

Kirstie Reynolds Team Lead – Environmental Project Management San Diego Gas & Electric Company 1010 Tavern Road, SD 1116 Alpine, CA 91901 (T) XXX-XXX-XXXX (C) XXX-XXX-XXXX (F) XXX-XXX-XXXX

April 12, 2017

Lisa Orsaba Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Notice to Proceed (NTP) Request #14 to Reconstruct the Circuit (C) 157 Component of the Cleveland National Forest Power Line Replacement Projects (Project)

Dear Ms. Orsaba:

On May 26, 2016, the California Public Utilities Commission (CPUC) granted San Diego Gas & Electric Company (SDG&E) a Permit to Construct the Project (Decision 16-05-038). The decision conditionally authorizes construction of the Project with the implementation of pre-construction mitigation measures (MMs) and applicant-proposed measures (APMs) identified in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). A Notice of Determination was submitted to the State Clearinghouse on May 31, 2016, indicating the CPUC's approval of the Project. In addition, the following agencies issued permits or Records of Decision (RODs) to indicate their approval of the Project:

- The United States Forest Service (USFS) issued a Final ROD on March 11, 2016 and a Master Special Use Permit on September 19, 2016.
- The Bureau of Land Management issued a Final ROD on September 28, 2016.
- The Bureau of Indian Affairs issued a Final ROD on March 30, 2016 and an Amended ROD on December 15, 2017.

Activity Summary

SDG&E is formally requesting authorization from the CPUC to begin reconstruction/relocation of C157, which is the federal preferred alternative and the City of San Diego Modified Alignment. Reconstruction/relocation will include the following:

- replacement of 34 existing wood distribution poles with weathered steel poles and installation or replacement of appurtenant equipment;
- reconductoring of the existing 12 kilovolt conductors;

- removal of 16 existing wood poles, including the existing conductor, and the installation of 30 new weathered steel poles and appurtenant equipment in a relocated alignment along Skye Valley Road;
- pole-top work at one structure; and
- use of the Frye Staging and Fly Yard, which is identified in Attachment A: Minor Project Refinement Request.

Reconstruction of C157 will also include access road maintenance and establishment of temporary work areas associated with pole replacement activities. Public and established private roads, as well as identified navigation and construction-only access roads, will be used for travel to and from the Project and for various construction activities (e.g., parking, pole staging, temporary material laydown, and stringing). Some construction-only access roads may require vegetation trimming and/or minor grading, but they will be returned to near pre-construction conditions upon completion of the reconstruction of C157. During construction, SDG&E will minimize impacts to natural areas to the fullest extent feasible by utilizing existing bare ground areas for construction along the Project alignment. All activities required for the reconstruction of C157 will be consistent with Section B in the Project's Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

SDG&E may also need to conduct minor tree trimming prior to energization of the newly relocated alignment in order to maintain the energized wire-to-vegetation clearances that are required for compliance with CPUC General Order 95. No ground disturbance will be conducted during the trimming activities. Vegetation crews will walk to each tree, climb the tree, and trim the necessary branches with hand tools. Depending on the size and the amount of the vegetation cut, the material will be either left on site in the right-of-way or carried out to the closest workspace with a chipper. If individual trees are found to be dead or dying, the full tree may be removed.

Attachment A: Minor Project Refinement Request of this NTP request describes and analyzes the environmental impacts of adding the Frye Staging and Fly Yard and increasing the height of 13 poles. The Minor Project Refinement (MPR) request also includes a survey area mapbook of the yard and an overview map of the poles that will be increased in height. The yard and the poles are incorporated into Attachment B: NTP #14 Components Map and Attachment C: Pre-Construction Status Report. Activities at the yard will include helicopter staging, take-off, and landing, as well as parking, fueling, and storage of construction materials and equipment. The yard will be active for approximately six months. Use of the yard will be consistent with Section B in the Project's Final EIR/EIS.

Attachment B: NTP #14 Components Map depicts the pole removal/replacement sites, new steel pole sites, pole-top work only site, stringing sites, the Frye Staging and Fly Yard, and access

roads required to reconstruct C157, as described by the Project's Final EIR/EIS and Attachment A: Minor Project Refinement Request.¹

Upon completion of construction activities on this component, all areas of temporary disturbance will be recontoured and restored to pre-construction conditions to the extent practicable. Table 1: Temporary Impact Acreage provides the temporary impacts associated with all work areas for C157. Cleanup work will include the removal of any temporary facilities not required for other approved Project activities, as well as collection and proper disposal of any waste, trash, and debris. The reconstruction/relocation of C157 is anticipated to take approximately five months from initial mobilization through construction completion, beginning in May/June 2018 and ending in October/November 2018.

Townson Import I section	Approximate Impacts (acres)			
Temporary Impact Location	Native Vegetation	Non-Native Grassland	Agricultural/Disturbed/ Developed/Bare Ground	
Access Roads ²	0.29	0.18	1.94	
Anchor Work Areas	0.16		0.02	
Pole Work Areas	0.62	0.01	0.50	
Stringing Sites	0.49	< 0.01	0.17	
Temporary Access/Entry/Turnaround	0.04		0.12	
Frye Staging and Fly Yard		1.14		
C157 Total	1.60	1.32	2.75	
Project Total to Date ³	40.88	31.52	101.73	

Table 1: Temporary Impact Acreage

Pre-Construction Mitigation Measures

A list of all pre-construction MMs/APMs identified in the MMCRP that are relevant to C157 is provided in Attachment C: Pre-Construction Status Report of this NTP request. To facilitate tracking and implementation, each MM/APM has been organized into tasks so that the various elements of each MM/APM can be tracked separately. Attachment C: Pre-Construction Status Report provides the full text of each MM/APM for C157, as well as the corresponding

¹ Public and established private roads that will be used for construction are not specifically identified in Attachment B: NTP #14 Components Map, but approved access roads are.

² SDG&E uses three types of access roads—maintained, navigation, and construction only. Construction-only access roads can sometimes require improvements and maintenance, which create temporary impacts to vegetation.

³ The total temporary impact acreage for the Project includes C157, as well as all pending and approved Workspace Adjustments, MPRs, and NTPs. Temporary impacts due to outrigger adjustments will be totaled and included in the Post-Construction Report for each component.

completion status and details on the status. No construction work will occur until all of the applicable pre-construction MMs/APMs are fulfilled.

SDG&E respectfully requests authorization of this NTP request by May 15, 2018 in order to begin construction activities along C157 and meet the overall Project schedule. Should you have any questions or need additional information, please do not hesitate to contact me at XXX-XXX-XXXX.

Sincerely,

Kinstie Reynolds

Kirstie Reynolds Team Lead – Environmental Project Management SDG&E

Attachment A: Minor Project Refinement Request Attachment B: NTP #14 Components Map Attachment C: Pre-Construction Status Report

cc:

Allison Rice, Dudek Anna Bischoff, Dudek Keith Carwana, Dudek David Hochart, Dudek Brad Aughinbaugh, USFS KD Tyree, USFS Kirsten Winter, USFS Tim Knowd, SDG&E Jennifer Kaminsky, SDG&E Katie Basinski, SDG&E Heidi Waitley, SDG&E Jim Vanlandingham, SDG&E Rachel Ruston, SDG&E Tanzania Ware, SDG&E Anne Marie McGraw, Insignia Environmental (Insignia) Fred Bauermeister, Insignia Jeff Coward, Insignia Kevin Kilpatrick, Insignia Erin Tomaras, Insignia ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST



CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

A Sempra Energy utility MINOR PROJECT REFINEMENT REQUEST FORM							
Date Submitted:	04-12-18		Request #:		017		
Date Approval Required:	05-15-18		Landowner:		Various		
APN:	XXX-XXX-XX, XX XXX-XXX-XX, XX XXX-XXX-XX, XX	X-XXX-2	XX, XXX-XXX-XX	K, XXX	X-XXX-XX	K, XXX-X	
Refinement from (check all	that apply):	-					
□ Mitigation Measure	\Box APM	⊠ Pro	oject Description		Drawing		Other
Identify source (mitigation	measure, project desc	cription,	etc.):				
the California Public Utilities Commission (CPUC). The responses included Attachment B.8 C157 Route Map for the Cleveland National Forest Power Line Replacement Projects (Project), which depicted approved staging and fly yards. Pages B-45 and B-46 of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) state that the Project's staging yards will be used for storage and preparation of construction materials, including replacement poles, conductors, and construction equipment before delivery to the individual pole work areas; and the Project's fly yards will be used for helicopter take-off and landing, temporary storage for poles and equipment, pole assembly, and fueling. Table B-2: Summary of Applicant's Proposed Power Line Replacement Projects of the Final EIR/EIS lists the maximum height for poles on Circuit (C) 157. The information in this Minor Project Refinement (MPR) request discusses the addition of one staging and fly yard (Frye Staging and Fly Yard), as well as height increases for 13 poles along C157 that are above the maximum pole height described in the Final EIR/EIS. A brief description and justification of the refinements are provided on pages 2 and 3 of this MPR request.							
Attachments (check all that	t apply):						
⊠ Refinement Request Screening Form (see Attachment A: Minor Project Refinement Reques Screening Form)	ag Form⊠ Photos (SeeAttachment C: Surveyent A: MinorAttachment B:Area Map; Attachment□ Otherment RequestPhotographs)D: Poles Exceeding the□ Other						
Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond "yes" or "no" to the following questions (a) through (d).							
(a) Is the proposed refinem area? The requested refinements ar study area, which is depicted However, the Frye Staging at result, supplemental hydrolog 2017. Additional details rega applicable resource section in Form, and the boundaries of Map.	e located within the ge in Figure ES-1 Regior and Fly Yard occurs out gical, biological, and cu arding the specific surv a Attachment A: Minor	eographic nal Overv side of th ultural res veys cond r Project 1	boundary of the Fin iew Map in the Fina baseline survey an sources surveys wer ucted can be found Refinement Request	nal EIR al EIR/ reas. A re cond in each t Screen	/EIS EIS. as a ucted in n	□ Yes	⊠ No

(b) Will the proposed refinement result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS?	□ Yes	🛛 No
(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?	□ Yes	🖾 No
(d) Does the proposed refinement trigger an additional permit requirement?	□ Yes	🛛 No

Describe refinement being requested (attach drawings and photos as needed):

As depicted in Attachment B: Photographs and Attachment C: Survey Area Map, SDG&E proposes to add the Frye Staging and Fly Yard for use during reconstruction of C157. The yard will be approximately 1.14 acres. No grading will be required, but minor vegetation clearing will occur. The coast live oaks (*Quercus agrifolia*) located southeast of the yard will not be removed or impacted. The coast live oaks are shown in Attachment B: Photographs. Access to the yard will occur via Skye Valley Road, which is located north of the yard. The yard will be used for approximately six months. The activities associated with the utilization of the yard will be consistent with the Project description provided in the Final EIR/EIS.

As shown in Attachment D: Poles Exceeding the Maximum Height and listed in Table 1: Poles Exceeding the Maximum Height, there are 13 poles that will exceed the maximum height described in the Final EIR/EIS by six inches to six feet. Because just the heights of the poles are changing, the poles are only analyzed in the Visual Resources section of Attachment A: Minor Project Refinement Request Screening Form.

Pole Number	Final EIR/EIS Maximum Height (feet)	Total Above-Ground Pole Height (feet)	Maximum Exceedance (feet)
P278724	47.5	53.5	6
P258082 [P-6]	47.5	53.5	6
P258086 [P-10]	47.5	48	0.5
P258087 [P-11]	47.5	50	2.5
P258089 [P-13]	47.5	52	4.5
P258090 [P-14]	47.5	52	4.5
P258092 [P-16]	47.5	52	4.5
P258093 [P-17]	47.5	52	4.5
P258094 [P-18]	47.5	52	4.5
P278743	47.5	52	4.5
P476799	47.5	52	4.5
P278750	47.5	52	4.5
P574132	47.5	52	4.5

Table 1: Poles Exceeding the Maximum Height

Provide need for refinement (attach drawings and photos as needed):

Not Applicable (N/A)

The Frye Staging and Fly Yard is being requested to provide additional space for helicopter activities and construction and materials storage on the eastern portion of C157, which has limited ground access for equipment and lacks an approved staging and fly yard that is large enough to facilitate construction.

Table B-2 of the Final EIR/EIS only considered the existing alignment for C157 and did not consider the relocation portion that is part of the federal preferred alternative and City of San Diego Modified Alignment. Due to the relocation, the following is required:

- Poles P278724, P258082, P258086, P258087, P258092, P258093, P258094, P278743, and P476799 were increased slightly in height to maintain the minimum required clearances for power lines and communications facilities (i.e., AT&T) when crossing roads in rural areas.
- Poles P278750 and P574132 were increased slightly in height to maintain the required ground and wire-towire clearances for power lines. These poles also include adequate spacing for necessary electrical equipment.
- Poles P258089 and P258090 were increased slightly in height to provide additional loading capacity for necessary aerial marker balls.

Date refinement is expected t	o be implemented:	05-16-17			
Resource Agency Coordination					
Resource Agency	Name	Action Required	Date	Documentation (see attached if yes)	

N/A

N/A

□ No

 \Box Yes

N/A

ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

The requested refinements were evaluated to verify that they will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest (CNF) Power Line Replacement Projects (Project). The following Final EIR/EIS Consistency Checklist answers the consistency questions for each resource category and includes a description and justification, as necessary. The consistency questions were developed using the California Environmental Quality Act Checklist provided in the Final EIR/EIS. Refer to the Final EIR/EIS for the details on the Project impact evaluation.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Visual Resources (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)?			
Final EIR/EIS evaluation ¹ : Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Visual Resources:

The requested refinements are consistent with the visual resource analysis as defined in the Final EIR/EIS and will not impact scenic vistas or roadways. Impacts to the visual character of the area that may occur as a result of minor vegetation clearing for the Frye Staging and Fly Yard will be temporary and reduced with implementation of Applicant-Proposed Measure (APM) VIS-01 and APM VIS-02.

The 13 poles listed in Table 1: Poles Exceeding the Maximum Height will exceed the maximum height described in Table B-2 of the Final EIR/EIS by six inches to six feet. The relocated portion of Circuit (C) 157 (federal preferred alternative and City of San Diego Modified Alignment) will traverse land with a High Scenic Integrity Objective as designated by the CNF Land Management Plan; however, the United States (U.S.) Forest Service (USFS) Record of Decision amended the plan to permit an exception to standards for scenic integrity where C157 crosses this objective, and visual mitigation is being negotiated with the USFS in accordance with Mitigation Measure (MM) VIS-1. As described in the Final EIR/EIS, the existing wood poles on the Project already create noticeable obstructions to views of the background sky, ridgelines, and surrounding terrain and vegetation; thus, the installation of wider and taller replacement poles will not substantially block features that are not already blocked by existing poles. In addition, as described in the Final EIR/EIS, the form, line, color, and texture of the replacement poles on C157 will appear similar to the existing wood poles and will create similar patterns in the landscape; however, due to the increased maximum height of the poles, deviations in scale may be perceptible to viewers within a foreground viewing distance. Because the increases to the pole heights are minimal, they will not create additional impacts to visual resources beyond what was already analyzed in the Final EIR/EIS. Thus, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in the Final EIR/EIS.

¹ The Final EIR/EIS evaluations of impact significance are provided for each resource; this table notes the most significant determination within each resource section identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist		1	1
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Air Quality (e.g. produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors to additional pollutants)?	\boxtimes		
Final EIR/EIS evaluation: Significant and unavoidable (Class I)/Adverse and unavoidable			

Summary of Proposed Minor Project Refinement Impacts on Air Quality:

Activities associated with utilization of the Frye Staging and Fly Yard (e.g., the type of equipment used and the number of truck trips) are consistent with those discussed in the Final EIR/EIS and will not increase air emissions beyond what was analyzed. Although additional vegetation clearing will occur and may result in a minor increase in air quality impacts in the localized area, this activity will be short term and temporary. In addition, there are no sensitive receptors located within 1,000 feet of the Frye Staging and Fly Yard. With the implementation of air-related APMs, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final EIR/EIS.

Biological Resources (e.g., result in temporary or permanent loss of native vegetation, preserve areas, native wildlife and/or their habitats; cause an adverse effect to jurisdictional waters or sensitive or special-status species; result in the introduction of invasive, non-native, or noxious plant species; conflict with local, regional, or state habitat conservation plan; or interfere with the movement of any resident or migratory wildlife)?		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

Summary of Proposed Minor Project Refinement Impacts on Biological Resources:

The Frye Staging and Fly Yard was not surveyed during the Project's permitting phase. Therefore, a supplemental survey of the yard occurred in 2017 during the Pre-activity Study Report (PSR) process in accordance with SDG&E's Subregional Natural Community Conservation Plan to determine if sensitive biological resources occur within or adjacent to the refinement area. No special-status plant or wildlife species or other biological resource issues were identified within or adjacent to the yard. Attachment C: Survey Area Map depicts the yard and the biological survey results.

The addition of the yard will result in an increase of up to 1.14 acres of temporary impacts to non-native grassland. No U.S. Fish and Wildlife Service-designated critical habitat occurs within the refinement area. All MMs defined in the Project's Mitigation Monitoring, Compliance, and Reporting Program—as well as other permit and plan conditions—will be implemented as applicable to minimize or mitigate for additional impacts. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Cultural and Paleontological Resources (e.g., cause an adverse change to Traditional Cultural Properties or historical, archeological, or paleontological resources; or disturb any human remains)?	\boxtimes		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:

The Frye Staging and Fly Yard was not previously surveyed for cultural resources during pre-construction and cultural resources inventory work in 2011, as described in the *Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in support of the Proponent's Environmental Assessment* (ASM Affiliates, Inc. [ASM] 2011). Therefore, a supplemental intensive pedestrian survey was conducted by ASM in 2017. No new cultural resources were recorded during the supplemental survey, and no previously recorded cultural resources were identified within the yard. The yard is located within the Project's area of potential effect, as defined in the Project's Programmatic Agreement, and will not result in impacts to any historic properties. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to cultural resources as identified in the Final EIR/EIS.

The Frye Staging and Fly Yard is underlain by sedimentary rock units with Potential Fossil Yield Classification Class 1 (very low sensitivity). Therefore, no additional paleontological monitoring will be required. Thus, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to paleontological resources as identified in the Final EIR/EIS.

Greenhouse Gases (e.g., result in a net increase of greenhouse gas emissions, or conflict with an applicable plan, policy, or regulation that reduces greenhouse gas emissions)? <i>Final EIR/EIS evaluation: Less than significant (Class</i>		
Final EIR/EIS evaluation: Less than significant (Class III)/Not adverse		

Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:

Activities associated with utilization of the Frye Staging and Fly Yard are consistent with the greenhouse gas (GHG) analysis in the Final EIR/EIS. Although additional minor vegetation clearing will occur, use of the yard will not trigger an exceedance of the GHG threshold of 10,000 metric tons of carbon dioxide equivalent per year or an exceedance of the County of San Diego Climate Action Plan criteria for annual grading and land clearing due to the small change in acreage. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to GHG emissions as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Public Health and Safety (e.g., result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials; emit hazardous waste within one-quarter mile of a school; be located on a hazardous materials site; result in a safety hazard for people residing or working in the Project area; interfere with an adopted emergency plan; or create safety hazards due to structural failure)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			

Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:

The Frye Staging and Fly Yard occurs within the area assessed in the *Report on ASTM Phase I Environmental Site Assessment Cleveland National Forest Electric Safety and Reliability Project San Diego County, California.* No known hazardous materials sites are located within the yard. Additionally, the closest privately owned airport to the yard is Reider Ranch Airport, which is located approximately five miles south. Therefore, temporary helicopter operations are not expected to interfere with air traffic patterns and are consistent with the analysis in the Final EIR/EIS. Thus, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public health and safety as identified in the Final EIR/EIS.

Fire and Fuels Management (e.g., increase the probability of a wildfire, reduce the effectiveness of firefighting, or introduce non-native plants that would contribute to ignition potential)?		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:

The Frye Staging and Fly Yard is located within the Very High Fire Hazard Severity Zone, which is consistent with the Fire and Fuels Management analysis in the Final EIR/EIS. The potential risk of wildfire ignition and spread associated with the yard will be managed in compliance with the Project's Construction Fire Prevention/Protection Plan. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to fire and fuels management as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i> <i>I)/Adverse and unavoidable</i>			

Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:

The Frye Staging and Fly Yard was not surveyed during the Project's permitting phase. Therefore, a supplemental survey for jurisdictional wetlands and non-wetland waters was conducted in 2017 for the refinement area as part of the PSR process. The yard does not contain any wetlands or non-wetland waters of the U.S. or State under the jurisdiction of the California Department of Fish and Wildlife, Regional Water Quality Control Board, or the U.S. Army Corps of Engineers. The yard was included in the Storm Water Pollution Prevention Plan for Transmission Line 6957 and C157. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to hydrology and water quality as identified in the Final EIR/EIS.

Land Use (e.g., disturb land uses at or near the Project components, divide an established community, or conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the Project)? <i>Final EIR/EIS evaluation: Significant and unavoidable (Class</i> <i>I)/Adverse and unavoidable</i>		
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Summary of Proposed Minor Project Refinement Impacts on Land Use:

In accordance with the Construction Notification Plan and MM LU-1, property owners within 1,000 feet of C157 will be notified of construction activities in association with Notice to Proceed request #14, and the property owners within 1,000 feet of the Frye Staging and Fly Yard will be included in that notification process. In addition, the yard is located in the same County of San Diego land use and zoning designations that were analyzed in the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to land use as identified in the Final EIR/EIS.

Noise (e.g., disturb sensitive receptors and violate local rules,		
standards, and/or ordinances; or cause ground borne vibration)?	\boxtimes	
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

Summary of Proposed Minor Project Refinement Impacts on Noise:

Additional construction-related noise will be generated from minor vegetation clearing associated with the Frye Staging and Fly Yard, but those noise impacts will be the same as those analyzed in the Final EIR/EIS. In addition, there are no sensitive receptors located within 1,000 feet of the yard, and work will be short term and temporary. With the implementation of noise-related MMs and APMs, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise as identified in the Final EIR/EIS.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	Not Applicable
Public Services and Utilities (e.g., result in construction of new, or expansion of existing, facilities for fire protection, municipal water supplies, telecommunications, and solid waste; or disrupt electric service)?			
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse			

Summary of Proposed Minor Project Refinement Impacts on Public Services and Utilities:

The Frye Staging and Fly Yard is consistent with the public services and utilities analysis in the Final EIR/EIS and will not require new or expanded facilities or services. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to public services and utilities as identified in the Final EIR/EIS.

Recreation (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)?		
Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse		

Summary of Proposed Minor Project Refinement Impacts on Recreation:

While the Frye Staging and Fly Yard is located near the Pine Creek Wilderness, Hauser Wilderness, Barrett Lake, and Barrett Lake Valley Trail, use of the yard will not reduce or preclude access or visitation to these recreational areas or increase the possibility of unauthorized access to specially designated or restricted areas, which is consistent with the Final EIR/EIS. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to recreation as identified in the Final EIR/EIS.

Transportation and Traffic (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)? <i>Final EIR/EIS evaluation: Less than significant with mitigation (Class II)/Adverse</i>			
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Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:

The total number of truck trips associated with construction of the Project will not change, and the Frye Staging and Fly Yard will affect the same roadways that were analyzed in the Final EIR/EIS, such as Skye Valley Road. As a result, traffic flow is not anticipated to be substantially impacted due to the use of the yard. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to transportation and traffic as identified in the Final EIR/EIS.

ATTACHMENT B: PHOTOGRAPHS



Cleveland National Forest Power Line Replacement Projects Minor Project Refinement Request #17 Attachment B: Photographs



Photograph 1:

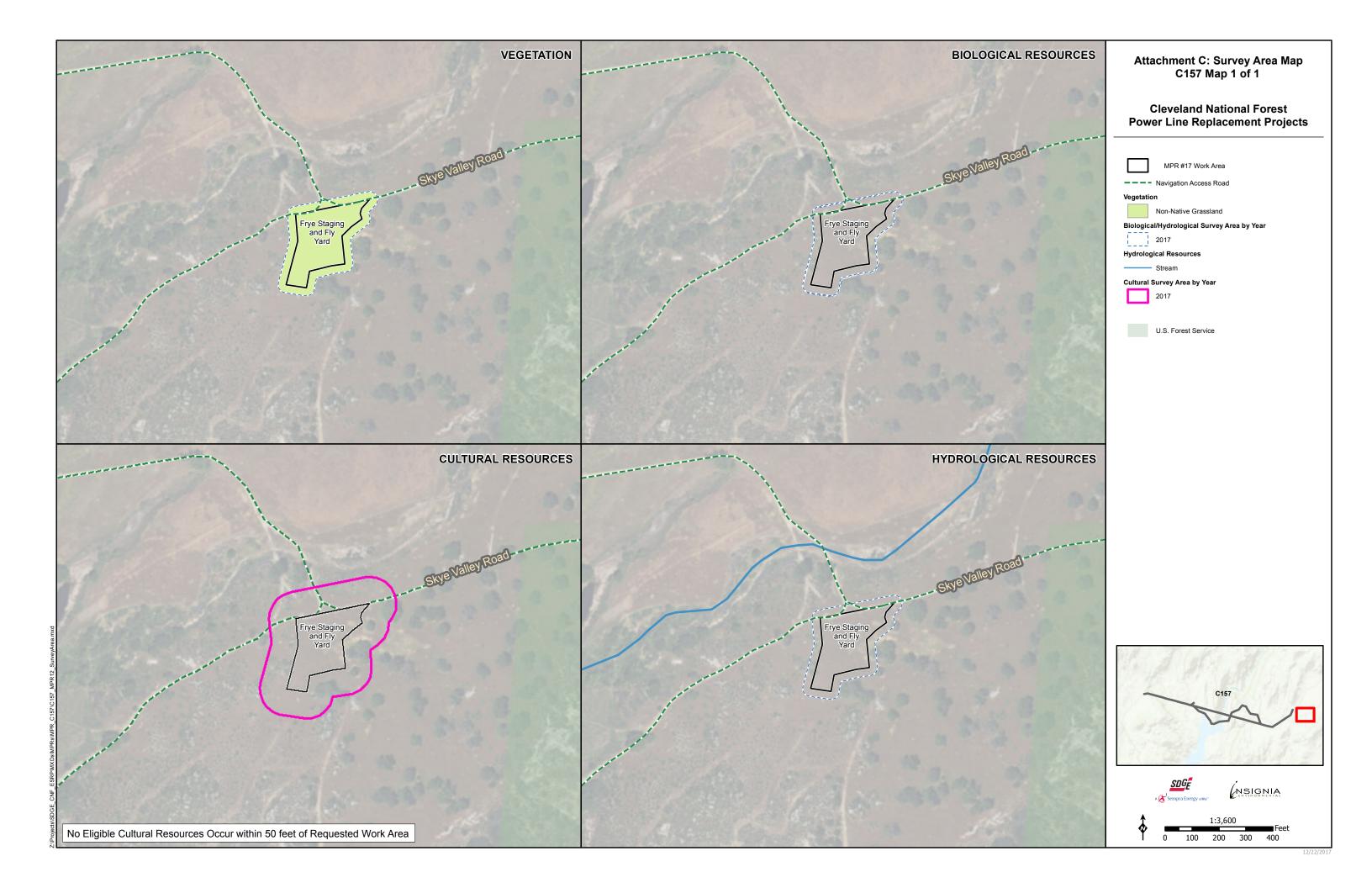
Southeast-facing view of the requested location for the Frye Staging and Fly Yard, as observed on October 26, 2017. Coast live oaks (*Quercus agrifolia*) are located southeast of the yard.



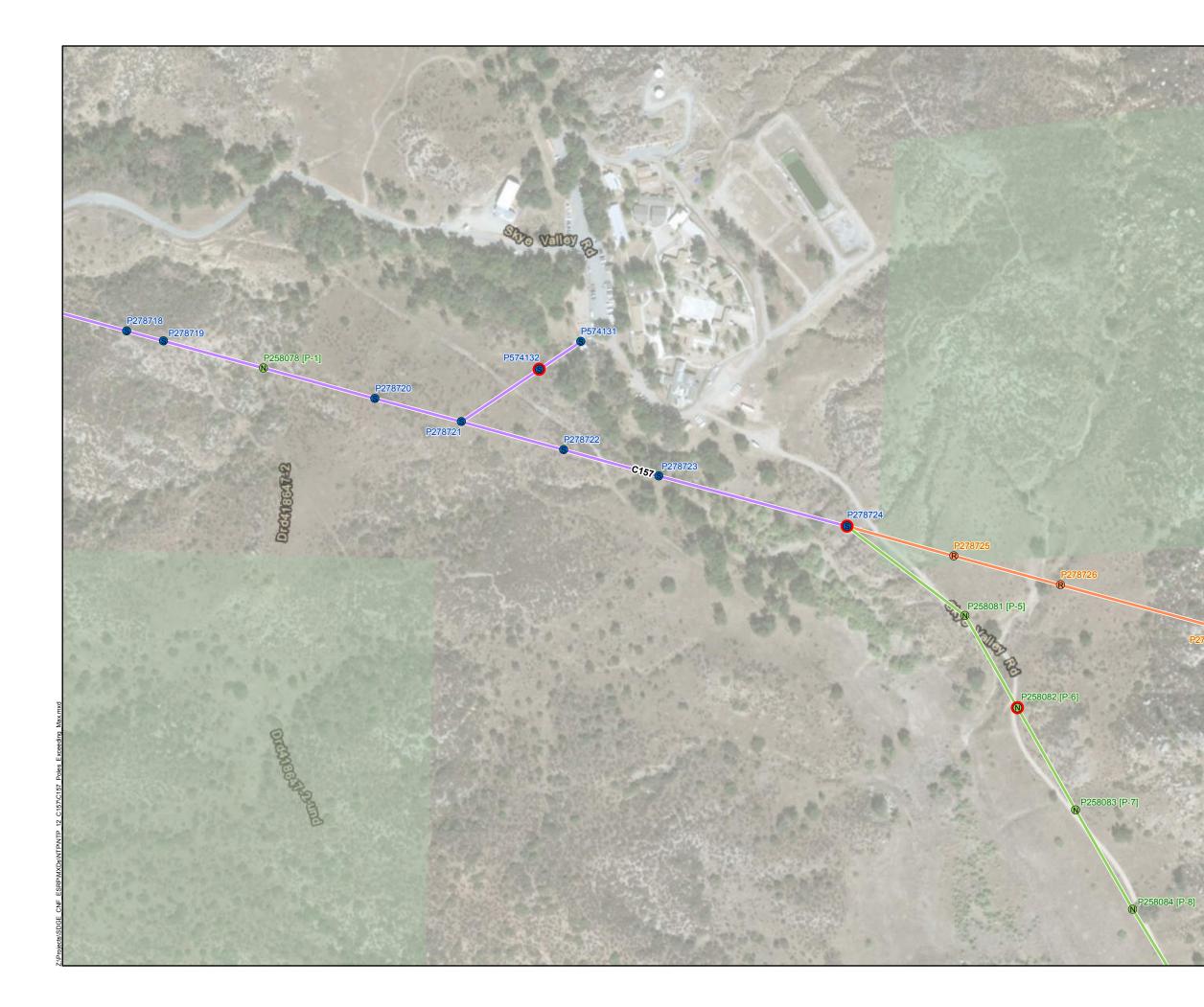
Photograph 2:

South-facing view of the requested location for the Frye Staging and Fly Yard, as observed on October 26, 2017.

ATTACHMENT C: SURVEY AREA MAP

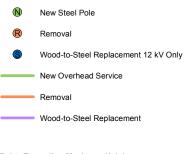


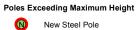
ATTACHMENT D: POLES EXCEEDING THE MAXIMUM HEIGHT



Attachment D: Poles Exceeding the Maximum Height C157 Map 1 of 3

Cleveland National Forest Power Line Replacement Projects



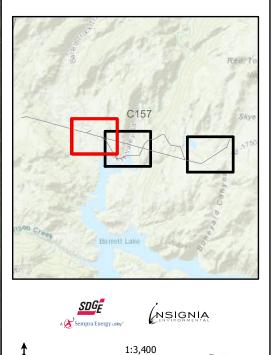




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Wood-to-Steel Replacement 12 kV Only

United States Forest Service

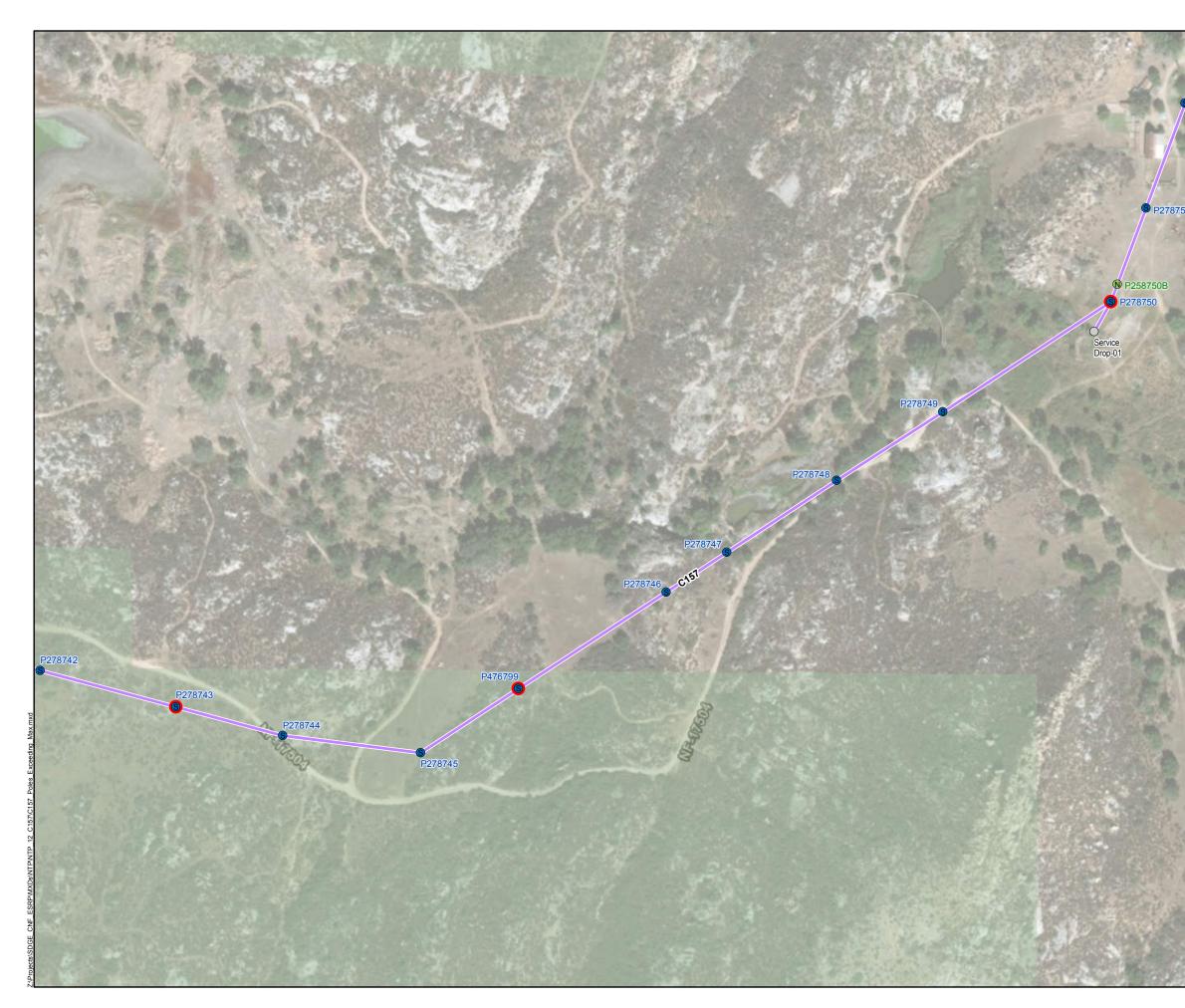


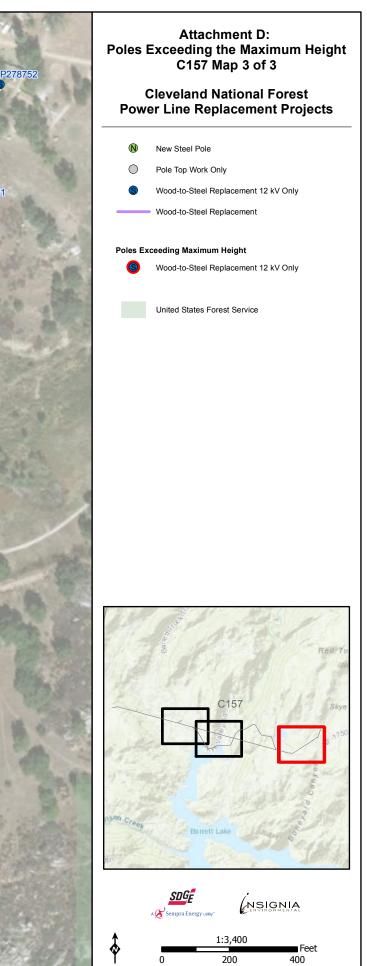
200

Feet

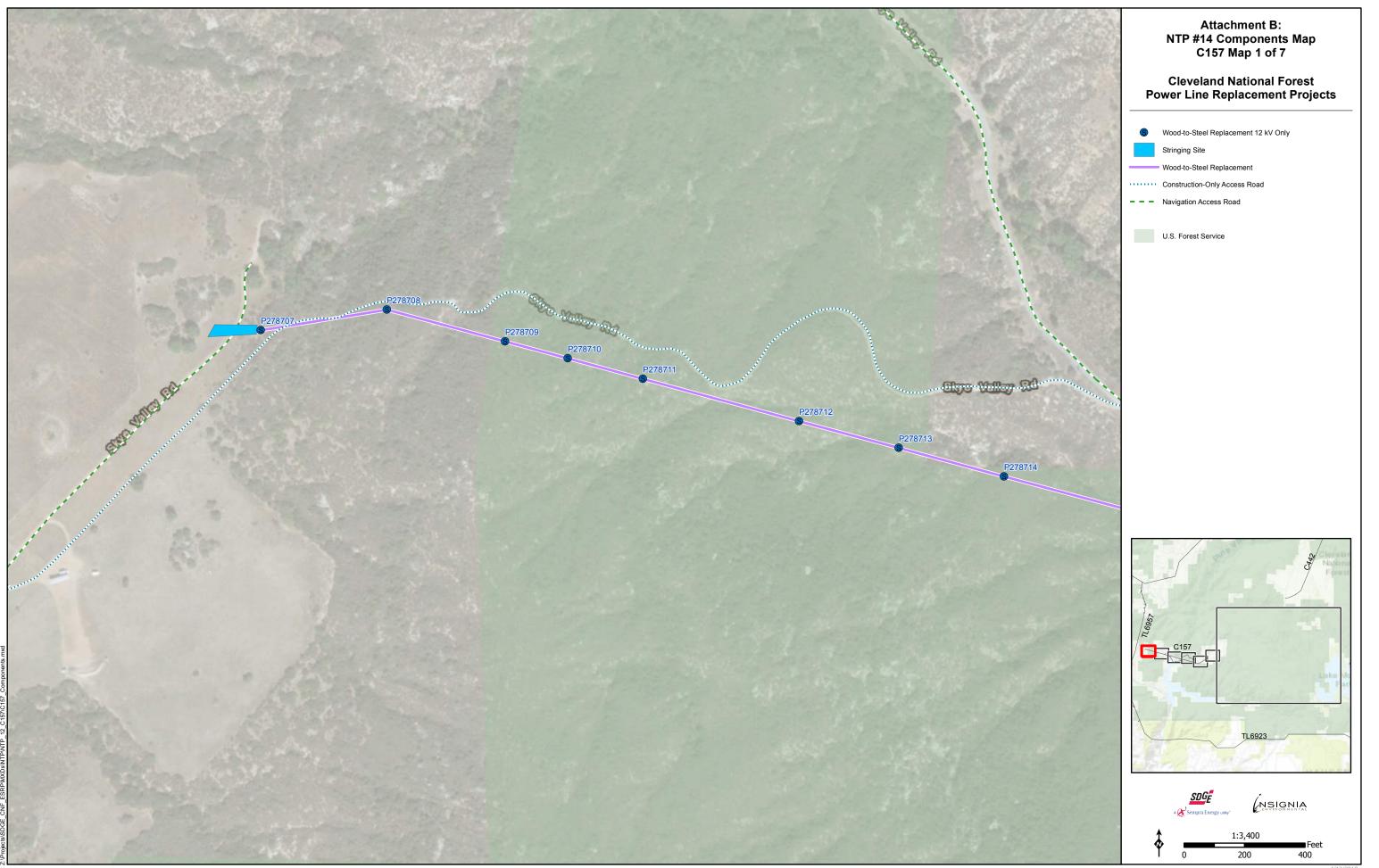
400

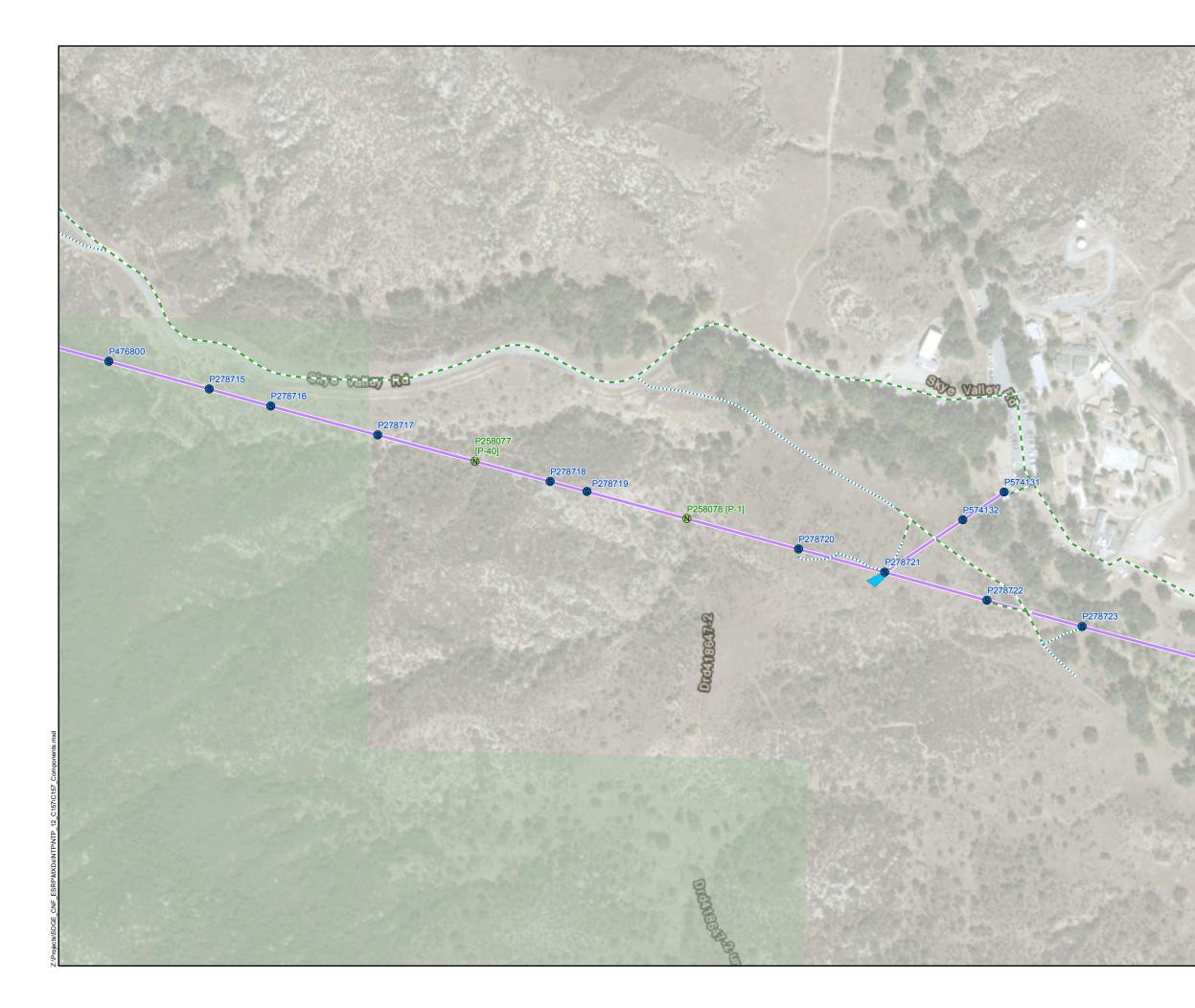


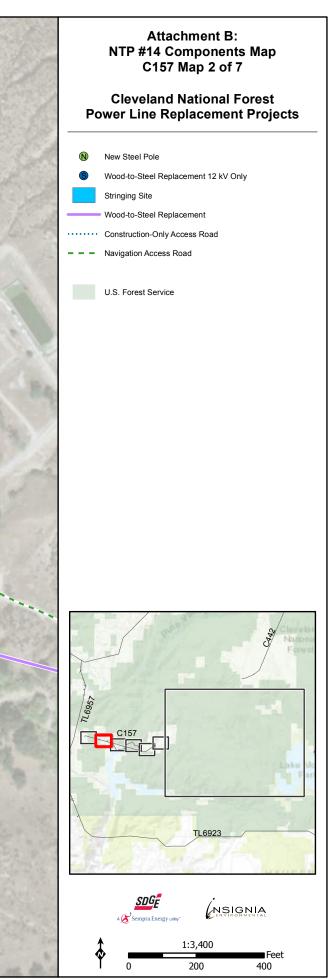




ATTACHMENT B: NTP #14 COMPONENTS MAP







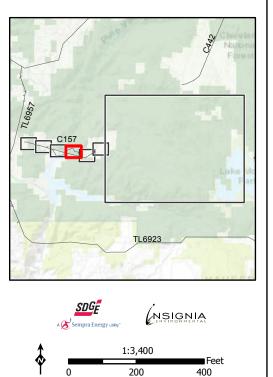


Attachment B: NTP #14 Components Map C157 Map 4 of 7

Cleveland National Forest Power Line Replacement Projects

N	New Steel Pole
R	Removal
S	Wood-to-Steel Replacement 12 kV Only
	Stringing Site
	New Overhead Service
	Removal
	Wood-to-Steel Replacement
•••••	Construction-Only Access Road
	Navigation Access Road

U.S. Forest Service







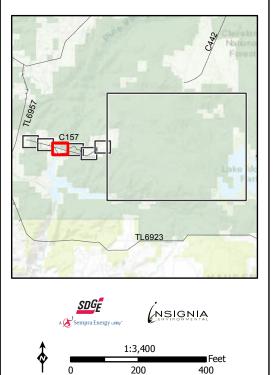
Cleveland National Forest Power Line Replacement Projects

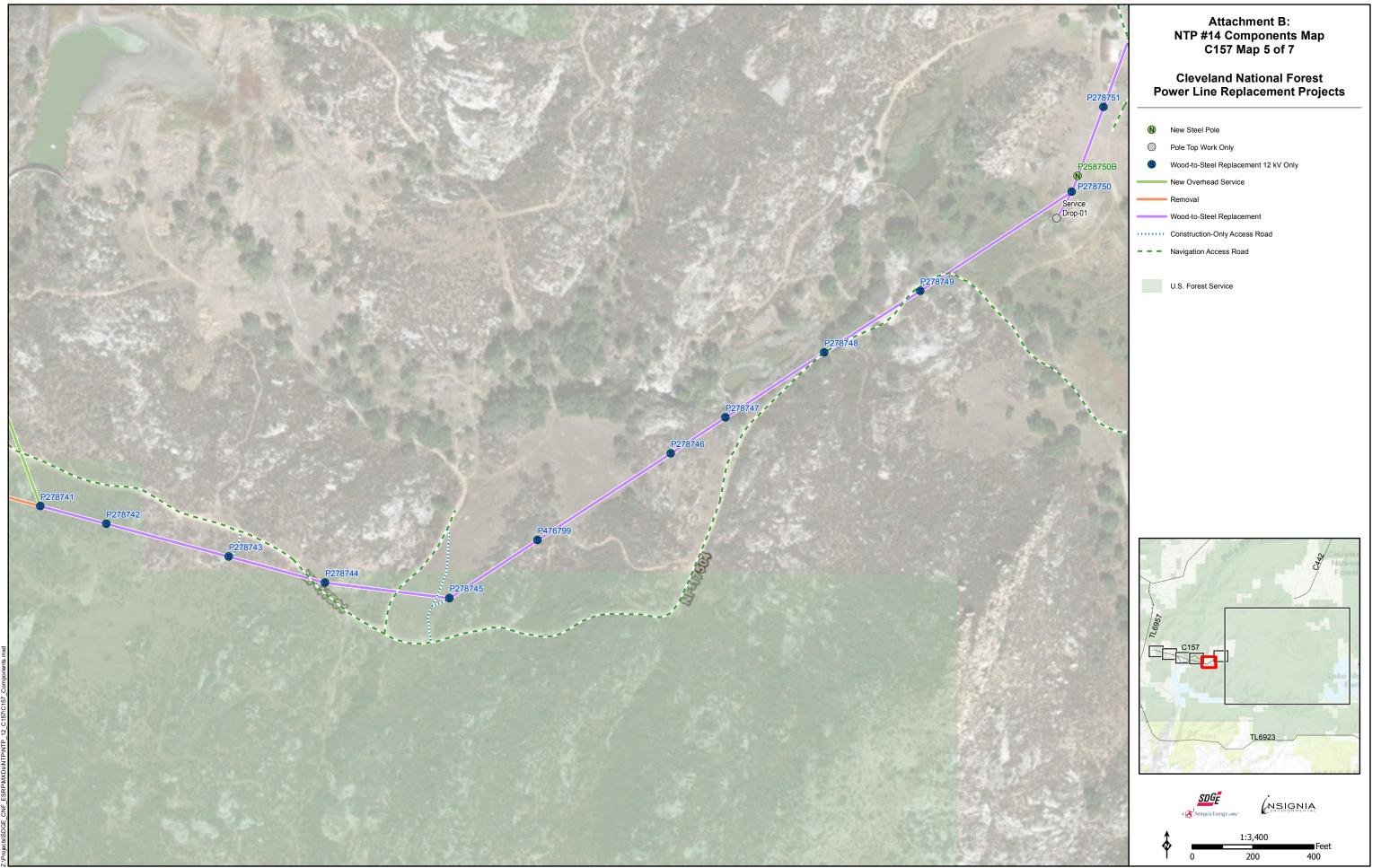
	N	New Steel Pole
	R	Removal
	S	Wood-to-Steel Replacement 12 kV Only
		Stringing Site
		New Overhead Service
		Removal
		Wood-to-Steel Replacement
•	•••••	Construction-Only Access Road
		Navigation Access Road

U.S. Forest Service

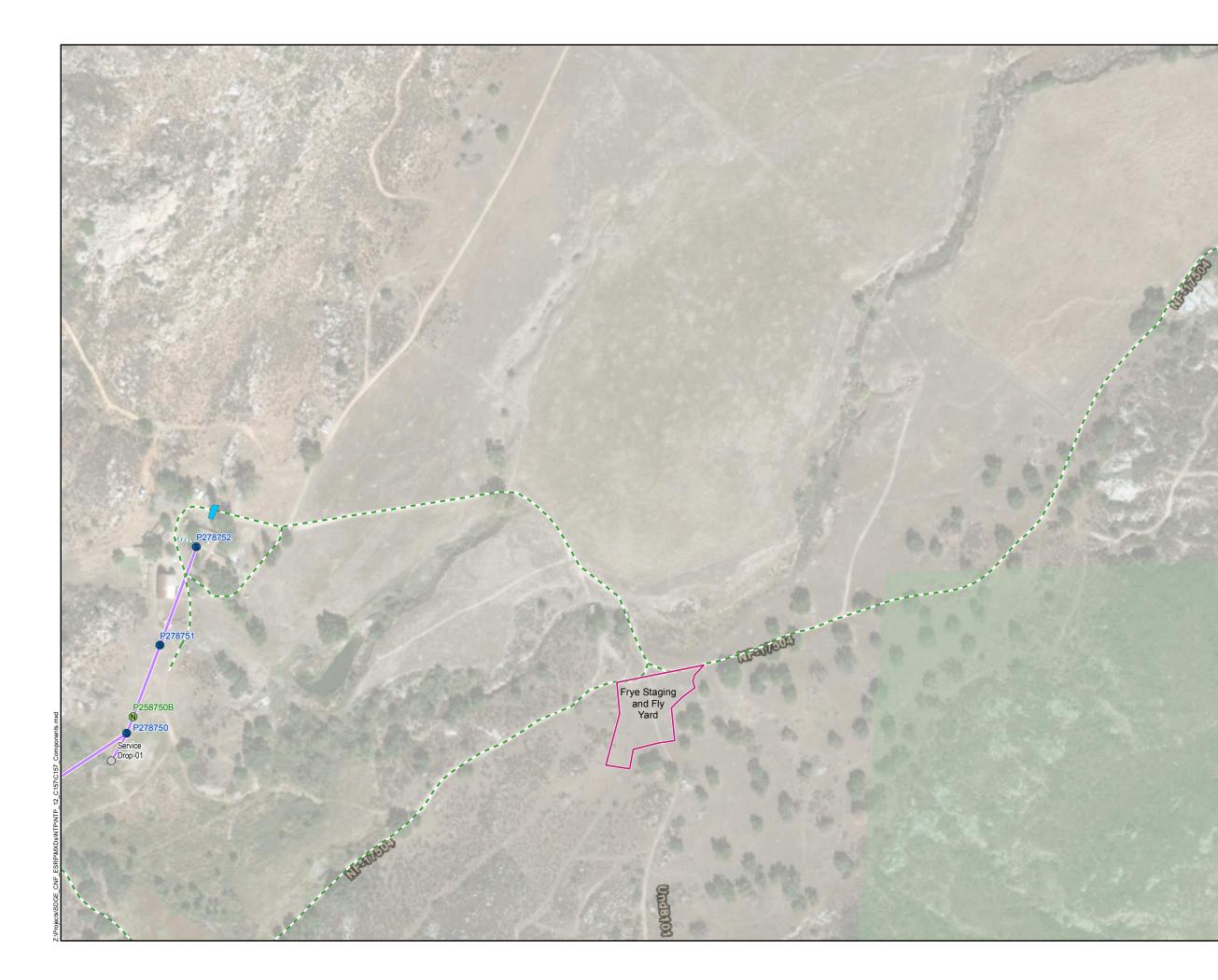
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N





4/12/2018

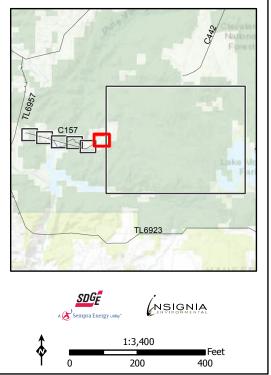


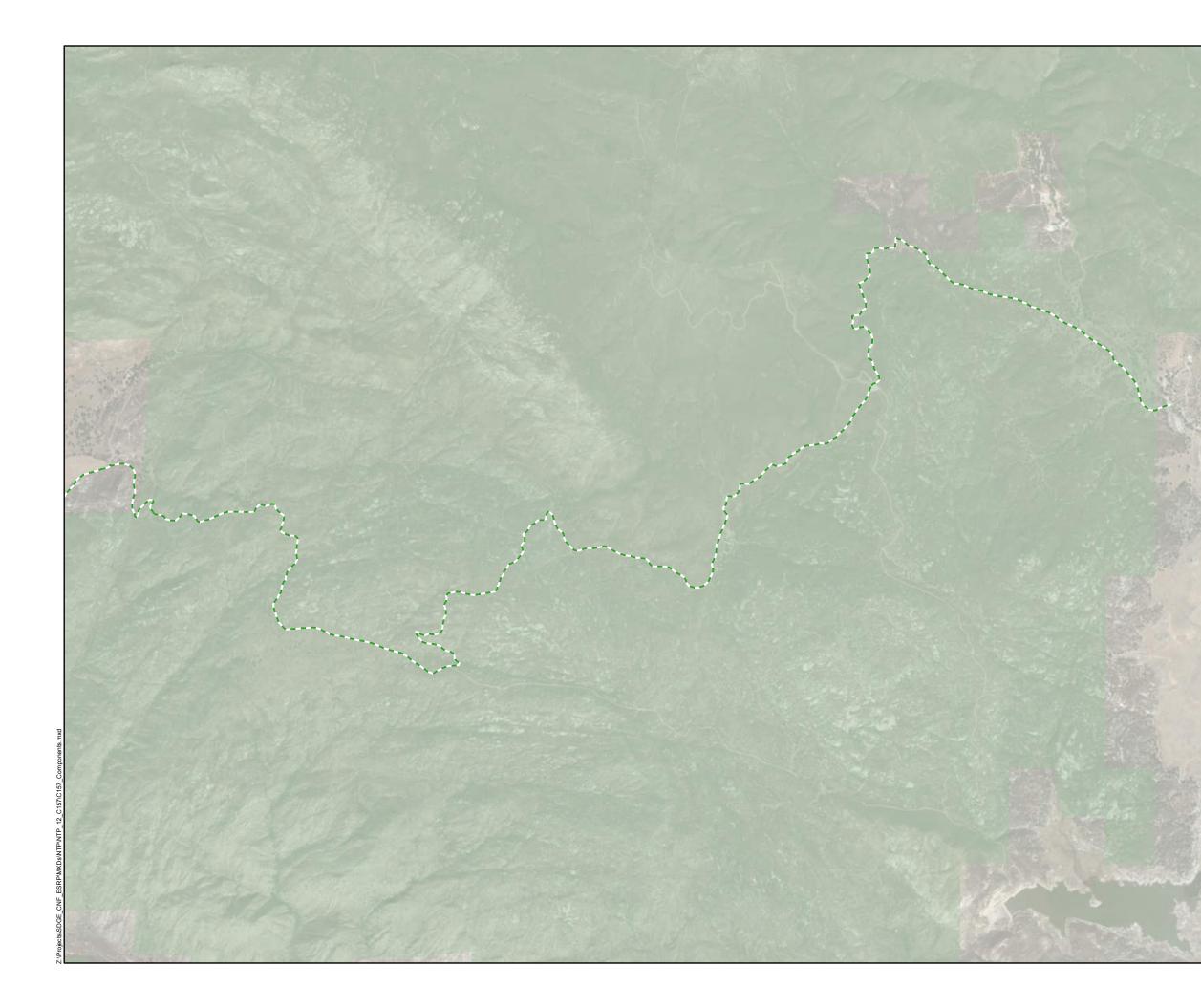
Attachment B: NTP #14 Components Map C157 Map 6 of 7

Cleveland National Forest Power Line Replacement Projects

N	New Steel Pole
\bigcirc	Pole Top Work Only
S	Wood-to-Steel Replacement 12 kV Onl
	Fly Yard/Staging Area
	Stringing Site
	 Wood-to-Steel Replacement
	Construction-Only Access Road
	Navigation Access Road

U.S. Forest Service



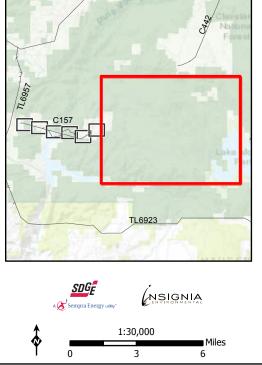




Cleveland National Forest Power Line Replacement Projects

--- Navigation Access Road

U.S. Forest Service



4/12/2018

ATTACHMENT C: PRE-CONSTRUCTION STATUS REPORT

Attachment C: Pre-Construction Status Report

-To Be Implemented During Construction

-Pending

-To Be Implemented Following Construction

Report Criteria:

SOURCE: MMCRP

TIMING: Design; Design and During; Design and Post; Pre; Pre and During; Pre and Post; Pre, During, and Post LOCATION: C157

Location: C157

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Visual	VIS-01 (Scenery Conservation Plan	SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. Each 69 kV power line or 12 kV distribution line segment will be covered under an individual section of the plan, and each section will be reviewed and approved by the appropriate agencies prior to any ground-disturbing activities for the specific segment. The purpose of this plan is to identify and implement specific actions that will minimize the project's visual disturbance to the naturally established scenery. Specific actions shall also be identified and implemented for individual poles to protect existing views from established scenic vistas and roadways located outside of the CNF. Power and distribution line support towers shall be designed to minimize their visual prominence and contrast to the natural landscape. Individual poles anticipated to create adverse effects to scenic vistas and/or particularly noticeable visual contrast in existing views shall be designed, located, shaped, textured, and/or screened as necessary to minimize their visual contrast, blend and complement the adjacent forest and community character. Methods such as limiting the number of climbing pegs and identifying less visually intrusive pole markings for high voltage lines, consistent with CPUC requirements, shall be considered. SDG&E shall also be required to provide photorealistic visual simulations of typical proposed designs that include design features that may be incorporated into poles identified for visual treatment to demonstrate the effectiveness of such features in reducing visual contrast and prominence as viewed from sensitive viewsheds.	The USFS approved the Scenery Conservation Plan on September 8, 2016. A final copy of the plan was provided to the CPUC for its records on September 8, 2016. An updated plan that includes a discussion of visual mitigation applicability for C157 will be submitted to the USFS for approval prior to construction. A final copy of the plan will be provided to the CPUC for its records prior to construction.	Pre and During	Pending
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Management Plan Amendment	have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives.	The USFS Final ROD, which was signed on March 11, 2016, provided three Project-specific amendments to the CNF Land Management Plan. These amendments granted Project- specific exceptions for inconsistencies with the CNF Land Management Plan Scenic Integrity Objectives, including where C157 crosses an area with a High Scenic Integrity Objective.	Pre	Complete
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Visual	VIS-02	02	Management Plan	effects that are inconsistent with the LMP scenic integrity objectives. Compensation shall be accomplished through agency approved scenery restoration activities, fee-payment for scenery restoration projects, or preservation of comparable lands.	SDG&E will coordinate with the USFS to determine the applicability and extent of potential compensation that could be required for the reconstruction of C157. The details of the determination of applicability and potential compensation will be included in the updated Scenery Conservation Plan, which will be submitted to the USFS for approval prior to construction.	Pre	Pending
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-Complete

-Not Applicable OR To Be Implemented Immediately Prior to Construction

Comments

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Biological Resources	APM- BIO-02	01	Plant and Wildlife Surveys	All work areas will be surveyed for special-status plant and wildlife species by a qualified biologist prior to the commencement of construction in accordance with SDG&E's pre-activity survey report requirements.	A qualified biologist conducted a pre-activity survey of C157 in accordance with SDG&E's Subregional NCCP operational protocols. Documentation of the Pre-activity Study Report's submittal to the USFWS and CDFW will be provided to the CPUC and USFS prior to construction.	Pre	Pending
Biological Resources	APM- BIO-05	01	Stringing Sites	Stringing site locations are designed with a preference toward placement within roadways, where possible, to minimize additional potential impacts from grading and vegetation removal that may otherwise be required if these stringing sites were required to be located in vegetated, off-road areas.	SDG&E placed stringing sites within existing roadways to the maximum extent feasible, which will be shown in a Workspace and Sensitive Resources Map that will be submitted to the USFS and CPUC on April 12, 2018.	Design	Pending
Biological Resources	APM- BIO-06	01	Implement NCCP in Laguna Mountains Skipper Habitat	Although Laguna Mountains Skipper is not covered under SDG&E's Natural Community Conservation Plan (NCCP), SDG&E will utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57 in United States (U.S.) Forest Service- (Forest Service-) modeled critical habitat and occupied habitat to minimize any potential impacts to this species. In addition, SDG&E will have a qualified biologist survey any Laguna Mountains Skipper habitat prior to work.	No modeled critical habitat or occupied habitat for Laguna Mountains skipper occurs within this component; therefore, this measure is not applicable.	Pre and During	N/A
Biological Resources	APM- BIO-07	01	CA Spotted Owl Consultation	If California spotted owls are identified in the vicinity of proposed work areas during the pre-activity survey process, SDG&E will consult with the appropriate resource agencies to avoid impacts to nesting California spotted owl.	SDG&E will implement the Project's NBMP before and during construction activities to avoid impacts to nesting birds, including California spotted owls. If California spotted owls are detected, SDG&E will consult the appropriate resource agencies.	Pre	To Be Implemented Immediate Prior to Construction
Biological Resources	APM- BIO-08	01	Design New Poles with Avian Protection Practices	SDG&E will design and install all new poles to conform to the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee.		Design and During	To Be Implemented During Construction
Biological Resources	APM- BIO-09	01	Bat Roost Coordination	If active bat roosts are identified during pre-activity surveys, SDG&E will coordinate with the U.S. Fish and Wildlife Service/California Department of Fish and Wildlife as appropriate.	Active bat roosts (six night roosts and one day roost) were identified near C157 during focused surveys. Survey results were submitted to the CDFW, CPUC, and USFS on April 2, 2018. During construction, SDG&E will re-evaluate the roost sites and coordinate with the USFWS and/or CDFW about these roosts as appropriate.	Pre	To Be Implemented During Construction

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Biological	BIO-01	01	Work Limits		Final engineering plan
Resources					workspaces will be su
					and Sensitive Resour
					The approved work li
				will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is	with stakes and/or fla
				temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within	construction. Additio
				the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's	signage will be install
				compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H).	SDG&E's exclusive-us
					prior to construction.

Biological	BIO-02	01	Contractor Training	Conduct contractor training for all construction staff. Prior to construction, all developer, contractor, and subcontractor	All construction perso
Resources				personnel shall receive training regarding the appropriate work practices necessary to implement the mitigation measures and	required Worker Envi
				comply with environmental regulations, including plant and wildlife species avoidance, impact minimization, and best	Program training imm
				management practices. Sign-in sheets and hard hat decals shall be provided that document contractor training has been	on the Project and wi
				completed for construction personnel.	to indicate that they h
					Training sign-in sheets
					the Weekly Environm
					during construction.

Biological Resources	BIO-03	01	Biological Monitoring	Conduct biological construction monitoring. An authorized biological monitor must be present at the construction sites during all initial ground-disturbing and vegetation-removal activities in undeveloped areas (i.e., not roads or existing developed areas). The monitor shall survey the construction project footprint and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports and submitted through the duration of project construction to document compliance with environmental requirements.	Biological monitors ap the USFS will conduct ground disturbance a activities. Biologists th "trainees only" by the monitoring on private supervision of a fully a USFS-managed lands. results will be summa Environmental Compl

Biological Resources	BIO-04	01	Habitat Restoration	Restore all temporary construction areas pursuant to a Habitat Restoration Plan (HRP). All previously undisturbed temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. Restoration techniques may include the following: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process for use in the restoration of sites requiring restoration. Wherever possible, vegetation will be left in place or mowed, and not grubbed, or the NCCP, to avoid excessive root damage and allow for natural regrowth following construction. Temporary impacts shall be considered a permanent impact and compensated accordingly (see MM BIO-5). Specifically, the HRP, the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-5). Specifically, the HRP will include the following sections: Introduction; Mitigation Measure Summary; Plan Objectives; Plan Implementation; Pre-Construction Documentation; Clearing and Grading; Cleanup; Seeding; Other Planting Methods- Schedule-Restoration; Seeding and Planting- Restoration Monitoring; Monitoring Success Criteria, and Remedial Measures; Reporting; Completion of Restoration Program- Reference. The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and Forest Service) who will oversee impl	The Habitat Restoration the CPUC and USFS on Coward was approved Specialist by the CPUC and by the USFS on Oc Meyer-Lovell was appr Restoration Specialist 2016 and by the USFS Habitat Restoration Pla during construction.
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Comments

ans with delineated submitted as a Workspace arces Map on April 12, 2018. limits will be delineated flagging immediately prior to ional restricted access alled at work areas outside of use easements immediately n.	Pre and During	Pending
rsonnel will attend the hvironmental Awareness hmediately prior to working will receive a hard-hat decal y have attended the training. ets will be submitted with mental Compliance Reports	Pre and During	To Be Implemented Immediately Prior to Construction
approved by the CPUC and act monitoring during initial e and vegetation removal that were identified as he USFS will only conduct ate lands or under the y approved biologist on ds. Biological monitoring marized in the Weekly apliance Reports.	Pre and During	To Be Implemented During Construction
ation Plan was approved by on August 11, 2016. Jeffry ved as a Habitat Restoration UC on September 14, 2015 October 26, 2015. Cecilia pproved as a Habitat ist by the CPUC on May 31, FS on May 23, 2016. The Plan will be implemented b.	Pre, During, and Post	To Be Implemented During Construction

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Biological Resources	BIO-06	01	Fire Prevention	Implement fire prevention best management practices during construction and operation activities. Fire prevention best management practices shall be implemented during construction and operation of the project as specified by the Construction Fire Prevention/Protection Plan (to be developed as required under MM FF-1 and MM FF-2). The PALS system will be followed for any work on National Forest System lands.	The Construction Fire Prevention/Protection Plan was approved by the SDCFA on December 2, 2015; by SDRFPD, CAL FIRE, and the BLM on December 18, 2015; by the BIA on January 7, 2016; by the USFS on June 17, 2016; and by the CPUC on July 29, 2016. Updated plans were submitted to the CPUC and USFS on September 30, 2016 and May 31, 2017, but no approval was required. SDG&E coordinated with the USFS on edits to the plan's Attachment 2: Project Fire Prevention Matrix on CNF Land, and the USFS approved the edits on October 17, 2017. A copy was provided to the CPUC for its records on October 19, 2017. SDG&E coordinated with the USFS on additional edits to the plan's Attachment 2: Project Fire Prevention Matrix on CNF Land, and the USFS approved the edits on March 7, 2018. A copy was provided to the CPUC for its records on April 9, 2018. The plan will be implemented during construction.	Pre and During	To Be Implemented During Construction
Biological Resources	BIO-07	01	SWPPP	Prepare and implement a Stormwater Pollution Prevention Plan. Prepare a Stormwater Pollution Prevention Plan pursuant to the specifications described in APM HYD-05 and MM HYD-1.	TL6957 and C157 were jointly enrolled under the Construction General Permit (Order 2009- 0009-DWQ [as amended by 2010-0014-DWQ and 2012-006-DWQ]). Permit Registration Documents, which include an NOI and a SWPPP, were electronically filed to the State Water Resources Control Board's Storm Water Multiple Applications and Report Tracking System on February 22, 2018. The SWPPP and NOI approval (Waste Discharge Identification Number #9 37C382650) were submitted to the CPUC and USFS on March 5, 2018. The SWPPP will be implemented during construction.	Pre and During	To Be Implemented During Construction
Biological Resources	BIO-09	01	Pole Replacement with RCAs	SDG&E shall identify all proposed replacement pole locations within the vicinity of Riparian Conservation Areas (RCAs) to identify those poles and associated access roads that can be reasonably relocated outside these areas and consult with the Forest Service for authorization of their relocation and proposed placement. These Forest Service requirements will only apply to National Forest System lands.	A map of pole and access road locations in the vicinity of Riparian Conservation Areas on USFS- managed lands will be submitted to the CPUC and USFS on April 12, 2018.	Pre and During	Pending
Biological Resources	BIO-10	01	Limit Impacts to Jurisdictional Features	Limit temporary and permanent impacts to jurisdictional features to the minimum necessary. Formal jurisdictional delineation and permits are required prior to construction for all work areas located within or adjacent to jurisdictional wetlands and waters. The applicant shall obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit from the ACOE, a Clean Water Act Section 401 water quality certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement with the California Department of Fish and Wildlife for impacts to jurisdictional features prior to project construction. These permits are anticipated to be approved under the MSUP. The terms and conditions of these authorizations shall be implemented.	Surveys for waters of the U.S. and the state under the jurisdiction of the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife were completed in accordance with MM BIO-10. No impacts to waters of the U.S. and the state from SDG&E's final design and planned construction activities were identified for C157. Therefore, no permits from jurisdictional resource agencies will be obtained, and existing permits will not be utilized.	Pre and During	N/A

Timing Status

Comments

Due en d	
Pre and	N/A
During	
	Pre and During

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Biological Resources	BIO-10	02	Limit Impacts to Jurisdictional Features	In addition, prior to conducting work or establishing the final design of a selected transmission line alignment, a planning-level assessment of aquatic resources will be conducted to identify the environmentally preferred alternative. The assessment will include review of the National Hydrography Dataset, National Wetland Inventory, U.S. Geological Survey topographic maps, high-resolution digital photography, and necessary field checking. Once the environmentally preferred alternative is identified, a jurisdictional delineation will be conducted of the selected transmission line to ensure the final design is the Least Environmentally Damaging Practicable Alternative (LEDPA) and is in compliance with the Clean Water Act (CWA) Section 404(b)(1) Guidelines. The CWA Section 404 permit authorization will be obtained for any discharges into waters of the United States and	Surveys for waters of the U.S. and the state under the jurisdiction of the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife were completed in accordance with MM BIO-10. No impacts to waters of the U.S. and the state from SDG&E's final design and	Pre	N/A
				the widths of access roads and construction of bridges over waters of the United States will be minimized to the extent feasible.	planned construction activities were identified for C157. Therefore, no permits from jurisdictional resource agencies will be obtained, and existing permits will not be utilized.		

Biological	BIO-11	01	Habitat Creation,	Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no	Construction activities
Resources	100-11		Enhancement,	net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to all jurisdictional resources shall be	not impact waters of
Resources			Preservation, or	compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or and restoration	under the jurisdiction
			Restoration	at a minimum of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or	Engineers, the Region
			Restoration	restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and	Board, and the Califo
				monitoring specifications, and shall be approved by the permitting agencies prior to construction of the project. A habitat	and Wildlife. Therefore
				restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate	the U.S. and the state
				method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage (as	is not required.
				discussed in SDG&E NCCP 7.2 Habitat Enhancement Measures). Temporary impacts shall be restored sufficient to compensate for	
				the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary	
				impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent	
				impact and compensated accordingly. All habitat creation and restoration used as mitigation for the proposed project on public	
				lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as	
				mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.	

Biological Resources	BIO-12	01	Requirements	Where drainage crossings are unavoidable, construct access roads at right angles to drainages. Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.		Pre and During	N/A
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es associated with C157 will f the U.S. and the state n of the U.S. Army Corps of nal Water Quality Control ornia Department of Fish ore, no net loss of waters of e will occur, and mitigation	Pre and During	N/A

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

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Biological Resources	BIO-13	01	Special Status Plant Surveys	Conduct preconstruction surveys for special status plants in areas not accessible during previous rare plant surveys. Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) and Forest Service to conduct a focused rare plant survey on site during the time period when the previously described special-status plant species are detectable. Table D.4-123 in EIR/EIS describes the 40 blooming plant species that shall be surveyed, months they shall be surveyed (i.e., blooming periods), and the TL/circuits on which they occur. Cuyamaca cypress	In 2016 and 2017, qua were approved by the conducted special-stat of C157 that were not Chambers Group surve
				and tecate cypress can be surveyed anytime of the year. Surveys shall be conducted in areas not included during rare plant surveys (see Chambers Group Inc. 2012b, Table 2). Of the 40 species described, there is some potential for 8 of these species to occur in vernal pools, including California Orcutt grass*, Cuyamaca larkspur, long-spined spineflower, Orcutt's brodiaea*, San Diego goldenstar*, San Diego thornmint*, Santa Lucia dwarf rush, and variegated dudleya*. These 8 species are also included in Table D.4-12. These species will also be protected through implementation of, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands (MM BIO-10 through MM BIO-12). Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a Covered Species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided. The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC and Forest Service. CPUC and Forest Service will review and approve the rare plant survey report and recommended avoidance or mitigatio	2017 Rare Plant Survey submitted to the CPUC construction.
Biological Resources	BIO-14	01	Special Status Plant Fencing/Flagging	Install fencing or flagging around identified special-status plant species populations in the construction areas. Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities.	Notification of planned species surveys is prov Construction Status Me and USFS. In 2016 and (who were approved b conducted special-stat The 2016 and 2017 Rat for C157, as well as the the locations of special be submitted to the CF construction. Special-st adjacent to delineated access roads will be fer immediately prior to co component. Special-st be flagged if they are a away from work areas are not likely to be end work activities will occ work areas, access roa footpaths. A Workspac Resources Map depicti occurrences and the lo fencing/flagging will be and USFS on April 12, 2

ualified biologists (who ne CPUC and USFS) satus plant surveys in areas of accessible during the rveys in 2010. The 2016 and vey Reports for C157 will be UC and USFS prior to	Pre and During	Pending
ned special-status plant ovided during the weekly Meetings with the CPUC and 2017, qualified biologists	Pre and During	Pending

, =0=0.	nd 2017, qualified biologists d by the USFS and CPUC) satus plant surveys of C157. Rare Plant Survey Reports the GIS shapefiles reflecting cial-status plant species, will CPUC and USFS prior to I-status plant species ed workspaces or along fenced or flagged o construction along this estatus plant species will not e a considerable distance as (including footpaths) and encountered. All Project ccur within the delineated oads, and flagged bace and Sensitive cting special-status plant elocations of be submitted to the CPUC 2, 2018.				
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Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Comments

Biological BI Resources	10-15 0	11 Special-Status Plant Compensation	Implement special-status plant species compensation. Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the Forest Service. Land preservation must be completed within 36 months of initiation of construction. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required. Forest Service requirements will only apply to National Forest System lands.	The Special-Status Plant Species Salvage and Relocation Plan was approved by the CPUC on August 22, 2016 and by the USFS on August 24, 2016. SDG&E will implement the Special-Status Plant Species Salvage and Relocation Plan prior to initial ground-disturbing activities. The approved Habitat Restoration Plan will be implemented during and after construction for impacts to sensitive plant species.	Pre and During	To Be Implemented During Construction
Biological Resources BI	IO-16 0	1 Special-Status Butterfly Fencing and Surveys	Install fencing or flagging around identified special-status butterfly host species populations in the construction areas and road maintenance. Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for larvae or adult (nectar sources or egg laying sources) plant for the following species: Hermes copper butterfly, Laguna Mountains skipper, or Quino checkerspot butterfly. These host plants include Cleveland's horkelia, western plantain, bird's beak, owl's clover, California buckwheat, and spiny redberry. Similar protective measures for special-status plants (identified in MM BIO-13 and MM BIO-14) shall be implemented. Occupied or suitable habitat for these species shall be avoided to the greatest extent feasible. In addition to the implementation of SDG&E NCCP Operational Protocols, site visits will be conducted prior to construction and road maintenance. Prior to site visits, a digital database of known host plant populations will be reviewed. Site visits will verify the known locations of host plant populations in the area and, if present, avoid those locations.	Notification of planned butterfly and host plant surveys is provided during the weekly Construction Status Meetings with the CPUC and USFS. In 2016 and 2017, qualified biologists (who were approved by the USFS and CPUC) conducted focused special-status plant surveys along C157 to identify locations of host plant species for special-status butterflies. Host plants for species special-status butterflies will be flagged for avoidance adjacent to delineated workspaces or along access roads immediately prior to construction along this component. Host plant species will not be flagged if they are a considerable distance away from work areas (including footpaths) and are not likely to be encountered. All Project work activities will occur within the delineated work areas, access roads, and flagged footpaths. A Workspace and Sensitive Resources Map depicting areas to be fenced or flagged in order to protect special- status butterfly host plant species will be submitted to the CPUC and USFS on April 12, 2018. GIS data of the locations of all special- status butterfly host plant species observed during the surveys will be submitted to the CPUC and USFS with the Workspace and Sensitive Resources Map.	Pre	Pending

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Biological Resources	BIO-17	01 Butterfly Protoco Surveys	project construction activities in occupied habitat. The project proponent shall conduct preconstruction protocol surveys for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that SDG&E's low-effect habitat conservation plan (HCP) for Quino (SDG&E 2007) adequately protects the species, historical surveys are adequate, or as superseded by consultation with the USFWS and Forest Service) in any project construction area known to support the species. Surveys shall be conducted by a qualified biologist in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be	Notification of planned butterfly and host plant surveys is provided during the weekly Construction Status Meetings with the CPUC and USFS. There is no habitat along C157 that supports Laguna Mountains skipper or QCB. Qualified biologists (who were approved by the USFS and CPUC) conducted protocol-level Hermes copper butterfly surveys along C157 in 2016 and 2017. The 2016 Hermes Copper Butterfly Focused Survey Report was submitted to the CDFW, USFS, and CPUC on August 18, 2016. The 2017 Hermes Copper Butterfly Focused Survey Report was submitted to the CDFW, USFS, and CPUC on October 16, 2017.	Pre	Complete
Biological Resources	BIO-18	01 Butterfly Habitat Compensation	Provide compensation for temporary and permanent impacts to Occupied or Critical Habitat for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat through conservation and/or restoration. Temporary and permanent impacts to Quino checkerspot butterfly and Laguna Mountains skipper shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for occupied non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Forest-related impacts will be mitigated at the ratios provided above on Forest Service lands and in coordination with the Forest Service. Habitat compensation shall be accomplished through U.S. Fish and Wildlife Service-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly or Laguna Mountains skipper as appropriate. Mitigation for Hermes copper butterfly shall consist of 1:1 replacement of temporary impacts to occupied habitat, where host plants are impacted, and at a 2:1 ratio where permanent impacts occur. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration and restoration and legal protection assurances.	No critical or occupied habitat for QCB, Hermes copper butterfly, or Laguna Mountains skipper occurs along this component; therefore, no temporary or permanent impacts to occupied or critical habitat are anticipated, and no compensation for impacts is required.	Pre and During	N/A

Biological BIO-19 Resources	01 Avoid Butterfly Host Plants	habitat and Hermes copper occupied habitat shall maximally avoid host plants for these species. The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by these species based on safety and other superseding regulatory requirements. The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications to		Pre	N/A
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Biological Resources	BIO-20	01	Obtain Wildlife Permits	of the Forest Service consulting with the USFWS on the project, if federally listed wildlife species not already covered by SDG&E's NCCP (including any species that may be listed prior to issuance of the PTC and MSUP) may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species not already covered by SDG&E's NCCP may be impacted by the project, SDG&E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). In addition, take authorization for golden eagles will	November 19, 2015. NCCP/HCP operational protocols and the conservation measures from the Biological Opinion will be implemented prior to and during construction.	Pre	To Be Implemented During Construction
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Biological	BIO-20	02	Obtain Wildlife	When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&E shall implement all	This measure applies to areas within designated	Pre and	N/A
Resources			Permits	applicable protocols to avoid and minimize impacts to this species defined in the SDG&E Low-Effect Habitat Conservation Plan for	critical habitat for QCB. There is no critical	During	
				Quino.	habitat for QCB along this component;		
					therefore, this measure is not applicable.		

Biological	BIO-20	03	Obtain Wildlife	Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&E shall implement all impact	This measure applies to
Resources			Permits	minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which	critical habitat for Lagu
				includes:1. Prior to project work, a qualified biologist shall identify all LMS habitat (to include host plant and nectar sources)	There is no critical habi
				within 10 meters of the proposed project(s) ROW. SDG&E facilities that are within designated critical habitat for Laguna	Mountains skipper alon
				Mountains skipper are shown on USFWS Critical Habitat maps (71 FR 74592–74615). During any maintenance activities, a	Therefore, this measure
				qualified biologist will be present to monitor work and ensure that Laguna Mountains skipper habitat is not affected.2.	
				Chipping of vegetation shall not be allowed in known or potential Laguna Mountains skipper habitat. This includes the ROW	
				within or adjacent to (within 10 meters) known or potential Laguna Mountains skipper habitat. Potential habitat shall be	
				identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW	
				work. 3. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to	
				Laguna Mountains skipper habitat. Prior to operation of vehicles on existing roads or trails, a qualified biologist will ensure that	
				the road or trail itself does not contain host plants or nectar sources. 4. Any project that may adversely affect the Laguna	
				Mountains skipper shall require consultation with the U.S. Fish and Wildlife Service. If the NCCP is not used, then formal	
				consultation with the USFWS and CDFW will need to occur to determine the need for take permits	

Biological	BIO-21	01	Sensitive Butterfly	If construction occurs in occupied and/or suitable habitat for sensitive butterfly species, SDG&E will implement the following:	No occupied or suitable
Resources			Species		along this component; t
			Construction	Quino checkerspot: SDG&E will comply with the avoidance and minimization measures outlined in the existing Low-Effect Habitat	is not applicable.
			Measures	Conservation Plan for Quino checkerspot butterfly.	

Biological Resources	BIO-21	02	Sensitive Butterfly Species Construction Measures	Hermes copper: Because this species is not state- or federally listed, the following will only be required for activities: While performing construction activities within the flight season, a qualified biological monitor will be on-site for all project activities to assure that both impacts to host plants and direct take of Hermes copper butterflies are avoided to the greatest extent feasible. The biological monitor may temporarily stop work in the event a Hermes copper butterfly is observed within the immediate construction area (i.e., the flagged work areas currently being used for construction activities.)	This measure applies to suitable Hermes copper on the 2016 and 2017 qualified Hermes copp (who were approved by there is suitable habitat flight season, a biologic during the flight season activities. A Workspace Map depicting suitable habitat will be submitt on April 12, 2018. Cons component is schedule May/June 2018 to Octo
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Dielegical	DIO 21	02	Consitive Duttorfly	Laguna Mountains skinner hutterfly Construction will assure outside of the flight cases OB at least 10 meters (22 feet) away from	No occupied or quitable
Biological	BIO-21	03	Sensitive Butterfly	Laguna Mountains skipper butterfly: Construction will occur outside of the flight season OR at least 10 meters (33 feet) away from	No occupied or suitable
Resources			Species	all host plant locations. If there is a known or newly discovered occurrence during the flight season, construction shall be	Mountains skipper occu
			Construction	prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service	component; therefore,
			Measures	determines construction activities may commence. The Laguna Mountains skipper flight season occurs from April to July.	applicable.

0	e and uring	N/A

ble habitat for QCB exists t; therefore, this measure	Pre and During	N/A
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re, this measure is not	occurs along this	Pre and During	N/A
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nd other qualified CPUC- and USFS-appro
npacts to will conduct monitoring
Commission routes during and imm
nstruction surveys, construction activities
an, on-site were identified as "tra
ess routes using will only conduct mon
under the supervision
biologist on USFS-mar
monitoring results wil
Weekly Environmenta
n C a

Biological	BIO-24	01	Speed Limits	Enforce speed limits in and around all construction areas. Vehicles shall not exceed 15 miles per hour on unpaved roads (as stated	Documentation that t
Resources				in SDG&E NCCP 7.1 Operational Protocols) and the right-of-way accessing the construction site or 10 miles per hour during the	incorporated into the
				night.	was provided to the 0
					2016. Documentation
					included in the Work
					Awareness Program
					and USFS on July 20,
					monitors will enforce
					component during co
					compliance with this
					documented in the W
					Compliance Reports
					USFS.

Biological Resources

Biological I Resources

proved biological monitors oring and delineate access mmediately prior to ies. Biological monitors that 'trainees only" by the USFS nonitoring on private lands or on of a fully approved nanaged lands. Biological will be submitted within the ntal Compliance Reports.	Pre and During	To Be Implemented Immediately Prior to Construction
at the MMCRP was he construction contracts e CPUC and USFS on July 20, on that MM BIO-24 was rker Environmental in was provided to the CPUC D, 2016. Project biological ce speed limits along this construction, and is measure will be Weekly Environmental s submitted to the CPUC and	Pre and During	To Be Implemented During Construction
at the MMCRP was he construction compliance ded to the CPUC and USFS on mentation that MM BIO-26 e Worker Environmental n was provided to the CPUC D, 2016. This measure will be g construction along this cumented in the Weekly apliance Reports.	Pre and During	To Be Implemented During Construction
at the MMCRP was he construction compliance ded to the CPUC and USFS on mentation that MM BIO-27 Worker Environmental n was provided to the CPUC D, 2016. This measure will be g construction along this cumented in the Weekly	Pre and During	To Be Implemented During Construction

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Biological Resources	BIO-28	02	Implement Bird Protection Measures	To avoid avian disturbance by construction activities, an Avian Protection Plan, including a Nesting Bird Management Plan, shall be developed in coordination with the Wildlife Agencies prior to project onset to develop measures based on site specific conditions to protect birds. This Avian Protection Plan shall be implemented by SDG&E and their biological monitors with oversight by the CPUC and the Forest Service. The Plan shall include procedures to allow the Wildlife Agencies open communication with the biological monitor(s) and access to scientific data collected that will be electronically stored in a database approved by the CPUC, the Forest Service, and the Wildlife Agencies. Between February and September during project construction, SDG&E shall provide a monthly summary of nesting bird monitoring activities and at the completion of each nesting season shall provide an evaluation of the data collected to date as specified in the Nesting Bird Management Plan. B. The Project's transmission pole and line design may have an impact on certain raptor species. Consequently, in addition to the construction activities, the Plan shall address avian mortality related to line strikes through the use of adaptive management (i.e., measures to make the lines more visible to the suite of species affected), in response to reported mortalities. C. The Avian Protection Plan shall include the following measures: a. Compliance with the Migratory Bird Treaty Act b. Compliance with Fish and Game Code Sections 3503, 3503.5, and 3511c. Activities shall be prohibited with i. Approximately 0.25 mile of California spotted owl active nest sites (or activity centers) during the breeding season (February 1through August 15) unless surveys confirm that California spotted owls are not nesting within the 0.25- mile radius; ii. 500 feet of raptor and owl active nests; iii. 500 feet of federally and/or state-listed birds active nests; iv. 250 feet of occupied burrowing owl burrows from February 1 to August 31 or within 160 feet from Septem	The APP/NBMP was developed in coordination with the Wildlife Agencies. Approval of the APP/NBMP was received from the CDFW on May 18, 2016; from the USFWS on June 20, 2016; from the USFS on June 30, 2016; and from the CPUC on July 19, 2016. The APP/NBMP will be implemented during construction along this component.		To Be Implemented During Construction
Biological	BIO-28	02	Implement Bird	If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue	Burrowing owls were identified less than one	Droopd	To Be Implemented Immediate

Biological	BIO-28 03	Implement Bird	If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue	Burrowing owls were identified less than one	Pre and	To Be Implemented Immediately
Resources		Protection Measures	through coordination with the CDFW and monitoring. If it appears that the burrowing owls may be directly impacted, then a relocation plan will be developed for the specific burrowing owl(s). This plan would include the methods to relocate, location of the relocation, and post-relocation monitoring. Active relocation and banding of birds is not required. Similar buffers will be utilized for non-Forest Service lands as specified in the Avian Protection Plan and Nesting Bird Management Plan. "Nest" is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the	mile from the right-of-way during 2010 surveys of C157. CPUC- and USFS-approved avian biologists will conduct nesting bird surveys immediately prior to construction in compliance with MM BIO-28. If burrowing owls are identified in the Project vicinity, the required procedures will be followed in accordance with	During	Prior to Construction
			adult birds or once nestlings or fledglings are no longer dependent on the nest.	MM BIO-28 and the APP/NBMP.		

Biological B Resources		Protection Measures	Electric Safety Code (NESC) requirements and should provide general information on specialized construction designs to meet APLIC standards. In particular, conductor separation between the energized and grounded hardware should meet the current state of the art requirements to protect species up to California condor. If appropriate separation is not feasible, then the	•	During	To Be Implemented During Construction
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Biological Resources	BIO-28	05	Implement Bird Protection Measures	D. The database shall include special features to accommodate additional variables (covariate) information requested by the Wildlife Agencies designed for this Project that will provide data which will contribute to the scientific standards of effective avian avoidance measures. In order to help evaluate buffer effectiveness, nests shall be monitored on a daily basis by a qualified biologist during disturbance and-related activities (i.e., brushing, tree trimming, ground-disturbing activities, mechanized or manual construction/removal/installation, and restoration activities) and every 4 days following disturbance until nest fates have been determined for entry into the database. Daily nest monitoring will be conducted by a qualified biologist, from as far away as possible while still being able to observe activity. The biologist need not observe the actual contents of the nest, but may extrapolate status based on adult behaviors. Actual surveys of the nest contents must not occur more than weekly (i.e., allow at least 7 days between nest visits) and visits should be very brief, paths should go by the nest without stopping if possible, the biologist should not touch leaves or branches, and should take a new route each time they pass by the nest. If brown-headed cowbirds or potential nest predators (e.g., scrub jays, crows, ravens) are in the area, then the visit should be postponed until they are gone.	CPUC- and USFS-approved avian biologists will conduct surveys and nest monitoring immediately prior to and during construction activities in compliance with MM BIO-28. Avian biologists that were conditionally approved by the CPUC will only conduct monitoring on private lands under the supervision of a fully approved avian biologist. The Avian Reporting Database is described in Section 8 - Avian Reporting Database of the approved NBMP. Nests will be monitored in accordance with the approved NBMP. SDG&E will continue to provide database access to the Wildlife Agencies, as stipulated in the measure.		To Be Implemented Immediately Prior to Construction
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	Biological	BIO-28	06	Implement Bird	At a minimum, the plan(s) shall include the following sections: Plan Objectives; Applicable Mitigation Measures; Environmental	The APP/NBMP has b
	Resources			Protection Measures	Awareness Program; Existing Avian Resources; Construction Process and Timing (related to avian resource protection); Specific	coordination with the
					APLIC measures to be Applied; Nest Survey and Monitoring Method; Surveyor Experience and Training; Nesting Bird Survey	Approval of the APP/
					Protocol; Standard Buffer Distances as determined in consultation with Wildlife Agencies; Protections of Listed Species, Raptors,	the CDFW on May 18
					and Eagles; Nest Monitoring Data Collection; Avian Reporting System; Nest Monitoring Log to include fates of all nests monitored;	June 20, 2016; from t
					Reporting including update of database accessible to Wildlife Agencies; Nest Management; Nesting Habitat Reduction; Nesting	and from the CPUC o
					Deterrent; Nest Removal; Risk Assessment and Mortality Reduction; Quality Control and Effectiveness; Avian Enhancement; Key	APP/NBMP will be im
					Resources; Prior to the start of construction and implementation, SDG&E shall submit the plan to the U.S. Fish and Wildlife	construction along th
					Service, CDFW, CPUC, and Forest Service for review and approval.	

Biological	BIO-28	07	Implement Bird	E. In order to identify locations of current bald eagle (Haliaeetus leucocephalus), golden eagle (Aquila chrysaetos), California	Coordination with the
Resources			Protection Measures	spotted owl (Strix occidentalis), American peregrine falcon (Falco peregrinus anatum), or federally and/or state-listed or fully protected bird nests, the monitoring biologists will coordinate with the U.S. Forest Service (Forest Service), U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife (CDFW) to ensure that the most up to date information is made available to monitoring biologists. If work will be conducted within a 1 mile buffer of historic and currently known nests during the bald or golden eagle breeding season (December 15 through July 31), SDG&E will survey the historic and currently known nests sites to determine if they are active. If nests are determined to be active, then work within 1 mile of active nests shall be rescheduled	is ongoing, in accorda These species are add Protections of Listed Eagles of the approve prior to and during co and nest buffers will
				until after the completion of nesting activity at those nests. Alternatively, SDG&E may plan work activities to occur outside of the 1 mile buffers during the breeding season.	accordance with the a

Biological Resources	BIO-30	01	Bat Protection	(A) Townsend's bat protection measures	A literature review and potential Townsend's l
				Prior to work being conducted, measures will be employed to protect (a) Townsend's bat and (b) bats in general. Prior to work being conducted, qualified biologists will conduct a literature search for potential roost sites and follow-up surveys for Townsend's big-eared bat maternity roosts within 500 feet of project lines during the breeding/pupping season (April–mid- September). Typical Townsend's big-eared bat roosts occur in mines, caves, buildings, long and dark culverts, and older bridges (pre-1960) (Pierson and Rainey 1994). If any potential structures or features for Townsend's big-eared bat are present within the project area they shall be surveyed.	conducted by CPUC- an biologists in 2016. Surv submitted to the CDFV April 2, 2018.

Biological Resources	BIO-30	02	Bat Protection	Inspections of potential roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Where active roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number present at the time of visit (count or estimate); 3) the location, amount, distribution, and age of all droppings shall be described and pinpointed on a map; and 4) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance. If non-maternity roosts are identified, the CDFW will be notified and consulted. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 500 feet of the roost location until the end of the pupping season or until the roost is determined to be unoccupied by Townsend's big-eared bat. For the protection of young (i.e., unable to fly) and hibernating adults all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of	Based on data collecter review, field assessme seven active bat roost day roost) were identi Townsend's big-eared were identified within however, the status of evaluated prior to con
				the pupping season.	

	Biological E Resources	BIO-30	03		literature search for known general bat roost sites and follow-up surveys within 100 feet of project lines during the breeding/pupping season (April–mid-September). In general, bat species may roost in rock outcrop, dense tree canopies, flaking tree bark, snags, bridges, mine, caves, flumes, and buildings. If any known sites for bats in general are present within the project area they shall be surveyed.	A literature review and t conducted for potential roosts by CPUC- and USI biologists in 2016. Surve submitted to the CDFW, April 2, 2018.
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Comments

been developed in he Wildlife Agencies. P/NBMP was received from .8, 2016; from the USFWS on the USFS on June 30, 2016; on July 19, 2016. The mplemented during this component.	Pre and During	To Be Implemented During Construction
he USFS, CDFW, and USFWS dance with this measure. ddressed in Section 7.2 d Species, Raptors, and ved NBMP. Immediately construction, nest surveys I be implemented in e approved NBMP.	Pre and During	To Be Implemented Immediately Prior to Construction
and follow-up surveys for I's big-eared bat roosts were - and USFS-approved bat urvey results were DFW, CPUC, and USFS on	Pre	Complete
cted during the literature ment, and focused surveys, osts (six night roosts and one ntified near C157. No ed bat maternity roosts nin 500 feet of C157; of the day roost will be re- onstruction.	Pre and During	Complete
and follow-up surveys were ntial common bat species d USFS-approved bat urvey results were	Pre	Complete

V, CPUC, and USFS on

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Biological Resources	BIO-30	04	Bat Protection	Inspections of known roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Bats shall be identified to the most specific taxonomic level possible. Where active bat roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the specific was identified); 4) the location, amount, distribution, and age of all bat droppings shall be described and pinpointed on a map; and 5) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance.	Based on data collected during the literature review, field assessment, and focused surveys, seven active bat roosts (six night roosts and one day roost) were identified near C157. The day roost is inhabited by common bat species and is located within 100 feet of C157 work areas (near Poles P278751 and P278752).	Pre	Complete
iological esources	BIO-30	05	Bat Protection	If potential roosts are determined to be present then the roosts must be analyzed further to determine if Townsend's big-eared bats are present and if maternity roosts are present. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 100 feet of the roost location until the end of the pupping. For the protection of young (i.e., unable to fly) and hibernating adults, all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.	Seven active bat roosts (six night roosts and one day roost) were identified near C157 during focused surveys; however, no Townsend's big- eared bat maternity roosts were identified within 500 feet of the C157 work areas. One day roost inhabited by common bat species was identified near Poles P278751 and P278752. If construction is initiated during the breeding/pupping season, CPUC- and USFS- approved bat biologists will conduct follow-up surveys to determine if the day roost site is active prior to construction activities at those poles. If the day roost is determined to be a maternity roost, an approximately 100-foot buffer will be established to exclude construction activities from the pole work areas. If additional bat roosts are identified in the vicinity of C157, the CPUC and CDFW will be notified.	Pre and During	Pending
Biological Resources	BIO-31	01	Kangaroo Rat Survey	Biologists will conduct surveys for Stephens' kangaroo rat. In locations where Stephens' kangaroo rat habitat assessments were not accessible during the 2010 surveys (including the extensive parcels of land westward of Santa Ysabel owned by a single landowner – Map Pages MS-016-025 [Chambers Group Inc. and SJM Biological Consultants 2012; Appendix A] and the large parcel immediately south of Old Highway 80 and southward of southern end of Kitchen Creek Road [Map Page MS-069 [Chambers Group Inc. and SJM Biological Consultants 2012]; Appendix A]), a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC)-approved biologist to assess the potential areas for Stephens' kangaroo rat to occur within SDG&E's proposed project area.	C157 was previously accessible during the 2010 SKR surveys; therefore, additional surveys are not required, and this measure is not applicable.	Pre	N/A
Biological Resources	BIO-31	02	Kangaroo Rat Survey	Any burrows, utilized habitat, or signs of Stephens' kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephens' kangaroo rat occupied habitat. If Stephens' kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephens' kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) rerouting access to the project work area for complete avoidance of Stephens' kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.	No SKR habitat occurs along C157; therefore, this measure is not applicable.	Pre and During	N/A

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Biological BIO-33 Resources	01	Arroyo Toad Focused Surveys	Focused surveys for arroyo toad shall be conducted. Prior to initiating construction, all riverbed areas within 1,000 feet of construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31) for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed.	CPUC and USFS-approved arroyo toad biologists conducted focused surveys for arroyo toads in 2016. Arroyo toads were detected within 500 feet of C157. The 2016 Arroyo Toad Focused Survey Report will be submitted to the CPUC and USFS prior to construction. SDG&E will obtain concurrence from the USFWS with the approval of the Final C157 Arroyo Toad Monitoring Plan.		
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Biological	BIO-33	02	Arroyo Toad	If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring	Andrew Borcher's resu
Resources			Focused Surveys	plan that includes the following measures, in consultation with the USFWS: [Refer to MM BIO-33 in the MMCRP for all 16	CPUC and USFS for ap
				monitoring plan specifications]	biologist" per MM BIC
					The CPUC and USFS a
					as an "authorized biol
					January 18, 2018. The
					Monitoring Plan was s
					on February 15, 2018
					The USFWS and SDG8
					site visit on March 7, 2
					with documentation of
					sent to the USFS and (
					construction. The plar
					during construction. A
					Resources Map depict
					fencing areas for arroy
					to the CPUC and USFS

Biological Resources	BIO-33 (03	Arroyo Toad Focused Surveys	On Forest Service lands, occupied arroyo toad breeding habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo toad habitat (or designated critical habitat) will be mitigated at 2:1. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined.	SDG&E will coordinate with the USFS on the type and amount of required mitigation for impacts to occupied arroyo toad habitat on USFS-managed land as part of a comprehensive compensatory mitigation plan. Consultation will also occur with the USFS to verify operating periods for arroyo toad protection prior to construction.	Pre and Post	Pending
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Cultural and	APM-	01	Archaeological and	Prior to construction, all SDG&E, contractor, and subcontractor personnel will receive training regarding the appropriate work	The Worker Environme
Paleontological	CUL-01		Paleontological	practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations,	training includes a pres
Resources			Trainings	including the potential for exposing subsurface cultural, archaeological, and paleontological resources and how to recognize	applicable environmen
				possible buried resources. This training will include a presentation of the procedures to be followed upon discovery or suspected	including the potential
				discovery of cultural and archaeological materials, including Native American remains and their treatment, as well as of	cultural, archaeologica
				paleontological resources.	resources and how to r
					resources. This training
					of the procedures to be
					discovery or suspected
					archaeological materia
					American remains and
					as paleontological reso
					personnel will attend t
					Environmental Awaren
					immediately prior to b
					Project.

esume was submitted to the approval as an "authorized IO-33 on January 17, 2018. approved Andrew Borcher ologist" per MM BIO-33 on	Pre and During	Pending
ne Draft C157 Arroyo Toad a submitted to the USFWS 8 for review and comment. a&E conducted a required , 2018. The final plan along of USFWS approval will be d CPUC prior to an will be implemented A Workspace and Sensitive cting proposed flagging or oyo toad will be submitted FS prior to construction.		

 Pre and During Pre and During Pro to Construction Prior to Construction 		
	presentation on the mental laws and regulations, ntial for exposing subsurface gical, and paleontological to recognize possible buried ining includes a presentation to be followed upon cted discovery of cultural and cerials, including Native and their treatment, as well resources. All construction nd the Worker areness Program training	

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Cultural and Paleontological Resources	APM- CUL-02	01	Pre-Construction Cultural Surveys	Intensive pedestrian surveys will be conducted prior to construction in those areas within the ROWs for which initial survey access was not granted to determine the potential for impacts to cultural resources in these areas. Where possible, engineering design will be re-evaluated to determine whether facilities can be relocated to avoid any cultural resources identified from these additional surveys. If relocation is not feasible, APM CUL-03 will be implemented to minimize impacts to sensitive cultural resources.	Cultural resources surveys for the Project were completed during the initial survey (Schaefer and Williams 2011: The 2011 [Revised 2013] Inventory, Evaluation and Treatment of Cultural Resources in the Cleveland National Forest Transmission and Distribution Line Increased Fire Safety Project in support of the Proponent's Environmental Assessment). Subsequent pedestrian surveys were completed on C157 in 2016 and 2017 to account for any survey gaps due to restricted access, Project additions, and the final design.	Pre	Complete
Cultural and Paleontological Resources	APM- CUL-03	01	Designate ESAs	All potentially National Register-eligible or archaeologically sensitive sites, as defined in the Cultural Resources Technical Report, that will not be directly affected by construction but are within 50 feet of replacement pole locations will be designated as Environmentally Sensitive Areas (ESAs). Potentially eligible resources include those that are recommended eligible, as well as unevaluated sites. Protective fencing or other markers will be erected and maintained to protect these ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs will not be signed or marked as cultural, historical, or archaeological resources.	ESAs located within 50 feet of construction sites will be delineated with protective fencing prior to construction. Fencing will be regularly inspected for damage during construction and will be repaired as needed.	Pre and During	To Be Implemented Immediately Prior to Construction
Cultural and Paleontological Resources	APM- CUL-06	01	Cultural Resources Treatment Plan	In consultation with the Forest Service HPM, BIA Archaeologist, the Tribes, and the SHPO, SDG&E will develop a Cultural Resources Treatment Plan that includes procedures for protection and avoidance, evaluation and treatment, and the curation of any potentially register-eligible cultural materials. Specific protective measures, including a monitoring program, will be defined in the Cultural Resources Treatment Plan to reduce potential adverse impacts on unknown cultural resources to less-than-significant levels.	The required components of the Cultural Resources Treatment Plan were incorporated in the Historic Properties Management Plan. The Historic Properties Management Plan was finalized on August 25, 2016; and it was approved by the USFS on August 25, 2016, and by the CPUC and SHPO on August 26, 2016. Completion of MM CUL-01c satisfies the requirements of this APM.	Pre	Complete
Cultural and Paleontological Resources	APM- CUL-08	04	Paleontological Monitoring	The paleontological monitor will follow the procedures outlined in the Paleontological Monitoring and Treatment Plan, which will be prepared and will include information regarding pre-construction field surveys, construction personnel training, necessary permits, research design, monitoring methodology, fossil discovery and recovery protocols, fossil preparation and curation procedures, and the preparation of a final monitoring report.	SDG&E has prepared a Paleontological Monitoring & Treatment Plan, which will be implemented during construction.	Pre and During	To Be Implemented During Construction
Cultural and Paleontological Resources	CUL-01	01	Cultural Resource Management	In order to avoid adverse effects to historic properties, SDG&E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements:	The Project's Programmatic Agreement was finalized in February 2016. The Historic Properties Management Plan was finalized on August 25, 2016; and was approved by the USFS on August 25, 2016, and by the CPUC and SHPO on August 26, 2016. The Project's Historic Properties Management Plan outlines procedures for cultural resource management that are consistent with this measure, and these procedures will be implemented during construction.	Pre and During	To Be Implemented During Construction

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Cultural and	CUL-01	03	Cultural Resource	1b. – Avoid and protect potentially significant resources. Where feasible, complete avoidance of impacts shall be the preferred	Impacts to cultural an
Paleontological			Management	strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a	be avoided to the max
Resources				Historic Properties Management Plan (HPMP), as described below.	during construction. A
					ESAs to be fenced and
					to the CPUC and USFS

Cultural and Paleontological Resources	CUL-01	04			The Historic Properti finalized on August 2 by the USFS on Augu CPUC and SHPO on A
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Cultural and	CUL-02	01	Reduce Impacts to Historic Cabins		The historic cabins refe are not located on C15
Paleontological				D.5-12 of the ERVEIS, the original exterior materials of the cabins shall not be removed, modified, of covered. If equipment	
Resources				attached to the cabins must be replaced, the equipment shall retain its original appearance in terms of materials and size. If this	measure is not applica
				cannot be met, then a cultural monitor is required to be present during the replacement of the lines to minimize modifications to	
				the cabin exteriors.	

Cultural and Paleontological	CUL-03	01	Implement CRTR Recommendations	During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79,	All cultural monitoring recommendations inc
Resources				Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. Further, when on City-owned land (portions of C157, T625, and C449), the City's Land Development Manual – Historical Resource Guidelines per the San Diego Municipal Code, Chapter 14, Article 3, Division 2, Section 14.0201, shall be followed (http://docs.sandiego.gov/ municode/MuniCodeChapter14/Ch14Art03Division02.pdf).	Resources Technical R the Historic Properties implemented prior to Archaeologists approv will implement the rec Documentation confir recommendations will and USFS in the Week Compliance Reports. A ESAs to be fenced and construction will be prior USFS prior to construct

Comments

urveys were completed in es, Inc. (Schaefer and 2011 [Revised 2013] n and Treatment of Cultural veland National Forest stribution Line Increased a support of the Proponent's ssment); and subsequent vere conducted on C157 in results of these subsequent as part of an update to istoric Properties which will be submitted with he USFS for a 30-day with the consulting parties construction.	Pre	Pending
and historical resources will aximum extent possible A mapbook identifying all ad avoided will be provided S prior to construction.	Pre and During	Pending
ies Management Plan was 25, 2016, and was approved 1st 25, 2016 and by the August 26, 2016.	Pre and During	Complete
eferred to in this measure 157; therefore, this cable.	Pre and During	N/A
ng requirements and included in the Cultural Report and Appendix A of es Management Plan will be o and during construction. oved by the CPUC and USFS ecommendations.	Pre and During	Pending
firming the completion of all vill be provided to the CPUC ekly Environmental . A mapbook identifying all nd avoided during		

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Fire Protection	FF-01	01	Fire	SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service,	The Construction Fire
				Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL	Plan was approved by
			n Plan	FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of lead	2, 2015; by SDRFPD, C
				agencies. SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will	December 18, 2015; b
				be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all	2016; by the USFS on .
				construction activities by SDG&E. At minimum, the plan will include the following:-Procedures for minimizing potential ignition,	CPUC on July 29, 2016
				Vegetation clearing, Fuel treatment area establishment to Parking requirements, Smoking restrictions, Hot work restrictions- Red	submitted to the CPUC
				Flag Warning restrictions- Fire coordinator role and responsibility- Fire suppression equipment on site at all times work is	30, 2016 and May 31,
				occurring- Requirements of Title 14 of the California Code of Regulations, 918 "Fire Protection" for the private land portions-	was required. SDG&E
				Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice 113-1 (July 2012)-	USFS on edits to the p
				Emergency response and reporting procedures- Emergency contact information- Worker education materials; kick-off and tailgate	Project Fire Prevention
				meeting schedules- Other information as provided by responsible and commenting agencies (as appropriate for each project).	the USFS approved the
				Additional restrictions will include the following: During the construction phase of the project, the applicant shall implement	2017. A copy was prov
				ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily	records on October 19
				construction and hotwork; Fire Suppression Resource Inventory – In addition to 14 CCR 918.1(a), (b), and (c), the applicant shall	coordinated with the
				update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly	to the plan's Attachme
				basis and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE; During Red Flag Warning events, as issued daily	Prevention Matrix on
				by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest	approved the edits on
				Service Project Activity Level (PAL) is "E" on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency	was provided to the C
				construction and maintenance activities shall cease or be required to operate under a Hot Work Procedure. The Hot Work	April 9, 2018. The plan
				Procedure will be in compliance with the applicable sections in NFPA 51-B "Fire prevention during welding, cutting, or other hot	during construction.
				work" and CFC Chapter 26 "Welding and other Hot Work." The applicant and contractor personnel shall be informed of changes	
				to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF. All construction crews and inspectors shall be provided	
				with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of	
				fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction	
				activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area as soon as	
				the fire is identified/discovered immediately upon ignition. Each crew member shall be trained in fire prevention, initial attack	
				firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for	
				reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and	
				redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on	
				the day the information change goes into effect. Each member of the construction crew shall be trained and equipped to	
				extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each	
				crew member shall at all times be within 50 feet of fire suppression equipment, as outlined in ESP 113.1. SDG&E will provide a	
				draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90	
				days prior to the start of any construction activities. The final plan will be approved by the responsible lead agencies with input	
				from the fire and permitting agencies, as desired, prior to the initiation of construction activities and provided to SDG&E for	
				implementation during all construction prior to the initiation of construction activities. All construction work on the proposed	
				power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.	

General	APM- GEN-06	01	Conduct Notifications	Prior to initiating construction, SDG&E will make all the appropriate and necessary notifications, including landowner notifications.	This measure will be satisfied through the implementation of MM LU-01 and in accordance with the Construction Notification Plan.	Pre	Complete
General	DIA	04					

General	APM- GEN-07	01	Excavation Notification	disturbing activities in order to identify buried utilities. Exploratory excavations (potholing) will also be conducted to verify the			To Be Implemented Immediately Prior to Construction
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re Prevention/Protection by the SDCFA on December CAL FIRE, and the BLM on by the BIA on January 7, n June 17, 2016; and by the 16. Updated plans were UC and USFS on September 1, 2017, but no approval E coordinated with the e plan's Attachment 2: ion Matrix on CNF Land, and the edits on October 17, rovided to the CPUC for its 19, 2017. SDG&E e USFS on additional edits ment 2: Project Fire n CNF Land, and the USFS on March 7, 2018. A copy c CPUC for its records on an will be implemented	Pre and During	To Be Implemented During Construction

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Hydrology and Water Quality	APM- HYD-04	01	Conduct Wetlands and Waters Surveys	Any areas not surveyed for potentially jurisdictional wetlands or waters due to limited access will be surveyed prior to the start of construction activities and potential impacts will be assessed and the appropriate jurisdictional permits will be obtained as needed.	Surveys for waters of the U.S. and the state under the jurisdiction of the U.S. Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife were completed in accordance with MM BIO-10. No impacts to waters of the U.S. and the state from SDG&E's final design and planned construction activities were identified for C157. Therefore, no permits from jurisdictional resource agencies will be obtained, and existing permits will not be utilized.	Pre	N/A
Hydrology and Water Quality	APM- HYD-05	01	SWPPP	SDG&E will prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will identify BMPs based on its Water Quality BMPs Manual for each activity that has the potential to degrade surrounding water quality through erosion, sediment run-off, and other pollutants. These BMPs will then be implemented and monitored by a Qualified SWPPP Practitioner.	TL6957 and C157 were jointly enrolled under the Construction General Permit (Order 2009- 0009-DWQ [as amended by 2010-0014-DWQ and 2012-006-DWQ]). Permit Registration Documents, which include an NOI and a SWPPP, were electronically filed to the State Water Resources Control Board's Storm Water Multiple Applications and Report Tracking System on February 22, 2018. The SWPPP and NOI approval (Waste Discharge Identification Number #9 37C382650) were submitted to the CPUC and USFS on March 5, 2018. The SWPPP will be implemented during construction.	Pre and During	To Be Implemented During Construction
Hydrology and Water Quality	HYD-01	01	Erosion Control Plan/SWPPP	As required by the Construction General Permit, SDG&E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project or for individual construction segments, as required, to reduce soil erosion during construction. The SWPPP(s) and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance for the respective construction segment. SDG&E shall provide the CPUC and Forest Service with subsequent amendments to the SWPPP as part of SDG&E's weekly compliance reports. In weekly construction compliance reports, SDG&E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water Multiple Application and Report Tracking System (SMARTS) following storm events.	TL6957 and C157 were jointly enrolled under the Construction General Permit (Order 2009- 0009-DWQ [as amended by 2010-0014-DWQ and 2012-006-DWQ]). Permit Registration Documents, which include an NOI and a SWPPP, were electronically filed to the State Water Resources Control Board's Storm Water Multiple Applications and Report Tracking System on February 22, 2018. The SWPPP and NOI approval (Waste Discharge Identification Number #9 37C382650) were submitted to the CPUC and USFS on March 5, 2018. The SWPPP will be implemented during construction.	Pre and During	To Be Implemented During Construction
Hydrology and Water Quality	HYD-01	02	Erosion Control Plan/SWPPP	SDG&E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gullying. The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization) and incorporate Construction General Permit SWPPP requirements for each construction segment as the SWPPP(s) for that segment are completed. Additionally, the ECP shall complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4. The ECP shall be updated for each construction segment and provided to the (CPUC) and the federal agencies for review and approval prior to each agency's Notice to Proceed issuance for that construction segment.	The Erosion Control Plan was approved by the CPUC and USFS on August 11, 2016. An update to Attachment D: SWPPP BMP Site Maps of the plan for C157 was submitted to the CPUC and USFS on February 23, 2018. The Erosion Control Plan will be implemented during construction.	Pre, During, and Post	To Be Implemented During Construction

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lydrology and Vater Quality	HYD- 02a	01	Water Supply Plan	For water that is to be purchased from one or more public or private water/utility district(s), private landowners, or from tribes, SDG&E shall provide to the CPUC written documentation from such district(s) and/or landowners indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The documentation shall also indicate the type of water (potable or reclaimed) and the specific source of the water (groundwater well or surface diversions). The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan (WSP) to be submitted to the CPUC prior to notice to proceed for each project component.	The Water Supply Plan was approved by the USFS on June 28, 2016 and by the CPUC on August 11, 2016. An updated plan without references to specific transmission lines was submitted to the CPUC and USFS on March 8, 2017, and no approval was required. An updated plan with three additional water sources was submitted to the CPUC and USFS on April 7, 2017; and no approval was required.	Pre and During	Complete
Hydrology and Water Quality	HYD- 02b	01	Groundwater Evaluation	For identified water sources that derive their water supply from groundwater, SDG&E shall commission a groundwater study by a registered/certified hydrogeologist, as reviewed and approved by CPUC, to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner's permission) in the vicinity of proposed well location/water sources and to verify that the proposed source is capable of supplying the amount of water needed. The groundwater study shall evaluate whether the volume and duration of the proposed groundwater use would exceed County of San Diego thresholds for impacts with respect to groundwater supply and well interference. If the evaluation indicates the potential for significant impacts, the registered/certified hydrogeologist shall recommend feasible mitigation measures (e.g., a groundwater monitoring program) to avoid exceeding applicable thresholds. The groundwater evaluation shall be provided along with the documentation of purchased water sources, and the CPUC shall not authorize construction of the project unless such documentation have been provided by SDG&E and approved by CPUC. If the evaluation finds that impacts cannot be avoided given the volume and duration of the proposed groundwater use, the CPUC will not authorize use of the water source and shall require SDG&E to seek other viable sources of water.	SDG&E commissioned a groundwater study of the Live Oak Springs Water District. SDG&E submitted the resume for a registered/certified hydrogeologist on September 27, 2016. The CPUC approved the hydrogeologist on September 27, 2016. The final Live Oak Springs Water District Groundwater Evaluation was submitted to the CPUC for approval on March 22, 2017. The CPUC approved the evaluation on March 30, 2017. An updated Water Supply Plan that includes the Live Oak Springs Water District was submitted to the CPUC and USFS on April 7, 2017; and no approval was required.	Pre	Complete

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ydrology and /ater Quality	HYD-04 01	Access Road Condition Evaluation and Repair Design Report	Planned grading and repair activities along SDG&E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within RCAs, or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, or CEG contracted by SDG&E and reviewed and approved by the CPUC and the Forest Service) prior to initiating construction on the associated segment, who will identify areas experiencing chronic errosion and drainage issues. At a minimum, segments shall include, but are not limited to, the following: - TL625 in the Vicinity of Barber Mountain Road - TL625 north of Lyons Valley Road and south of Carveacre Road - C442 east of Oak Valley and south of 1-8, on the western flanks of Long Peak - Short segments of TL629 on either side of Cameron Valley and east of Pine Valley. The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues prior to beginning work on those facilities associated with the problematic access road. The designed solution(s) shall be included into the approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments. Examples of such solutions could include, but are not limited to the following: - Crowning road sections with gentle slopes to prevent standing water on the road -grade and the soil erosivity - Minimizing the number of water crossings, and maintaining crossings as close to a 90-degree angle as possible to the stream channel or ingede fish migration. - Constructing perennial and seasonal/ephemeral stream crossings so as not to change the cross-sectional area of the stream channel or ingede fish migration. - Constructing perennial and seasonal/epheme	The Access Road Condition Evaluation and Repair Design Report was approved by the CPUC on August 18, 2016 and by the USFS on August 19, 2016. There is one SDG&E exclusive- use access road identified along C157. SDG&E is currently coordinating with the USFS on the final approach to the Access Road Decommissioning Plan. An Access Road Condition Inventory and Evaluation Report will not be needed as this road segment will likely be decommissioned.	Pre and During	N/A
Hydrology and	HYD-06 02	Creek Crossing	Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-bore procedures to avoid	Per the MMCRP, this measure applies only to	Pre and	N/A

Hydrology and	HYD-06	02	Creek Crossing	Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-bore procedures to avoid	Per the MMCRP, this n
Water Quality				direct impacts and shall be conducted in a manner that does not result in sediment-laden discharge or hazardous materials	the alternative alignm
				release to the water body. SDG&E shall develop a Jack-and-Bore/Horizontal Directional Drill (HDD) Contingency Plan for this work	Underground in Bould
				in accordance with MM-HYD-8. Additionally, SDG&E shall implement the following measures during horizontal boring (jack-and-	it is not applicable to t
				bore) operations and shall be included in the HDD Contingency Plan:1 Site preparation shall begin no more than 10 days prior to	
				initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages. 2 Trench and/or bore pit spoil	
				shall be stored a minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a	
				sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention). 3 Portable pumps and	
				stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be	
				placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10-gallon fuel or oil capacity	
				should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times. 4	
				Within 24 hours following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and	
				temporary sediment barriers shall be left in place until restoration is deemed successful. SDG&E shall obtain the required permits	
				prior to conducting creek crossing work. Required permits may include ACOE CWA Section 404, Regional Water Quality Control	
				Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. SDG&E shall implement all pre and post-	
				construction conditions identified in the permits issued.	

s measure applies only to ment (Option 3 Ider Creek Road); therefore, o this component.	
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Measure Category MMNo TaskNo Mitigation Measure Task Text Title

	Plan	If horizontal directional drilling is to be used during construction, SDG&E shall prepare a Horizontal Directional Drill (HDD) Contingency Plan to address procedures for containing an inadvertent release of drilling fluid (frac-out). The plan shall contain specific measures for monitoring frac-outs, for containing drilling mud, and for notifying agency personnel. The plan shall also discuss spoil stockpile management, hazardous materials storage and spill cleanup, site-specific erosion and sediment control, and housekeeping procedures, as described in the Stormwater Pollution Prevention Plan. The Jack-and-Bore HDD Contingency Plan shall be submitted to the CPUC, Forest Service, Bureau of Indian Affairs, and ACOE 60 days prior to construction.	Per the MMCRP, this measure applies only to the alternative alignment (Option 3 Underground in Boulder Creek Road); therefore, it is not applicable to this component.	Pre and N/A During
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Hydrology and Water Quality	HYD-07 02	HDD Contingency Plan	activities. Required permits may include U.S. Army Corps of Engineers Clean Water Act Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement Section 1602. The applicant shall implement all	Per the MMCRP, this measure applies only to the alternative alignment (Option 3 Underground in Boulder Creek Road); therefore, it is not applicable to this component.	Pre and During	N/A
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and Use and	LU-01	01	Construction	Prepare Construction Notification Plan. Forty-five (45) days prior to construction of the first segment, the project applicant shall	The Construction Notification Plan was	Pre	Pending
nning			Notification Plan		approved by the USFS on June 16, 2016 and by		
				updated with additional information 45 days before construction of each additional segment. The plan shall identify the	the CPUC on June 17, 2016. An updated		
				procedures that will be used to inform private landowners, schools, and agencies with authority over recreational areas/facilities	Construction Notification Plan with a list of		
				of the location and duration of construction; identify approvals that are needed prior to posting or publication of construction	adjacent landowners for C157 will be submitted		
				notices; and include text of proposed public notices and advertisements. The plan shall address at a minimum the following	to the CPUC prior to construction. The public		
				components:	venue notice, public mailer, and newspaper ads		
					were submitted to the CPUC and USFS for		
				Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice	approval on November 14, 2017. The notices		
				shall identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential	were resubmitted to the CPUC and USFS on		
				properties and other sensitive land uses. The notice shall state the type of construction activities that will be conducted and the	January 17, 2018. The CPUC provided comments		
				location and duration of construction, including all helicopter activities. The project applicant shall mail the notice to all residents	on February 14, 2018. The notices were		
				or property owners within 1,000 feet of project components and to all land use agencies having jurisdiction over a recreation	resubmitted on February 20, 2018. The CPUC		
				area/facility located within 1,000 feet of a project component. If construction delays of more than 30 days occur, an additional	approved the notices on February 20, 2018, and		
				notice shall be prepared and distributed. To facilitate access to properties obstructed by construction activities, the project	the USFS approved the notices on February 22,		
				applicant shall notify property owners and tenants at least 24 hours in advance of construction activities and shall provide	2018. The public venue notice for C157 was		
				alternative access if required.	posted at various locations adjacent to the		
					alignment on March 5, 2018, and those		
				Newspaper/website advertisements. Fifteen (15) days prior to construction of any project component, notices shall be placed in	locations were documented in an email to the		
				local newspapers and bulletins, including Spanish language newspapers and bulletins, and on the relevant websites of	CPUC and USFS on March 6, 2018. The public		
				jurisdictional agencies. The Forest Supervisor, District Rangers, and Public Affairs Officer of the Cleveland National Forest shall also	mailer was mailed on March 21, 2018, and the		
				be notified. The notice shall state when and where construction will occur and provide information about the public liaison	certificate of mailing was submitted to the CPUC		
				person and hotline. If construction is delayed for more than 7 days, an additional round of newspaper notices shall be placed to	and the USFS on March 22. The newspaper		
				discuss the status and schedule of construction.	advertisement ran in the Alpine Sun on March		
					22, 2018; Hoy San Diego on March 24, 2018;		
				Public venue notices. Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as	and the Union-Tribune on March 25, 2018.		
				libraries, community notification boards, post offices, rest stops, community centers, trailheads, informational kiosks, and other			
				public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose			
				and schedule of construction activities.			
				Public liaison person and toll-free information hotline. The project applicant shall identify and provide a public liaison person			
				before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction			
				disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed			
				to the public. The project applicant shall also establish a toll-free telephone number for receiving questions or complaints during			
				construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be			
				addressed in the Construction Notification Plan.			

Comments

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

157 is not listed in t neasure is not applic

Land Use and	LU-03	01	Reduce Land Use	At least Ninety (90) days prior to completing final transmission line design for the approved route, the project applicant shall	C157 is not listed in th
Planning			Conflicts	notify landowners of parcels through which the alignment would pass regarding the specific location of the ROW, individual towers, staging areas, access roads, or other facilities associated with the project that would occur on the subject property. The notified parties shall be provided 30 days in which to identify conflicts with any planned development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner. Property owners whose land may be divided into potentially uneconomic parcels shall be afforded this same opportunity, even if development plans have not been established. The project applicant shall endeavor to accommodate these reroutes to the extent that they are feasible and do not create adverse impacts to resources or to other properties that would be greater in magnitude than impacts that would occur from construction and operation of the alignment as originally planned.	measure is not applica

Land Use and Planning	LU-04	01	Prior to construction, for any structure or object that is placed in, under, or over any portion of a county roadway, SDG&E shall obtain, from the San Diego County Director, Department of Public Works (DPW), a written encroachment permit in accordance with Section 71 (Highway and Traffic) of the San Diego County code of Regulatory Ordinances.	C157 is not listed in the measure is not applica
-			with Section 71 (Highway and Traffic) of the San Diego County code of Regulatory Ordinances.	

Noise	APM- NOI-01	01	Schedule	SDG&E will provide notice of the construction schedule to all property owners within 300 feet of the Proposed Action by mail at least one week prior to the start of construction activities. The announcement will state the construction start date, anticipated completion date, and hours of operation, as well as a telephone number to call with questions or complaints during construction.	implementation of MM LU-01 and in	Pre and During	Complete
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Public Health and PHS- Safety	01 01	Contractor Training	San Diego Gas & Electric (SDG&E) shall provide written documentation that all staff, including contractor, and subcontractor project personnel, have received training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures.	All construction personnel will receive the Worker Environmental Awareness Program training immediately prior to beginning work on the Project. The Worker Environmental Awareness Program training includes the appropriate work practices and hazardous materials protocol. Sign-in sheets will be submitted with the Weekly Environmental Compliance Reports.	During	To Be Implemented Immediately Prior to Construction
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Public Health and Safety	PHS-02	02	Hazardous Materials BMPs	The Spill Response and Notification Plan was approved by the USFS on July 21, 2016 and by the CPUC on July 18, 2016.	Pre	Complete
Public Health and Safety	PHS-03	02		A pre-blast survey will be conducted if blasting is determined to be necessary.		To Be Implemented During Construction

Comments

n the measure; therefore, this	Pre	N/A
olicable.		

Pre	N/A
	Pre

the measure; therefore, this	Pre	N/A
cable.		

Measure Category MMNo TaskNo Mitigation Measure Task Text Title

Public Health and	PHS-03	04	Blasting Procedures	- The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground	If blasting is required
Safety				movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity	Blasting Plan in accor
				requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance	-
				Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement The blasting plan shall	
				outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting	
				procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside	
				the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall	
				be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year	
				from the date of the last blast.	

Public Health and Safety	PHS-04	01	Contamination	between poles Z173105 and Z173109 shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid any ground disturbance in the	Poles Z173105 throug along C157; therefore apply to this compone
			Training	area.	

Public Health and Safety	PHS-07 01	Geotechnical Investigations	seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these	SDG&E performed de geotechnical investiga Results of the investig into the final design.
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Public Health and Safety	PSU-01	01			
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Recreation	REC-01	01	Gate Plan	To deter unauthorized access to specially designated or restricted areas via SDG&E access roads authorized by the MSUP, the	The Gate Plan was app
				project applicant shall submit a plan and schedule for gate (or other barriers, such as pipe rails, where appropriate) installation to	August 25, 2016. The L
				the Forest Service for approval. Gates will meet Forest Service engineering standards, and designs will be approved by the Forest	gates and potential bar
				Service prior to installation. In addition, appropriate deterrence signage approved by the Forest Service shall be installed on gates	Access Road Decommis
				to SDG&E access roads. Maintenance of gates and signage shall be the responsibility of the project applicant.	the Gate Plan. Therefo
					applicable for this com

Transportation and Traffic	APM- TRANS- 06	01		SDG&E will coordinate flight patterns with local air traffic control and the Federal Aviation Administration prior to construction to prevent any adverse impacts due to increased air traffic.	Per the APM and MM 2 was submitted to the C APM was superseded b Environmental Impact Statement. Therefore, applicable.
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Comments

d, SDG&E will prepare a ordance with this measure.	Pre and During	To Be Implemented During Construction
ugh Z173109 are not located re, this measure does not nent.	Pre and During	N/A
design-level desktop gations for C157 in 2017. tigations were incorporated	Pre and During	Complete
firming that AT&T facilities onto the power line ures will be submitted to the prior to transferring the	Pre	Pending
approved by the USFS on e USFS will include any barriers on C157 in the missioning Plan instead of efore, this measure is not omponent.	Pre, During, and Post	N/A
M Superseded List (which he CPUC on July 5, 2016), this ed by MM PHS-5 in the Final act Report/Final Impact re, this measure is not	Pre and During	N/A
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