat within the project area, and to offset indirect effects of the project on arroyo habitat, SDG&E will develop and implement an arroyo toad predator control program on USFS lands. The scope and methods for this program will be developed in consultation with the Service and USFS.	See B-7j
SS-CM-11 Compensation for the loss of arroyo toad-occupied habitat will be implemented... Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7j
SS-CM-15 Towers, pads, pull stations, access roads, staging areas, and fly facilities will not be located within suitable/potential arroyo toad upland aestivation and riparian breeding habitat to the extent feasible...	See B-7j
B-7i: Conduct coastal California gnatcatcher surveys, and implement appropriate avoidance/minimization/compensation strategies	NA: No suitable habitat or Ca gnatcatcher identified.
SS-CM-19 All brushing or grading taking place within occupied habitat of the gnatcatcher 500 ft of any gnatcatcher sightings during construction will be conducted outside of the gnatcatcher breeding season (2-15 through 8-31). When conducting all other construction activities during the gnatcatcher breeding season, within occupied habitat, the following avoidance measures will apply. Vegetation clearing outside of the breeding season (10-1 through 2-14) will take place in the presence of a biological monitor approved by the Service... A Service-approved biologist will survey for gnatcatchers within 10 days prior to initiating activities in an area. The results of the survey will be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities...If an active nest is located, 300-ft no-construction buffer will be established around each nest site... The applicant will contact the Wildlife Agencies to determine the appropriate buffer zone...However, if construction must take place within 300-ft buffer, a qualified acoustician will monitor noise..	See B-7i
SS-CM-20 Compensation for the loss of occupied gnatcatcher habitat will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
SS-CM-21 Compensation for the loss of unoccupied designated critical habitat for the gnatcatcher will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Per the NTP request, although the Pomerado Substation is devoid of vegetation, birds may nest within the facility on existing equipment and structures. For construction between January 15 and August 15, within 10 calendar days prior to construction, a qualified biologist will conduct avian breeding surveys. Results of the surveys will be submitted to the CPUC and Wildlife Agencies for review and approval. If active nests are located, a suitable buffer will be established. If project construction cannot occur completely outside the general avian breeding season, then pre-construction surveys will be conducted in the following manner: 1. 100-foot pre-construction surveys will be conducted for non-listed bird species prior to occupancy/use. 2. 500-foot pre-construction surveys for listed bird species, including raptors. If burrowing owls are discovered during pre-construction nesting bird surveys or during construction, provisions of Mitigation Measure B-7d will be implemented.
B-9a: Survey for bat nursery colonies	See BIO-APM-28
B-10a: Utilize collision-reducing techniques in installation of transmission lines	Transmission lines will not be installed as part of the work at Pomerado Substation. Therefore, this mitigation measure does not apply.
B-11a: Prepare and implement a Raven Control Plan	NA
B-12a: Conduct maintenance activities outside the general avian breeding season	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
B-12b: Conduct maintenance when arroyo toads are least active	NA
B-12c: Maintain access roads and clear vegetation in Quino checkerspot butterfly habitat	See B-7i
BIO-APM-1: Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted. Implement with B-1a, B-1b, B-2a, B-5a, B-7d, B-7e, B-7g, B-7i, B-7j, B-k, B-7l, B-7m, and B-7o	NA. Per the NTP request, habitat for sensitive plants and animal species does not exist within or surrounding the Pomerado Substation. Construction activities will take place within the existing facility. There is no vegetation or suitable habitat present within the facility and no impacts to biological resources will occur as a result of the upgrade activities.
BIO-APM-2: Train personnel regarding the appropriate work practices necessary to effectively implement the biological APMs.	The Safe Worker and Environmental Awareness Program (SWEAP) video will be shown to all project personnel and enforced throughout all phases of the Project, and includes appropriate work practices to effectively implement the biological resources and applicant proposed mitigation measures (APMs).
BIO-APM-3: Restrict vehicle movement to existing and constructed roads. Implement with B-5a, B-7a, B-8a, B-9a, B-12a, B-12b, and B-12c	During construction. Vehicle traffic will be restricted to existing, paved roads.
BIO-APM-4: Comply with project area limits during construction and survey activities	All vehicles shall remain on existing roads or inside the Substation boundaries. Construction activities will be limited to pre-disturbed areas within the Substation.
BIO-APM-5: Configure access roads in compliance with hydrological resources guidelines. Implement with B-1a, B-2a, B-5a, and B-8a	NA
BIO-APM-6: Comply with all applicable environmental laws and regulations. Implement with B-1a, B-5a, B-8a, and B-12a	During construction and operation of this site, SDG&E will comply with all the necessary environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat. The SWEAP video was approved by the CPUC on March 4, 2010. This SWEAP will be shown to all project personnel to ensure compliance with all applicable laws and regulations, addressing the protection of wildlife and its habitat.
BIO-APM-7: Littering is not allowed. Implement with B-6a, B-8a, and B-12a	The SWEAP video addresses the fact that no littering is allowed, including food waste, other waste or any type of debris.
BIO-APM-8: Delineate sensitive plant population boundaries. Implement with B-5a	NA. There are no sensitive plant populations that exist within the facility.
G-CM-33 Prior to construction, plant population boundaries designated as listed or proposed by the Wildlife Agencies and other resources designated as listed or proposed by SDG&E and other resource agencies will be clearly delineated with visible flagging or fencing, which will remain in place for the duration of construction...Where these areas cannot be avoided, focused surveys for covered plant species will be performed. Notification of presence of any covered plant species to be removed in the work area will occur within ten (10) working days prior to construction activity, during which time the Wildlife Agencies may remove such plant(s) or recommend measures to minimize or reduce the impact...	See B-1a. There are no sensitive plant populations that exist within the Substation fence-lines.
BIO-APM-9: Follow brush clearing guidelines. Implement with B-8a and B-12a	NA
BIO-APM-10: No wildlife, including rattlesnakes, may be harmed except to protect life and limb; Firearms shall be prohibited. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. The SWEAP also addresses that firearms are prohibited in all project areas, except for security personnel.
BIO-APM-11: Feeding of wildlife is not allowed. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that feeding wildlife is prohibited.
BIO-APM-12: Do not bring pets. Implement with B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that project personnel are not allowed to bring pets to any project area, minimizing harassment or killing of wildlife and prevention of introduction of animal diseases to wildlife populations.
BIO-APM-13: Plant or wildlife species may not be collected for pets or any other reason. Implement with B-5a and B-12a	The SWEAP video will be shown to all project personnel, and includes instructions that prohibit collecting plant or wildlife species for pets or any other reason.
BIO-APM-14: Comply with removal of wildlife and transportation guidelines. Implement with B-7a	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Follow APMs during emergency repairs. Implement with B-1a and B-2a	NA
BIO-APM-16: Follow sensitive tree trimming guidelines. Implement with B-1a, B-2a, B-8a, and B-12a	NA. No tree trimming will occur at the construction site.
BIO-APM-17: Permanently close any new access roads or spur roads constructed as part of the project that are not required as permanent access. Implement with B-1a	NA. No access roads will be constructed.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features. Implement with B-2a and B-5a, B-8a, and B-9a	NA. No access roads will be constructed. Per NTP request, there are no sensitive features or endangered species or their sensitive habitat within the facility areas.
G-CM-27 To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location...Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks. Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	NA. See BIO-APM-18 above
BIO-APM-19: Implement restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM	See B-1a
BIO-APM-20: Leave vegetation in place in construction areas where re-contouring is not required. Implement with B-1a	See B-1a
BIO-APM-21: Comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981). Implement with B-10a	NA. Per the NTP request, Pomerado Substation upgrade activities do not include installation of additional power lines or new tall support structures.
BIO-APM-22: Salvage may include removal and stockpiling for replanting. Implement with B-5a	NA
BIO-APM-23: Remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Implement with B-1a and B-3a	NA
BIO-APM-24: Prevent livestock or wildlife from falling through covers. Implement with B-7a	NA
BIO-APM-25: Revegetate disturbed soils. Implement with B-1a and B-3a	NA
BIO-APM-26: Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles. Implement with B-7a	NA. No excavation will occur during construction activities.
BIO-APM-27: Remove all existing raptor nests from structures that would be affected by Project construction. Implement with B-8a	Existing raptor nests have not been observed within the substation. If construction activities occur during the raptor breeding season (January 1 through September 15), a pre-construction raptor nest survey will be conducted in accordance with Mitigation Measure B-8a. If nests are found prior to construction and during the raptor breeding season, SDG&E will follow the provisions of Mitigation Measure B-8a.
BIO-APM-28: Remove potential roost trees	NA. There are no potential bat roost trees on site.
BIO-APM-29: Reduce construction night lighting on sensitive habitats. Implement with B-7a and B-9a	Surveys for nesting birds shall be conducted within 10-days prior to construction and reported to the CPUC.
<b>Visual Resources</b>	
V-1a: Reduce visibility of construction activities and equipment	NA. The upgrades will be installed within the existing Substation site. There is an existing eight-foot wall that provides appropriate screening. There will not be additional visual impacts to nearby residences as a result of the upgrades since the Substation is located within an industrial area.
V-1b: Reduce construction night lighting impacts	NA. Per the NTP request, no night work is anticipated. No permanent lighting will be installed.
V-2a: Reduce in-line views of land scars	NA. Access to this facility will be made via existing roads. No new access roads will be constructed for utilization of the facility.
V-2b: Reduce visual contrast from unnatural vegetation lines	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2c: Reduce color contrast of land scars on non-Forest lands	NA. This location will not require grading, nor will visual contrast be created that would need to be reduced.
V-2d: Construction by helicopter	NA
V-2f: Reduce land scarring and vegetation clearance impacts on USFS-administered lands	NA
V-3a: Reduce visual contrast of towers and conductors	NA.
V-7a: Reduce visual contrast associated with ancillary facilities	NA. Colors and textures of all upgraded equipment will match existing equipment, therefore a Surface Treatment Plan will not be required.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
V-7b: Screen ancillary facilities	NA. Per the NTP request, the upgrades will be installed within the substation site which has an existing eight-foot perimeter wall that serves as screening for the Substation. No new structures will be installed; there will be no additional visual impacts to nearby residences as a result of the upgrades.
V-21a: Reduce night lighting impacts	NA. Per the NTP request, no night work is anticipated.
V-45a Prepare and implement Scenery Conservation Plan	NA
V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures	NA
V-68a: Eliminate sky lining of ridgeline towers and conductors	NA
VR-APM-1: Place structures at the maximum feasible distance from highway, canyon, and trail crossings.	NA. No crossings proposed.
VR-APM-2: Use dulled metal finish on transmission structures and non-specular conductors in visually sensitive areas. Implement with V-3b	NA
VR-APM-3: Match the spacing of structures where the line parallels existing transmission lines	NA
VR-APM-4: No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits. Implement with V-1c	The SWEAP video will be shown to all project personnel, and includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-5: Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence. Implement with V-3c	NA
VR-APM-6: In scenic view areas place structures to avoid sensitive features and/or allow conductor to clearly span the features. (Need SDG&E input)	NA
<b>Land Use</b>	
L-1a: Prepare Construction Notification Plan	A Construction Notification Plan was submitted to the CPUC and approved 3-1-10. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1c: Coordinate with MCAS Miramar	NA
L-2b: Revise project elements to minimize land use conflicts	NA. Construction activities will be limited to the previously disturbed areas within the existing Pomerado Substation fence-line and no new landowners will be affected as part of the scope of work;
LU-APM-1: Provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and SDG&E will appoint a public affairs officer to address public concerns or questions. Implement with L-1d	Property owners and tenants within 300 feet of the Substation will be noticed prior to commencement of construction activities. Verification of such notification will be submitted to the CPUC as per the Construction Notification Plan approved on March 1, 2010.
LU-APM-2: Place new transmission structures more than 330 feet from an existing residence. Implement with L-1d	NA
LU-APM-4: Notify property owners and tenants in advance of construction activities. Provide alternative access if feasible. Implement with L-1e	NA. Construction at this site will take place inside the existing substation and as a result, access to adjacent properties will not be affected.
LU-APM-5: Coordinate construction activities with appropriate water management representatives. (Need SDG&E input). Implement with L-1a	NA. Irrigation canals and flood management structures are not located at the Pomerado Substation.
LU-APM-6: Flag ROW boundary and limits of construction activity inside and outside the ROW in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided. Implement with L-1f	See B-1a.
LU-APM-7: Install project facilities along the edges or borders of private property, open space parks, and recreation areas.	NA.
LU-APM-8: Continue coordination efforts with the Counties of Imperial and San Diego General Plan Updates and the City of San Diego General Plan Updates to include the Proposed Project in their respective General Plans.	NA. The proposed upgrades to the Pomerado Substation do not require an update to the San Diego County General Plan.
LU-APM-9: Obtain all necessary and/or appropriate ministerial land use permits	NA. Per the NTP request, upgrade activities will take place within the existing Pomerado Substation; therefore, ministerial land use permit(s) will not be necessary.
LU-APM-10: Match structure locations with existing transmission facilities. (Need SDG&E input)	NA. No new structures will be built as part of the scope of work for Pomerado Substation upgrades.
<b>Wilderness and Recreation</b>	
WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area	NA.
WR-1b: Provide temporary detours for trail users	NA
WR-1c: Coordinate with local agencies to identify alternative recreation areas	NA
WR-2a: Develop a reroute for the BCD Alternative Revision to reduce effects on recreation	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
WR-2b: Evaluate and Implement PCT Route Revision	NA
WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.	NA
R-APM-2a: Provide advance notice of restriction of conflicts with access routes to recreational use areas. Implement with WR-1a	NA
R-APM-2b: No construction that affects trail use will be conducted in that area on federal holidays. Implement with WR-1a	NA
R-APM-2c: Coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department. Implement with WR-1a	NA
R-APM-2d: Post signs directing vehicles to alternative park access and parking in the event construction temporarily obstructs parking areas near trailheads. Implement with WR-1a	NA
R-APM-2e: Post signs advising recreation users of construction activities and directing them to alternative trails or bikeways on both sides of all trail intersections. Implement with WR-1a	NA
R-APM-2f: Post signs advising equestrians of construction timeframes where helicopters are used for construction, at all equestrian trail-access points within the vicinity of the flight paths. Implement with WR-1a	NA
R-APM-3a: Construction-related traffic shall be restricted to routes approved by the authorized agencies	NA
<b>Agriculture</b>	
AG-1a: Avoid interference with agricultural operations	NA. There are no agricultural fields located within or adjacent to the site.
AG-1b: Restore compacted soil	NA
AG-1c: Coordinate with grazing operators	NA
AG-3b: Consult with and inform aerial applicators	NA
LU-APM-3: Compensate farmers for losses of crops along ROW. Implement with L-1d	NA
<b>Cultural Resources</b>	
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	The Final Inventory Report of the Cultural Resources concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Pomerado Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance. The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.
C-1b: Avoid and protect potentially significant resources	See C-1a.
C-1c: Develop and implement Historic Properties Treatment Plan	NA. Per the NTP request, there are no NRHP- and/or CRHR-eligible resources within the Pomerado Substation.
C-1d: Conduct data recovery to reduce adverse effects	See details in C-1a and C-1c.
C-1e: Monitor construction at known ESAs	See details in C-1a and C-1c.
C-1f: Train construction personnel	The approved SWEAP video will be shown to all project personnel, and includes instructions on recognition and protection of cultural resources.
C-1g Avoid and protect Old Highway 80 (P-37-024023)	NA
C-2a: Properly treat human remains	Per the NTP request there are no known Native American human remains located within this previously disturbed and developed site. Unanticipated archeological materials discovered during construction will be treated as described in the project Historic Properties Management Plan (HPMP).
C-3a: Monitor construction in areas of high sensitivity for buried resources	See details in C-1a and C-1c.
C-4a: Complete consultation with Native American and other Traditional Groups	NA. Per the NTP request, work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties	During construction. Per the NTP request, there are no known NRHP- and/or CRHR-eligible resources within the facility. However, if NRHP- and/or CRHR-eligible resources are discovered during construction, this mitigation measure would be implemented 30 days prior to operation of the project.
C-6a: Reduce adverse visual intrusions to historic built environment properties	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
C-6e: Reduce adverse visual intrusions to portions of Old Highway 80	NA
C-6f: Reduce adverse visual intrusions to the Desert View Tower view shed	NA
CR-APM-1: Instruct construction personnel on the protection and avoidance of cultural resources. Implement with PAL-1e	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. Additionally, the construction contract will address state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them will be signed by each individual. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
CR-APM-2: Flag archeological sites that are eligible or potentially eligible for the National Register	See details in C-1b. No sites identified.
CR-APM-3: Report any previously unidentified cultural resource (historic or prehistoric site or object) discovered	The SWEAP video will be shown to all project personnel, and includes instructions on what to do in case a cultural resource is discovered during construction activities.
CR-APM-4: Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, and reconstruction of a historical resource consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines	NA. See C-4a.
CR-APM-5: Follow the guidance described for: Preservation in-place for mitigating impacts to archaeological sites, and preparation of data recovery plans	Per the NTP request, this mitigation measure will be implemented during construction. There are no known cultural resources within the facility. Unanticipated cultural resources discovered during construction will be treated as described the project Historic Properties Management Plan (HPMP).
CR-APM-6: Avoid, fence, or barricade historic properties, contributing portions and sensitive features for protection	NA. No sites identified.
CR-APM-7: Control erosion, sedimentation, or indirect displacement. Implement with C-2a, C-3a, C-4a, and C-5a	See details in C-1a and C-1c.
CR-APM-8: Avoid and protect elements of the landscape that are essential to the historic setting of the property	NA. No sites identified.
CR-APM-9: Install permanent fencing or barriers; or control/restrict access to the historic property	NA. No sites identified.
CR-APM-10: Locate project structures so that conductors span linear historic properties; underground placement of pipelines and conductors will be bored under linear properties to avoid disturbance or intrusion	NA. No sites identified.
CR-APM-11: Implement standard practices for cultural and paleontological resources on private lands	See details in C-1a and C-1c.
CR-APM-12: Conduct cultural surveys for staging areas that have not yet been identified	NA
<b>Paleontological Resources</b>	
PAL-1a: Inventory and evaluate paleontological resources in Final APE	NA. Based on the Paleontological Records Search submitted 2-25-10, per CPUC review there is no potential to encounter paleontological resources at the Pomerado Substation. The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1b: Develop Paleontological Monitoring and Treatment Plan	NA. Per CPUC review, no monitoring plan is required.
PAL-1c: Monitor construction for paleontology	NA. Per CPUC review, no monitor is required.
PAL-1d: Conduct paleontological data recovery	See PAL-1b
PAL-1e: Train construction personnel	The SWEAP video will be shown to all project personnel, and includes instructions on recognition of possible subsurface paleontological resources.
GEO-APM-9: Implement appropriate mitigation efforts if paleontological resources are encountered. Implement with PAL-1d	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
<b>Noise</b>	
N-1a: Implement Best Management Practices for construction noise	Per the NTP request, upgrade activities will be conducted between the hours of 7:00 a.m. and 7:00 p.m. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC. There are industrial buildings adjacent to the Pomerado Substation. Installation of sound barrier walls or acoustic blankets to shield residences will not be required as there are no noise-sensitive receptors within 200 feet of the Substation.
N-2a: Avoid blasting where damage to structures could occur (SDG&E to define blasting)	NA
N-3a: Respond to complaints of corona noise	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
NOI-APM-1: Provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads; and establish a toll free telephone number for receiving questions/complaints. Implement with I-1a	NA. There are no known sensitive receptors and residences within 300 feet of the Pomerado Substation.
<b>Transportation and Traffic</b>	
T-1a: Restrict lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-4a: Ensure pedestrian and bicycle circulation and safety.	NA. Pedestrian and bicycle facilities will not be affected with the occupancy of this facility.
T-5a: Repair roadways damaged by construction activities	It is not anticipated that upgrade activities at the Pomerado Substation will cause roadway damage. Should damage to roads occur, provisions of this mitigation measure will be implemented.
T-7a: Notify public of potential short-term elimination of parking spaces	NA. It is not anticipated construction at this site will eliminate parking spaces.
T-9a: Prepare Construction Transportation Management Plan	NA. A project-wide Traffic Study was completed on March 3, 2010. The Study revealed that there will not be a significant traffic impact and therefore mitigation is not required for the proposed construction at the Pomerado Substation. The existing circulation system and intersection controls will function adequately.
T-11b: Consult with and inform U.S. Customs and Border Patrol	NA. The Pomerado Substation is not within the area of border patrol aircraft operations along the Interstate Alternative and Modified Route D Alternative.
T-APM-2a: Obtain required permits for temporary lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-APM-2b: Submit detour plans. Implement with T-1b	NA. No detours are planned.
T-APM-4a: Coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	SDG&E shall coordinate with emergency service providers prior to activities that would restrict movements of emergency vehicles. Advance documentation of coordination with emergency service providers shall be submitted to the CPUC.
T-APM-5a: Consult with County Education Offices, School Districts to coordinate construction activities adjacent to school bus stops	NA. Construction activities are not adjacent to school bus or bus transit stops.
T-APM-6a: Comply with county parking ordinances or approved traffic control plan	See T-1a and T-7a
T-APM-6b: Prohibit parking on San Diego County-maintained roads and highways unless otherwise noted at specific locations; comply with the County of San Diego Department of Public Works Traffic Guidelines, 2001 whenever possible, or an approved traffic control plan	Parking will comply with the County of San Diego Department of Public Works Traffic Guidelines (2001) for parking along San Diego County maintained roads and highways.
T-APM-8a: Obtain required permits for entering railroad ROW	NA
T-APM-9a: Underground all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway. (Need SDG&E input)	NA
T-APM-10a: Provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure access to properties when not actively constructing the underground cable alignment	NA
<b>Public Health and Safety</b>	
P-1a: Implement Environmental Monitoring Program	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. As identified in the Environmental Monitoring Plan, the Environmental Field Representative/Lead Monitoring Manager for this Project is Steve Riggs (Burns & McDonnell). The SWEAP video, which was approved by the CPUC on March 15, 2010, includes discussion of the implementation of the Environmental Monitoring Program, maintenance of emergency spill supplies and equipment, the proper use of hazardous materials, development of a Hazardous Communication Plan, development of applicable environmental safety plans associated with hazardous materials, assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project, proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations, and environmental training regarding potential exposure. The SWEAP video will be shown to all Project personnel and enforced throughout all phases of the Project.
P-1b: Maintain emergency spill supplies and equipment	Maintain emergency spill supplies and equipment. Hazardous material spill kits will be maintained onsite for response to small spills. The SWEAP video will be shown to all project personnel, and includes instructions on emergency spill response, including emergency spill supplies and equipment. Detailed information for responding to accidental spills will be provided in Emergency Response information included in the site Storm Water Pollution Prevention Plan must be submitted prior to construction.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
P-2a: Test for residual pesticides/herbicides on currently or historically farmed land	NA. There is no farmed land at this facility.
P-3a: Appoint individuals with correct training for sampling, data review, and regulatory coordination	During construction.
P-3b: Documentation of compliance with measures for encountering unknown contamination	During construction.
P-7a: Evaluate contaminated sites	NA. No ground disturbance will occur.
HS-APM-1: Train personnel involved in using hazardous materials. Develop a Hazardous Communication Plan. Implement with P-1a	All personnel involved in using hazardous materials will be trained in the proper use and safety procedures for the chemical per the approved Hazard Communication Plan and by watching a SWEAP video. All personnel involved in using hazardous materials will be equipped with the necessary Personal Protection Equipment (PPE). The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Train personnel in refueling vehicles. Implement with P-1a	Refueling will only be performed by operators trained in refueling of vehicles or equipment. Refueling shall be performed in a designated area, with secondary containment, by a mobile refueling tanker (2,500-3,000 gallon capacity). This refueling tanker will be stored offsite.
HS-APM-3: Develop applicable environmental safety plans associated with hazardous materials. Implement with P-1a	Per the NTP request, the Pomerado Substation has an existing Spill Prevention Control and Countermeasure Plan (SPCC) which contains emergency response and spill response information (plan submitted with the request). The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC April 2, 2010. The Substation Hazardous Materials Business Plan was included with the request. No new oil-filled equipment will be installed as part of the work activities at the site, so no additional containment will be required and the SPCC Plan will not require changes.
HS-APM-4: Develop a site specific blasting plan of tower footing	NA. Blasting is not anticipated at this site.
HS-APM-5: Investigate all Government Code §65962.5 sites or other known contamination sites along the transmission line ROW.	NA. The Substation is not a Section 65962.5 site or known contamination site.
HS-APM-6: Investigate any known or potential areas for Unexploded Ordinance (UXO) used by the military along the ROW	NA. Per the NTP request, the site has been previously excavated. There is no known or potential for UXO, as this area was not utilized for military purposes.
HS-APM-7: Train personnel involved in excavation and grading or for ROW clearing to recognized UXO and/or potential soil, surface water, and groundwater potential contamination sites	NA. See HS-APM-6.
HS-APM-8: Assign an Environmental Field Representative and/or General Contractor for Health & Safety. Implement with P-1a	The Environmental Monitoring Plan submitted to the CPUC on May 10, 2010 identifies the Environmental Field Representative assigned to the project. SDG&E has assigned a Health & Safety Officer to the project.
HS-APM-9: Contact airport representative and/or Federal Aviation Administration Authorities regarding work within all existing and proposed transmission line corridors within 2 miles of an airport	NA. The scope of work is for upgrades to an existing facility and not construction along the proposed transmission line corridor.
HS-APM-10: Store and dispose of hazardous waste and solid waste in accordance with federal, State, and local regulations. Implement with P-1a	All hazardous waste and solid waste will be stored and disposed of in accordance with Federal, State and local regulations. SDG&E requirements for waste disposal will meet or exceed State requirements for waste disposal facilities. Hazardous material minimization shall be employed whenever feasible.
HS-APM-11: Develop Fire Prevention and Response Plan (FPRP). Assign a project Fire Marshal to enforce all provisions of the FPRP	An approved project specific Fire Plan for Construction, Operations and Maintenance has been developed and acknowledged by the CAL Fire Chief. A Fire Marshall has been hired for the project and is assigned to enforce the Fire Plan.
HS-APM-12: Develop a Traffic Control Plan	NA. Per the NTP request, construction activities will not cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts.
HS-APM-14: Construction workers shall undergo environmental training regarding potential exposure	The SWEAP video will be shown to all project personnel, and includes procedures regarding potential exposure of hazardous materials in accordance with Federal, State, and local authorities.
HS-APM-15: Stop work and notify Health and Safety Officer if during excavation soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities during the Pomerado Substation upgrades associated with this project.
HS-APM-16: Terminate and cordoned off work if soil or groundwater contamination is suspected	See HS-APM-15.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
HS-APM-17: Notify regulatory agency if the sample testing determines that contamination is found above regulatory limits	See HS-APM-15.
PS-1a: Limit the conductor surface electric gradient	NA. No conductors will be used at the site and communication upgrades will not interfere with radio or television frequencies.
PS-1b: Document and resolve electronic interference complaints	NA. Upgrades will not interfere with radio or television frequencies.
PS-2a: Implement grounding measures	NA. No conductors will be used at the site.
<b>Air Quality</b>	
AQ-1a: Suppress dust at all work or staging areas and on public roads	A Dust Control Plan was approved by the CPUC on January 20, 2010 for the entire project. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities at this site.
AQ-1b: Use low-emission construction equipment	SDG&E will use available Tier 3 equipment, minimizing the use of Tier 2 equipment at the facility. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. Equipment run logs will be maintained on a daily basis to satisfy mitigation measures and periodically submitted to the CPUC.
AQ-1h: Obtain NOx and particulate matter emission offsets	Construction-phase activities and emissions would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity de minimis thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would be satisfied based upon these lower emissions.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	During construction, SDG&E will offset Construction-Phase Greenhouse Gas Emissions with Carbon Credits as per documentation submitted to the CPUC Aug. 27, 2009. Per the request, a verification e-mail dated March 10, 2010 indicated that SDG&E purchased Carbon Reduction Tons (CRTs) to satisfy this measure. Quarterly reports will be provided as required.
AQ-4c: Avoid sulfur hexafluoride emissions	NA. The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. Per the NTP request, there will be no SF6 emissions at the facility.
AQ-APM-1: Comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]). File a Dust Control Plan with the ICAPCD	See AQ-1a
AQ-APM-2: Control fugitive dust	A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout construction activities.
AQ-APM-3: Minimize mud and dust from being transported onto paved roadway surfaces, pave, and gravel	Per the NTP request, SDG&E will use methods to minimize mud and dust tracking on paved roads.
AQ-APM-4: Carpool to the job site	The SWEAP video will be shown to all project personnel, and includes promoting carpooling to the job site.
AQ-APM-5: Minimize unnecessary construction vehicle idling time	The SWEAP video will be shown to all project personnel, and includes vehicle idling.
<b>Hydrology and Water Resources</b>	
H-1a: Prepare Substation Grading and Drainage Plan; construct during the dry season	NA. There will be no grading or other ground disturbing activities during the Pomerado Substation Upgrades.
H-1a (CC): Construct during the dry season	NA
H-1b: Construction in Los Peñasquitos Canyon Preserve to be in the dry season; SWPPP to be reviewed and approved by San Diego County and City of San Diego	NA
H-1k: Comply with Forest Service conditions	NA
H-1l: Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment-Control Plan	NA
H-2d: Maintain vehicles and equipment	Will occur during construction.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	NA. There will be no blasting at this facility. A Blasting Plan will not be required.
H-5a: Install substation runoff control	NA
H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property	NA

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
H-7a: Develop Hazardous Substance Control and Emergency Response Plan for project operation	Per the NTP request, the existing Pomerado Substation SPCC Plan contains emergency response information to assure quick and safe clean-up of spills as required to address hazardous substance control and emergency response. The SPCC Plan was submitted with the request. The SPCC Plan will not require an update because none of the substation upgrade equipment contain over 55 gallons of oil.
H-8a: Bury power line below 100-year scour depth	NA
WQ-APM-1: Minimize disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks	NA. There will be no disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks.
WQ-APM-2: Place structures so as to avoid sensitive features such as watercourses, or to allow conductors to clearly span the features, within limits of safety and standard structure design	NA. Per the NTP request, there are no sensitive water features in the construction area.
WQ-APM-3: Clearly mark where construction equipment and vehicles are not allowed on-site; and train personnel	NA. There are no sensitive water features inside the site.
WQ-APM-4: Maintain adequate distance from stream banks and beds; use existing bridges to cross major streams and culverts in most dry intermittent streams; Span surface water, riparian areas and floodplains; prepare and implement a Storm Water Pollution Prevention Plan (SWPPP)	Per the NTP request, SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Pomerado Substation. SDG&E's Water Quality Construction BMP Manual will be referenced for BMP implementation and maintenance. A copy of this document was submitted with the request. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.
WQ-APM-5: Construct any stream crossings at low flow periods; and if necessary, develop a site-specific mitigation and restoration plan	NA. There will be no stream crossings at this location.
WQ-APM-6: Avoid designated surface water protection areas	NA. Groundwater supplies will not be used during project construction.
WQ-APM-8: Obtain and comply with required permits for any groundwater discharged to surface waters or storm drains	NA.
WQ-APM-9: Prohibit storage of fuels and hazardous materials within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells	During construction. Storage of fuels and hazardous materials will be prohibited within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells.
WQ-APM-10: At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, comply with burial depth requirements. Implement with H-6a	NA. There are no stream banks inside or surrounding the site.
WQ-APM-11: Test groundwater levels along underground portion of the project drilling pilot borings	NA
WQ-APM-13: Do not disposed of hazardous materials onto the ground, the underlying groundwater, or any surface water	Hazardous waste will be disposed in enclosed containment and removed to a hazardous waste facility permitted or authorized to treat, store, or dispose of such materials. In the event of a release of hazardous materials to the ground, it will be promptly cleaned up in accordance with applicable local, State and Federal regulations. Trash will be contained in totally enclosed receptacles.
WQ-APM-14: Secure required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization	See WQ-APM-4.
WQ-APM-15: Construct access roads to avoid streambeds	NA. Construction access will be provided by existing roads to the Substation.
WQ-APM-16: Conduct site-specific assessments for each affected site	NA. There are no sensitive water resource features such as wetlands or waters of the State located in or near the site.
<b>Geology, Minerals, and Soils</b>	
G-2a: Protect desert pavement	NA
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	NA. Per the NTP request, the design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed.
G-4a: Reduce effects of ground shaking	NA. See G-3a.
G-4b: Conduct geotechnical investigations for liquefaction	NA. See G-3a.
G-5a: Minimize project structures within active fault zones	NA. See G-3a.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	NA. See G-3a.

## Sunrise Powerlink Project NTP 8 Compliance Table

Mitigation Measure and APM	Status
G-9a: Coordinate with quarry operations	NA
GEO-APM-1: No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable	NA. Construction access will be provided by existing roads to the Substation.
GEO-APM-2: Comply with soil disturbance guidelines	NA. There will be no grading or other ground disturbing activities during the Pomerado Substation Upgrades.
GEO-APM-3: Avoid placing structures in areas of high shrink/swell potential	NA. No new structures will be installed.
GEO-APM-4: Place structures in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock	NA. See GEO-APM-3.
GEO-APM-5: Avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation	NA. No ground disturbance will occur.
GEO-APM-6: Conduct surface restoration for erosion control and re-vegetation	SDG&E will implement the site SWPPP during construction.
GEO-APM-8: Remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage; and position structures to span over potential landslide areas	NA. There are no boulders or hills within the facility construction area..
<b>Socioeconomics</b>	
S-2a: Notify public of utility service interruption	NA
S-2b: Protect underground utilities	NA
S-3a: Recycle construction waste	SDG&E and/or its construction contractor shall recycle a minimum of 90% of inerts and 70% of all other materials generated during construction activities. Documentation from the recycling and/or landfill facilities used for construction will be provided to CPUC.
S-3b: Use reclaimed water	The Water Resources Availability Study, as discussed in the Project Modification Report, determined that sufficient supplies of surface water, reclaimed water, and potable water would be available to meet Project demand.
PSU-APM-1: Coordinate with all utility providers with facilities located within or adjacent to ensure that design does not conflict with other facilities	NA. No third party utility providers will be affected.
PSU-APM-2: Notify Underground Service Alert a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines	NA. No ground-disturbing activities will occur.
PSU-APM-3: Coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized	SDG&E will coordinate with emergency services. Construction schedules and activities are not anticipated to disrupt emergency and police service response times. Per the NTP request, there will not be lane closures or other activities associated with construction at the Substation that will interfere with emergency and police service response times or access. If lane closures do need to occur, documentation of prior coordination with emergency service providers shall be submitted to the CPUC.
<b>Fire and Fuels Management</b>	
F-1a: Develop and implement a Construction Fire Prevention Plan	During construction. A Construction Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on Jan. 20, 2010.
F-1b: Amend and implement Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007)	A Construction Fire Plan, acknowledged by the CAL FIRE Chief, was approved by the CPUC on January 20, 2010. Therefore, the preconstruction component of this measure is complete. The plan will need to be revisited and updated every five years.
F-1c: Ensure coordination for emergency fire suppression	NA. Construction activities will be limited to the facility and will not obstruct firefighting equipment or crews or emergency fire suppression efforts
F-1d: Remove hazards from the work area	If present, dead and decaying vegetation will be removed from the facility prior to set up or chipped and spread onsite in piles no higher than six inches.
F-1e: Contribute to defensible space grants fund	Fire agency proposal for both Defensible Space (F-1e) and Power line Firefighting Mitigation Fund (F-3a) were approved 3-7-10. Post-construction task.
F-2a: Establish and maintain adequate line clearances	See F-1a
F-2b: Install existing conductors on steel poles	See F-1a
F-2c: Perform climbing inspections	Post-construction task.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. Post-construction task.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	Per the NTP request, SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU. It will be implemented prior to energization.