PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 30, 2019

Richard Quasarano Environmental Project Manager San Diego Gas & Electric Company 1010 Tavern Road Alpine, CA 91901 Sent via email to: RQuasarano@semprautilities.com

RE: Notice to Proceed Request No. 6 for the removal and replacement of the existing 138-kV transmission line with a new double-circuit 230-kV transmission line from Rancho Viejo Road southeast to pole #41 for the South Orange County Reliability Enhancement Project.

Dear Mr. Quasarano:

San Diego Gas & Electric Company (SDG&E) is requesting authorization from the California Public Utilities Commission (CPUC) to commence construction on select activities for the South Orange County Reliability Enhancement (SOCRE) Project. Notice to Proceed No. 6 (NTP-6) shall include removal and replacement of the existing 138-kV transmission line with a new double-circuit 230-kV transmission line from Rancho Viejo Road southeast to pole #41. NTP-6 construction activities will occur between double-circuit standard steel pole #5 (previously approved in NTP-5), located east of Rancho Viejo Road, and pole #41, located west of the Talega Hub and Marine Corps Base Camp Pendleton. Construction for NTP-6 will be confined to the activities described below. NTP-6 activities will take place within the cities of San Juan Capistrano and San Clemente and unincorporated Orange County.

Segment 1b: Double-Circuit 230-kV Transmission Line East of Rancho Viejo Road to Via Pamplona

Segment 1b will consist of construction of a double-circuit 230-kV transmission line (TL23007 and TL23030) running overhead from new transmission standard pole #5 east of Rancho Viejo Road (previously authorized under NTP-5) and continuing southeast along new transmission standard poles to Via Pamplona on the border of the Rancho San Juan Residential Development, at which point the line will transition to underground Segment 2. Segment 1b work will generally consist of the following:

- The existing 138-kV transmission line (TL13835) and twelve associated existing transmission structures from Z223180 to Z203022 will be removed (removal of Z203020 and Z203021 is described below under *Segment 2*).
- Ten (10) new transmission standard poles (#6 through #15) will be installed.
- Two transmission cable poles will be installed (#16 and #17) to transition the overhead conductor to an underground position.

Segment 2: Underground 230-kV Transmission Lines Via Pamplona to La Pata Avenue, along Stallion Ridge Segment 2 will consist of two construction of 230-kV transmission line segments installed underground along Stallion Ridge between Via Pamplona and La Pata Avenue. One segment (TL23030) will be installed along the northern side of Stallion Ridge, and one segment (TL23007) will be installed along the southern side of the road. Segment 2 work will generally consist of the following:

- The underground double-circuit 230-kV line will head north from transmission cable poles #16 and #17 for approximately 300 feet along Via Pamplona, then turn east along Stallion Ridge. These circuits will continue in new underground conduit through the existing paved road until they reach the eastern terminus of Stallion Ridge at La Pata Avenue. The underground conduits would continue south for approximately 200 feet until they reach new 230-kV transmission cable poles #18 and #19. A new underground structure (vault U109340) will be installed. The new trench package would also include conduit for new fiber optic communications lines.
- The existing 138-kV transmission line (TL13835) and associated transmission structures Z203021 and Z203020 will be removed.

Segment 3: Double-Circuit 230kV Transmission Line

South from Stallion Ridge to Talega Hub

Segment 3 will consist of construction of new transmission cable poles #18 and #19 (to transition the underground conductor to an overhead position), construction of the overhead 230-kV double-circuit transmission line from these poles to new transmission standard pole #41, and removal of the existing 138-kV transmission line (TL13835) structures. Segment 3 work will generally consist of the following:

- Twenty-one (21) 230-kV transmission structures (#21 to #41) will be installed.
- Twenty-nine (29) existing transmission structures and associated conductor will be removed from existing transmission structure Z206511 to Z327416.
- All-dielectric self-supporting (ADSS) fiber cable will be installed underground from transmission standard pole #38 to the Pico Substation to replace the existing fiber cable connection (from Z221636 to Pico Substation) using new and existing conduit. Trenching will occur along the access road to intercept the existing conduit and within Pico Substation. In addition, overhead ADSS fiber cable will be installed from pole #38 to the Pico Substation.

In addition, NTP-6 includes the following construction activities:

- Improvements to existing access roads; access road improvements will not include widening or realignment of existing roads
- Minor vegetation clearing along the sides of access roads, including some tree branch trimming (but no tree removal).
- Installation of temporary guard structures to protect roadways and utility corridors, including trimming of some trees to facilitate roadway crossings and installation of the guard structures.

- Installation and use of four staging areas, identified as Staging Areas 1, 2, 3, and 4 in the NTPR-6 Mapbook (Attachment A to Attachment 1).
- Geotechnical work or soil testing within the construction work areas, as needed to finalize facility design requirements.

Work activities under NTP-6 will occur within temporary work areas. The approved staging areas will be utilized for the majority of construction staging for work activities under NTP-6. Construction activities for areas east of the San Juan Capistrano Substation are further described in the Final Environmental Impact Report (FEIR) for the SOCRE Project (Decision D.16-12-064).

NTP-6 for the SOCRE Project is hereby granted by the CPUC for the proposed construction activities based on SDG&E's NTP-6 request, dated October 15, 2019, and the understanding that SDG&E and its contractor(s) will meet the following conditions:

- SDG&E will comply with all Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) included in the Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP) Compliance Plan for the SOCRE Project.
- All construction activities for NTP-6 will be conducted in compliance with applicable local permit requirements.
- SDG&E will obtain all necessary permits prior to initiating the specific Project activities
 triggering each permit requirement. Copies of any relevant permits, compliance plans
 (MMCRP, Storm Water Pollution Prevention Plan [SWPPP], etc.), and this NTP shall be
 available on-site for the duration of construction activities. Prior to initiating an activity
 requiring a permit, SDG&E will provide a copy of the required permit to the CPUC upon
 request.
- Prior to the commencement of NTP-6 work activities, SDG&E will obtain any additional land rights (temporary and/or permanent) that will be required to install the Project components and provide evidence of such to the CPUC upon request.
- SDG&E will provide biological, cultural resource, paleontological, and other specialty monitors on site, as needed, during construction activities to ensure protection of sensitive resources.
- Preconstruction clearance surveys for biological, cultural, and paleontological resources will be conducted, as appropriate, prior to construction activities.
- All crew personnel shall be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log with the names of all crew personnel trained through the Safety and Environmental Awareness Program (SEAP) shall be maintained on-site and made available to the CPUC upon request.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agency and the CPUC shall be notified immediately.

- Only staging areas approved by the CPUC under this or other NTPs or MPRs will be
 used for all long-term staging, materials laydown, equipment storage, and Project vehicle
 parking, or other approved uses, necessary to support the activities included in NTP-6.
 Staging areas will be appropriately screened in accordance with applicable MMs and
 APMs.
- The CPUC must review and approve any additional staging areas, temporary workspace areas, or access routes; long-term laydown areas for materials or equipment storage proposed outside of approved staging areas; and/or changes to construction techniques.
- Only staging areas identified in the FEIS for use as helicopter fly yards or otherwise approved by the CPUC for use as helicopter fly yards may be used for this purpose.
- SDG&E will submit a Helicopter Safety Plan to the CPUC prior to the start of construction activities that require helicopter operations.
- As necessary to complete work on private and public ROWs, temporary equipment parking and materials storage may occur on public ROWs as authorized by the City of San Juan Capistrano, City of San Clemente, or Orange County in encroachment and traffic control permits. As necessary, all other overnight storage of equipment or laydown of construction materials (e.g., steel poles delivered in sections and assembled in place) will occur within the Temporary Work Areas identified in the NTPR-6 Mapbook (Attachment A to Attachment 1) and be temporary and short in duration.
- Prior to implementing stringing or other construction activities that would entail temporary closure of a portion of the Via Zamora roadway, SDG&E will prepare a description of its plan for minimizing effects to local residents and maintaining emergency access and provide the plan to the CPUC for review and comment.
- No new access roads will be constructed and improvements to existing access roads will
 not include widening or realignment of roads.
- Minor vegetation clearing along the sides of access roads is limited to one foot beyond the established graded section on each side of the road and some trimming of tree branches that would obstruct construction access. Tree trimming will be limited to the minimum practicable amount to allow for safe and efficient construction activities. No trees will be removed as part of access road improvements. If SDG&E determines the need for more extensive vegetation clearing or trimming, SDG&E will report and obtain approval of such from the CPUC prior to conducting the clearing or trimming.
- SDG&E will conduct all activities associated with stringing new transmission conductor
 across Ortega Highway according to the specific permit conditions identified in the
 encroachment permit and traffic control permit obtained from the California Department
 of Transportation (Caltrans), including traffic control, timing restrictions, and
 notifications.
- If the CPUC determines that any work activities require a traffic control permit (e.g., work associated with a large delivery to the site or equipment parking), SDG&E will obtain the appropriate permit(s) prior to performing those activities.

- Construction workers driving personal vehicles to the work area may park in legal parking locations on public streets in accordance with local parking restrictions.
- Operation and staging of construction equipment will occur primarily during daylight
 hours (generally 7:00 A.M. to 6:00 P.M.), Monday through Friday. If SDG&E determines
 that construction activities are necessary to meet schedule demands or permit
 requirements outside of these hours (e.g., nights, holidays, and Sundays), SDG&E will
 follow the terms and notifications outlined in MM NV-1 and the Project's approved
 Noise and Vibration Control Plan.
- Work areas will be restored immediately following completion of their use for construction and will be restored as close as possible to their original grade and landscape condition or as otherwise agreed to with the property owner and per Project MMs and APMs described in Attachment B to Attachment 1, MMCRP Requirements Tracking Table for NTPR-6.
- For all work locations within 50-feet of jurisdictional aquatic features, SDG&E will
 consult with the USACE and CDFW to prepare BMPs for review and approval by the
 CPUC. SDG&E will implement BMPs approved for these areas by the CPUC prior to
 construction. For construction work areas located within 200 feet of a jurisdictional
 aquatic feature, SDG&E will maintain a 50-foot exclusionary buffer.
- SDG&E will measure ambient noise levels at sensitive residential receptors located within 45 feet of the 230-kV line segments before operation of the Project's 230-kV line and provide a record of the ambient noise levels to the CPUC upon completion of the noise measurement.
- To control soil erosion, hydromulch or other effective soil stabilization techniques will be applied on all disturbed, inactive areas in compliance with the Project's SWPPP.
- Guy wires for transmission and distribution poles will be installed in a manner that would not impede public access or create a safety hazard.

Sincerely.

Andrew Barnsdale

CPUC Environmental Project Manager

ce:

Joe Donaldson, E & E, CPUC Compliance Manager Jennifer Kaminsky, SDG&E Project Manager

Attachment 1: Notice to Proceed Request No. 6 for the removal and replacement of the existing 138-kV transmission line with a new double-circuit 230-kV transmission line from Rancho Viejo Road southeast to pole #41 for the South Orange County Reliability Enhancement Project. (dated October 15, 2019)

Richard Quasarano October 30, 2019 Page 6

Attachment 1

Notice to Proceed Request No. 6 for the removal and replacement of the existing 138-kV transmission line with a new double-circuit 230-kV transmission line from Rancho Viejo Road southeast to pole #41 for the South Orange County Reliability Enhancement Project. (dated October 15, 2019)



Richard Quasarano SOCRE Environmental Project Manager San Diego Gas & Electric Company (T) 858-654-8211

October 15, 2019

Andrew Barnsdale Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Notice to Proceed Request No. 6 for the removal and replacement of the existing 138-kV transmission line with a new double-circuit 230-kV transmission line from Rancho Viejo Road southeast to pole #41 for the South Orange County Reliability Enhancement Project.

Mr. Barnsdale:

On December 15, 2016, the California Public Utilities Commission (CPUC) voted to grant San Diego Gas & Electric Company (SDG&E) a Certificate of Public Convenience and Necessity (CPCN) (Decision D.16-12-064) for the South Orange County Reliability Enhancement Project (SOCRE or Project) contingent upon implementation of the Mitigation Monitoring, Compliance and Reporting Program (MMCRP). SDG&E requests approval of this Notice to Proceed Request No. 6 (NTPR-6) for construction activities between double-circuit standard steel pole #5 (previously approved in NTP-5) and pole #41 as shown in *Attachment A, NTPR-6 Mapbook (Mapbook)*. Pole #5 is located east of Rancho Viejo Road. Pole #41 is located west of the Talega Hub and Marine Corps Base Camp Pendleton.

This work will include the removal of the existing 138-kV transmission line and associated structures; construction of a new overhead double-circuit 230-kV transmission line; the installation of two 230-kV underground transmission lines along Stallion Ridge¹; and the installation of communications infrastructure. More detailed descriptions of these activities are shown below. NTPR-6 activities will take place within the cities of San Juan Capistrano and San Clemente, and unincorporated Orange County. Transmission components identified herein are described in the Final Environmental Impact Report (FEIR), dated April 25, 2016 (State Clearinghouse No. 2013011011) and shown in the *Mapbook*.

Pursuant to the Project's MMCRP, the following information (Sections 1.0 to 11.0) is provided and organized as outlined in Section 3.2.2, Notice to Proceed Process Requirements, and contains all pertinent information required for the CPUC to authorize NTPR-6 activities.

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¹ The City of San Juan Capistrano renamed Vista Montana Road to Stallion Ridge

1.0 Description of Work and Comparison to FEIR

As described in the Project's FEIR Section 2.3.3.1, Proposed Transmission Line Segments (pages 2-15 and 2-19), SDG&E will rebuild and upgrade the overhead transmission line from transmission standard pole #5 (previously approved in NTP-5) southeast to transmission standard pole #41 and install underground 230-kV transmission lines from Via Pamplona to La Pata Avenue along Stallion Ridge. See below for a description of NTPR-6 work components and a comparison of the components to those described in the Project's FEIR. Please refer to the *Mapbook* for the depiction of the NTPR-6 work components and associated temporary and permanent work areas. Please see *Table 1* below for locations of existing structure removals and new pole installations in the *Mapbook*. The poles and existing structures in *Table 1* are listed in order of appearance in the *Mapbook*.

Table 1. Mapbook References for Pole Installations and Removals

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Mapbook	Ροσο	1
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Install: Transmission Standard Pole #6

Remove: Z223180

Mapbook Page 2

Install: Transmission Standard Poles #7, #8 and #9

Remove: Z327353, Z327354 and Z327355

Mapbook Page 3

Install: Transmission Standard Poles #10, #11, and #12

Remove: Z630977, Z198318 and Z198319

Mapbook Page 4

Install: Transmission Standard Poles #13 and #14

Remove: Z198320, Z198321, Z198322 and Z196606

Mapbook Page 5

Install: Transmission Standard Pole #15 and Transmission Cable Poles #16, #17, #18 and #19

Remove: Z203022, Z203021, Z203020 and Z206511

Mapbook Page 6

Install: Transmission Standard Poles #21, #22 and #23

Remove: Z221660, Z221659, Z221658, Z221657 and Z221656

Mapbook Page 7

Install: Transmission Standard Poles #24 and #25

Remove: Z221655 and Z221654

Mapbook Page 8

Install: Transmission Standard Pole #26

Remove: Z221653 and Z221652

Mapbook Page 9

Install: Transmission Standard Poles #27, #28 and #29

Remove: Z221651, Z100064, Z100065 and Z221647

Mapbook Page 10

Install: Transmission Standard Poles #30 and #31

Remove: Z221646, Z221645, and Z221644

Mapbook Page 11

Install: Transmission Standard Poles #32 and #33

Remove: Z221643 and Z221642

Mapbook Page 12

Install: Transmission Standard Poles #34 and #35

Remove: Z221641, Z221640, and Z327403

Mapbook Page 13

Install: Transmission Standard Poles #36, #37 and #38

Remove: Z221638, Z221637, and Z221636

Mapbook Page 14

Install: Transmission Standard Poles #39, #40 and #41

Remove: Z221635, Z221634, Z221633 and Z327416

Segment 1b: Double-Circuit 230-kV Transmission Line

East of Rancho Viejo Road to Via Pamplona

From the new transmission standard pole located east of Rancho Viejo Road (#5, previously authorized under NTP-5), the double-circuit 230-kV transmission line (TL23007 and TL23030) would continue overhead southeast of the future San Juan Capistrano (SJC) Substation along new transmission standard poles to Via Pamplona on the border of the Rancho San Juan Residential Development where the line would transition underground as follows (and as described in the FEIR, Section 2.3.3.1):

- The existing 138-kV transmission line (TL13835) and twelve associated existing transmission structures from Z223180 to Z203022 will be removed (removal of Z203020 and Z203021 described under *Segment* 2).
- Ten (10) new transmission standard poles (#6 through #15) would be installed.
- Two transmission cable poles would be installed (#16 and #17) to transition the overhead conductor to an underground position. In regard to the stringing site associated with this work located along Via Zamora (*Mapbook*, page 5), APM TR-3 would be implemented to notify local emergency response agencies of the work and ensure emergency services would be maintained to the affected residences. Additionally, there is a second access available for residences and emergency responders through Via Salamanca. The SDG&E Public Affairs Manager will meet with the neighborhood HOA to notify them of this work. Additionally, no-parking signs will be placed a minimum of 48 hours prior to construction or as required by the traffic control plan in accordance with APM TR-7.

Segment 2: Underground 230-kV Transmission Lines

Via Pamplona to La Pata Avenue, along Stallion Ridge

Two 230-kV transmission line segments would be installed underground along Stallion Ridge between Via Pamplona and La Pata Avenue as shown in the *Mapbook* (page 5), and described in the FEIR Section 2.3.3.1, page 2-19. One segment (TL23030) would be installed along the northern side of Stallion Ridge, and one segment (TL23007) would be installed along the southern side as follows:

- The underground double-circuit 230-kV line will head north from transmission cable poles #16 and #17 for approximately 300 feet along Via Pamplona, and will turn east along Stallion Ridge. These circuits will continue in new underground conduit through the existing paved road until they reach the eastern terminus of Stallion Ridge at La Pata Avenue. The underground conduits would continue south for approximately 200 feet until they reach new 230-kV transmission cable poles #18 and #19. A new underground structure (vault U109340) will be installed. The new trench package would also include conduit for new fiber optic communications lines.
- The existing 138-kV transmission line (TL13835) and associated transmission structures Z203021 and Z203020 will be removed.

Segment 3: Double-Circuit 230kV Transmission Line

South from Stallion Ridge to Talega Hub

New transmission cable poles #18 and #19 would transition the underground conductor to an overhead position. From here, the 230-kV double-circuit transmission line would continue to new transmission standard pole #41, and the existing 138-kV transmission line (TL13835) structures would be removed. This work is described in the FEIR, Section 2.3.3.1 and summarized as follows:

- Twenty-one (21) 230-kV transmission structures (#21 to #41) would be installed.
- Twenty-nine (29) existing transmission line structures and associated conductor will be removed from existing transmission structure Z206511 to Z327416.
- In addition, all-dielectric self-supporting (ADSS) fiber cable would be installed underground from transmission standard pole #38 to the Pico Substation to replace the existing fiber cable connection (from Z221636 to Pico Substation) using new and existing conduit as shown in the *Mapbook* (page 13). Trenching will occur along the access road to intercept the existing conduit, in addition to trenching that will occur within Pico Substation. In addition, overhead ADSS fiber cable will be installed from pole #38 to the Pico Substation.

Comparison of Work to FEIR

The NTPR-6 Project components described above are consistent with the descriptions contained within the Project's FEIR and Final Decision. As discussed in FEIR Section 2.4.5, the Project's transmission line work would be similar to what is in the FEIR but may vary somewhat based on final engineering. There have been minor modifications to some pole locations, but all are within

the same designated work area as they were in the FEIR. Please see the changes from the FEIR outlined below:

- Figure 2-1 in the FEIR shows a 138-kV steel cable-riser pole #8a to be installed near Via Pamplona where Segment 1b ends. Pole #8a will not be installed due to changes in final engineering. Please refer to FEIR, Section 2.3.3.1; Segment 1b: Double-Circuit 230-kV Transmission Line and 138-kV East-Side Getaways.
- New transmission standard pole #20 was originally planned to replace existing transmission structure Z206511 as shown in the FEIR, Figure 2-1, and as shown on page 5 of the *Mapbook*; however, final engineering determined a new pole will not be installed in that location, so the transmission line will continue from transmission cable poles #18 and #19, to transmission standard pole #21. Existing transmission structure Z206511 will still be removed.
- It was originally anticipated in the FEIR (Figure 2-6, and Section 2.4.5.5) that both underground transmission line segments along Stallion Ridge (TL23030 and TL23007) would be installed in new duct banks which would require trenching to occur along the length of each segment. Based on the current engineering design, it is anticipated that the southern underground 230-kV segment (TL23007) will be installed within an existing 138-kV duct package. This will reduce the amount of trenching required to perform this work. However, field verification will be required prior to making a final determination as to whether the existing duct bank will suffice or if a new duct bank, as described in the FEIR, will be needed.
- The ADSS work described herein was contemplated as part of the Project in Section 2.3.4 of the FEIR. After final engineering, it was determined installation of new ADSS will be performed as follows: Replace the existing underground fiber cable connection from Z221636 to the Pico Substation with new underground ADSS fiber cable from new transmission standard pole #38 to the Pico Substation. Also, string overhead ADSS fiber cable from pole #38 to the Pico Substation. This work is being performed to replace the existing telecommunications connection between Pico Substation and Talega Substation, as well as to establish a new telecommunications connection between the SJC, Pico, and Talega Substations. Please refer to page 13 of the *Mapbook* for the location of this work.

2.0 Description of Activities for Project Component

Consistent with Project's FEIR Section 2.4.5, Transmission Line Construction and Removal (pages 2-49 to 2-56), SDG&E contractors will complete transmission line work activities as described below. Please note that the activities described below illustrate the more substantial activities to occur during construction but are not comprehensive of every activity that must be performed to construct transmission lines, including those activities associated with construction mitigation and compliance described in the Project's MMCRP and approved plans. In addition, geotechnical work or soil testing within the construction work areas may be needed to finalize design requirements for the facilities discussed herein.

Access Road Improvements

Equipment and vehicles will use existing access roads wherever possible to reach the existing and

proposed transmission line structure sites. While access roads will not be widened, vegetation clearing along the sides of the roads to allow safe access and reduce wildfire potential will take place. Vegetation clearing will typically extend one foot beyond the established graded section (windrow) on both sides. Branches of trees that obstruct access roads will be trimmed, however no trees will be removed as part of access road improvements. Other improvements (e.g., reestablish or refresh [regrade]) to existing access roads will also take place as necessary. No new access roads or spur roads are proposed as part of NTPR-6 construction activities. Public roads that will be utilized to access structures are not described in this NTP Request.

Overhead Transmission Line Construction and Removal

The steel transmission poles will be delivered in sections and assembled within the temporary work areas as shown in the *Mapbook*. A crane will be used to lift and install the poles. The poles will be installed on concrete foundations or direct buried into auger holes per Section 2.4.5.3 of the FEIR. Aerial bucket trucks or similar equipment will be used to access structure arms and install attachments. Helicopters may also be utilized for transmission line construction, and APM TR-6, MM TR-2(a), and MM TR-3 would be implemented as appropriate.

Stringing equipment will be used to string conductor from structure to structure using controlled tension to keep the conductor elevated and away from obstacles. Where necessary, temporary guard structures will be installed to protect roadways and utility corridors. Trees may be trimmed to facilitate roadway crossings and for installation of the guard structures. In accordance with MM BR-4, tree trimming will be limited to the minimum practicable amount to allow for safe and efficient NTPR-6 construction activities. Traffic control may also be used for roadway crossings in accordance with approved Traffic Control Plans. Please refer to Section 10 below (Permits and Approvals) for additional information regarding NTPR-6 permit requirements.

Existing transmission components (e.g., poles, cross arms, hardware, conductor insulators) will be removed and properly recycled or disposed of in accordance with applicable laws and regulations, as well as the Project's Hazardous Materials and Waste Management Plan (HMWMP) and Hazardous Materials Mitigation Measures (MMs) and Applicant Proposed Measures (APMs) described in *Attachment B, MMCRP Requirements Tracking Table for NTPR-6*. Pole foundations will be removed to 2 feet below final-grade and direct bury poles will be removed completely. The holes will be backfilled with clean fill or a bentonite soil mixture and the site will be stabilized and restored to match existing grades and landscape conditions immediately surrounding the disturbed areas as required.

Ortega Highway (SR-74) Overhead Transmission Crossing

SDG&E has obtained an encroachment permit and traffic control permit from the California Department of Transportation (Caltrans) to string new transmission conductor across Ortega Highway (Mapbook, page 2). SDG&E plans to utilize bucket trucks on the east and west sides of the highway right-of-way in place of netting and guard structures to protect traffic during stringing activities. Once the bucket trucks are situated in their designated workspaces per the encroachment permit and traffic control permit, stringing will take place during permitted periods. All activities including traffic control, timing restrictions, and notifications will be conducted according to the specific Caltrans permit conditions.

230-kV Underground Transmission Line Installation

Underground transmission lines will be installed in new duct banks composed of PVC conduit, along with underground structures. It is anticipated that the trenches will be approximately 6 feet deep and 2.5 feet wide. Underground structures will be installed in-line with the underground duct banks (refer to Page 5 of *Mapbook*). Underground structures will be delivered to the associated work areas and lowered into place using truck-mounted cranes.

After conduit installation, concrete will be poured to form duct banks, and conductor cables will be installed. Each overhead segment will be transitioned underground through transmission cable poles and pulled into the duct banks. They will return to an overhead position through cable poles at the terminus of the underground segments.

Prior to pulling conductor through the conduit, a fish line will be attached to the cable puller and used to pull transmission conductor cable through the conduit to the underground structure, where it will be spliced to the next section of cable. The northern segment (TL23030) of the double-circuit 230-kV underground transmission line will be installed in a new duct bank. Based on the current engineering design, the southern underground segment (TL23007) will be installed within the existing 138-kV duct, which will reduce the amount of trenching required. However, field verification will be required prior to making a final determination as to whether the existing duct bank will suffice, or if a new duct bank, as described in the FEIR, will be required.

ADSS Connection to Pico Substation

A riser duct will be installed at pole #38 and new underground conduit will be installed to intercept the existing underground conduit. Trenching for this work will occur along the access road from pole #38 for approximately 50 to 60 feet to the location where a new hand hole will be installed over the existing conduit. The existing conduit will be inspected during construction to assess its condition. If the existing conduit cannot be used, new conduit will be installed in a trench from transmission standard pole #38 to the Pico Substation within the existing access road. We have included this potential additional workspace along the access road in the *Mapbook* (page 13).

The new ADSS fiber cable will be pulled underground from pole #38 to the existing frame inside Pico Substation in the existing and/or new conduit using an underground cable puller. Trenching will occur inside the Pico Substation from the frame to an existing pull box on the south side of the substation (approximately 80 feet). From the pull box, the new ADSS fiber cable will be pulled in existing and/or new conduit to the control shelter. Trenches will be approximately 3 feet deep, and 14 inches in width. In addition, new overhead ADSS fiber cable will be installed overhead from pole #38 to connect to the rack in Pico Substation.

3.0 Staging, Storage Yards and Laydown Areas

The NTPR-6 access roads adjacent to pole sites and approved work areas will be used as laydown areas where pole components and materials may temporarily be situated for assembly. Approved work areas will also be used for installation of temporary construction components such as support structures and guy wires.

There are four staging areas proposed as part of NTPR-6. The first staging area is shown on pages 3 and 4 of the *Mapbook*, and also shown as "Staging Area 1" in Figure 2-1 and in Appendix C (Figure 1, page 12) of the FEIR. The second staging area is shown on page 6 of the *Mapbook*. It is also shown as "Staging Area 2" in Figure 2-1 and in Appendix C (Figure 1, page 15) of the FEIR. The third staging area is shown on page 12 of the *Mapbook*. It is also shown as "Staging Area 3" in Figure 2-1, and in Appendix C (Rights-of-Way Map, sheet 3) of the FEIR. The fourth staging area is shown on page 15 of the *Mapbook*, and also shown as "Staging Area 4" on Figure 2-1 in the FEIR. Staging areas included in NTP-6 will be properly screened while in use in accordance with MM AES-3.

4.0 Location of Project Component

NTPR-6 work activities will take place southeast of the SJC Substation, in the cities of San Juan Capistrano and San Clemente, and unincorporated Orange County. Transmission line work will begin at transmission standard pole #5 east of Rancho Viejo Road and continue to transmission standard pole #41 west of the Talega Hub. Please refer to the *Mapbook*, to view the NTPR-6 components and work areas.

5.0 Estimated Area of Land Disturbance

NTPR-6 will result in approximately 3.83 acres of permanent impacts and approximately 15.93 acres of temporary impacts. Please refer to Appendix C in the FEIR to view maps showing these impacts. In accordance with the Construction General Permit (2009-0009-DWQ (As amended by 2010-0014-DWQ and 2012-0006-DWQ)) effective soil cover such as hydromulch or another effective soil stabilization technique will be applied on disturbed, inactive areas in order to control erosion and fugitive dust in compliance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Work areas will be restored immediately following completion of their use as close as possible to their original grade and landscape condition, or as otherwise agreed to with the property owner and per Project MMs and APMs described in *Attachment B*, *MMCRP Requirements Tracking Table for NTPR-6*.

6.0 Construction Schedule and Duration

Construction associated with NTPR-6 activities is anticipated to begin in the fourth quarter of 2019, and will take approximately 2 years to complete. As described in MM NV-1, daily construction equipment operating and staging hours are planned for daylight hours (7:00 A.M. to 6:00 P.M.) Monday through Friday. Work may occur on Saturdays and at night as needed to meet schedule demands or permit requirements. If construction activities are necessary outside of the hours outlined in the applicable jurisdiction's noise ordinance (e.g., nights, holidays, and Sundays), SDG&E will follow the terms and notifications outlined in MM NV-1 and the Project's approved Noise and Vibration Control Plan.

7.0 Construction Personnel

Approximately 50-75 construction personnel will typically be onsite for the work included in NTPR-6. The peak number of construction personnel, including SDG&E management, engineering, and environmental compliance personnel onsite at one time for NTPR-6 activities will be approximately 100 personnel. Please see *Attachment B*, *MMCRP Requirements Tracking Table for NTPR-6* for further details on applicable monitoring requirements.

8.0 Off-Road Diesel Equipment List

In addition to any hand tools, hand power tools or equipment rated less than 50 horsepower required for NTPR-6 work activities, SDG&E anticipates conducting construction activities using the equipment listed in *Table 2* below.

Table 2. Off-Road Equipment List

Equipment Description	Fuel Type	On-Road or Off-Road
WaterTruck	Gasoline	On-Road
289 Skid Steer	Diesel	Off-Road
430 Backhoe	Diesel	Off-Road
930 Loader	Diesel	Off-Road
Chipper	Diesel	Off-Road
End Dump	Diesel	On-Road
Dozer	Diesel	Off-Road
Road Grader	Diesel	Off-Road
Compactor	Diesel	Off-Road
Loader	Diesel	Off-Road
Dump/Haul Truck	Diesel	On-Road
Excavator	Diesel	Off-Road
2-ton Flatbed Truck	Gasoline	On-Road
Aerial Bucket Truck	Diesel	On-Road
100 Ton Crane	Diesel	Off-Road
15-ton Crane	Diesel	Off-Road
Drill Rig with Auger	Diesel	On-Road
Concrete Truck	Diesel	On-Road
Backhoe	Diesel	Off-Road
Fork Lift	Diesel	Off-Road
Trencher	Diesel	Off-Road
50-ton Crane	Diesel	Off-Road
Asphalt Paver	Diesel	Off-Road
Boom Lift	Diesel	Off-Road

All equipment and vehicles anticipated to be used to complete NTPR-6 construction activities are identified in the equipment list outlined in Appendix F, Detailed Construction Equipment Use tables, of the Project's FEIR. If equipment not listed in Appendix F or above is needed during construction, it will comply with the Tier rating and reporting requirements found in APM AQ-2 and actual emissions will be tracked and reconciled in compliance with MM AQ-1. In compliance with MM AQ-1, SDG&E provided estimated construction Nitrogen Oxide (NOx) emissions calculations to the CPUC for all construction activities anticipated to occur in 2019 which includes

activities identified in NTPR-6. As required by MM AQ-1, SDG&E will submit additional NOx emissions calculations for 2020 and subsequent construction years as required.

9.0 Preconstruction Requirements, Status and Mitigation Measures/Applicant Proposed Measures

During construction of the components described herein, SDG&E will implement all applicable APMs and MMs as identified in the Project's FEIR and in the MMCRP. The applicability and status of all APMs and MMs included within the Project's MMCRP is provided in *Attachment B*, *MMCRP Requirements Tracking Table for NTPR-6*. The table is color coded for easy reference by applicability, timing and the status (if the measure contains a preconstruction requirement). Preconstruction measures that are pending as noted in *Attachment B* include the following:

- MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic, and Wetland Areas: For all NTPR-6 work areas within 50 feet of a jurisdictional aquatic feature (see Table 3 below), SDG&E will consult with USACE and CDFW and BMPs will be submitted to the CPUC for review and approval prior to construction.
- *MM BR-3: Preconstruction Surveys*: A CPUC-approved, qualified biologist will perform a preconstruction survey within 14 days of the start of ground disturbance.
- MM BR-8: Western Burrowing Owl Impacts Reduction Measures: A CPUC-approved biologist will perform a preconstruction survey prior to ground disturbance and implement avoidance and eviction measures as required.
- *MM BR-10: Mitigation Plan Development:* The Mitigation Plan will be approved by the CPUC prior to construction in NTPR-6 areas that are subject to the NCCP/HCP.
- *APM TR-7: Traffic Control Plans*: Any required Traffic Control Plans will be developed, reviewed, and approved by the authority having jurisdiction over the impacted roadway(s), before any traffic control activity is implemented for NTPR-6.
- *MM TR-*2(a): *Helicopter Safety Plan and External-Load Training Program:* A Helicopter Safety Plan will be submitted to the CPUC prior to the start of construction activities that require helicopter operations.
- MM TR-4: City of San Juan Capistrano and City of San Clemente Traffic Engineer and Parks and Recreation Review. A Traffic Control Plan will be submitted for the City of San Juan Capistrano and/or the City of San Clemente's review and approval for any activities that require traffic control, and appropriate permits will be acquired prior to commencement of the subject work.

Table 3. Locations within 50-feet of a Jurisdictional Aquatic Feature

Mapbook Page	Structure Location	Work Area	Distance to CDFW JD Water (Feet)	Distance to USACE JD Water (Feet)
Page 2	9	At Structure Location	4	5
Page 2	E of 9	Guard Structure	< 1	11

Mapbook Page	Structure Location	Work Area	Distance to CDFW JD Water (Feet)	Distance to USACE JD Water (Feet)
Page 3	W of 10	Guard Structure	< 1	42
Page 5	UG	Via Pamplona UG Area	31	N/A
Page 5	UG	Stallion Ridge UG Area	16	24
Page 6	23	Pole 23 Work Area	11	11
Page 12	34	Pole 34 Work Area	34	N/A
Page 14	39	Pole 39 Work Area	36	40

Prior to construction, SDG&E will communicate the environmental concerns and appropriate work practices to all SDG&E crews and contractors through Safety Environmental Awareness Program (SEAP) training. The SEAP includes, but is not limited to, a review of air quality, archaeological and paleontological resources, biological resources, dust control measures, hazardous waste and spill prevention, construction fire control and emergency response measures, and noise control measures. SDG&E completed the first SEAP training on September 13, 2017 and will continue to provide training throughout construction.

10.0 Permits and Approvals

Construction activities included in NTPR-6 will require the local, state, and federal agency permits listed in *Table 4* below. SDG&E will obtain all necessary permits prior to initiating the specific Project activities triggering each permit requirement.

Table 4. NTPR-6 Required Permits

		Applicability to Project	Ministerial/
Agency	Permit	Component	Discretionary
City of San Juan Capistrano	Traffic Control Permit	Traffic control for lane closures on City streets as required for NTPR-6 work activities.	Ministerial
	Encroachment Permit	Approval for work within the City's public ROW (e.g., underground and overhead work).	Ministerial
City of San Clemente	Traffic Control Permit	Traffic control for lane closures on City streets as required for NTPR-6 work activities.	Ministerial
	Encroachment Permit	Approval for work within the City's public ROW (e.g., overhead transmission work).	Ministerial
County of Orange	Traffic Control Permit	Traffic control for lane closures on City streets as required for NTPR-6 work activities.	Ministerial
	Encroachment Permit	Approval for work within the County's public ROW.	Ministerial
State Water Resources Control Board	Construction General Permit and Stormwater Pollution Prevention Plan	The Project's SWPPP will be updated to include NTPR-6 work areas.	N/A

Agency	Permit	Applicability to Project Component	Ministerial / Discretionary
California Department	Encroachment Permit and/or	Work within Caltrans Right-	Discretionary
of Transportation	Traffic Control Permit	of Way (SR-74).	

11.0 Request for Approval

SDG&E respectfully requests authorization of NTPR-6 to begin the work described herein as conditioned on any pending preconstruction requirements by October 24, 2019. Should you have any questions or need additional information, please to not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,

Richard Quasarano

SOCRE Environmental Project Manager

Attachment A: NTPR-6 Mapbook

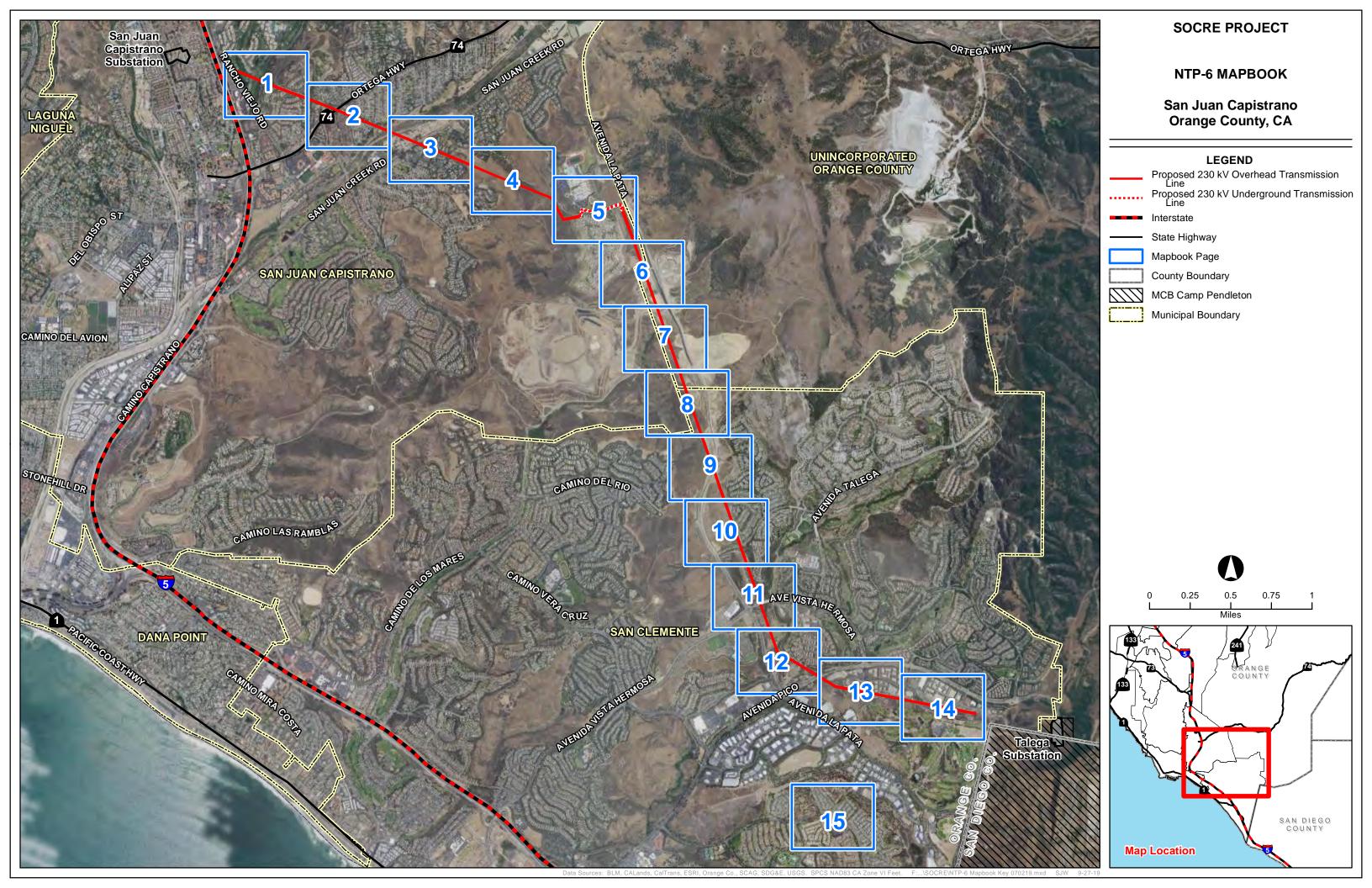
Attachment B: MMCRP Requirements Tracking For NTPR-6

cc: Joe Donaldson, Ecology and Environment, Inc. Jennifer Kaminsky, SDG&E Project Manager

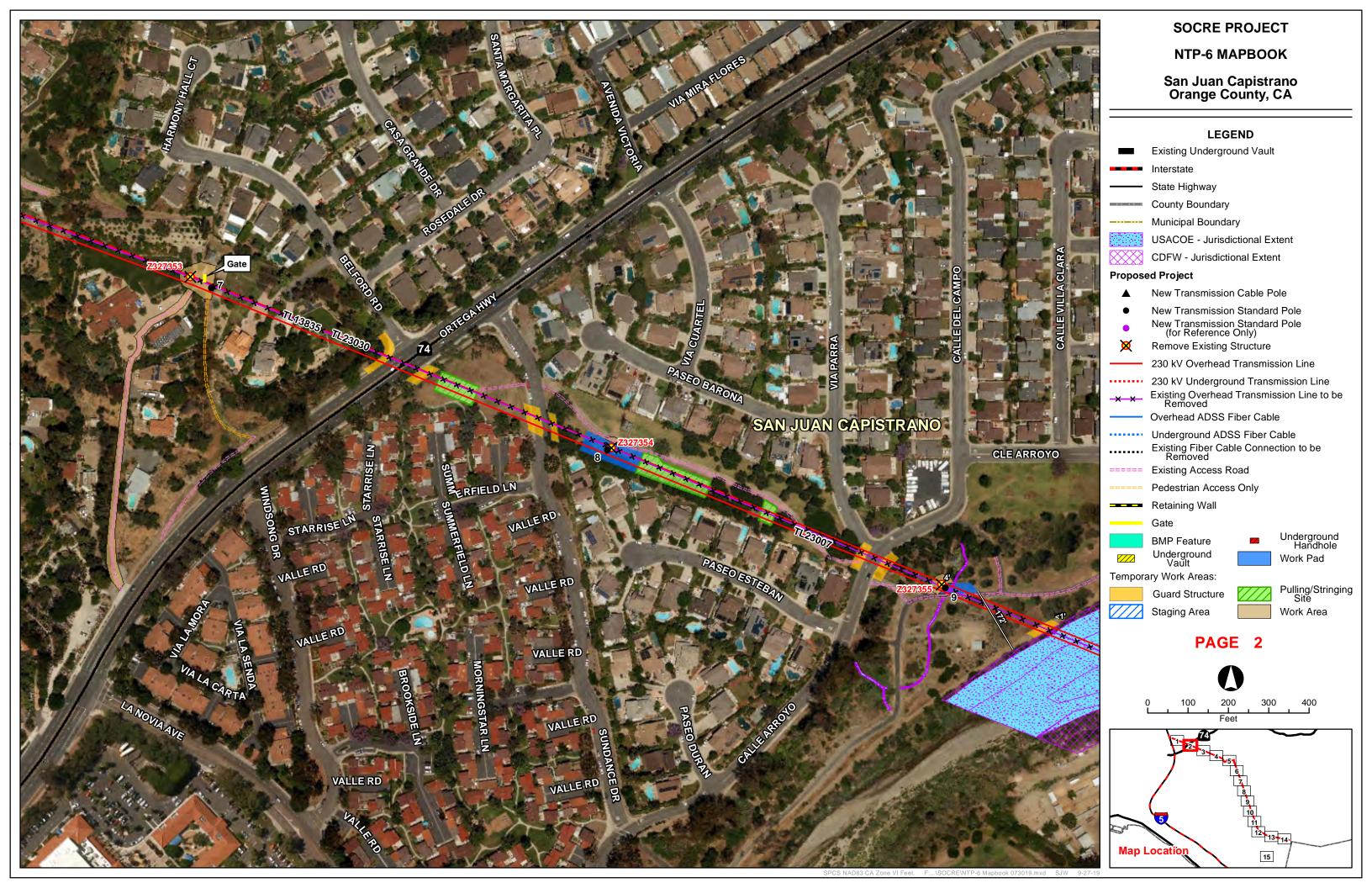
William Bostwick, Project Coordinator

Kenda Pollio, KP Environmental

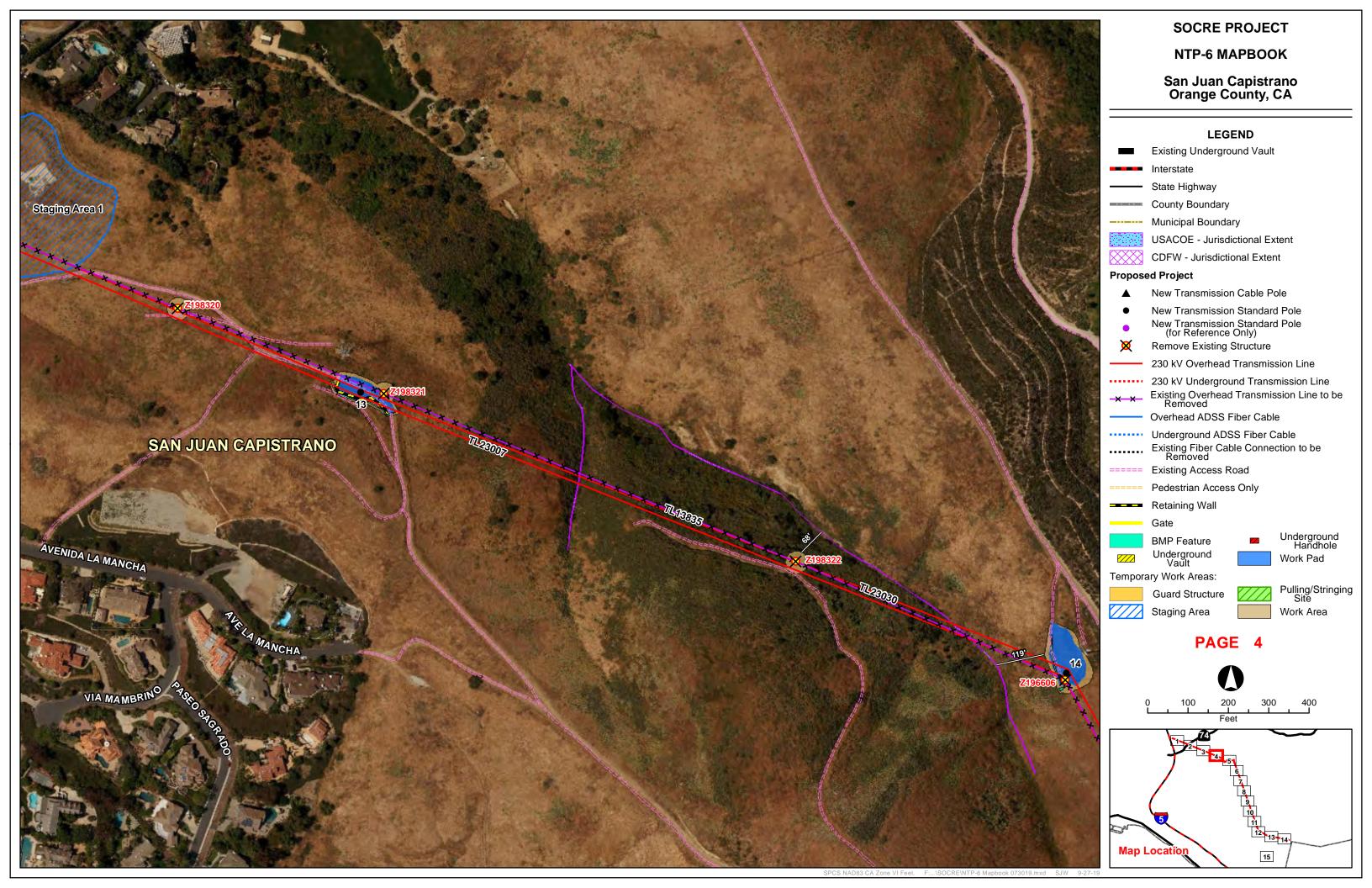
ATTACHMENT A NTPR-6 Mapbook

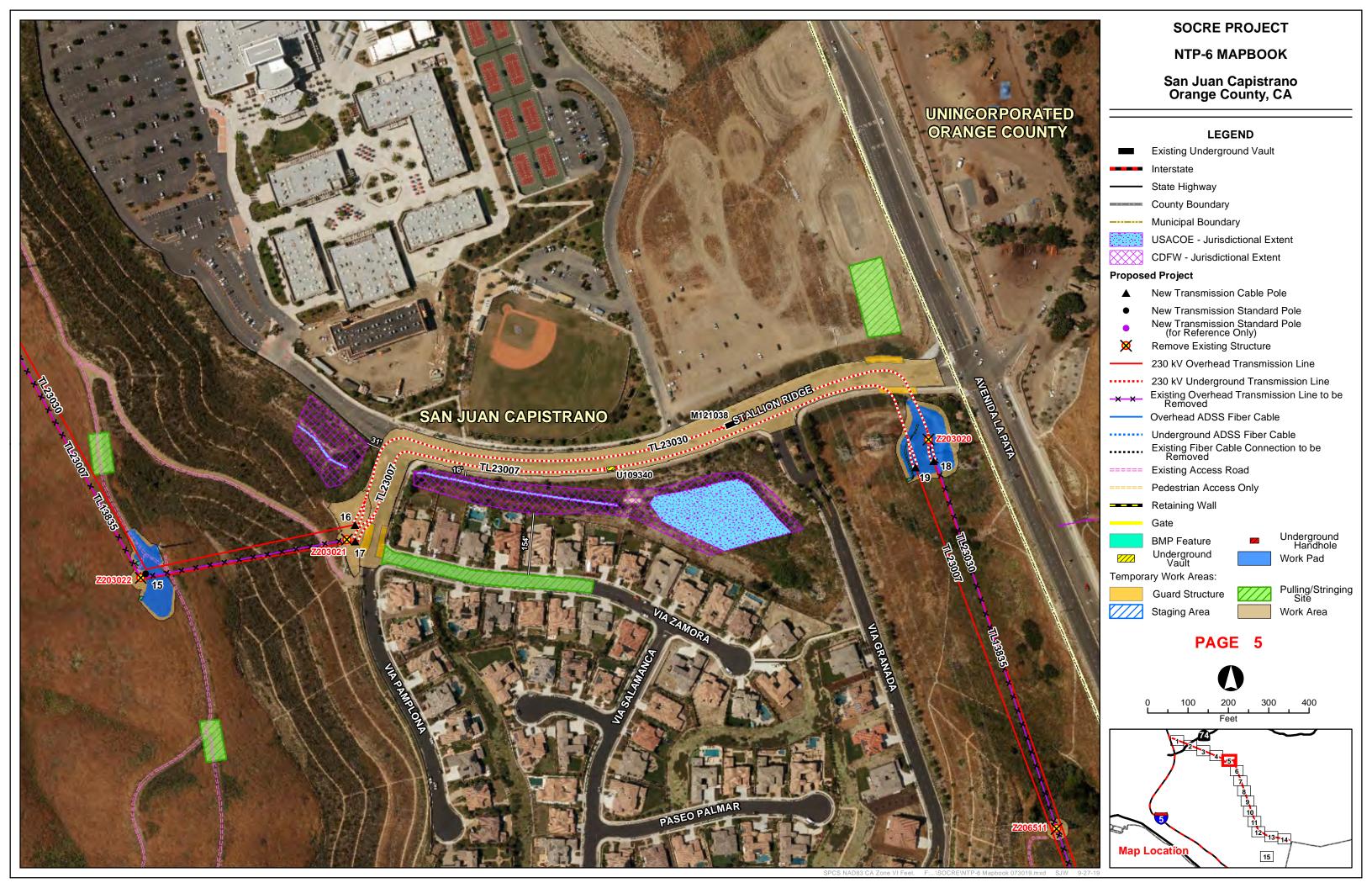


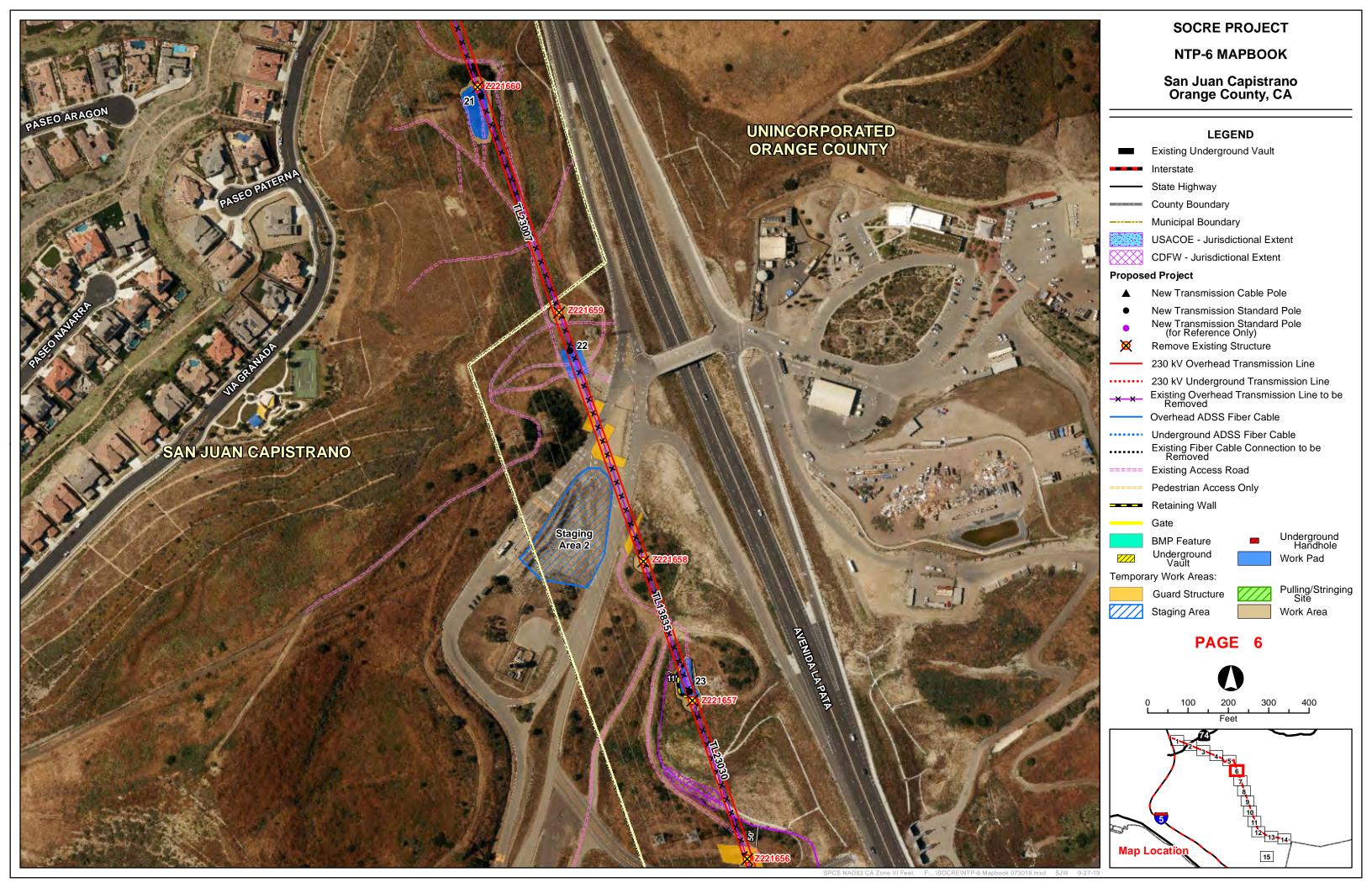


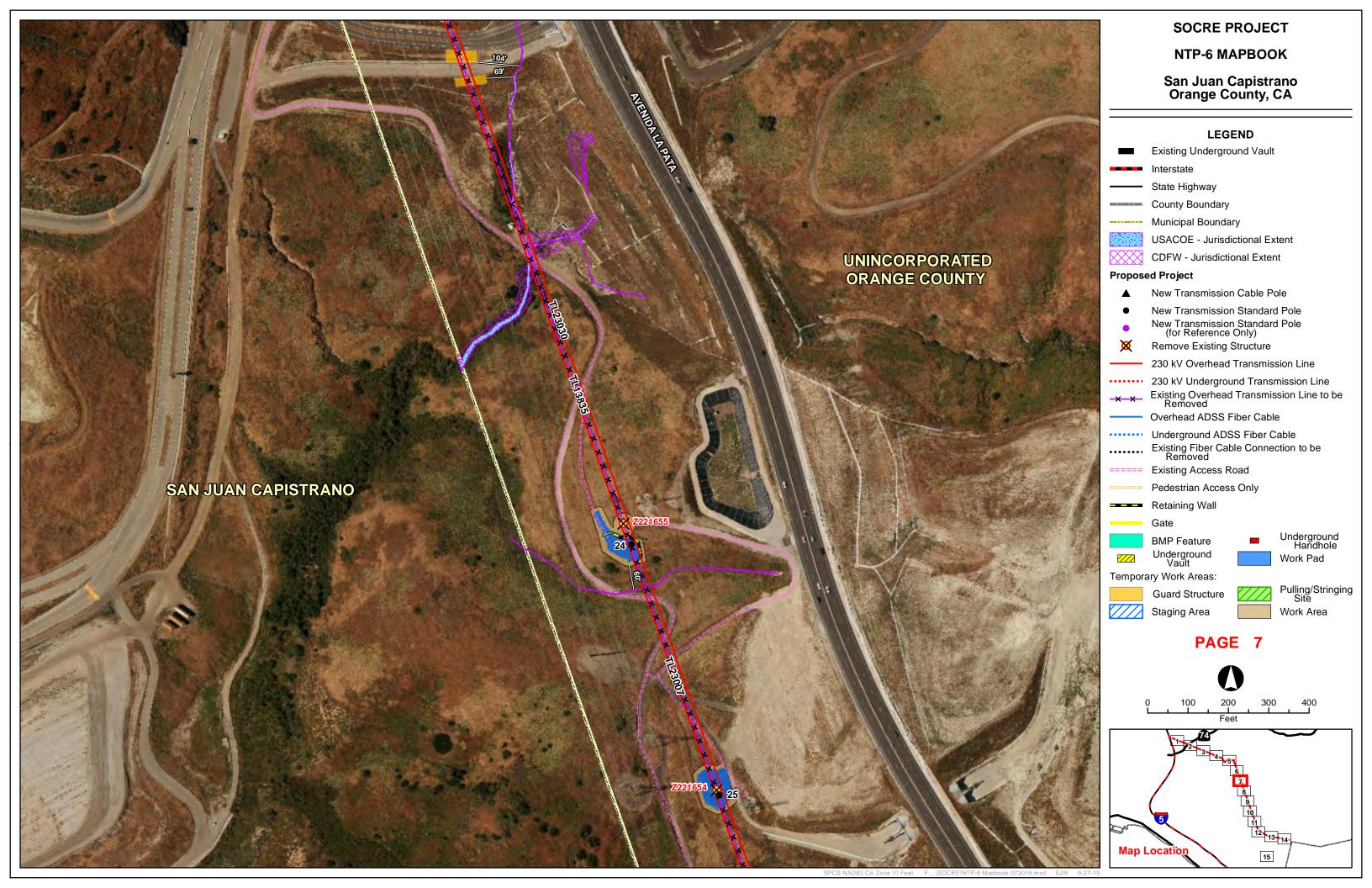


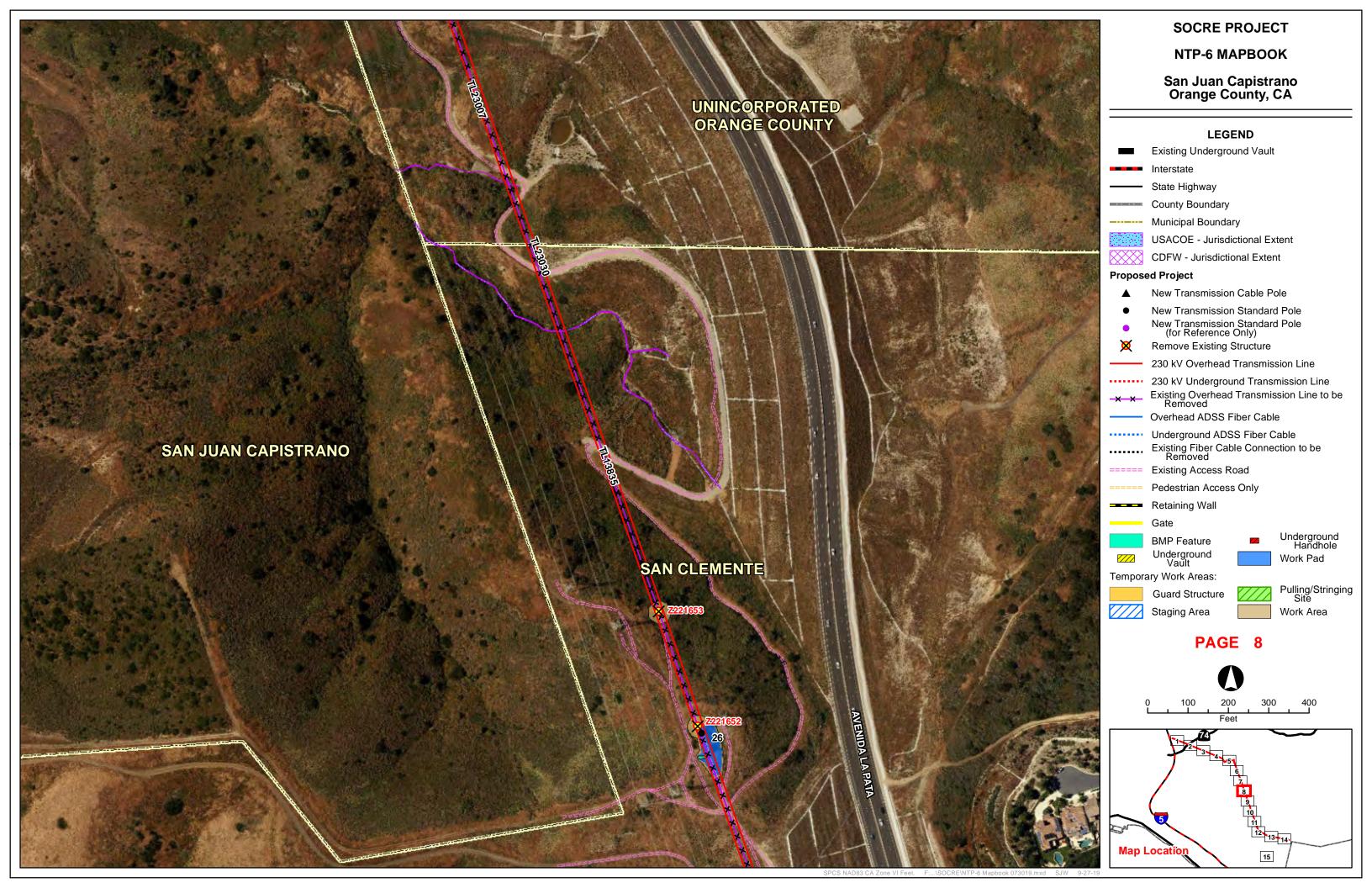










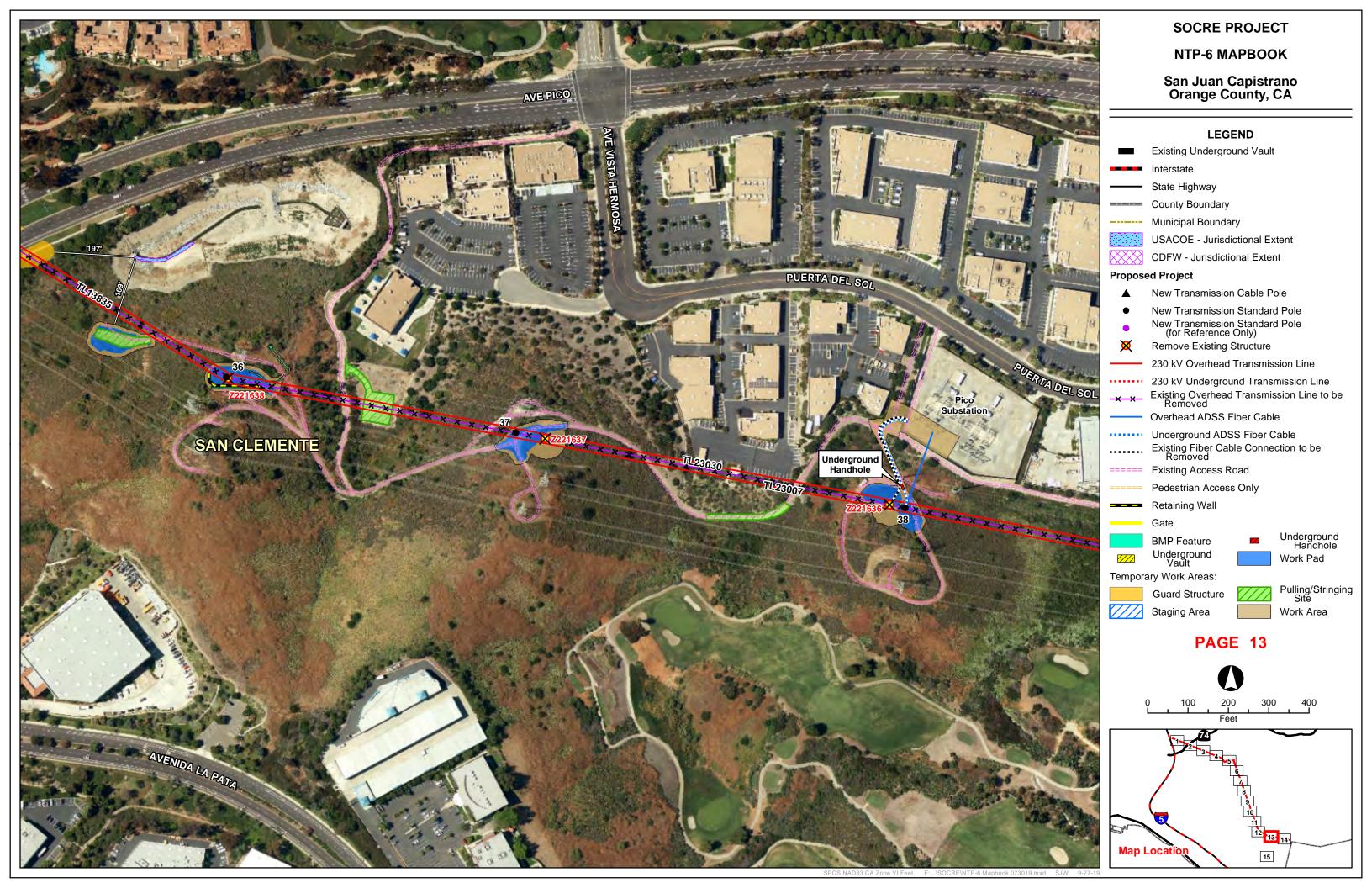


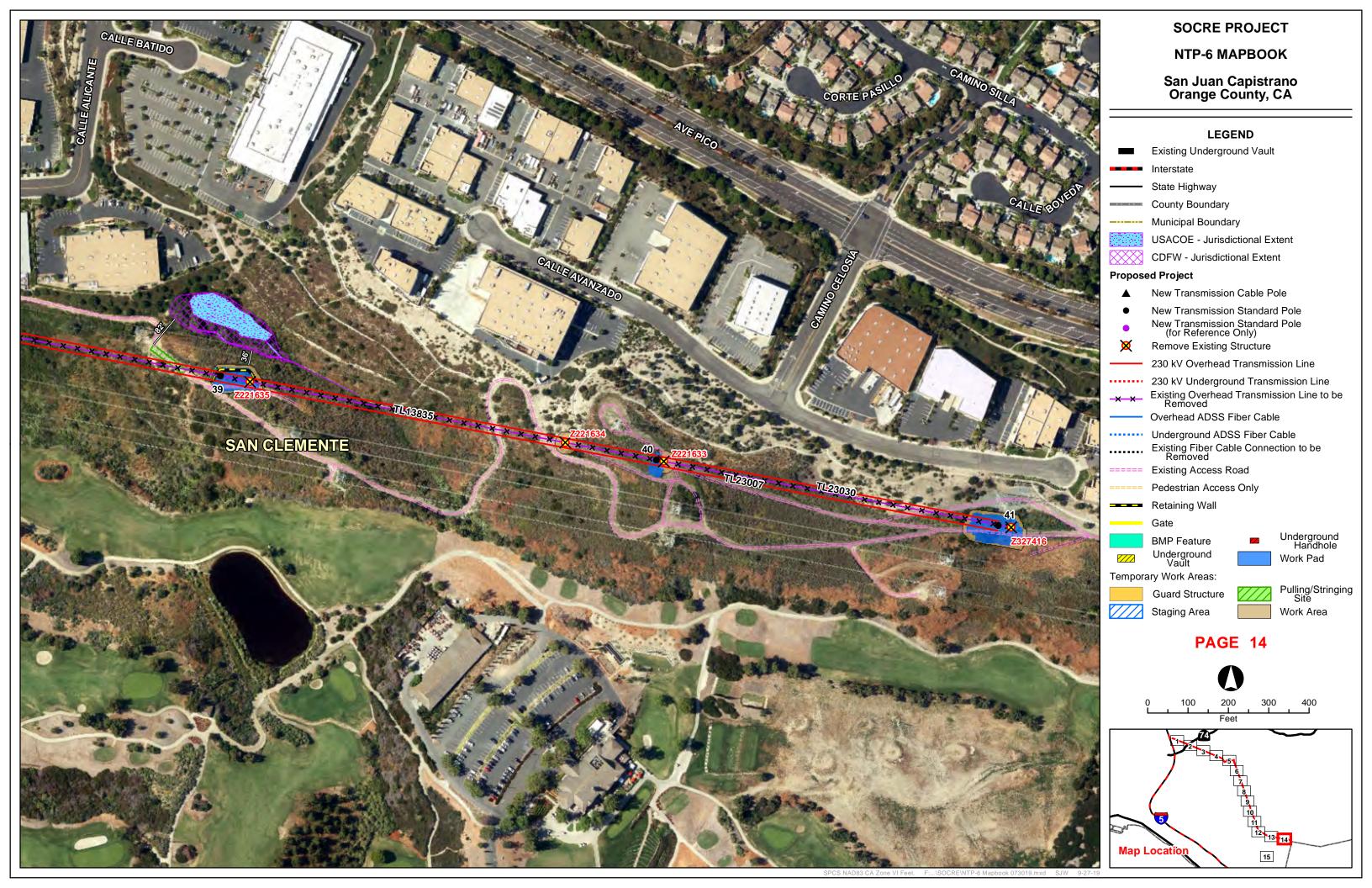














ATTACHMENT B MMCRP Requirements Tracking Table For NTPR-6

,		A DDI ICA DII ITV	
APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
AESTHETICS			
APM AES-1: Clean Work Areas. During construction, SDG&E would keep construction activities as clean and inconspicuous as practical.	During Construction and Restoration	Applicable	SDG&E and its contractors will implement this measure during NTPR-6 activities.
APM AES-2: Restoring Disturbed Areas. When proposed project construction has been completed all disturbed terrain would be restored through recontouring and revegetation in order to reestablish a natural appearing landscape and reduce potential visual contrasts between disturbed areas and the surrounding landscape.	During Restoration	Applicable	Immediately following completion of NTPR-6 activities, all disturbed terrain will be restored per the applicable restoration related requirements, including those mandated by MM AES-2 and MM BR-7.
APM AES-3: Visual Screening - San Juan Capistrano Substation. The applicant would install landscaping and a screening wall would be installed in key areas along the perimeter of San Juan Capistrano Substation to partially screen views of substation structures and to visually integrate the new substation facilities with the existing setting. Figure 2-4 depicts the general location of new substation landscaping. Plant material would be appropriate to site-specific conditions and the local landscape setting. Landscaping would be consistent with technical requirements for proposed project operations and maintenance and would incorporate input from the City of San Juan Capistrano, local residents, and SDG&E's facility security.	Restoration and Operation	Not Applicable	NTPR-6 activities including overhead and underground transmission line work are located outside the San Jan Capistrano (SJC) Substation property.
MM AES-1: Architectural Review of San Juan Capistrano Substation. To ensure that the aesthetic design of San Juan Capistrano Substation facilities, such as walls, buildings, and landscaping, are consistent with the City of San Juan Capistrano's aesthetic design criteria, the applicant shall submit a revised series of elevations and a landscape plan to the City's Architectural Review Board (ARB) prior to filing for grading and building permits. The ARB shall have the opportunity to provide input to the CPUC on whether the applicant's revised plans are consistent with the City's aesthetic design criteria and if any modifications are appropriate. The CPUC will take into account the ARB's input in reviewing and approving the aesthetic design and landscaping for the San Juan Capistrano Substation. The applicant shall not initiate ground-disturbing activities until the CPUC approves the aesthetic design and landscaping plan for the San Juan Capistrano Substation.	Pre-construction	Not Applicable	Complete. The CPUC approved the Project's Aesthetic Design Plan on April 16, 2018. However, NTPR-6 work activities will take place outside the SJC Substation property.

South Orange County Reliability Enhancement Project NTPR-6 Request

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Measure Not Applicable to NTPR-6

Applicable to NTPR-6 – Measure to be Implemented During

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Applicable to NTPR-6 – Pre-Construction Status Pending/Ongoing

ATTACHMENT D. WINGA REQUIREMENTS TRACKING TABLE				
APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS	
MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions. Clearing and ground disturbance required for construction, operation, and maintenance, including, but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, will be the minimum required, and the applicant will consult with the CPUC to identify and implement methods to restore disturbed areas to pre-construction conditions for all areas not required for operation and maintenance. The applicant will consult with the CPUC to identify and implement methods to restore disturbed areas to conditions that would blend with the overall landscape character, to the extent feasible. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance will be regraded and revegetated to restore these areas to an appearance that will help blend them into the overall landscape character.	During Construction, Restoration, and Operation	Applicable	NTPR-6 activities will occur within the Project's approved temporary and permanent impact areas. Immediately following completion of NTPR-6 construction activities, the work areas will be restored per applicable restoration related Project requirements, including local ministerial encroachment permits (e.g., road repaving) or through coordination with property owners.	
MM AES-3: Screen or Effectively Locate Laydown Areas. Laydown areas within view of residences, scenic roads, and recreational facilities will be effectively located to limit views (aesthetic effects) of materials, equipment, vehicles, and other items used during construction. Staging and laydown areas that cannot be located away from public views will be screened using opaque fencing or landscaping to limit aesthetic effects. Where laydown areas are visible from publicly accessible areas and roads, any associated signage will be kept to the minimum necessary to communicate information about the project, safety, and security. All laydown areas will be effectively reclaimed immediately following completion of their use.	During Construction and Restoration	Applicable	There are four staging areas proposed as part of NTPR-6. In addition, access roads adjacent to pole sites and approved work areas will be used for laydown, where pole components and materials may be temporarily situated for assembly. All NTPR-6 activities will be in accordance with MM AES-3.	
MM AES-4: Glare and Color Contrast Reduction for Transmission Structures and Conductors. To reduce potential glare and color contrast for components of the project, the finish on all new transmission structures will be non-reflective (e.g., steel that has been galvanized and treated to create a dulled finish) to reduce light reflection and color contrast and help blend the structures into the landscape setting. All new transmission conductors will be non-specular to minimize conductor reflectivity and help blend them into the landscape setting.	During Construction	Applicable	The transmission poles will have a dulled steel finish and conductor connected to the transmission poles will be nonspecular.	
MM AES-5: Shield or Downcast Construction Lighting. To reduce the potential for visual impacts associated with construction lighting, lighting for construction activities will be limited to an amount required for safety of construction personnel and security of construction equipment. In order to minimize the effect of light pollution in the surrounding area, all construction lighting will be operated and oriented to mostly or fully eliminate off-site light spill at all times.	During Construction and Restoration	Applicable	SDG&E will implement MM AES-5 during NTPR-6 activities.	

South Orange County Reliability Enhancement Project NTPR-6 Request

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Applicable to NTPR-6 – Measure to be Implemented During Construction/Restoration/Operation

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
AIR QUALITY			
 APM AQ-1: Control Fugitive Dust Emissions. The applicant would minimize fugitive dust by: Using a gravel apron to reduce mud/dirt track-out from unpaved truck exit routes. Applying water to disturbed areas within a construction site. Limiting the onsite vehicles to a 15-mph speed limit on unpaved roads. If necessary, SDG&E or its contractor(s) can install speed monitoring equipment at strategic locations and along project roads. Requiring all trucks hauling dirt, sand, soil, or other loose material to be covered with a fabric tarp and maintain a freeboard height of 12 inches. Applying a cover to storage piles when wind events are declared. 	During Construction and Restoration	Applicable	SDG&E will implement APM AQ-1 during NTPR-6 activities.
Requiring local streets to be swept by Rule 1186-compliant PM10 efficient vacuum units a minimum of once per month.			
APM AQ-2: Minimize NOX and Particulate Matter (PM) Emissions from Off-Road Diesel-Powered Construction Equipment. Where available, SDG&E will ensure that all off-road diesel-powered construction equipment with engines greater than 50 horsepower are compliant with Tier 4 interim or Tier 4 off-road emissions standards, as specified by the phase-in schedule below: 2015: 5% Tier 4 interim engines 2016: 10% Tier 4 engines 2017: 20% Tier 4 engines 2018: 30% Tier 4 engines 2019: 40% Tier 4 engines 2020: 50% Tier 4 engines In the event equipment with a Tier 4/Tier 4 interim engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOx and PM to no more than Tier 3 emission levels. Equipment with an engine not compliant with the Tier 4/Tier 4 interim standard will be allowed only when the applicant has performed (and documented) a good faith effort (due diligence) to locate Tier 4 and/or Tier 4 interim equipment in the Project vicinity (defined as within 200 miles of the Project site). Use of older equipment (operated with tailpipe retrofit controls that reduce exhaust emissions of NOx and PM to no more than Tier 3 emission levels) would be allowable following due diligence and associated documentation that no Tier 4/Tier 4 interim equipment	During Construction and Restoration	Applicable	NTPR-6 activities will utilize off-road diesel-powered construction equipment with engines greater than 50 horsepower and that are compliant with Tier 4 interim or Tier 4 off-road emissions standards as specified in the phase-in schedule for years 2019 through 2020. Construction occurring after 2020 will continue to meet a minimum of 50% Tier 4 usage. In the event SDG&E cannot achieve the Tier 4 equipment minimum usage requirements provided, documentation of due diligence will be submitted to the CPUC per APM AQ-2.

South Orange County Reliability Enhancement Project NTPR-6 Request

October 2019 Page **3** of **39** Measure Not Applicable to NTPR-6

Applicable to NTPR-6 – Measure to be Implemented During Construction/Restoration/Operation

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
(or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with written correspondence (or signed statement and electronic mail) by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms providing equipment within the defined project vicinity (200 miles). Documentation of due diligence will be submitted to CPUC staff for before equipment is used on the project. The applicant will make available to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at the time of mobilization of each applicable unit of equipment.			
MM AQ-1: Oxides of Nitrogen (NO _X) Credits. The emissions of NO _X due to construction of the proposed project will be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NO _X emissions in excess of the SCAQMD regional significance threshold of 100 pounds per day. The total amount of NO _X RTCs to be purchased will be calculated when the construction schedule is finalized. The applicant will purchase and submit the required RTCs to the SCAQMD at least 60 days prior to the start of each construction year for the upcoming year of construction. The applicant will also track actual daily emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage.	Pre-construction and during Construction	Applicable	Ongoing. As per the 2019 NOx Construction Emissions Mitigation Analysis Memo submitted to the CPUC on 11/8/2018, estimated emissions for 2019 construction activities, including NTPR-6 activities, are below the 100 pounds per day threshold. Therefore, no credits need to be purchased for work associated with NTPR-6 for 2019. Estimated emissions will be calculated for 2020 and subsequent years and purchased as necessary. If required, SDG&E will purchase and submit the required RTCs to the SCAQMD at least 60 days prior to the start of the 2020 construction year. The 2020 NOx Construction Emissions Mitigation Analysis Memo will be submitted to the CPUC once complete. SDG&E will track actual daily emissions during construction as required by the Project's monitoring plan.

South Orange County Reliability Enhancement Project NTPR-6 Request

October 2019 Page **4** of **39** Measure Not Applicable to NTPR-6

Applicable to NTPR-6 – Measure to be Implemented During

Construction/Restoration/Operation

Applicable to NTPR-6 – Pre-Construction Status Pending/Ongoing

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
SDG&E Subregional Natural Community Conservation Plan (NCCP)/Habitat Conservation Plan (HCP) Operational Protocols: See Appendix O.	Pre-construction, during Construction, and Operation	Applicable	Ongoing. NTPR-6 work areas are primarily located within disturbed or developed areas, however there will be some temporary and permanent impacts within critical habitat areas. Work in these areas will be subject to mitigation requirements and draw down of credits as described in SDG&E's NCCP/HCP.
MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic, and Wetland Areas. In all project locations, vehicular traffic (including movement of all equipment) will be restricted to established construction areas indicated by flagging and signage. CPUC notification and approval will be required for any additional disturbance areas already identified and evaluated for the project pursuant to CEQA. As feasible, the applicant shall use disturbed or low habitat value areas before using undisturbed or higher quality habitat areas, as determined by a qualified biologist. Prior to ground disturbing activities, sensitive resources, such as waterbodies, oak trees, special status plant populations, and natural communities, will be clearly marked and avoided. All aquatic features, including vegetated washes, creeks, drainages (ephemeral and perennial), and riparian areas, will be spanned by the 230-kV transmission and 12-kV distribution line where possible. If construction will occur within 200 feet of an aquatic feature, biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features. If the applicant cannot maintain the 50-foot exclusionary buffer, the applicant will submit best management practices (BMPs) to the CPUC for review and approval prior to construction. In addition, if the applicant is unable to maintain the 50-foot buffer, the applicant shall consult with USACE and CDFW regarding potential impacts to streams or wetlands. If nighttime lighting is necessary adjacent to aquaticareas, lighting shall be shielded away from these areas to prevent impacts on a quatic wildlife.	Pre-construction, during Construction, and Operation	Applicable	Ongoing/Pending. SDG&E will implement MM BR-1 during NTPR-6 construction. There are several work areas located within 200 feet of a jurisdictional aquatic feature, and 8 locations where work will occur within 50 feet of a jurisdictional aquatic feature (See Table 3 in Request Letter). A 50-foot exclusionary buffer will be established for work areas that are within 200 feet of a jurisdictional aquatic feature. For the work areas located within 50 feet of a jurisdictional aquatic feature, SDG&E will consult with USACE and CDFW and BMPs will be submitted to the CPUC for review and approval prior to construction.
MM BR-2: Biological Monitoring. CPUC-approved, qualified biological monitors will be present during construction and restoration activities in areas where sensitive resources identified by a CPUC-approved biologist may be impacted by construction of the project. Biological monitors will be assigned to the project in areas of sensitive biological resources. The monitors will be responsible for ensuring that impacts on special status species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate,	During Construction and Operation	Applicable	SDG&E will implement MM BR-2 during NTPR-6 construction.

South Orange County Reliability Enhancement Project NTPR-6 Request

October 2019 Page **5** of **39** Measure Not Applicable to NTPR-6

Applicable to NTPR-6 – Measure to be Implemented During Construction/Restoration/Operation

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
monitors will flag the boundaries of areas where activities will need to be restricted in order to protect native plants and wildlife or special status species. Those restricted areas will be monitored to ensure their protection during construction. The applicant shall submit the biological monitors' daily monitoring reports and monthly biological monitoring reports to the CPUC, CDFW and USFWS.			
MM BR-3: Pre-construction Surveys. a. Pre-construction surveys will be conducted by CPUC-approved, qualified biologists according to standardized methods. Surveys will encompass all construction areas. Existing baseline vegetation data will be used during post-construction restoration efforts, as outlined in Section 7 of the SDG&E Subregional NCCP/HCP. Pre-construction surveys will take place for each discrete work area within 14 days of the start of ground disturbance, or if work has lapsed for longer than 14 days. b. Additionally, a CPUC-approved, qualified biologist will conduct pre-construction clearance sweeps for special status species at all access, staging, and work areas where suitable habitat is present within approximately 24 hours of construction and restoration activities each day. c. In addition to these pre-construction surveys, a CPUC-approved biologist will conduct protocol-level surveys for coastal California gnatcatcher and least Bell's Vireo along the proposed 12-kV distribution line where surveys have not yet taken place. A CPUC-approved biologist will also perform protocol-level southwestern willow flycatcher and rare plant surveys throughout the entire project area, where suitable habitat exists. If a special status species is found at any time, the CPUC will be notified within 48 hours, and the CPUC will determine the need for additional consultation with the appropriate resource agency or agencies.	Pre-construction (no more than 14 days prior to the start of construction).	Applicable	Ongoing/Pending. Resumes for qualified biologists have been approved by the CPUC. SDG&E will continue to provide additional resumes for approval throughout construction as needed. CPUC approval of resumes is required prior to new biologists starting work on the Project. Protocol level surveys for all NTPR-6 work areas were completed per MM BR-3 (c) during the 2016 breeding season and submitted to the CPUC on 05/11/2017. Pre-construction surveys and clearance sweeps will be performed prior to start of NTPR-6 ground-disturbing activities as required. If special status species are found during construction, the CPUC will be notified and surveys will be performed as required.
MM BR-4: Limit Removal of Native Vegetation Communities and Trees. The removal of native vegetation and trees will be limited to the minimum practicable area required for construction of the project. To the extent feasible, grading, grubbing, graveling, or paving will only occur for permanent project components. Temporary staging areas will be used in such a way that it facilitates post-construction restoration, per Section 7 of the SDG&E Subregional NCCP/HCP. Drive-and-crush methods will be employed, with the exception of those areas where this	During Construction and Restoration	Applicable	SDG&E will implement MM BR-4 during NTPR-6 construction.

South Orange County Reliability Enhancement Project NTPR-6 Request

October 2019 Page **6** of **39** Measure Not Applicable to NTPR-6

Applicable to NTPR-6 – Measure to be Implemented During

Construction/Restoration/Operation

Applicable to NTPR-6 – Pre-Construction Status Pending/Ongoing

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
method is not feasible for temporary staging areas for safety reasons and placement of temporary structures, such as construction trailers and drop tanks.			
MM BR-5: Avian Safe Building Standards. The applicant will design all transmission structures installed as part of the proposed project to be consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006).	Pre-construction	Applicable	Complete. The transmission structures have been designed and will be constructed in accordance with Avian Safe Building Standards.
MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. The applicant will develop a Nesting Bird Management Plan in consultation with the USFWS, CDFW, and CPUC that outlines protective measures and BMPs that will be employed to prevent disturbance to active nests of both special status and Migratory Bird Treaty Act (MBTA) -protected bird species with the potential to occur in the projectarea. The Nesting Bird Management Plan will include the following components: • Appropriate survey timing, extents, and methods, including dates of local breeding season when surveys must take place; monitoring and reporting protocol; protocol for determining whether a nest is active; and protocol for documenting, reporting, and protecting active nests within construction and restoration areas will be included in the Nesting Bird Management Plan. If pre-construction survey protocols exist for a-special status avian species with a potential to be impacted by the project, the plan will outline the implementation of these protocols. The survey area will include the construction area, plus an additional distance large enough to accommodate the protective buffer of MBTA-protected bird species likely to occur in proximity to the construction area. The plan will also specify approved nest deterrent methods, inactive nest management, and state that project-related nest failures will be reported to the USFWS and CDFW. • Appropriate and effective buffer distances, including horizontal buffers from nests, horizontal buffers from territories, if appropriate, and vertical buffers for helicopters will be included. Buffers will not be based on generalized assumptions regarding all nesting birds, but will be specific to the site and species/guild and account for specific stage of nesting cycle and construction work type. During construction and restoration, a CPUC-approved avian biologist will implement the appropriate buffer distances will be specified. Buffer reductions for special status species and raptors shall be determined upo	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Nesting Bird Management Plan was approved by the CPUC on 8/16/2017. SDG&E will implement the Plan as required during construction.

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 active buffer areas will be completed by a CPUC-approved biologist before, during, and after helicopter use in the vicinity of active buffers and reported to the CPUC. The Nesting Bird Management Plan will include the minimum requirements to become a CPUC-approved avian biologist and biological monitor for nesting birds, including education, experience in conducting biological surveys, and experience with specific birds in the project area. The CPUC-approved biological monitor will halt work if it is determined that active nesting will be disturbed by construction or restoration activities until further direction or approval to work is obtained from the CPUC and/or appropriate wildlife agencies. 			
The Nesting Bird Management Plan will be submitted to the USFWS, CDFW, and CPUC for review and comment no more than six months prior to the start of construction, with the intent that the plan will be finalized no more than two months prior to the start of construction. The final plan will be implemented during construction and restoration activities. A Nesting Tracker will be maintained and updated weekly during the nesting bird season, and will be submitted to USFWS, CDFW, and CPUC on a monthly basis. This Nesting Tracker will contain data such as species, location, buffer, monitor name, and status of the nest.			

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
MM BR-7: Coastal Cactus Wren Avoidance. a. Pre-construction Surveys. CPUC-approved biologists will perform pre-construction surveys in potential coastal cactus wren habitat within 200 feet of each discrete work area and record the location and quality. Pre-construction surveys will take place within two weeks prior to the start of ground disturbance or when work has lapsed for longer than two weeks. b. Conservation. Should suitable coastal cactus wren habitat patches be identified in or within 200 feet of work areas, the areas will be avoided to the greatest extent possible during construction. Habitat includes, but is not limited to, mature cholla or prickly-pear cactus typically less than 1 meter in height, interspersed with California sagebrush, California buckwheat, and blue elderberry. Habitat patches may be as small as approximately lacre. Habitat patches located in close proximity to construction activities should be protected by physical barriers, such as rope or signage. c. Habitat Restoration Plan for Coastal Cactus Wren Habitat. Prior to construction of the proposed project, and with the coordination and review of USFWS and CDFW, SDG&E will prepare a habitat restoration plan for coastal cactus wren habitat. Details of the restoration plan will be finalized pending consultation between the applicant, SDG&E, USFWS, and CDFW. The restoration plan will be prepared by a qualified botanist familiar with this vegetation association. The plan will include the following elements: planting/reseeding species mentioned above in correct ratios so as to be suitable for coastal cactus wren; monitoring plan and schedule, including duration and performance criteria, and any specific measures that will be required to ensure success of the restoration effort. Suitable habitat will be replaced at a 1:1 ratio, and if SDG&E chooses to implement the restoration effort outside the project area, it must be no more than 3 miles away from the project area. d. Take Avoidance. Should biologists identify nesting coastal cactu	Pre-construction, during Construction, and Restoration	Not Applicable	Coastal cactus wren habitat assessment was included in the Nesting Bird Management Plan approved by the CPUC on 8/16/2017. Per the habitat assessment, it has been determined that no suitable habitat for this species occurs within 200 feet of the NTPR-6 work areas.
MM BR-8: Western Burrowing Owl Impacts Reduction Measures. a. Pre-construction Surveys for Burrowing Owls. Prior to ground disturbance, a CPUC-approved biologist will conduct pre-construction take-avoidance surveys for burrowing owls within 150 meters of project areas in suitable habitat no more than 14 days prior to ground-disturbing activities according to methods outlined in the CDFW's 2012 (or most recent) Staff Report on Burrowing Owl Mitigation (CDFG 2012). Surveys will provide data on whether burrowing owls occupy the site and, if so, whether the owls are actively nesting.	Pre-construction, during Construction, and Restoration	Applicable	Pending. As necessary, pre-construction take-avoidance surveys will be conducted no more than 14 days prior to the start of construction and the measure will be implemented during construction of NTPR-6 as required. If pre-construction take-avoidance surveys

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 b. Burrowing Owl Impact Avoidance. If pre-construction take-avoidance surveys detect the presence of any active burrowing owl burrows during breeding season, the burrows will be avoided, and construction activities within 150 meters will be enclosed by construction fencing. Buffer sizes are outlined in the CDFW's Staff Report on Burrowing Owl Mitigation. Active burrowing owl burrows should be monitored regularly according to methods outlined in the Nesting Bird Management Plan, and buffers should remain in place until the nest fledges or fails. c. Eviction. If, in consultation with the CDFW, it is determined that project activities require removal of occupied burrows, or burrows potentially occupied by burrowing owls, eviction and burrow closure may be required to ensure against "take" of owls or nests. However, eviction is required, it will occur only after consulting with CDFW and CDFW approval of a Burrowing Owl Exclusion Plan. Monitoring will be conducted to ensure take is avoided during eviction procedures. Owls may not be evicted or captured without prior authorization from the CDFW. 			in suitable habitat detect the presence of any active burrowing owl burrows during breeding season, impact avoidance measures and/or eviction will be carried out in accordance with MM BR-8 (b) and (c).
 MM BR-9: Invasive Plant Control Measures. The applicant will use standard BMPs to avoid the introduction and spread of controllable invasive plant species such as tamarisk (<i>Tamarix</i> sp.) and giant reed (<i>Arundo donax</i>) during construction of the project. Proper handling during construction will include the following: All vehicles and equipment will be cleaned prior to arrival at the work site. Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads. Straw or hay bales used for sediment barrier installations or mulch distribution will be obtained from state-cleared sources that are free of invasive weeds. The applicant will develop an Invasive Plant Management Plan to outline the methods that will be employed to prevent the spread of invasive plants on site. This plan will be submitted to the CDFW and CPUC for review and comment no more than six months prior to the start of construction, with the intent to produce a final draft of the plan no later than two months prior to the start of construction. 	Pre-construction, during Construction and Restoration	Applicable	Complete. The Invasive Plant Management Plan was approved by the CPUC on 8/14/2017. CDFW stated they had no comments on the Plan on 7/19/2017. SDG&E will implement the Plan as required during construction.
 MM BR-10: Mitigation Plan Development. To ensure that the project is consistent with the SDG&E Subregional NCCP/HCP, the applicant will prepare and implement a Mitigation Plan for the project. The Mitigation Plan will: Detail a consultation process in accordance with Section 6.2.1 of SDG&E's NCCP/HCP. Alternatively, an updated process and timeline can be developed as allowed by both USFWS 	Pre-construction and during Construction	Applicable	Pending. NTPR-6 work areas are primarily located within disturbed and/or developed areas, however there will be impacts to habitat that will be subject to the NCCP/HCP as part of NTPR-6. As required by SDG&E's

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 Require SDG&E to provide the CPUC with written confirmation from USFWS and CDFW that the consultation process has been carried out to the satisfaction of the agency and is consistent with the SDG&E Subregional NCCP/HCP. Include a summary of the policies and procedures in the SDG&E Subregional NCCP/HCP that are relevant to other HCPs/NCCPs, conservation plans, and public or private conservation or preserve areas, including, but not limited to: Operational protocols used in sensitive habitat areas; Mitigation for temporary and permanent impacts, including habitat enhancement and mitigation credits; Coordination and consultation procedures with the USFWS and CDFW; Definition of preserve area according to the SDG&E Subregional NCCP/HCP; Identification and mapping of areas that may qualify as a preserve area within 100 feet of any project component; and A review of locations where there may be potential conflicts among conservation plans. This plan will be submitted to the USFWS, CDFW, and CPUC for review and comment with the intent to produce a final draft of the plan, approved by the CPUC, no less than two months prior to the start of construction. Implementation of the Mitigation Plan, excluding any restoration or other physical habitat improvements that are required as a result of the agency consultation, will be implemented prior to the start of construction. 			Regional NCCP/HCP, a pre-activity study report (PSR) will be prepared identifying those locations covered by the NCCP/HCP and the Mitigation Plan will be submitted to CDFW and USFWS for review and comment, and approved by the CPUC prior to construction beginning in those areas where the NCCP/HCP will be triggered.
CULTURAL RESOURCES			
APM CUL-1: Worker Training for Cultural Resources. Prior to the initiation of construction or ground-disturbing activities, all SDG&E, contractor, and subcontractor personnel would receive training regarding the appropriate work practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural resources and paleontological resources and to recognize possible buried resources. Training would inform all construction personnel of the anticipated procedures that would be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, and their treatment, as well as of paleontological resources.	Pre-construction, during Construction and Restoration	Applicable	Ongoing. Worker Training (SEAP) has been developed and submitted to the CPUC on 07/07/2017. The SEAP training was first administered on September 13, 2017. All Project personnel will be required to participate in the SEAP prior to starting work on the Project. SEAP administration will remain ongoing throughout construction for all new Project personnel.

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ATTACHMENT B. IMMENT REGORDINETS TRACKING TABLE				
APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS	
APM CUL-2: Cultural Resource Monitoring. A qualified archaeologist would attend preconstruction meetings, as needed, and a qualified archaeological monitor would monitor ground disturbing activities in the vicinity of all known cultural resources within the proposed project area. The requirements for archaeological monitoring would be noted on the construction plans. The archaeologist's duties would include monitoring, evaluation of any finds, analysis of collected materials, and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.	During Construction and Restoration	Applicable	A qualified archeologist will be present as necessary for ground disturbing activities within ESAs or within 100 feet of ESAs; defined as activities that would alter the existing elevations of the site, involve site development, grading, grubbing or tree root removal. NTPR-6 activities will be performed in compliance with the Project's Cultural Resources Construction Monitoring Plan approved by the CPUC on 6/26/2017.	
APM CUL-3: Avoid Known Cultural Resources. Known cultural resources that can be avoided would be demarcated as Environmentally Sensitive Areas. Construction crews would be instructed to avoid disturbance of these areas.	Pre-construction and during Construction	Applicable	Known cultural resources will be demarcated as Environmentally Sensitive Areas in compliance with the Project's Cultural Resources Construction Monitoring Plan.	
APM CUL-4: Unanticipated Cultural Finds. In the event that cultural resources are discovered, the archaeologist would have the authority to divert or temporarily halt ground disturbance to allow evaluation of potentially significant cultural resources. The archaeologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The archaeologist, in consultation with SDG&E's Cultural Resource Specialist, would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, a Research Design and Data Recovery Program would be prepared and carried out to mitigate impacts.	During Construction and Restoration	Applicable	SDG&E will implement APM CUL-4 if unanticipated cultural resources are discovered in compliance with the Project's Cultural Resources Construction Monitoring Plan.	
APM CUL-5: Curate Cultural Discoveries. All collected cultural remains would be cataloged and permanently curated with an appropriate institution. All artifacts would be analyzed to identify function and chronology as they relate to the history of the area. Faunal material would be identified as to species.	During Construction and Restoration	Applicable	If necessary, SDG&E will collect, catalog, and curate cultural discoveries in compliance with the Project's Cultural Resources Construction Monitoring Plan.	

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		APPLICABILITY	
APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	TO NTPR-6	STATUS
APM CUL-6: Archeological Monitoring Results Report. An archaeological monitoring results report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, would be prepared and submitted to SDG&E's Cultural Resource Specialist, SDG&E's Environmental Project Manager, and the CPUC. Any new cultural sites or features encountered would be recorded with the <i>SCCIC or SCIC</i> .	During Construction and Restoration	Applicable	APM CUL-6 will be implemented by SDG&E as necessary and in compliance with the Project's Cultural Resources Construction Monitoring Plan.
APM CUL-7: Monitoring by Native Americans. Native American monitoring may be implemented if transmission line construction has the potential to impact identified and mapped traditional locations and places. The role of the Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional location or place.	During Construction and Restoration	Applicable	APM CUL-7 will be implemented by SDG&E as necessary.
APM CUL-8: Paleontological Monitoring. A paleontological monitor would work under the direction of a qualified project paleontologist and would be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits with high paleontological resource sensitivity. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	During Construction and Restoration	Applicable	A paleontological monitor will be onsite for NTPR-6 excavation and ground-disturbing activities which require paleontological monitoring. All NTPR-6 activities will be performed in compliance with the Project's Paleontological Monitoring and Treatment Plan, which was approved by the CPUC on 08/29/2017.
APM CUL-9: 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 must concur with the evaluation procedures to be performed before construction activities are 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. When 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	During Construction and Restoration	Applicable	APM CUL-9 will be implemented as necessary in compliance with the Project's Paleontological Monitoring and Treatment Plan.

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scientific institution with permanent paleontological collections, and a paleontological monitoring report would be written.			
APM CUL-10: Building of Distinction Requirements. The applicant proposes to take the following steps found in Council Policy 602, which applies to the alteration, modification, or demolition of "significant" structures: 1. Advertise, for a period of three months, that the former utility structure may be available for relocation. 2. Prepare a photographic record of the former utility structure. Photographs will include: a. Each elevation; b. Close-ups of any unusual or unique architectural features; and c. Views of the structure from a distance. In addition, measured drawings or plans will be included. If not relocated, allow the removal of any architectural elements of the former utility structure for a period of two weeks at the expense of any local historic interest group or organization removing the element.	Pre-construction	Not Applicable	Complete. NTPR-6 does not include any work within the SJC Substation or work that would affect the former utility structure.
MM CUL-1: Supplemental Worker Training for Cultural Resource. As a supplement to APM CUL-1, this measure requires the applicant to incorporate the following specific topics into the pre-construction cultural resource training for all on-site personnel: —Describe the role of cultural and paleontological resources monitors and the role of Native American monitors; —Describe the types of cultural and paleontological resources that may be found in the project area; —Describe the potential for human remains to be discovered during ground disturbing activities; and —Describe the penalties associated for breaking the laws relevant to the protection of cultural and paleontological resources. The cultural and paleontological resources training components will be developed by a CPUC-approved cultural resources consultant (see MM CUL-3) and CPUC-approved paleontological consultant (see MM CUL-6). The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Worker Training (SEAP) has been developed and submitted to the CPUC on 07/07/2017. The SEAP training was first administered on September 13, 2017. All Project personnel will be required to participate in the SEAP prior to starting work on the Project. SEAP administration will be ongoing throughout construction for all new Project personnel. The SEAP sign-in sheets for each month are provided as an attachment in the Monthly Environmental Compliance Report submitted to the CPUC on the 10 th of each month.
MM CUL-2: Construction Monitoring Plan. Prior to construction, the applicant will submit a Construction Monitoring Plan for the proposed project, prepared by the approved consultant(s)	Pre-construction, during	Applicable	Complete. The Construction Monitoring Plan was approved by the CPUC on

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(MM CUL-3) for review and approval by the CPUC. The final Construction Monitoring Plan shall be implemented, as specified, throughout construction and restoration. The Construction Monitoring Plan shall, at a minimum:	Construction, and Restoration		06/26/2017. The Construction Monitoring Plan will be implemented during construction.
 Identify areas where native soil will be disturbed by construction or restoration of the proposed project or where known cultural resources (APM CUL-2) occur in the project area as areas that will be monitored by a CPUC-approved archaeologist. 			
 Confirm that archeological monitoring will be performed during all ground disturbing activities along Segment 1a of the 230-kV transmission line, Segment A of the 12-kV distribution line, and within the proposed San Juan Capistrano Substation to prevent potential damage to buried Juaneño/Acjachemen deposits. Describe monitoring procedures that will take place for each project component area, as required. 			
 Describe how often monitoring will occur (e.g., full time, part time, spot checking). 			
Describe monitoring reporting requirements (APM CUL-6).			
 Describe the Testing and Evaluation Plans and Data Recovery Plans (APM CUL-4 and APM CUL-5). Include contact information for those to be notified or reported to. 			
MM CUL-3: Qualified Cultural Resources Consultants. The applicant will retain the services of qualified professional (CPUC-approved) cultural resources consultants who meet or exceed the United States Secretary of the Interior qualification standards for professional archaeologists published in 36 Code of Federal Regulations (CFR) 61 and who have experience working in the jurisdictions traversed by components of the proposed project sufficient to identify the full range of cultural resources that may be found in the proposed project area. The consultants will also have knowledge regarding the cultural history of the proposed project area. The resumes and supporting information for each cultural resource consultant will be submitted to the CPUC for approval. At least one qualified cultural resources consultant must be approved by the CPUC prior to start of construction.	Pre-construction	Applicable	Complete. The CPUC approved a qualified cultural resource consultant on 04/27/2017 and on 09/12/2017.
MM CUL-4: Native American Consultation and Participation Planning. As a supplement to APM CUL-7, prior to construction, the applicant will provide evidence to the CPUC that tribes requesting consultation with the applicant regarding the project design and impacts on cultural resources were consulted. In addition, the applicant will provide evidence to the CPUC that tribes that express interest in the project during any phase (i.e., project application through end	Pre-construction, during Construction, and Restoration	Applicable	Complete. SDG&E submitted a Native American Monitoring Plan (NAMP) to the CPUC on 07/26/2017 and submitted to the tribes on 07/27/2017. A copy of the 8/14/2017 response received from the

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of construction and restoration) have been given the opportunity to participate in additional cultural resources surveys (MM CUL-5) and/or cultural resources monitoring when performed by a CPUC-approved cultural resources consultant (MM CUL-3).			Juaneno Band of Acjachemen Nation indicating that they had no commentson the NAMP was submitted to the CPUC
To outline the expected duties and responsibilities of all parties involved, the applicant and a CPUC-approved cultural resources consultant will submit a Native American Participation Plan prior to construction. The final Native American Participation Plan shall be implemented, as specified, throughout construction and restoration. Tribes that have expressed interest in the project prior to construction will be given the opportunity to participate in development of the plan. At a minimum, the plan will specify that:			on 8/17/2017. The NAMP will be implemented during construction.
 Native American monitors, if approved by a tribe, are expected to participate in worker environmental awareness and health and safety training and follow all health and safety protocols. 			
 Attendance by Native American monitors during construction and restoration of the proposed project is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work. 			
 The Native American monitors will have the ability to notify a CPUC-approved cultural resources consultant who has the authority to temporarily stop work (MM CUL-3) if they find a cultural resource that may require recordation and evaluation. 			
 Interpretation of a find will be requested from Native American monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in the final Cultural Resources Report. 			
 The tribes involved with preparation of the Native American Participation Plan will be given the opportunity to participate in the development of Testing and Evaluation Plans and Data Recovery Plans (MM CUL-2) if the development of these plans is required. 			
 Native American monitors approved by a tribe for monitoring work on the project will be notified 30 days prior to start of construction of the various project components. 			
 The Native American monitors will be compensated for their time. If more than one tribal group wishes to participate in the monitoring, SDG&E will work out an agreement for sharing of monitoring compensation. 			
 Define a process to inform tribes of completed cultural surveys and to provide a copy of the survey to interested tribes. 			

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MM CUL-5: Additional Cultural Resources Surveys. Prior to issuance of the notice to proceed, the applicant will ensure that qualified archaeological consultants, as specified in MM CUL-3, will conduct intensive-level cultural resources surveys (transects no greater than 10 meters) for all areas to be disturbed that have not already been surveyed for cultural resources and that, prior to the project, had been undisturbed. Surveys shall also include a California Historic Resources Information System search and Native American Heritage Commission Sacred Lands file database search. Reports that specify the research design, methods, and survey results will be submitted to the CPUC for review and must be accepted by the CPUC prior to the start of ground disturbance in the previously unsurveyed areas.	Pre-construction	Not Applicable	The NTPR-6 work areas were previously surveyed during the Project's DEIR development (September 29 and 30, October 11 and 12, and December 28 and 29, 2011; February 28, 2012; and March 15, 2012); therefore, MM CUL-5 does not apply.
MM CUL-6: Qualified Paleontological Consultants. The applicant will retain the services of qualified professional paleontological consultants with knowledge of the local paleontology and the minimum levels of experience and expertise, as defined by the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010). The resumes and supporting information for each paleontological consultant will be submitted to the CPUC for approval. At least one qualified paleontological consultant must be approved by the CPUC prior to start of construction.	Pre-construction	Applicable	Complete. The CPUC approved SDG&E's qualified paleontological consultant on 04/27/2017 and on 09/12/2017.
MM CUL-7: Paleontological Monitoring and Treatment Plan. Prior to start of construction, the applicant will submit a Paleontological Monitoring and Treatment Plan for the proposed project that is prepared by a CPUC-approved paleontological consultant (MM CUL-6) to the CPUC for approval. This plan will be adapted from the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) to specifically address each project component. In addition, the plan will, at a minimum:	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Paleontological Monitoring and Treatment Plan (PMTP) was approved by the CPUC 08/29/2017. The approved PMTP will be implemented during construction.
• Describe the criteria used to determine whether an encountered resource is significant and if it should be avoided or recovered.			
 Identify construction and restoration impact areas of moderate to high sensitivity for encountering paleontological resources and the shallowest depths at which those resources may be encountered. 			
Describe methods of recovery, preparation, and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting.			
Briefly identify and describe the types of paleontological resources that may be encountered.			
Describe monitoring procedures that will take place for each component of the project that requires monitoring.			

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 Describe how often monitoring will occur (e.g., full time, part time, spot checking), as well as the circumstances under which monitoring will be increased or decreased. Describe the circumstances that will result in the halting of work. Describe the procedures for halting work and for notifying construction and restoration crews when work is to be halted and to be resumed. Include testing and evaluation procedures for resources encountered. Describe procedures for curating any collected materials. Outline coordination strategies to ensure that the CPUC-approved paleontological consultant (MM CUL-6) conducts full-time monitoring of all grading activities in sediments determined to have a moderate to high sensitivity. Include reporting procedures. Include contact information for those to be notified or reported to. For sediments of low or undetermined sensitivity, the Paleontological Monitoring and Treatment Plan will specify the level of monitoring necessary. Sediments with no sensitivity will not require paleontological monitoring. The plan will define specific conditions in which monitoring of earthwork activities could be reduced and/or depth criteria established to trigger monitoring. These factors will be defined by an approved (MM CUL-6) paleontologist. 			
 MM CUL-8: Preservation of Former Utility Structure at Capistrano Substation. The applicant shall incorporate the following design specifications at Capistrano Substation and features shown in Appendix S of this EIR with the purpose to rehabilitate the west wing of the former utility structure at Capistrano Substation per the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings: Replacement of the current landscaping with landscaping that returns the existing utility structure's setting to an earlier appearance. Construction of an approximately 5-foot-tall retaining wall parallel to the northern and eastern walls of the retained west wing. Construction of a masonry wall approximately 10 feet tall on the inside of the western perimeter of the substation. When viewed from the exterior, the masonry would vary from 12 to 15 feet in height due to grading behind the substation wall. The northern and southern perimeter walls would remain at approximately 10 feet in height. 	Pre-construction and during Construction	Not Applicable	Work covered under this measure will not be included in NTPR-6. Demolition of the former utility structure is complete and was included in NTP-2 work activities, which was approved by the CPUC on 10/13/2017.

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The existing utility structure shall remain approximately 4 inches from the western perimeter wall.			
The southern and western walls of the retained portion of the existing substation shall be located outside of the secured substation facility and will be visible from Camino Capistrano. The northern and eastern walls of the existing utility structure shall effectively act as part of the substation security wall.			
 Installation of new steel doors to replace the doors in the southern, eastern, and northern walls of the existing utility structure. The northern and eastern doors will serve as part of the security wall. 			
Construction of a driveway from the main substation access to the structure's southern door.			
Set back the southern driveway vehicle access gate by approximately 80 feet from Camino Capistrano.			
Set back the northern driveway access gate by approximately 35 feet from Camino Capistrano.			
The northern and southern vehicular access gate shall be approximately 30 feet wide. Each pair of gates will be made of black wrought iron and be approximately 15 feet in width.			
Grading and the phased site development would be similar to that of the Proposed Project Substation.			
Modifications to the existing utility structure shall include:			
• East Wing Demolition: Retain 12 inches of roof and walls where the east wing intersects the west wing of the existing structure. This will allow the remaining portion of the roof and wall visually to read as a "ghost" of the east wing once it is removed.			
West Wing Rehabilitation:			
 Western Wall: the exterior wall, concrete wall iron jacking, and windows will be repaired. Security bars will be installed on all interior windows. 			
 Northern Wall: Deteriorated, non-original, sidelights, and transom windows shall be replaced to match the original. Those that are replaced shall be made from steel rather than wood for increased security. Door assembly does not require glazing, but shall be constructed exclusively of steel following the original pattern. This wall and replacement door will only be accessible from the interior. 			
 Eastern Wall: The interior door shall be replaced with a new exterior door that matches the original but is designed for exposure to the elements. Glazing is not required for the 			

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door or existing windows, but design should follow the original pattern. The eastern wall, window, and door will only be accessible from the interior.			
 Southern Wall: Deteriorated, non-original, sidelights, and transom windows shall be replaced to match the original. Those that are replaced shall be made from steel rather than wood for increased security. Door assembly does not require glazing, but shall be constructed exclusively of steel following the original pattern. Due to visibility from the street, the door. should include translucent wire glass at the transom. Where glazing occurs at the transom, security bars shall be installed on the interior. 			
- Interior Window Sills: Where water damage has occurred, windows sills shall be repaired.			
- Interior Crane: The movable crane shall be retained.			
 Lighting: A lighting plan shall be developed and implemented. It will include manually operating exterior wall sconces on the north and south walls. 			
The applicant shall prepare and implement a historicarchitect monitoring plan. The plan shall include, but shall not be limited to, the following information:			
 Qualifications of the historic architect monitor (must meet the Secretary of the Interior's Professional Qualifications Standards); 			
Activities that shall be monitored by the historic architect monitor;			
Authority given to the historic architect monitor to halt construction on the former utility structure in order to prevent damage to the structure;			
 Procedures that the historicarchitect monitor will follow to halt construction and the procedures to restart construction; and 			
Reporting procedures for the historicarchitect.			
The historic monitoring plan shall be submitted to the CPUC for approval at least six weeks prior to start of construction on the former utility structure.			
 The applicant shall also prepare a Historic American Building Survey (HABS) photographic documentation for the utility structure before the east wing is removed. The applicant shall provide the HABS documentation to the CPUC at least six weeks prior to start of construction on the former utility structure. 			

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
GEOLOGY, SOILS, AND MINERAL RESOURCES			
APM GEO-1: Conduct an Engineering-level Geotechnical Investigation for Liquefaction Potential and Implement Recommended Design Measures. A geologic hazard evaluation was conducted by URS in 2008 to evaluate the pole locations along the Proposed Project transmission line route for the presence of geologic hazards that may affect the new towers and poles. The geologic hazard evaluation indicated the presence of geologic conditions potentially susceptible to liquefaction at the locations of proposed Pole Nos. 8, 9 and 10. Prior to construction, an engineering-level geotechnical investigation would be performed at these locations under the supervision of a California Certified Engineering Geologist or California licensed Geotechnical Engineer to further evaluate the liquefaction potential at each of these pole locations and to develop design measures to minimize the potential for damage to Proposed Project structures in the event of strong ground shaking. Recommendations of the geotechnical investigation would be incorporated into the final design for these structures. These recommendations would include augmented grading practices, expanded erosion control measures and deeper foundations.	Pre-construction, during Construction, and Restoration	Applicable	Complete. The construction of Poles #8, #9 and #10 are included in NTPR-6. An engineering-level geotechnical investigation has been performed and the results report has been provided to the CPUC. Recommendations from the evaluation have been incorporated into final engineering and design.
APM GEO-2 Conduct an Engineering-level Geotechnical Survey for Landslides and Implement Recommended Design Measures to Ensure Slope Stability is not Impacted and the Potential for Damage to Protect Structures is Minimized. A geologic hazard evaluation was conducted by URS in 2008 to evaluate the structure locations along the Proposed Project transmission line route for the presence of geologic hazards that may affect the new towers and poles. The geotechnical hazard evaluation identified areas with recent and ancient landslides along the Proposed Project transmission line route due to unstable slope conditions in portions of both the Capistrano and Monterey formations Prior to construction, an engineering-level geotechnical investigation would be performed at each pole location along the transmission line route that is in or near a mapped landslide or other unstable slope condition. This investigation would be performed under the supervision of a California Certified Engineering Geologist or California licensed Geotechnical Engineer, and would identify protection measures to be designed and implemented to ensure that the Proposed Project does not materially increase slope stability risks and to minimize potential for damage to Proposed Projectstructures in the event of landslides. These recommendations would include augmented grading practices, expanded erosion control measures and deeper foundations.	Pre-construction, during Construction, and Restoration	Applicable	Complete. An engineering-level geotechnical investigation has been performed at all pole locations along the transmission line route for NTPR-6 that are in or near a mapped landslide or other unstable slope condition, and the results report has been provided to the CPUC. Recommendations from the evaluation have been incorporated into final engineering and design.
MM GEO-1: Conduct an Engineering-level Geotechnical Investigation for Liquefaction Potential and Implement Recommended Design Measures. Prior to construction, an engineering-level geotechnical investigation shall be performed at Pole Nos. 1a through 5a	Pre-construction, during	Not Applicable	This measure is not applicable to NTPR- 6. Transmission structures #1a through #5a are included in NTP-4.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
under the supervision of a California Certified Engineering Geologist or California licensed Geotechnical Engineer to further evaluate the liquefaction potential at each of these pole locations and to develop design measures to minimize the potential for damage to proposed project structures in the event of strong ground shaking. Recommendations of the geotechnical investigation shall be incorporated into the final design for these structures.	Construction, and Restoration		
GREENHOUSE GASES			
APM GHG-1: Operations Emissions Controls. SDG&E developed this APM to ensure that sulfur hexafluoride is properly managed. SDG&E would implement its existing sulfur hexafluoride mitigation strategies during the operation and maintenance of sulfur hexafluoride-containing equipment installed as part of the proposed project. These strategies include:	During Operation	Not Applicable	NTPR-6 does not include any equipment containing sulfur hexafluoride.
 Recording company-wide sulfur hexafluoride purchases, use, and emissions rates to comply with the USEPA's requirements for Electrical Transmission and Distribution Equipment Use (Mandatory Reporting of Greenhouse Gases, 40 CFR Part 98, Subpart DD) and the CARB's Regulation for Reducing Sulfur Hexafluoride Emissions from gas-insulated switchgear (Code Regs. Tit. 17, § 95350-95359); 			
Implementing a sulfur hexafluoride recycling program;			
Training employees on the safety and proper handling of sulfur hexafluoride;			
Continuing to report GHG emissions with the Climate Registry; and			
• Implementing SDG&E's sulfur hexafluoride leak detection and repair program. This program includes monthly visual inspections of each GCB, which includes checking pressure levels within the breaker and recording these readings in SDG&E's Substation Management System. During the installation or major overhaul of any GCB, the unit is tested over a 24-hour period to ensure no leaks are present. Minor overhauls of each GCB are conducted every 36 to 40 months to check overall equipment health. This process includes checking gas pressure, moisture ingress, and sulfur hexafluoride decomposition. If the GCB fails any of these checks, the unit is checked for leaks and repaired. In addition, all GCBs are equipped with a gasmonitoring device and alarm that automatically alerts SDG&E's Grid Operations Center. If gas pressure approaches minimum operating levels, an alarm is immediately reported to SDG&E's Substation Construction and Maintenance Department. The GCB is usually inspected for leaks within 24 hours of such an alarm. SDG&E's leak detection practice includes the following three methodologies:			
 Spraying a leak-detection agent onto common leak points — including O rings, gaskets, and fittings; 			

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 Using a field-monitoring device (sniffer) to detect the presence of sulfur hexafluoride gas; and Using a laser-detection camera to detect the presence of sulfur hexafluoride gas when the above two methods are unsuccessful in finding a leak. 			
HAZARDS AND HAZARDOUS MATERIALS			
APM HAZ-1: Conduct Environmental Site Assessment. Prior to the start of earth disturbance activities at the upper yard portion of the existing Capistrano Substationsite, a Phase II Environmental Site Assessment (soil sampling) would be performed and, if any contaminated soil is found to be present, contaminated soils would be managed, removed, transported, and disposed of in accordance with all applicable laws, ordinances and safety standards. The Environmental Site Assessment would be completed pursuant to American Society for Testing and Materials International standard requirements.	Pre-construction	Not Applicable	NTPR-6 activities do not include earth disturbing activities at the SJC Substation site, therefore this measure is not applicable.
APM HAZ-2: Hazardous Materials and Waste Management Plan. The applicant would prepare a project-specific Hazardous Materials and Waste Management Plan (HMWMP) following final CPUC project approval and be submitted to the CPUC prior to issuance of any applicable Notice to Proceed for the project. Handling, recycling, and waste transportation, and temporary waste storage procedures would be outlined within the HMWMP. The project-specific HMWMP would include site-specific procedures and would be developed based on SDG&E standards and applicable hazardous materials laws, standards, and regulations. Sampling and cleanup levels would be established in the HMWMP as follows: • Confirmation samples would be taken to ensure that site conditions are consistent with	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Hazardous Materials and Waste Management Plan was submitted on 08/02/2017 and approved by the CPUC on 09/07/17. SDG&E will implement the Plan during NTPR-6 activities.
current and proposed land uses (i.e., electric substation);			
 Confirmation samples would be taken, utilizing industry standard testing methods (e.g. EPA Methods), for appropriate site-specific contaminants of concern; 			
Final sampling procedures would be included within the project-specific HMWMP; and			
Final cleanup levels would be identified in the HMWMP and be consistent with acceptable levels for Commercial Industrial land uses.			
Plans for the unanticipated discovery of contaminated soil and/or groundwater during construction would be included in the HMWMP, including:			
 Procedures in response to the discovery of contaminated soil or groundwater, including those for stopping work, securing the contaminated area, preventing the spread of contamination, and appropriate waste management (testing, profiling, shipping disposal); 			

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 Training requirements for construction workers performing excavation activities; Dewatering procedures; and Procedures for notifying SDG&E and agency personnel in the event of the discovery of contaminated soil and/or groundwater. The applicant's outline of environmental procedures for management of the following would be addressed in the HMWMP: Asbestos Management; Hazardous Materials Transportation Security Plans; Hazardous Materials and Waste Management; Hazardous Material and Waste Shipping; Hazardous Waste Minimization Plans; and Field Guidelines for Emergency Incidents. Soil sampling and building materials sampling results from applicable Environmental Site Assessments would be applied to development of the HMWMP. 			
APM HAZ-3: Personal Protection Equipment. Specialized crews would be utilized to conduct any remediation (safe removal of contaminants) at the Capistrano Substation site prior to actual construction of the proposed project commencing. Proper personal protection equipment would be utilized by all remediation workers that may come into contact with known contaminated soil or hazardous building materials. Personal protection equipment would be determined based upon the nature of the contamination present at any given portion of the substation site and would comply with all applicable CalOSHA standards.	During Construction and Restoration	Not Applicable	NTPR-6 does not apply to work inside the Capistrano Substation site; therefore, this measure is not applicable.
APM HAZ-5: Recycling and Reuse. It is SDG&E's practice to reuse or recycle all old structures/poles, materials, and components following the retirement of substations, transmission lines, and structures/poles. Whatever cannot be reused or recycled is disposed of at an appropriate facility pursuant to all applicable laws.	During Construction and Restoration	Applicable	SDG&E will implement this measure during NTPR-6 activities and will recycle or reuse materials as feasible.
APM HAZ-6: Fire Control. Construction restrictions would occur during times of high fire threat such as Red Flag Warnings issued by the National Weather Service or other severe fire weather conditions as identified by SDG&E. Consistent with SDG&E's Electric Standard Practice 113.1 and the project-specific fire plan, prior	During Construction and Restoration	Applicable	A revised Construction Fire Prevention and Emergency Response Plan was approved by the CPUC on 04/11/2018. SDG&E will implement the revised Construction Fire Prevention and

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to starting construction activities, SDG&E would clear dead and decaying vegetation from proposed project work areas where personnel are active or where equipment is in use or being stored within ROWs, staging areas, stringing sites, and access roads. Cleared dead and decaying vegetation would either be removed or chipped and spread on site. The project-specific fire plan would requirements for equipping diesel and gasoline operated engines with spark arrestors, carrying emergency fire suppression equipment, furnishing a water truck on or immediately adjacent to the proposed project work area, restricting smoking and vehicle idling, construction restrictions during Red Flag Warning periods (as applicable); and conducting pre-activity tailgate meetings that include fire safety discussions.			Emergency Response Plan during construction.
 MM HAZ-1: Hazardous Substances Contamination Prevention Plan. Prior to construction, the applicant shall prepare and implement a Hazardous Substances Contamination Prevention Plan supplementing the Hazardous Material Business Plan to prevent the release of hazardous materials and hazardous waste. The plan will include the following requirements and procedures: Training requirements for construction workers in appropriate work practices, including spill prevention and response measures. Additional training requirements for those performing excavation activities shall be required and shall include training on types of contamination (e.g., petroleum hydrocarbons, lead, asbestos, and hazardous materials (as defined by the California Health and Safety Code) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). Contain all hazardous materials at work sites and properly dispose of all such materials. 	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Hazardous Materials and Waste Management Plan supplants the Hazardous Substances Contamination Prevention Plan and was approved by the CPUC on 09/07/17. SDG&E will implement the Hazardous Materials and Waste Management Plan during construction.

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Monitor and remove any vehicles with chronic or continuous leaks from use and complete repairs before returning them to operation.			
Store shovels and drums at the staging areas. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper off-site disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material.			
Procedures for transporting, shipping, and disposal of hazardous waste.			
Procedures for managing asbestos containing material.			
 Procedures for notifying applicant and agency personnel in the event of the discovery of contaminated soil and/or groundwater. Contact information for federal, regional, and local agencies, the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater, and licensed disposal facilities and haulers. 			
 Procedures for dewatering, including storage, testing, treatment, and disposal requirements and dewatering BMPs with reference to the applicant's Stormwater Pollution Prevention Plan (SWPPP). 			
This plan will be submitted to the CPUC for review and approval 30 days prior to the start of project construction.			
MM HAZ-2: Contaminated Materials from MCB Camp Pendleton. Excavation, grading, or removal of any materials within MCB Camp Pendleton boundaries shall be accomplished in accordance with EPA Best Management Practices for Outdoor Shooting Ranges (EPA-902-B-01-001), RCRA, the Clean Water Act, 40 CFR 260 (Federal Hazardous Waste Regulations), and California Title 22 (California Hazardous Waste Regulations). All work shall be accomplished with every effort to prevent the spread of any potential contamination or release of any potential existing contaminants to the environment in accordance with all federal, state, and local laws, regulations and instructions. Prior to the removal of any soil or wood and construction debris that has been used in live fire training and received impact from rounds, the soil or debris shall be sampled for appropriate hazardous in accordance with all federal, state, and local laws, regulations, and instructions. Also, prior to the removal of any wood and construction debris that has been used in live fire training and received impact from rounds, the debris should be sampled for lead and other constituents. If the soil, wood, or debris is determined to be hazardous waste, it will be handled and disposed of in accordance with applicable hazardous waste regulations. All hazardous waste manifests shall be signed by the Hazardous Waste	During Construction and Restoration	Not Applicable	NTPR-6 does not include activities on Marine Corps Base (MCB) Camp Pendleton.

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Branch, AC/S Environmental Security. Solid lead or copper removed from the base shall be recycled in accordance with the base Qualified Recycling Program regulations.			
MM HAZ-3: Worker Safety Training. As part of the worker environmental awareness program, the applicant will prepare a safety training module, in coordination with an appropriate representative from MCB Camp Pendleton, to inform all on-site personnel of the active military training activities occurring within MCB Camp Pendleton and the potential hazards associated with working at Talega Substation. The worker environmental awareness program shall include training on how to identify unexploded ordinance and what procedures shall be followed if potential unexploded ordinance is identified, including the "Three R's" method: Recognize, immediately Retreat, and Report to the Provost Marshal's Office at (760) 725-3888 or dial 911 immediately. The applicant shall provide a copy of the training material and trainee sign-in sheets to the CPUC prior to construction.	Pre-construction and during Construction	Not Applicable	NTPR-6 does not include activities on MCB Camp Pendleton.
 MM HAZ-4: Fire Prevention and Emergency Response Plan. The applicant will develop and implement a Fire Prevention and Emergency Response Plan. This plan, and a record of contact and coordination with the Orange County Fire Authority (OCFA), will be submitted to the CPUC for review and approval 30 days prior to the start of construction of the proposed project. The plan will describe fire prevention and response practices that the applicant will implement during construction of the proposed project to minimize the risk of fire and, in the case of fire, provide for immediate suppression and notification. The plan will include: Fire prevention and response practices, including the proper dispensing and storage of gasoline, diesel, and other fuels and combustible chemicals; power tool and equipment use; emergency access; fire suppression equipment and training; vegetation clearing; designated parking areas; appropriate climatic conditions and designated areas to perform welding or blow torch activities and other hot-work activities; and ceasing of any or all work activities, including helicopter use, as directed by the OCFA or other applicable fire department representatives. 	Pre-construction, during Construction, and Restoration	Applicable	Complete. A revised Construction Fire Prevention and Emergency Response Plan was approved by the CPUC on 04/11/2018. SDG&E will implement the revised Construction Fire Prevention and Emergency Response Plan during construction.
Communication protocols for on-site workers to coordinate with local agencies and emergency personnel and for the applicant's environmental health and safety personnel to coordinate with on-site workers in the event of fire, flood, or other emergencies or increased risk of emergency during construction or operation of the project.			
The Project Construction Manager, Contract Administrators, and/or Site Foreman will be			

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present at each worksite during construction activities, and it will be their responsibility to monitor the contractor's fire-prevention activities. The Project Construction Manager, Contract Administrators, and/or Site Foreman will have full authority to stop construction as needed to prevent fire hazards. The Project Construction Manager, Contract Administrators, and/or Site Foreman responsibilities will include:			
- Maintain a complete copy of the Fire Prevention and Emergency Response Plan;			
- Serve as a point of contact for fire departments in the event of fire or other emergency;			
 Manage the prevention, detection, control, and extinguishing of fires started accidentally as a result of construction activity; 			
 Review site-specific fire prevention and emergency response plans with construction personnel prior to starting work in each project area; 			
 Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At minimum, construction personnel will be trained in fire prevention and emergency reporting. Each member of the construction work force will be trained and equipped to extinguish small fires (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus); 			
- Be equipped with radio and cellular telephone access for the duration of each work day;			
 Ensure that all construction personnel are provided with operational radio and/or cellular telephone access to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite; 			
 Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel; and 			
- Construction workers will immediately report all fires to the nearest Fire Risk Manager.			
The required fire suppression equipment, tools, and other materials to be included with each construction vehicle on the Project.			
MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well. If an unrecorded oil and gas well is discovered during construction of the proposed project and the well is located within 50 feet of a construction disturbance area, the applicant shall immediately cease work within 50 feet of the well and notify the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR) Cypress District Office. Work shall not resume within 50 feet of	During Construction and Restoration	Applicable	SDG&E will implement MM HAZ-5 as needed. If an unrecorded oil or gas well is discovered, the Project's Lead Environmental Inspector will notify the DOGGR and work will not commence until approval is received.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
the unrecorded well until DOGGR has determined appropriate actions to be taken and has given written notice of approval for work to resume.			
HYDROLOGY AND WATER QUALITY			
MM WQ-1: Pesticide Application. If pesticides are used during construction or operations, they shall be applied in accordance with Federal Insecticide, Fungicide, and Rodenticide (FIFRA) labels. Applicators shall be appropriately trained and shall be certified by the California Department of Pesticide Regulation. Prior to any use of pesticides, the type of pesticides proposed for use shall be approved by the CPUC. Prior to each pesticide application the National Weather Service (forecast.weather.gov) shall be consulted, and no pesticides shall be applied if the chance of rain exceeds 70% within 24 hours of the proposed application time and location. Records of type and amount of pesticides used and locations of application shall be kept and submitted to the CPUC on a monthly basis during construction.	During Construction and Restoration	Applicable	SDG&E will implement this measure during NTPR-6 construction activities as needed.
NOISE AND VIBRATION			
APM NOISE-1: Nighttime and Weekend Activities. Any endeavors during the construction phase wherein nighttime and/or weekend activities are necessary (such as due to Caltrans transportation constraints for conductor stringing (I-5) or oversized/ overweight loads or CAISO outage constraints) would be limited to the extent feasible so that noise would not exceed the pertinent maximum noise level limits or the hourly L50 limits when measured at the nearest residential property. For example, to minimize potential noise disturbances during nighttime deliveries of transformers, the applicant would make every reasonable effort to minimize the duration of trucking activities at the project site. This would entail pulling delivery vehicles onto the project site, parking them overnight, and unloading/installing the item(s) during normal daytime construction hours. If nighttime or weekend activities cannot be conducted to meet the city's noise standards, SDG&E would communicate the exception to the appropriate local agency at least 24 hours in advance of conducting work that may exceed the threshold(s).	During Construction and Restoration	Applicable	SDG&E will implement this measure during NTPR-6 construction activities as required.
MM NV-1: Nighttime and Weekend Construction Noise Controls. Before performing any construction, activities required during periods of time not allowed by local ordinances (i.e., nighttime and weekends), the applicant will:	During Construction and Restoration	Applicable	SDG&E will implement this measure during NTPR-6 construction activities as needed.
 Obtain authorization from the local jurisdiction where work will be performed (city or county, as applicable) prior to initiating work at night and on weekends; Notify occupants of the sensitive receptors properties located within 230 feet of the work a 			

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
minimum of one week prior to the potential activities and their anticipated duration;	li		
 Ensure that noise levels will not exceed exterior noise standards of 55 A-weighted decibels (dBA) at the property boundary during the period of 6:00 p.m. to 10 p.m. and 45 dBA between 10 p.m. and 7 a.m.; 			
 Minimize the duration of trucking activities at work sites to less than 30 minutes, when feasible; 			
 Monitor noise levels during a cumulative period of more than 30 minutes in any hour (L₅₀) and maximum noise levels (L_{max}) at the nearest residential property boundary during the period when nighttime or weekend construction is performed; 			
 Report noise levels (hourly L₅₀ and L_{max}) measured at the nearest residential property to the local jurisdiction (city or county, as applicable) and the CPUC within one week. Noise level measurements shall be conducted and reported in compliance with the City of San Juan Capistrano and City of San Clemente requirements, as applicable; and 			
 If nighttime or weekend activities cannot be conducted to meet the local ordinance exterior noise standards, the applicant will implement additional mitigation measures, such as: 			
 Reducing trucking activities to shorter periods of time; 			
- Using low noise electrical equipment;			
 Installing portable noise barriers surrounding the work sites; or 			
 Offering potentially affected residents an alternative place to stay overnight or for a weekend, as necessary. 			
MM NV-2: Low-Noise Substation Equipment and Noise Barriers. The applicant will ensure that San Juan Capistrano Substation's operational noise levels will not exceed 45 dBA at the property boundary during the period of 10 p.m. to 7 a.m. This will be achieved by ensuring that the final substation layout provides sufficient setback between the project facilities and closest residential receptors, use of low-noise substation equipment, or installation of noise barriers in the perimeter of the substation. The 230-/138-kV and 138-/12-kV transformers will be located at a minimum distance of 100 feet from the nearest residential property. The applicant will conduct a noise survey at the closest receptors to the substation once the substation is fully operational to confirm that sufficient measures have been implemented to reduce noise levels to 45 dBA at the property boundary. The applicant will submit the noise survey results to the CPUC.	During Operation	Not Applicable	NTPR-6 activities do not include the operation of SJC Substation equipment.

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MM NV-3: Construction Vibration Control Measures. The applicant will implement the following measures to reduce construction vibration at substations, transmission lines, distribution lines, and staging areas located within 100 feet of residential and other vibrationsensitive receptors: Route heavily loaded trucks away from residential streets, if possible. Select streets with the fewest homes if no alternatives are available; Operate earth-moving equipment on construction sites as far away from residential and other vibration-sensitive receptors as possible; Phase earth-moving and ground-impacting operations so as not to occur in the same time period; Applicable Complete. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Control Plan was approved by the CPUC on 10/5/2017. The Construction Control Plan was approved by the CPUC on 10/5/2017. The Construction Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Access and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Control Plan was approved by the CPUC on 10/5/2017. The Construction Access and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibrat	APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
Implement a compliance monitoring program during construction to ensure implementation of vibration control measures.	 following measures to reduce construction vibration at substations, transmission lines, distribution lines, and staging areas located within 100 feet of residential and other vibration-sensitive receptors: Route heavily loaded trucks away from residential streets, if possible. Select streets with the fewest homes if no alternatives are available; Operate earth-moving equipment on construction sites as far away from residential and other vibration-sensitive receptors as possible; Phase earth-moving and ground-impacting operations so as not to occur in the same time period; Avoid nighttime activities; Avoid the use of vibratory rollers near noise- and vibration-sensitive areas; Conduct pre-construction notifications for sensitive receptors located within 100 feet of construction activities within 30 days prior to construction; Develop a construction vibration mitigation and monitoring plan during final project design to be reviewed and approved by the CPUC; and Implement a compliance monitoring program during construction to ensure implementation 	Construction and	Applicable	Vibration Control Plan was approved by the CPUC on 10/5/2017. The Construction Noise and Vibration Control Plan will be implemented during construction and restoration. SDG&E sent pre-construction notification letters to sensitive receptors, residents and property owners within 100 feet of

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
MM NV-4: Corona Noise Reduction during Wet Weather Conditions. The applicant will ensure that the incremental increase in ambient noise levels from the proposed 230-kV transmission line corona noise levels will not exceed FTA Cumulative Noise Levels Allowed by Criteria (Figure 4.11-1) at the closest sensitive receptor during nighttime operations (10 p.m. to 7 a.m.). To verify compliance with this measure, the applicant will measure ambient noise levels before the proposed project's 230-kV line operations and the operational noise levels at sensitive residential receptors located within 45 feet of the 230-kV line segments. Operational noise levels will be measured during three rain events during the first two rainy seasons when the 230-kV line is operating. Reports shall provide noise measurements in Ldn and indicate the existing ambient noise levels and weather conditions during measurements. The applicant will submit measurement results to the CPUC annually. If the reports determine that the corona noise levels exceed FTA Cumulative Noise Levels Allowed by Criteria at sensitive residential receptors located within 45 feet, the applicant will implement the use of additional insulation equipment and additional technological solutions and will repeat the measuring of operational noise levels at sensitive residential receptors located within 45 feet of the 230-kV line segments during three rain events during the subsequent two rainy seasons, until the FTA Cumulative Noise Levels Allowed by Criteria threshold is no longer exceeded during rain events.	Pre-Construction and during Operation	Applicable	SDG&E will implement MM NV-4 prior to and during operations as required.
MM NV-5: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan for the construction and restoration of the proposed project. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. The Noise Control Plan shall include measures that the applicant shall employ during construction and restoration of the proposed project to keep generated noise levels below the Severe Impact range shown in Figure 4.11-1 (FTA 2006) of this EIR at the nearest sensitive receptors to each project construction location, in order to avoid significant impacts from temporary ambient noise increases. The Noise Control Plan shall include measures such as the following: • Install and maintain an absorptive noise control barrier in the perimeter of the San Juan Capistrano Substation construction site. • Limit heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • Ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • Maintain construction equipment according to manufacturer recommendations.	Pre-construction, during Construction, and Restoration	Applicable	Complete. The Construction Noise and Vibration Control Plan was approved by the CPUC on 10/05/2017. SDG&E will implement the Plan as required during construction.

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Minimize construction equipment idling.			
Noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment shall be reduced by providing a layout of construction sites that minimizes the need for back-up alarms and using flagmen to minimize time needed to back up vehicles.			
When possible, use construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines.			
Where practical, locate stationary equipments uch as compressors, generators, and welding machines away from sensitive receptors or behind barriers. The Noise Control Plan shall detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure that generated noise levels do not exceed the Severe Impact range shown in Figure 4.11-1 of this EIR. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects that noise levels have exceeded the Severe Impact range shown in Figure 4.11-1 of this EIR. Noise level measurements shall be conducted in compliance with the City of San Juan Capistrano, City of San Clemente, and Orange County requirements.			
The Noise Control Plan shall designate a Construction Relations Officer that is readily available to answer questions or respond to complaints during any hours or days that construction or restoration is occurring. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with a phone number for the public to contact the Construction Relations Officer. The applicant shall submit on a monthly basis to the CPUC a summary report of the complaints submitted to the Construction Relations Officer. The summary report shall include detail on how each complaint was responded to, if and when the complaint was resolved, and contact information for the member of the public that submitted the complaint.			
PUBLIC SERVICES			
APM PS-1: Recreational Facility Access. Construction within existing public parks would not completely restrict access through the parks. Where necessary, SDG&E would create temporary foot and bicycle paths along with appropriate advanced notice and signage to direct and allow for the pedestrian and bicycle access through each affected park.	Pre-construction, during Construction, and Restoration	Applicable	SDG&E will implement this measure during NTPR-6 construction activities as needed.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
APM PS-2: Repair Damage to Public Facilities. All recreational facilities that are physically impacted during construction activities would be returned to an approximate pre-construction state, allowing for SDG&E operation and maintenance activities, following the completion of the proposed project. SDG&E would make replacements of any public damaged or removed equipment, facilities, and infrastructure, in a timely manner.	During Restoration	Applicable	SDG&E will restore impacted public facilities as necessary at the completion of the Project.
APM PS-3: Roadway Repair. SDG&E Contract Administrators oversee all aspects of construction and would ensure that contractors repair any damage caused by construction activities. Contract Administrators would also work with the customers and/or local agency to ensure repairs are sufficient and consistent with pre-construction conditions. Contractors working for SDG&E typically photograph and/or video document pre-construction conditions. At the completion of construction activities, this documentation is used to ensure that any damage that is caused by construction work is repaired.	During Restoration	Applicable	SDG&E will document (e.g., photograph and/or video) pre-construction roadway conditions and make any repairs caused by construction after completion of construction of NTPR-6 work activities. Documentation of the pre-construction conditions of the roadways will be made available to the CPUC upon request.
MM PS-1: Water Efficiency Plan. The applicant will make reasonable attempts to reduce overall water use and will reduce potable water use by at least 20 percent during drought conditions, as declared by the State of California. The applicant will be required to research reclaimed water sources and acquire reclaimed water to the greatest extent practicable. The applicant will prepare and submit a Water Efficiency Plan to the California Public Utilities Commission (CPUC) for review and approval at least 60 days prior to construction. The Water Efficiency Plan will detail the applicant's water efficiency measures, including the use of reclaimed water, palliatives, alternative construction methods, or other measures proposed by the applicant. The Water Efficiency Plan will detail the applicant's attempts to secure reclaimed water. In the event that a sufficient supply of reclaimed water cannot be reasonably obtained, the applicant will provide a well-documented justification for any use of potable water to be used for construction activities. If, at any time during construction, the State Water Resources Control Board (SWRCB) rescinds their Emergency Regulations (Resolution No. 2014-0038) due to a cessation of drought conditions in the state, the applicant may request that the CPUC rescind this mitigation measure. Alternatively, the applicant will need to revise their Water Efficiency Plan to remain in compliance with future adopted SWRCB regulations regarding water use during drought conditions.	60 days prior to Construction, during Construction, and Restoration	Applicable	Complete. The Water Efficiency Plan was approved by the CPUC on 10/03/2017. SDG&E will implement the Water Efficiency Plan as required during construction.

TRANSPORTATION AND TRAFFIC

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
APM TR-1: Avoid Traffic Near Schools. Construction generated traffic associated with the San Juan Capistrano Substation and construction of the 138-kV getaways (new underground cable packages and new Pole Nos. 1a through 7a) would avoid the start and ending time for the Saddleback Valley Christian School and the Serra Catholic High School. Workers would arrive at construction sites by 7:30 AM and would not leave prior to 3:30 PM.	During Construction and Restoration	Not Applicable	NTPR-6 does not include construction of the 138-kV getaways (new underground cable packages or new Poles #1a through #7a). These activities were approved under NTP-5.
APM TR-2: Avoid SR-74 Traffic. Construction generated traffic associated with the San Juan Capistrano Substation and construction of the 138-kV getaways (new underground cable packages and new pole Nos. 1a through 7a) would avoid the SR-74 off ramp from I-5. Avoidance of the SR-74 and I-5 interchange would ensure that construction generated traffic would not exacerbate existing conditions on the stretch of road between the intersections of SR-74 and Rancho Viejo Road and SR-74 and Del Obispo.	During Construction and Restoration	Not Applicable	NTPR-6 does not include construction of the 138-kV getaways (new underground cable packages or new Poles #1a through #7a). These activities were approved under NTP-5.
APM TR-3: Emergency Access. SDG&E would coordinate with local emergency response agencies during all construction within existing roadways. Coordination with local emergency response agencies (such as Orange County Sheriff's Department and Orange County Fire Authority) would ensure that impacts to emergency access are less than significant.	During Construction and Restoration	Applicable	SDG&E will coordinate with local emergency response agencies throughout construction.
APM TR-4: Off Peak Deliveries. Deliveries would be scheduled during off-peak traffic periods to reduce trips during the most congested periods of the day.	During Construction and Restoration	Applicable	When feasible, deliveries arriving to the construction site(s) via large trucks (defined as trucks with a gross vehicle weight rating of more than 10,000 pounds) would be scheduled to arrive and leave the site to avoid peak traffic times of 7:00 AM- 9:00 AM and 5:00 PM - 7:00 PM. Certain construction activities may require extended delivery windows (e.g. emergency events and concrete pours). In the event that construction activities will require extended delivery windows during peak traffic times, SDG&E will notify the CPUC prior to the delivery and will document the reasons why the exception is required.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
APM TR-5: Material Removal, City Streets. For any underground work along city streets, materials would be removed from work areas on a daily basis to minimize traffic impacts.	During Construction and Restoration	Applicable	SDG&E will implement this measure during Project construction and in accordance with local permits.
APM TR-6: Helicopter Use. When helicopters are in use for construction activities, designated fly yards would be kept clear of all other construction activity. If helicopters are used during construction of the proposed project, existing helicopter landing areas would be used wherever feasible. Helicopter landing areas along the existing ROW would be located away from residences and other land uses (generally at least one mile from sensitive noise receptors).	During Construction and Restoration	Applicable	Helicopters may be used for NTPR-6 work activities, and APM TR-6 will be implemented during construction in that case.
APM TR-7: Traffic Control Plans. Contractors working for SDG&E would develop specific traffic control plans immediately prior to the start of construction that adhere to the Standard Traffic Control Procedure from the authority having jurisdiction (federal, state, county, city, or municipality) of the roadway being impacted. The traffic control plans would be created for the various construction phases of the San Juan Capistrano Substation, underground transmission and underground distribution segments leaving the San Juan Capistrano Substation, and overhead transmission. The approved traffic control plans would describe lane closures and other methods for reducing adverse construction-related traffic impacts and require SDG&E to coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles, to ensure that emergency vehicle access is maintained and that impacts to traffic flow are minimized. All traffic control plans would be developed, reviewed and approved by the authority having jurisdiction of the specific roadway being impacted. The traffic control plans would include vehicular and non-vehicular traffic and would be communicated to the public at least 48 hours in advance of the traffic control measures being installed in the roadway or as required by the traffic control permit.	Pre-construction, during Construction, and Restoration	Applicable	Pending. NTPR-6 activities will require traffic control work within local jurisdiction ROW. As such, Traffic Control Plans/Encroachment Permits would be submitted, and appropriate permits would be acquired prior to start of NTPR-6 construction as needed. SDG&E will submit all acquired Encroachment Permits/Traffic Control Plans to the CPUC for their records prior to the start of construction activities covered under the relative permits.
MM TR-2 ^(a) : Helicopter Safety Plan and External-Load Training Program. Prior to start of construction, SDG&E must submit a Helicopter Safety Plan and External-Load Training Program prepared by qualified personnel to the CPUC. All workers that shall be present when helicopters are in use for construction of the project shall be trained regarding helicopter external loads. A sign-in sheet recording the names and dates of all individuals trained shall be maintained by SDG&E. Helicopter Safety Plan and Worker Environmental Awareness training shall include the following, at minimum: • An overview of the general steps taken by the certified Rotorcraft External-Load Operators	Pre-construction, during Construction, and Restoration	Applicable	Pending. Helicopters may be used for NTPR-6 construction activities. MM TR-2a will be implemented during construction in that case. The Project's SEAP which was submitted on 7/7/2017 addresses helicopter safety and external load training. Prior to the start of construction activities requiring helicopter operations, a Helicopter

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ATTACHMENT B. WIWCKI REQUIREMENTS TRACKING TABLE					
APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS		
before starting operations, including a survey of the flight area; the typical ground worker instructions from certified Rotorcraft External-Load Operators; the ramp inspection checklist (14 CFR 133 Ramp Inspection Job Aid) and examples of typical causes of unsatisfactory ramp inspections; and the equipment typically required for Class A, B, C, and D loads as specified in 14 CFR 133;			Safety Plan will be submitted to the CPUC.		
 A summary of the contents of the FAA-approved Rotorcraft Load Combination Flight Manuals applicable to external-load operations planned for the project including maximum loads (internal and external) and load types and general performance capabilities, under approved operating procedures and limitations, for each type of helicopter to be used; 					
 Detailed instruction regarding the proper methods of loading, rigging, or attaching external loads and examples of improper rigging and resultant accidents and incidents; and 					
Detailed information about planned helicopter construction techniques.					
A safety brief, plan of operations, and refresher helicopter external-load operations training shall occur at the start of all days during which helicopter external-load operations are planned to occur. The planned flight paths, landing areas, and timing and types of helicopter construction activities for the day shall be presented. At minimum, the refresher training shall include examples load types and maximum loads (internal and external) for each type of helicopter to be used that day and a demonstration of proper external-load attaching and restraining means for all types of attaching and retraining devices that may be used.					
No SDG&E personnel or contractor, including helicopter pilots and crewmembers, shall work in proximity to or be involved with helicopter external-load operations unless they receive the initial training and attend the daily safety brief and refresher training. Signatures of all personnel and contractors that attend the daily safety brief and refresher training shall be collected and clear indication on the worker (e.g., sticker on the hardhat color-coded by training day) shall be visible to indicate that the worker, pilot, or crewperson is approved to work in proximity to or otherwise be involved with helicopter external-load operations for the day.					
MM TR-3: Notification and Monitoring of Helicopter Use. SDG&E will notify the Long Beach Flight Standards District Office at least one week in advance of all days during which helicopter operations are planned to occur or as required by the Flight Standards District Office. In addition, SDG&E will notify all residents, businesses, and owners of property within 0.25 miles of planned helicopter flight paths and landing areas along the Project alignmentat least one week in advance of all days during which helicopter operations are planned to occur.	During Construction and Restoration	Applicable	Helicopters may be used for NTPR-6 construction activities, and MM TR-3 will be implemented during construction in that case.		

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In compliance with 14 CFR Part 133, the loading and unloading of all helicopter external loads shall be monitored by lineman (non-apprentice) certified by SDG&E to rig and inspect helicopter external loads.			
All accidents or incidents reported to the National Transportation and Safety Board (NTSB) or FAA shall, at the same time of reporting, be reported to the CPUC. Near misses involving helicopters that had the potential to result in an accident or incident as defined by NTSB but do not require NTSB notification, shall be recorded by SDG&E and immediately reported to the applicant's safety coordinator and the CPUC.			
MM TR-4: City of San Juan Capistrano and City San Clemente Traffic Engineer and Parks and Recreation Review. Prior to commencing work within city boundaries of San Juan Capistrano and San Clemente, the applicant shall submit a draft Traffic Control Plan (APM TR-7) for the project to the City of San Juan Capistrano and City of San Clemente traffic engineers and Parks and Recreation departments for their review. A Draft Traffic Control Plan shall be submitted according to the timeframe established by the authority having jurisdiction of the roadway or trail being impacted. The applicant shall incorporate any recommendations from this review related to bikeway, sidewalk, and unpaved trail facilities into a final Traffic Control Plan prior to com. The applicant shall provide a copy of the final Traffic control plan to the City of San Juan Capistrano, the City of San Clemente and the CPUC prior to commencing work.	Pre-construction, during Construction, and Restoration	Applicable	Pending. NTPR-6 activities will require traffic control work within local jurisdiction ROW. As such, Traffic Control Plans/Encroachment Permits would be submitted for the local authority's review and approval, and appropriate permits would be acquired prior to the start of NTPR-6 construction as needed. SDG&E will submit all acquired Encroachment Permits/Traffic Control Plans to the CPUC for their records prior to the start of construction activities covered under the relative permits.

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APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	APPLICABILITY TO NTPR-6	STATUS
 MM TR-5: Content Requirements of the Traffic Control Plan. The applicant shall include and implement the following restrictions within their Traffic Control Plan (APM TR-7): Lane closures along Vista Montana shall only be implemented to avoid the start and ending time for the San Juan Hills High School. Lane closures along Vista Montana shall not be allowed during the periods of 6:30 to 8:00 AM and 2:00 to 3:30 PM on days when San Juan Hills High School is in session. 	Pre-construction and during Construction	Applicable	SDG&E will implement MM TR-5 during NTPR-6 construction.
 Construction-generated traffic associated with the project shall avoid the start and ending time for San Juan Hills High School. Workers shall avoid traveling along Vista Montana during the periods of 6:30 to 8:00 AM and 2:00 to 3:30 PM on days that San Juan Hills High School is in session. These times shall be modified as necessary over the duration of the project in response to changing school arrival/dismissal times. Additionally, a final traffic control planshall be provided to the CPUC for approval prior to the start of construction. 			

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