PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

February 14, 2014

Mr. Brad Carter Project Manager San Diego Gas and Electric Company 8315 Century Park Ct. San Diego, California 92123



(Application No. 13-03-003)

Dear Mr. Carter:

San Diego Gas & Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence construction of the Tie-Line 637 Wood-to-Steel Replacement Project as described in SDG&E's NTP Request to Construct Tie-Line 637 Wood-to-Steel Project, dated February 11, 2014. The project includes replacement of 156 existing wood power line and interest distribution structures with new weathering steel structures along a 14-mile segment, from the Santa Ysabel Substation to the existing Creelman Substation, in the communities of Ramona and Santa Ysabel, San Diego County, California.

The Tie-Line 637 Wood-to-Steel Replacement Project was evaluated in accordance with the California Environmental Quality Act and a Permit to Construct (PTC) was granted by the CPUC on February 5, 2014 (Decision D.14-02-04). **NTP is granted by CPUC for the proposed construction activities based on the following factors:**

• The Final IS/MND prepared for the Tie-Line 637 Wood-to-Steel Replacement Project defined required mitigation measures to be implemented prior to project construction. The relevant mitigation measures for pre-construction activities associated with the project site are included in *Attachment A* and shall be implemented by SDG&E and its designated contractor. SDG&E's compliance with the pre-construction component for each measure is noted in the status table. Relevant mitigation measures for construction activities associated with the project site are additionally provided in *Attachment A*.

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

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



Brad Carter February 14, 2014

- All crew personnel shall be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log shall be maintained on-site with the names of all crew personnel trained and submitted to the CPUC.
- SDG&E shall comply with all applicable mitigation measures while conducting construction activities within the approved work limits associated with this Notice to Proceed.

Sincerely,

Lon Payne

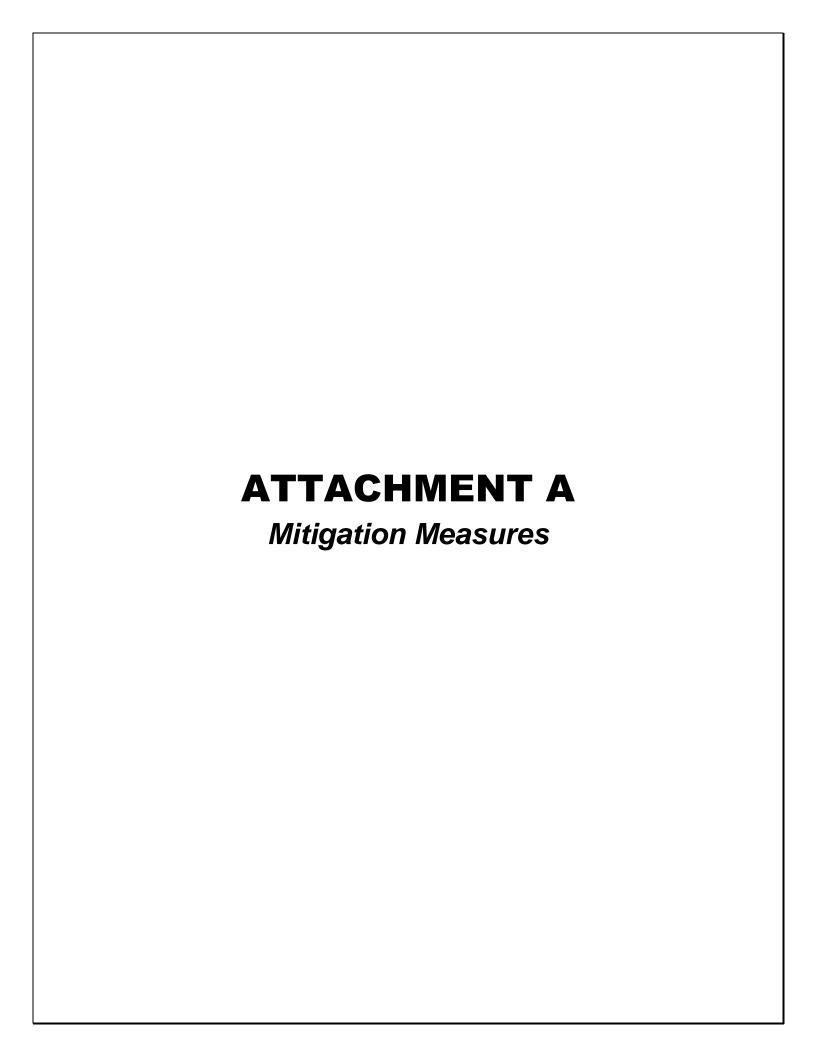
CPUC Environmental Project Manager

cc: D. Hochart, Dudek

A. Shaffer, Dudek

R. Giles, SDG&E

Att: Attachment A – Mitigation Measures



MM No.	Mitigation Measure	Applicability / Status	Notes
APM-GEN-1	Construction scheduling. SDG&E will coordinate construction of the proposed project such that construction activities will typically not overlap with other SDG&E construction projects in the immediate vicinity of the proposed project.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #1 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement. SDG&E commits to ensuring that no other SDG&E projects will overlap in the immediate vicinity of the Project.
APM-GEN-2	Helicopter use. Helicopter takeoffs and landings conducted at the Warnock and Santa Ysabel Staging Yards will be restricted to the approximate center of the staging area. Helicopter usage will conform to acceptable hours for construction activities, as outlined within the San Diego County Noise Code.	Applicable, pre-construction submittals met.	SDG&E submitted maps illustrating takeoff and landing areas, (center of the 6-acre and 5.4-acre) for Warnock and Santa Ysabel Staging yards, respectively, on February 3, 2014. The maps additionally illustrate directional paths for takeoff and landing.
APM-AES-1	Visual screening of staging yards. The Warnock and Santa Ysabel Staging Yards will have opaque mesh installed along the fence that will soften the view of the staging yard from public vantage points such as roads, residences, and public vantage points.	Applicable, pre-construction submittals met.	SDG&E submitted visual simulations (opaque green mesh) for screening materials on February 3, 2014. SDG&E included Conformance Statement #2 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement.
APM-AES-2	Restoring appearance of temporarily disturbed areas. When proposed project construction has been completed, all temporarily disturbed terrain will be restored, as needed and as appropriate, to approximate pre-construction conditions. Revegetation would be used, where appropriate (revegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to reestablish a natural-appearing landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape.	Applicable, pre-construction submittals met.	SDG&E submitted photograph documentation of pre-construction conditions for all sites on February 7, 2014.
APM-BIO-1	SDG&E Subregional NCCP. The proposed project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The proposed project is located within the SDG&E Subregional NCCP coverage area.	Applicable, no pre-construction submittals required.	
	The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Game), respectively, for the management and conservation of multiple species and their associated habitats, as established according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&E's activities in the Subregional Plan Area.		
	Pursuant to the SDG&E Subregional NCCP, SDG&E conducted pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm surveyed all proposed project impact areas and prepared a Preactivity Study Report (PSR) outlining all anticipated impacts related to the proposed project. The proposed project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR was submitted to the CDFW and USFWS, and no comments were received. Prior to the commencement of construction, a verification survey will be conducted of the proposed project disturbance areas, as required by the SDG&E Subregional NCCP.		
	Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures. If the previously delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&E mitigation bank will be required to address impacts from project-related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement.		
	Specific operating restrictions that are incorporated into the proposed project design to comply with the SDG&E Subregional NCCP include the following:		
	 Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1). No wildlife, including rattlesnakes, may be harmed, except to protect life and limb (Section 7.1.1, 2). Feeding of wildlife is not allowed (Section 7.1.1, 4). No pets are allowed within the ROW (Section 7.1.1, 5). Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7). Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8). 		

MM No.	Mitigation Measure	Applicability / Status	Notes
	 Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9). 		
	• Field crews shall refer all environmental issues, including wildlife relocation, dead or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10).		
	• All SDG&E personnel would participate in an environmental training program conducted by SDG&E, with annual updates (Section 7.1.2, 11).		
	 The Environmental Surveyor shall conduct preactivity studies for all activities occurring in natural areas, and will complete a preactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13). 		
	• The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14).		
	• The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25).		
	 In the event SDG&E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28). 		
	The Environmental Surveyor shall conduct monitoring as recommended in the preactivity study form (Section 7.1.4, 35.).		
	• Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38). Fugitive dust will be controlled by regular watering and speed limits (Section 7.1.4, 39).		
	 During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend 		
	appropriate avoidance and minimization measures (Section 7.1.6, 50).		
	 Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52). 		
	Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).		
BIO-1	Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) to conduct a focused rare plant survey during the time period when the following special-status plant species are detectable: San Diego gumplant (July – October; east of Del Amo Road (P65 east to Santa Ysabel Substation) in the following habitat types: chaparral, grassland, oak woodland, riparian forest, disturbed wetland, and in agricultural land east of Oak Hollow Road (P75 east to Santa Ysabel Substation)), and Coulter's saltbush (March – October; within proposed project impact areas within the project area in the following habitat types: agricultural land, coastal sage scrub, grassland, oak woodland, and disturbed wetlands).	Applicable, pre-construction submittals met.	SDG&E submitted biologist and rare-plant botanist resumes on December 20, 2013. SDG&E submitted a Focused Plant Survey Report (including preconstruction survey/methods, etc, for Fall 2013) on December 20, 2013. The Report includes maps of identified and inventoried SSP locations and habitat types are delineated. Coulterrs saltbush not present. SD gumplant
	There is some potential for little mousetail to occur within vernal pool and wetland areas; these areas will be protected through implementation of MM BIO 7, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands. However, there is a confined area (P103 through P107), where poles are situated within a wet meadow and will be cut down and removed by hand. Therefore, in this confined area, presence is assumed and SDG&E shall do the following: using pin flags, narrowly define footpaths for hand crews to and from the poles; crews will hand-cut the pole; and the cut poles will be removed by hand or by helicopter only.		present at SYSA and SS 19. SDG&E submitted a memo and additional map on February 3, 2014, committing to full avoidance of SD gumplant and proposed avoidance fencing at the SYSA and SS 19 during construction.
	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 though 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. CPUC will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.		
BIO-2	San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site	Applicable, pre-construction submittals met.	SDG&E submitted biologist resumes on December 20, 2013. Additional resumes were submitted on February 3, 2014.

MM No.	Mitigation Measure	Applicability / Status	Notes
	monitoring and documentation of violations and compliance.		
	SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report at a minimum shall include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations.		
BIO-3	At the end of each workday, any open holes shall be fully covered, after they have been inspected by the on-site biologist, with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.	Applicable, no pre-construction submittals required.	SDG&E included Conformance Statement #3 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement. SDG&E has incorporated the requirement to cover all holes into construction contract documents.
BIO-4	If construction activities including but not limited to tree trimming, road maintenance (i.e., re-establishing existing access roads), grading, or site disturbance are to occur between March 1 and September 1, a nesting bird survey shall be conducted by a qualified biologist to determine the presence of nests or nesting birds within 100 feet of the construction activities. The nesting bird surveys shall be completed no more than 72 hours prior to any construction activities. The survey will focus on special-status species known to use the area as well as other nesting birds that are protected under the Migratory Bird Treaty Act. If an active nest (defined below) is identified grading or site disturbance within a 100-foot buffer of the nest shall be monitored on a daily basis by a qualified biologist until project activities are no longer occurring within 100 feet of the nest or until fledglings become independent of the nest. "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 adult birds or once nestlings or fledglings are no longer dependent on the nest. The monitoring biologist may increase the buffer radius if he or she determines it is necessary. The monitoring biologist may decrease the buffer radius upon receiving approval from California Public Utilities Commission (CPUC), if he or she determines that the construction activities are disturbing the nesting activities. The monitoring biologist shall halt construction activities are not disturbing the nesting activities and a smaller buffer is more appropriate. The monitoring biologist shall halt construction activities fhe or she determines that the construction activities are disturbing the nesting activitie		SDG&E submitted biologist resumes on December 20, 2013. Additional resumes were submitted on February 3, 2014. SDG&E included Conformance Statement #4 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement. SDG&E commits to conducting nesting bird surveys no more than 72 hours prior to the construction at a given location. No requests from SDG&E for decreasing buffer space have been submitted to date.
BIO-5	nest), and compliance issues/concerns. The report shall also include the date and nesting outcome (e.g., depredated, nestling fledged, nest abandoned). In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC. If the CPUC-approved biologist observes an active nest (see definition below) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric would postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions. "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 adult birds or once nestlings or fledglings are no longer dependent on the nest.		SDG&E is not seeking approval for blasting activities as part of the NTP. If blasting is determined to be required, SDG&E will complete all applicable pre-blasting requirements.
BIO-6	In locations where Stephen's kangaroo rat habitat assessments were not conducted during the 2010 field survey, 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 Stephen's kangaroo rat to occur within the proposed project area. Any burrows, utilized habitat, or signs of Stephen's 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 Stephen's kangaroo rat occupied habitat. If Stephen's kangaroo rat occupied habitat cannot be avoided during construction, the monitoring	Applicable, pre-construction submittals met.	SDG&E submitted Stephen's kangaroo rat (SKR) biologist qualifications on September 20, 2013, along with a Rare Plant Survey Map of SD gumplant and Coulter's saltbush via email. SDG&E completed a SKR survey in October 2013. A memo was provided to Chambers Group (and to SDG&E) on November

MM No.	Mitigation Measure	Applicability / Status	Notes
	biologist shall make recommendations to ensure minimal impacts to the existing Stephen's kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to project work area for complete avoidance of Stephen's 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.		26, 2013 detailing the results of the field assessment/survey for SKR potential presence (survey areas included re-survey of 2007 Witch Creek fire burn areas, Tulloch and EA properties—not included in 2010). No trapping was required. Determination of no presence along alignment due to inappropriate topography and habitat.
			SDG&E submitted this report to the CPUC on December 20, 2013. No suitable habitat was identified (remaining requirements determined not applicable).
BIO-7	Prior to construction, qualified biologists approved by the California Public Utilities Commission shall flag all vernal pools (marginal or otherwise) and associated existing connectivity within the project footprint (water entering area during rain events) for avoidance during the proposed construction activities. Rain events are defined as "a precipitation event of 0.5 inch or greater."	Applicable, pre-construction submittals met.	SDG&E submitted biologist resume for Vernal Pools on December 20, 2013. Additional resumes were submitted on February 3, 2014.
	If work is conducted during the rainy season (October 1 through May 1), before scheduling project activity in areas flagged as vernal pools, the weather forecast will be monitored. Work will not be scheduled in these areas if a greater than 40% chance of a rain event (as defined above) is forecasted during the time needed to complete project activities. If a rain event unexpectedly occurs during project activity, the site will be secured with appropriate best management practices as identified in APM HYD-1. Construction travel along public access roads where the road rut vernal pools have been identified will be flagged or otherwise marked prior to construction for minimal impact to these locations. Project related traffic in these areas will be kept to the minimum required to implement the project.		SDG&E submitted maps of Vernal Pools (including construction footprint of Creelman Staging Yard and Warnock Rd) on December 20, 2013. The map identified 4 VPs to be flagged as ESAs; 9 VPs were identified that did not require ESA flagging is not required. SDG&E included Conformance Statement #5 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement.
			SDG&E committed to flagging all vernal pools that were included on the previously submitted map to ensure avoidance during construction. Flagging will be completed immediately prior to construction activities. Photograph documentation will be provided within the weekly compliance report as applicable.
APM-CUL-1	SDG&E's practices are in accordance with Federal, State, and local laws to protect and avoid cultural resources, including: Archaeological Resources Protection Act of 1979, as amended, National Historic Preservation Act of 1966, as amended (NHPA), California Penal Code 622 ½, PRC 5097.1 through 5097.6, PRC 5097.98, and CEQA. An independent Cultural Resource Management firm conducted pre-construction surveys under contract with SDG&E, prepared an inventory of cultural resources within the proposed project's Area of Potential Effect, and provided recommendations for avoidance and minimization to assist SDG&E in its compliance with CEQA requirements. SDG&E's Principal Cultural Resources Specialist worked closely with SDG&E design and engineering to move several of the poles during the design phase of the proposed project to avoid impacts to known cultural resources. Known cultural resources will be spanned or otherwise avoided through project design and through routing during construction activities to the extent feasible. In addition, the micropile pole type will be used at many locations during construction to minimize ground disturbance and decrease potential impacts to unknown buried deposits.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #6 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement.
APM-CUL-2	Cultural resources sensitivity training. Prior to construction or ground-disturbing activities, all SDG&E, contractor, and subcontractor project personnel will receive training regarding the appropriate work practices necessary to effectively implement the project design features and ordinary construction restrictions relating to cultural resources, including the potential for exposing subsurface cultural resources and paleontological resources. This training will include presentation of the procedures to be followed upon the absolute like a substantial processor of the procedure of the procedu	Applicable, pre-construction submittals met.	SDG&E submitted an archaeological training overview for cultural resources December 20, 2013. SDG&E submitted a paleontological training overview.
	remains, as well as of paleontological resources. Known archaeological sites would be demarcated by a qualified archaeologist as Environmentally Sensitive Areas prior to the start of construction. Construction crews would be instructed to avoid disturbance of these areas.		See APM CUL-3 for training documentation.
APM-CUL-3	Archaeological monitoring. A qualified archaeologist will attend preconstruction meetings, as needed, and a qualified archaeological monitor will monitor	Applicable, pre-construction submittals	See CUL-1 for mapping of ESAs (complete). SDG&E provided archaeologist resumes on December 20, 2013.
	activities in the vicinity of all known cultural resources within the proposed project area. The requirements for archaeological monitoring will be noted on the construction plans. The archaeologist's duties will include monitoring, evaluation of any finds, analysis of materials, and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.		SDG&E included Conformance Statement #4 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing this requirement.
			SDG&E committed to maintaining a record of trained personnel that have received Cultural Resources Sensitivity Training. Copies of the training

MM No.	Mitigation Measure	Applicability / Status	Notes
APM-CUL-5	Unanticipated discovery of human remains. If human remains are encountered during construction, SDG&E will comply with California State law	Applicable, no pre-construction	sign-in session logs will be provided within the weekly compliance reports.
	(Health and Safety Code Section 7050.5; PRC Sections 5097.94, 5097.98 and 5097.99). This law specifies that work will stop immediately in any areas where human remains or suspected human remains are encountered. The appropriate agency and SDG&E will be notified of any such discovery. SDG&E will contact the Office of the Medical Examiner. The Medical Examiner has two working days to examine the remains after being notified by SDG&E. Under some circumstances, a determination may be made without direct input from the Medical Examiner. When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the identified most likely descendant (MLD) and the MLD has 24 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the remains and grave goods. If the MLD does not make recommendations within 24 hours, the area of the property must be secured from further disturbance. If there are disputes between the landowner and the nearest likely descendants, the NAHC will mediate the dispute to attempt to find a resolution. If mediation fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.	submittals required.	
APM-CUL-6	Paleontological monitoring. A paleontological monitor will work under the direction of a qualified project paleontologist and will be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits for the eight poles located within paleontologically sensitive formations (i.e., Pomerado Conglomerate, Late Pleistocene to Holocene-age channel deposits). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	Applicable, pre-construction submittals met.	SDG&E submitted four paleontological resumes on December 20, 2013. SDG&E submitted a map on December 20, 2013 identifying eight direct- bury pole locations where monitoring for paleontological resources will be required.
APM-CUL-7	Unanticipated discovery of fossils. In the event that fossils are encountered, the paleontological monitor would have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with SDG&E's Cultural Resource Specialist, would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. If fossils are discovered, the paleontologist (or paleontological monitor) would recover them along with pertinent stratigraphic data. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth, recovery of bulk sedimentary-matrix samples for off-site wet screening from specific strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage would be cleaned, repaired, sorted, cataloged, and deposited in a scientific institution with permanent paleontological collections, and a paleontological monitoring report would be written.	Applicable, pre-construction submittals met.	See APM-CUL-6 for resumes.
CUL-1	During construction of the proposed project, all Avoidance Measures as identified in Table 4 of the project-specific cultural resources report conducted by ASM (ASM 2012) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission. Avoidance Measures as listed in Table 4 of the report include retention of a cultural resources monitor during pole relocation work; establishment of Environmentally Sensitive Areas (ESAs) where sensitive resources are present in the vicinity of work sites; and avoiding sensitive bedrock, historical features, or other identified features within established ESAs.	Applicable, pre-construction submittals met.	SDG&E submitted a map with delineated ESA boundaries (approved work areas within ESAs TBD); proposed micropiles or direct bury poles for ground disturbance avoidance (opposed to excavated foundation poles); and provided recommended fencing around certain ESAs on December 20, 2013. SDG&E submitted a memorandum/letter report to CPUC and Dudek (dated November 14, 2013) documenting the results of a preconstruction fielding, inventory, and cultural resource impact assessment conducted by ASM Affiliates, Inc. SDG&E submitted an additional map for avoidance and delineation of ESAs on February 3, 2014. SDG&E included Conformance Statement #8 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014, addressing ESA flagging requirements. SDG&E committed to implementing all avoidance measures listed within the ASM Cultural Resources Report to include cultural resource monitoring during pole relocation work, establishment and flagging of Cultural Environmentally Sensitive Areas (ESA) sites and avoidance of all identified cultural resources.

MM No.	Mitigation Measure	Applicability / Status	Notes
			Additionally, SDG&E included Conformance Statement #9 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014; SDG&E incorporated measures to avoid cultural resources into the project design and has included within construction contract documents
CUL-2	Prior to commencement of construction associated with the Santa Ysabel Staging Yard, an Environmentally Sensitive Area (ESA) shall be established around the existing resource by the retained cultural monitor. Fencing shall be erected to demarcate the ESA to minimize the potential for impacts during construction.	Applicable, pre-construction submittals met.	See CUL-1 for additional map provided for avoidance and delineation of ESA.
CUL-3	Where access roads traverse or are located near cultural resource sites as identified in the cultural resources report conducted by ASM (ASM 2012), vehicles shall be required to remain within existing access roads. No road grading shall be allowed within identified cultural resource site boundaries.	Applicable, pre-construction submittals met.	See CUL-1 for additional map provided in ASM cultural report
CUL-4	In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or human bones, all work within 50 feet of the resources shall be halted, and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of San Diego Gas & Electric (SDG&E), California Public Utilities Commission (CPUC), and the qualified archaeologist shall confer to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curation, as necessary; and a report prepared by a specialist according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the CPUC and SDG&E shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out. If the CPUC, in consultation with the qualified archaeologist, determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, SDG&E will: a. Attempt to redesign the project to avoid any adverse effect on the significant archaeological resources. b. If the circumstances warrant an Archaeological Data Recovery Program (ADRP), such a program shall be conducted. The project archaeologist and the CPUC shall confer and consult to determine the scope of the ADRP. The archaeologist s	Applicable, no pre-construction submittals required.	
APM-GEO-1	Project plans and specifications take into account the potential for mass wasting and liquefaction. A geotechnical study was conducted by VO Engineering Inc. in 2011 to evaluate the pole locations along the proposed project power line route for the presence of geologic hazards. The geotechnical study indicated the presence of geologic conditions potentially susceptible to mass wasting or liquefaction at the locations of proposed Pole Nos. P103, R107, P110, P114, P129, P22, P23, P48, P49, and P51. The final project plans and specifications prepared by the responsible engineer have taken into account the geologic hazard conditions present at these locations and include appropriate engineering design and construction measures to minimize the potential for damage to proposed project structures in the event that there is an occurrence of these hazards.	Applicable, pre-construction submittals met.	SDG&E submitted Geotechnical Investigation Report as part of SDG&E response to Data Request #1 on May 21, 2013
APM-GEO-2	Soil stabilization. Once temporary surface disturbances are complete, areas that would not be subject to additional disturbance will be stabilized to control soil erosion.	Applicable, no pre-construction submittals required.	
APM-HAZ-1	Steel structures. New structures are designed utilizing steel to avoid potential adverse effects relating to fire and fire damage.	Applicable, pre-construction submittals met.	SDG&E submitted pole designs submitted with PEA on March 13, 2013. SDG&E included Conformance Statement #10 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014; SDG&E confirmed that all new structures have been designed, and will be constructed utilizing weathering steel.
APM-HAZ-2	TL 637 Project Fire Plan. The purpose of the proposed project is to improve the reliability of the power lines in fire-prone (very high to extreme fire threat areas) and wind-prone areas and minimize the risks associated with future wildfires. The proposed project is located within the Very High fire threat designation, as indicated on SDG&E's 2012 Fire Threat Zone Map. The proposed project design includes fire-hardening techniques, including replacing wood poles with steel poles, increasing conductor spacing to maximize line clearances, installing steel poles designed to withstand an extreme wind-loading case and known local conditions, and installing longer polymer insulators. These design components of the proposed project minimize fire risk through enhanced safety and reliability of the power line system during extreme weather conditions. In addition to these design features, the proposed project will implement the TL 637 Project Fire Plan. The TL 637 Project Fire Plan exceeds fire prevention measures as stated in California Forestry Practice Rules, PRC 4:6. Avoidance and minimization measures to prevent wildland fires include training, oversight, and work controls in all phases of preparation and implementation of the proposed project. Training and briefings in fire prevention and suppression methods are key components of reducing the threat of a wildland fire on the proposed project. Additionally, suppression in the event	Applicable, pre-construction submittals met.	SDG&E submitted the TL 637 Project Fire Plan on March 13, 2013, which was included with Permit-to-Construct filing as PEA Appendix 4.7-B.

MM No.	Mitigation Measure	Applicability / Status	Notes
	of a fire starting will be facilitated by locating water tanks within two minutes of a work site, requiring firefighting equipment within 50 feet of any work/equipment site, and avoidance of construction activities during periods of declared Red Flag Warnings or other severe fire weather conditions as identified by SDG&E. Other avoidance and minimization measures may be employed, such as standby firefighters and fire engines. In addition, portions of the proposed project occurring within the Cleveland National Forest Fire Plan. The plan describes the project activity level (PAL) work restriction measures to employ while working on forest lands. Therefore, the proposed project design and construction avoidance and minimization measures will avoid and minimize fire risks as outlined in the TL 637 Project Fire Plan and the Cleveland National Forest Fire Plan.		
APM-HAZ-3	Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety. The proposed project will be constructed consistent with Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety. Electric Standard Practice 113.1 outlines practices and procedures for SDG&E activities occurring within areas of potential wildland fire threat within SDG&E's service territory. The proposed project design includes replacement of wood poles with steel poles, increased conductor spacing to maximize line clearances, installation of steel poles to withstand an extreme wind-loading case and known local conditions, and undergrounding of a portion of the power line. These design components of the proposed project minimize the fire risk through enhanced safety and reliability of the power line system, particularly during extreme weather conditions. The standard practices in Electrical Standard Practice 113.1 include avoidance and minimization measures to comply with state and local fire ordinances.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #11 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E confirmed that the project design complies with the Electrical Standard Practice 113.1 –Wildland Fire Prevention and Fire Safety.
APM-HAZ-4	Coordination and measures within parks and preserves. Appropriate safety measures will be implemented where trails and construction areas are near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ to provide a safety buffer between recreational users and construction areas. Construction schedule and activities will be coordinated with the authorized officer for the recreation area.	Applicable, pre-construction submittals met.	SDG&E submitted a summary record of email documentation with authorized officer (district ranger and supervisory park ranger for the recreation area) on February 7, 2014.
HAZ-1	Prior to construction, all San Diego Gas & Electric, contractor, and subcontractor project personnel would receive 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. A sign-in sheet of contractor and subcontractor project personnel who have received training shall be provided to California Public Utilities Commission on a weekly basis as indicated in MM BIO-2.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #12 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E committed to provide Hazardous Material Training to all contactors and subcontractors prior to the commencement of construction activities. Training sign-in logs will be provided within the Weekly Construction Status and MMCRP Compliance report.
HAZ-2	During construction, construction best management practices (BMPs) shall be implemented to prevent impacts from release of hazardous materials during construction activities. Typical BMPs could include, but would not be limited to, construction practices such as the use of absorbent pads for spill containment, specified locations for construction vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible.	Applicable, no pre-construction submittals required.	General Construction Permit and SWPPP, WDID No. 9 37C368844: Issued 2-3-14. Section 401 Water Quality Certification No. 11C-114: Issued May 16, 2012.
HAZ-3	In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions:	N/A	SDG&E is not seeking approval for blasting activities as part of the NTP. If blasting is determined to be required, SDG&E will complete all applicable pre-blasting requirements.
	 The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas &Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre- blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan. 		
	 The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. 		
	 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. 		
HAZ-4	Prior to flight operations for helicopter use during construction, San Diego Gas &Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration regulations regarding helicopter use to prevent conflict with air traffic generated by the Ramona Airport. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction activities.	Applicable, pre-construction submittals met.	SDG&E submitted the Draft Helicopter Operations and Lift Plan submitted on February 3, 2014, which includes Notice to Airman (FAA) language.
			SDG&E included Conformance Statement #13 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E committed to coordinating with local air-traffic control at the Ramona Airport and submit the Notice to Airman immediately prior to helicopter operations on the Project.

MM No.	Mitigation Measure	Applicability / Status	Notes
			SDG&E will comply with applicable Federal Aviation Administration requirements, as needed, including the preparation of Congested Area Plan(s). Documentation of helicopter-related coordination will be provided within the Weekly Construction Status and MMCRP Compliance report
HAZ-5	Prior to flight operations for helicopter use during construction, a Helicopter Lift Plan shall be prepared if required pursuant to Federal Aviation Administration regulations. The Helicopter Lift Plan shall be submitted to the California Public Utilities Commission for review and approval.	Applicable, pre-construction submittals met.	SDG&E submitted the Draft Helicopter Operations and Lift Plan submitted on February 3, 2014.
APM-HYD-1	SDG&E Water Quality Construction BMPs Manual. SDG&E's Water Quality Construction BMPs Manual (BMP Manual) was created to organize SDG&E's standard water quality protection procedures for various specific actions that routinely occur as part of SDG&E's ongoing construction, operations, and maintenance activities. The primary focus of most BMPs is the reduction and/or elimination of water quality impacts during construction of linear projects such as the proposed project. The BMPs described within the BMP Manual were derived from several sources, including the State of California guidelines as well as the Caltrans Water Quality BMPs. The BMP Manual will be utilized during construction (by way of preparation and implementation of the SWPPP), operation, and maintenance of the proposed project to ensure compliance with all relevant SDG&E and government-mandated water quality standards.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #14 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E will abide by the Water Quality Construction Best Management Practices (BMPs) manual for the duration of the Project and has incorporated requirements into construction contract documents.
HYD-1	 During routine operation and maintenance activities, if erosion is discovered along the proposed project alignment that would affect a surface water feature, including but not limited to a wet meadow, stream, channel or any other surface water body, San Diego Gas & Electric shall implement erosion control measures including but not limited to: Periodic inspection and maintenance, including cleaning dips and cross-drains, repairing non-jurisdictional ditches, marking culvert inlets to aid in location, and clearing debris from culverts. Avoid using roads during wet periods if such use would damage road drainage features. Grade road surfaces only as often as necessary to maintain a stable running surface and to retain the original surface drainage. Place all excess material removed by maintenance operations in safe disposal sites and stabilize these sites to prevent erosion. Avoid locations where erosion will carry materials into a stream. 	N/A, pre-construction submittals met.	
HYD-2	Herbicides shall not be applied within 100 feet of a surface water feature, including but not limited to a wet meadow, stream, channel, or any other surface water body.	Applicable, no pre-construction submittals required.	SDG&E included Conformance Statement #15 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E has incorporated the herbicide use requirement into construction contract documents.
HYD-3	During pole repair work, mowing or trimming of vegetation shall be conducted to ensure that ground disturbance is minimized. Vegetation clearing shall be avoided where feasible. In the unlikely event that vegetation clearing or minor grading is required during operation and maintenance activities, San Diego Gas & Electric shall establish a temporary work site where work is to be conducted. Any topsoil or vegetation removed during this process shall be stored, and redistributed over the temporary work site when maintenance activities are completed, unless clearance is required around the poles.	N/A (operations)	
HYD-4	San Diego Gas &Electric shall implement the terms and conditions as specified in the Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Certification (Certification No. 11C-114; May 16, 2012), which identifies the poles to remain in place and those to be relocated outside jurisdictional areas.	Applicable, no pre-construction submittals required.	SDG&E submitted pole locations, watershed and activities submitted on February 7, 2014 but not determined to be a pre-construction requirement
APM-NOI-1	Generators. Generator use will be limited to less than 50 horsepower (HP) at all staging yards. Any generators used at the staging yards will be located away from noise sensitive areas, and positioned on the property to comply with the San Diego County noise ordinance.	Applicable, no pre-construction submittals required.	
APM-NOI-2	Mufflers. Functioning mufflers will be maintained on all equipment.	Applicable, no pre-construction submittals required.	
APM-NOI-3	Resident notification. Residents within 50 feet will receive notification of the start of construction at least one week prior to the start of construction activities within that area.	Applicable, pre-construction submittals met.	SDG&E provided proof of public notification package (50' buffer delineated, APN notification parcels and list of land owners provided) on February 7, 2014. Cover letter is dated February 11, 2014.
NOI-1	At least 30 days before helicopter use and stringing operations are employed San Diego Gas &Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the proposed project alignment, SDG&E shall notify landowners, livestock facility owners, and residents within 50 feet of construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.	Applicable, pre-construction submittals met.	SDG&E included Conformance Statement #16 in the NTP Request to Construct Tie-Line 637 Wood-to Steel Project, dated February 11, 2014 addressing this requirement. SDG&E committed to distributing a public notice mailer to residents at least seven days prior to the start of helicopter or stringing operations. SDG&E submitted a Draft Notification Letter/Courtesy Notice provided to CPUC on February 7, 2014.

MM No.	Mitigation Measure	Applicability / Status	Notes
NOI-2	In the event noise levels during construction activities are expected to exceed an 8- hour Leq of 75 dBA at the nearest property line or within 50 feet of the existing and proposed project alignment where noise sensitive areas are located, San Diego Gas &Electric (SDG&E) shall implement noise reduction measures to reduce noise levels below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or 2) if noise barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents.	Applicable, no pre-construction submittals required.	
NOI-3	In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.		SDG&E is not seeking approval for blasting activities as part of the NTP. If blasting is determined to be required, SDG&E will complete all applicable pre-blasting requirements.
APM-REC-1	Temporary trail detours. Where feasible, temporary detours will be provided for trail users. Signs will be provided to direct trail users to the temporary trail detours.	Applicable, no pre-construction submittals required.	
	Standard Traffic Control Procedures. SDG&E will implement a traffic control plan to address potential disruption of traffic circulation during construction activities and address any safety issues. The traffic control plan will be prepared by the project engineer or contractor and subject to approval by the County.		Traffic Control Plan, conditions, and plan approved by San Diego County on 2/11/14. SDG&E provided documentation of San Diego County approval to CPUC on 2/12/14.
	Encroachment permits. SDG&E will obtain the required encroachment permits from Caltrans for work near Highways 78 and 79, and will ensure that proper safety measures are in place while construction work is occurring near public roadways. These safety measures include flagging, proper signage, and orange cones to alert the public to construction activities near the roadway.	met.	SDG&E submitted encroachment permit extension for wood-to-steel pole replacement projects to CPUC on February 3, 2014. Caltrans Encroachment Permit No. 11-11-6UC-0482R2: Extension Issued November 20, 2013.