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May 28, 2010

Ms. Billie Blanchard
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Re: Notice to Proceed (NTP) Request to Conduct White Star Communication Facility Upgrades

Dear Ms. Blanchard:

On December 18, 2008, the California Public Utilities Commission (CPUC) approved the Final Environmentally Superior Southern Route (Decision D.08-12-058) to construct the Sunrise Powerlink Project (Project). The decision grants San Diego Gas & Electric Company (SDG&E) a Certificate of Public Convenience and Necessity (CPCN) and conditionally authorizes construction of the Project with the implementation of preconstruction mitigation measures. A Notice of Determination was submitted to the State Clearinghouse on December 18, 2008.

As previously discussed with the CPUC, SDG&E intends to construct the Project in Links and Segments to coincide with environmental restrictions, preconstruction mitigation measure implementation scheduling, and planned outages. Some of the preconstruction activities, such as geotechnical investigations and establishing reliable communication in remote areas, are intended to support design modifications requested by the CPUC and/or the Bureau of Land Management, as well as preconstruction commitments presented in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS).

SDG&E is formally requesting authorization from the CPUC to begin upgrades to the existing White Star Communication Facility on Tierra Del Sol Road. Upgrades are necessary to provide reliable communication to field crews prior to and during construction of the Project in remote areas of east San Diego County. The upgrades to the White Star Communication Facility were described in detail and fully analyzed in the Re-circulated Draft EIR/Supplemental Draft EIS and are briefly summarized in the following paragraphs.

The upgrades will occur at the existing White Star Communication Facility, which is owned and operated by the County of San Diego. SDG&E has an easement along the eastern portion of the county's facility, where a SDG&E-owned and operated communication facility currently exists. Upgrades will occur at this previously developed site bordered by Tierra Del Sol Road to the east, the White Star Communication Facility to the west, and open space to the north and south.

Upgrades at the White Star facility will include installation of a new 75-foot steel monopole and removal of the two existing 75-foot wood poles. The new steel pole will sit atop a 54-inch-diameter foundation and will be located approximately 15 feet south of the existing equipment shelter. Three new microwave antenna dishes will be mounted on the new steel pole. The existing equipment shelter will be used to house new microwave communications equipment. The existing propane tank will be replaced with a new propane tank, and the existing back-up generator will continue to be used. Minimal ground disturbance will be required to complete the upgrades and work will occur within a non-vegetated, previously disturbed site.

There is ample parking to accommodate the small crew necessary to complete the work and no road closures will be required.

Installation of the new steel monopole will include augering the foundation hole to depth of 15.5 feet, and placing rebar, anchor bolts, and a base plate in the foundation hole. Concrete will then be poured and allowed to cure for seven days before the new steel monopole is erected and the antennas mounted. The upgrades are expected to take approximately 10 days to complete.

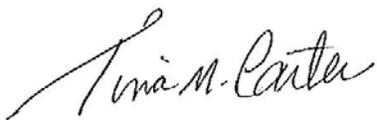
All of the preconstruction mitigation measures applicable to the White Star Communication Facility have been completed or will be implemented prior to mobilizing to the site. A list of all of the preconstruction measures that apply to White Star Communication Facility upgrade and their status is included as Attachment A: Preconstruction Mitigation Measure Tracking Table to this NTP request. A Plan Check application was submitted to San Diego County (County) on May 5, 2010. A copy of the Plan Check Receipt is included as Attachment B. No work will occur until authorization from the County has been received.

A geotechnical report entitled *A Geotechnical Investigation for the Gas Company Monopole and Equipment Shelter*, which presents the findings, conclusions, and recommendations for installation of the new monopole at the White Star Communication facility (also referred to as Tierra Del Sol), is included as Attachment C. Please note that the report contains a geological investigation of a new equipment shelter, which is no longer included as part of the White Star Communication Facility upgrades.

A cultural resources survey was conducted at the White Star Communication Facility for the SDG&E East County Substation Project in August 2009 and no cultural resources were identified. A copy of the cultural resources report is included as Attachment D. A limited Phase I Environmental Site Assessment, including a database search, was performed within 1000 feet of the site and no known contaminated sites exist in the vicinity. A summary of the study is included as Attachment E.

We respectfully request authorization of this NTP request by June 9, 2010 in order to establish our emergency communication system for the backcountry and support field crews that are currently surveying in the area. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 790-5514.

Sincerely,



Tina Carter
Sr. Environmental Specialist
San Diego Gas & Electric Co.

Attachments (5): Preconstruction compliance documentation

cc: Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group
Alan Colton, San Diego Gas & Electric Co.
Linda Collins, San Diego Gas & Electric Co.

ATTACHMENT A

Preconstruction Mitigation Measure Tracking Table

PRE-CONSTRUCTION MITIGATION MEASURE STATUS TABLE FOR THE WHITE STAR COMMUNICATION FACILITY UPGRADES					
<i>Mitigation Measures</i>	<i>Task Title</i>	<i>Task Text</i>	<i>Timing: PRE, DUR, PRENG, POST</i>	<i>Status (Completed, Conditioned, N/A)</i>	<i>Comments</i>
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Locate surface disturbing components in previously disturbed areas	Surface-disturbing components of the project shall be located in previously disturbed areas or where habitat quality is poor to the extent possible, and disturbance of vegetation and soils shall be minimized.	PRE, DUR	Completed	The April 30, 2010 draft Project Modification Report (PMR) and Map Book illustrate changes to the final design of the alignment with an overall reduction of impacts to sensitive features and a redesign of the alignment to be relocated to previously disturbed areas when feasible. A revised PMR and Map Book was submitted to the CPUC on May 14, 2010. As identified in the Final EIR/EIS (and described in detail in the Section 2 of the Recirculated Draft EIR/EIS), the White Star Communication Facility is located in a previously disturbed area.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Use construction mats to minimize disturbance	Temporary construction mats may be used to minimize vegetation and soil disturbance only where deemed appropriate by the qualified biologist (see Mitigation Measure B-1c). The construction mats shall not be left on the ground for more than three weeks. Use of construction mats shall be considered a temporary impact to vegetation and shall be mitigated in accordance with this mitigation measure.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Restore sensitive vegetation communities to pre-construction conditions	If avoidance of sensitive vegetation communities is not feasible due, for example, to physical or safety constraints, the Applicant shall restore temporarily impacted areas to pre-construction conditions following construction (or emergency repairs) and shall permanently block off all public access to them, and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community instead. Any area that can be preserved as intact or restored habitat, or if it contains any species (plant or animal) that require project-related compensatory mitigation will qualify as offsite mitigation lands. Restoration involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, and maintaining (i.e., weeding, replacement planting, supplemental watering, etc.) and monitoring the restored area for a period five years (or less if the restoration meets all success criteria). The success of the restoration is usually based on how the habitat compares with similar, nearby, undisturbed habitat. Any restoration efforts would be subject to a Habitat Restoration Plan approved by the CPUC, BLM, Wildlife Agencies, State Parks (for restoration in ABDSP), and USDA Forest Service (for alternatives with restoration on National Forest lands). The mitigation ratios also apply to impacts from emergency repairs.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Double mitigation ratios on lands already in mitigation	In cases where the impacts to sensitive vegetation communities occur on lands already in use as mitigation for other projects, the mitigation ratios shall be doubled, as is standard practice in San Diego County.	PRE	N/A	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. The Habitat Acquisition Plan discussed mitigation ratios on lands already in mitigation. This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site .
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Delineate all limits of construction	All limits of construction shall be delineated with orange construction fencing.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Coordinate gate installation 60 days prior to construction	SDG&E shall coordinate with the authorized officer for the applicable federal, State, or local land owner/administrator at least 60 days before construction in order to determine if gates shall be installed on access roads, especially trails that would be dually used as access roads, to prevent unauthorized vehicular access to the ROW. Gate installation shall be required at the discretion of the land management agency. On trails proposed for dual use as access roads, gates shall be wide enough to allow horses, bicycles, and pedestrians to pass through.	PRE	N/A	This mitigation measure is not applicable because no gates are required on the White Star Communication Facility site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Submit documentation of coordination 30 days prior to construction	SDG&E shall document its coordination efforts with the administering agency of the road/trail and provide this documentation to the CPUC, BLM, and all affected jurisdictions 30 days prior to construction.	PRE	N/A	This mitigation measure is not applicable because no road or trail closures are required on the White Star Communication Facility site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Post signs on access road gates prohibiting unauthorized users	Signs prohibiting unauthorized use of the access roads shall be posted on the installed gates.	DUR, POST	N/A	This mitigation measure is not applicable because no gates are required on the White Star Communication Facility site.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Provide funding for off-road vehicle patrols	To control unauthorized use of project access roads by off-road vehicle enthusiasts, SDG&E shall provide funding to land management entities responsible for areas set aside for habitat conservation to provide for off-road vehicle enforcement patrols. The responsible land management entities will formulate what funding is reasonable to control unauthorized use of project access roads.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is located on the existing Tierra Del Sol Road.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Mitigate for impacts by unauthorized activity	Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints) shall be mitigated at a 5:1 ratio (5.5:1 in FTHL MA). Restoration of the unauthorized impacts shall be credited at a 1:1 ratio (i.e., mitigated by in-place habitat restoration); the remaining 4:1 (or 4.5:1 in FTHL MA) shall be acquired off site.	DUR, POST	N/A	This mitigation measure will be implemented during construction. There is no pre-construction component to this mitigation measure .
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Submit a Habitat Restoration Plan	Areas to be restored shall include all areas temporarily impacted by construction, such as tower construction sites, laydown/staging areas, temporary access and spur roads, and existing tower locations where towers are removed. Where onsite restoration is planned, the Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the CPUC, BLM, State Parks (for restoration in ABDSP), USDA Forest Service (for alternatives with restoration on National Forest lands), and the Wildlife Agencies. The Habitat Restoration Specialist shall prepare and implement a Habitat Restoration Plan, for restoring temporarily impacted sensitive vegetation communities, to be approved by the CPUC, Wildlife Agencies, BLM, State Parks (for ABDSP restoration), and USDA Forest Service (for National Forest land restoration). The Applicant shall work with the CPUC, BLM, Wildlife Agencies, and State Parks until a plan is approved by all. This Habitat Restoration Plan must be approved in writing by the above-listed agencies prior to the initiation of any vegetation disturbing activities. Hydroseeding, drill seeding, or an otherwise proven restoration technique shall be utilized on all disturbed surfaces using a locally endemic native seed mix approved by the CPUC, Wildlife Agencies, BLM, State Parks (for ABDSP restoration), and USDA Forest Service (for National Forest land restoration).The Habitat Restoration Plan shall incorporate Desert Bioregion Revegetation/Restoration Guidance measures for restoration of temporary impacts to desert scrub and dune habitats. These measures generally include alleviating soil compaction, returning the surface to its original contour, pitting or imprinting the surface to allow small areas where seeds and rain water can be captured, planting seedlings that have acquired the necessary root mass to survive without watering, planting seedlings in the spring with herbivory cages, broadcasting locally collected seed immediately prior to the rainy season, and covering the seeds with mulch. The Habitat Restoration Plan shall incorporate the measures identified in the May 25, 2006 Memorandum of Understanding among Edison Electric Institute, USDA Forest Service, BLM, USFWS, National Park Service, and the Environmental Protection Agency (Edison Electric Institute, et al., 2006) where applicable. The MOU discusses vegetation management along ROWs for electrical transmission and distribution facilities on federal lands. The major provisions of the MOU include reducing soil erosion and water quality impacts; promoting local ecotypes in revegetation projects; planting native species and protecting rare species; and reducing the introduction of non-native, invasive or noxious plant species to the ROWs. The MOU can be viewed online at http://www.eei.org/industry_issues/environment/land/vegetation_management/EEI_MOU_FINAL_5_25_06.pdf .	PRE	N/A	SDG&E is developing a Habitat Restoration Plan, which will be submitted and approved prior to construction; however, this mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Maintain and monitor habitat restoration for 5 years	The restoration of habitat shall be maintained and monitored for five years after installation by an experienced, licensed Habitat Restoration Contractor, or until established success criteria identified in the Restoration Plan (specified percent cover of native and non-native species, species diversity, and species composition as compared with an undisturbed reference site) are met. Maintenance and monitoring for restoration in ABDSP shall be for a minimum of five years, even if established success criteria are met before the end of five years. Maintenance and monitoring shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration. If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the CPUC, BLM, State Parks (for ABDSP restoration), USDA Forest Service (for alternatives with restoration on National Forest lands), and the Wildlife Agencies.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Mitigate for impacted habitat	For areas where habitat restoration cannot meet mitigation requirements, as determined by the Habitat Restoration Specialist in coordination with CPUC, BLM, State Parks (for ABDSP restoration), USDA Forest Service (for alternatives with restoration on National Forest lands), and the Wildlife Agencies, offsite purchase and dedication of habitat shall be provided at the mitigation ratios provided in Table D.2-7 for the Proposed Project (see Impacts to Vegetation Communities and Required Mitigation tables in alternatives sections for the alternatives) or as otherwise required by the Wildlife Agencies, ABDSP, or USDA Forest Service (supersedes the mitigation ratios in BIO APM 1).The mitigation ratios for habitat acquisition and preservation shall follow those in Table D.2-7 for the Proposed Project (see Impacts to Vegetation Communities and Required Mitigation tables in alternatives sections for the alternatives).	PRE	N/A	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. The Habitat Acquisition Plan discusses mitigation for impacted habitat. However, this mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Mitigate for the loss of native trees and tree trimming	Mitigation for loss of native trees or native tree trimming shall be provided by (1) acquiring and preserving habitat within which the trees occur and/or (2) restoring (i.e., planting) trees on land that would not be subject to vegetation clearing (either in the Applicant's ROW and/or on land acquired and preserved). Any land to be used for this mitigation shall be approved by the CPUC, BLM, State Parks (for ABDSP restoration), USDA Forest Service (for alternatives with restoration on National Forest lands), and the Wildlife Agencies.	PRE, DUR, POST	N/A	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. The Habitat Acquisition Plan discusses mitigation for loss of native trees. However, this mitigation measure is not applicable to the White Star Communication Facility because no tree trimming or clearing is required.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Monitor trimmed native trees for 3 years	For all trimmed native trees, the trees shall be monitored for a period of three years. If a trimmed tree declines or suffers mortality during that period, the tree shall be replaced in-kind (by species) at a 2:1 or 5:1 ratio as recommended by the CDFG (see below). If a tree does not decline or suffer mortality, no mitigation shall be required.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no tree trimming or clearing is required.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Mitigate for native tree removal	Native trees that are removed shall be replaced in-kind (by species) as follows: <ul style="list-style-type: none"> • Trees less than five inches diameter at breast height (DBH) shall be replaced at 3:1 • Trees between five and 12 inches DBH shall be replaced at 5:1 • Trees between 12 and 36 inches shall be replaced at 10:1 • Trees greater than 36 inches shall be replaced at 20:1 	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no tree trimming or clearing is required.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Mitigate trimmed trees	Native trees that are trimmed shall be replaced in-kind (by species) as follows: • Trees less than 12 inches DBH shall be replaced at 2:1 • Trees greater than 12 inches DBH shall be replaced at 5:1	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no tree trimming or clearing is required.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Maintain and monitor all restoration for 10 years	All restoration shall be maintained and monitored for a minimum of 10 years. The restoration shall be directed according to a Habitat Restoration Plan approved by the CPUC, BLM, State Parks (for ABDSP restoration), USDA Forest Service (for National Forest land restoration), and the Wildlife Agencies.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Acquire off-site mitigation before line is energized	All offsite mitigation parcels shall be approved by the CPUC, BLM, Wildlife Agencies, State Parks (for impacts to ABDSP), and USDA Forest Service (for alternatives with impacts to National Forest lands) and must be acquired or their acquisition must be assured before the line is energized.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no mitigation parcels are required for construction.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Submit a Habitat Acquisition Plan 120 days prior to construction	SDG&E shall submit a Habitat Acquisition Plan at least 120 days prior to any ground disturbing activities. The Plan shall be submitted to the CPUC, BLM, the Wildlife Agencies, State Parks (for impacts in ABDSP) and USDA Forest Service (for impacts on National Forest Lands) for review and approval, and shall include, but shall not be limited to: legal descriptions and maps of all parcels to be acquired; schedule that includes phasing relative to impacts; timing of conservation easement recording; initiation of habitat management activities relative to acquisition; and assurance mechanisms (e.g., performance bonds to assure adequate funding) for any parcels not actually acquired prior to vegetation disturbing activities.	PRE	N/A	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010; however, this mitigation measure is not applicable to the White Star Communication Facility because no sensitive habitat will be impacted.
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	Submit a Habitat Management Plan	A Habitat Management Plan shall be prepared by a biologist approved by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) for all acquired offsite mitigation parcels. The Habitat Management Plan must be approved in writing by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) prior to the initiation of any vegetation disturbing activities. The Applicant shall work with the CPUC, BLM, Wildlife Agencies, State Parks, and USDA Forest Service until a plan is approved by all. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, offsite mitigation parcels. The Habitat Management Plan shall include, but shall not be limited to: • Legal descriptions of all mitigation parcels approved by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) • Baseline biological data for all mitigation parcels • Designation of a land management entity approved by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to National Forest lands) to provide in-perpetuity management; continued in B-1a-8b-1. • A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan • Designation of responsible parties and their roles (e.g., provision of endowment by the Applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity) • Management specifications including, but not limited to, regular biological surveys to compare with baseline; exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands).	PRE	N/A	A draft Habitat Management Plan is being developed and will be submitted to the CPUC for review and approval in May 2010; however, this mitigation measure is not applicable to the White Star Communication Facility because no sensitive habitat will be impacted.
G-CM-14:Minimize disturbance	Locate surface-disturbing activities in previously disturbed areas, to the extent practical	To the extent practicable, surface-disturbing components of the project will be located in previously disturbed areas or where habitat quality is poor to minimize disturbance of vegetation and soils.	PRE, DUR	Completed	The April 30, 2010 draft Project Modification Report (PMR) and Map Book illustrate changes to the final design of the alignment with an overall reduction of impacts to sensitive features and a redesign of the alignment to be relocated to previously disturbed areas when feasible. A revised PMR and Map Book was submitted to the CPUC on May 14, 2010. The White Star Communication Facility is located in a previously disturbed and developed area.
G-CM-15:Temporary construction mats	Use of construction mats	Temporary construction mats may be used to minimize vegetation and soil disturbance only where deemed appropriate by the qualified biologist. The construction mats will not be left on the ground for more than three weeks.	DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
G-CM-15:Temporary construction mats	Incorporate impact of using mats into HRP (G-CM-16)	Use of construction mats will be considered a temporary impact to vegetation and will be incorporated into the Habitat Restoration Plan per conservation measure G-CM-16.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-16:Habitat Restoration Plan	Habitat Restoration Plan approval	SDG&E will prepare and implement a Habitat Restoration Plan, approved by the CPUC, BLM, USFS, and Wildlife Agencies, for all temporarily impacted project areas. The Habitat Restoration Plan must be approved in writing by the above listed agencies prior to the initiation of any vegetation disturbing activities. Restoration involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, and maintaining (i.e., weeding, replacement planting, supplemental watering, etc.) and monitoring the restored area for a period of five years (or less if the restoration meets all success criteria). The compensation ratios listed in Table 2 will apply to impacts from emergency repairs during the construction phase. In cases where the impacts to sensitive vegetation communities occur on lands previously preserved to offset impacts from other projects, the mitigation ratios will be doubled, as is standard practice in San Diego County.	PRE	N/A	SDG&E is developing a Habitat Restoration Plan, which will be submitted and approved prior to construction; however, this conservation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
G-CM-16:Habitat Restoration Plan	Impacts, compensation, and a qualified habitat restoration specialist	Areas to be restored will include all areas temporarily impacted by construction, such as tower construction sites, laydown/staging areas, temporary access and spur roads, and existing tower locations where towers are removed. Restoration of some habitats in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation. In those instances, impacts will be considered permanent, and the compensation will consist of offsite land acquisition and preservation. Where onsite restoration is planned, SDG&E will identify specialist will prepare and implement the Habitat Restoration Plan. Hydroseeding, drill seeding, or an otherwise proven restoration technique will be use on all disturbed surfaces using a locally endemic native seed mix approved by the CPUC, BLM, USFS, and Wildlife Agencies to restore the area to its original condition. The Habitat Restoration Plan will incorporate the measures identified in the May 25, 2006, Memorandum of Understanding (MOU) among Edison Electric Institute, USFS, BLM, Service, National Park Service, and Environmental Protection Agency (EPA) (Edison Electric Institute et al. 2006), where applicable.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
G-CM-16:Habitat Restoration Plan	Temporary impacts to desert scrub and dune habitats	For restoration of temporary impacts to desert scrub and dune habitats, a separate Habitat Restoration Plan will be developed for desert vegetation communities and incorporate Desert Bioregion Revegetation/Restoration Guidance measures. These measures generally include alleviating soil compaction, returning the surface to its original contour, pitting or imprinting the surface to allow small areas where seeds and rain water can be captured, planting seedlings that have acquired the necessary root mass to survive without watering, planting seedlings in the spring with herbivory cages, broadcasting locally collected seed immediately prior to the rainy season, and covering the seeds with mulch.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because there is no desert scrub or dune habitat located on the site.
G-CM-16:Habitat Restoration Plan	Maintenance and monitoring	The restoration of habitat will be maintained and monitored for five years after installation by an experienced, licensed habitat restoration contractor, or until established success criteria identified in the Restoration Plan (e.g., specified percent cover of native and nonnative species, species diversity, and species composition as compared with an undisturbed reference site) are met. Maintenance, monitoring, and reporting will be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) will be taken by an experienced, licensed Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration. If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring will extend beyond the five-year period until the criteria are met or unless otherwise approved by the CPUC, BLM, USFS and Wildlife Agencies. For areas where habitat restoration cannot meet restoration requirements, as determined by the habitat restoration specialist in coordination with the CPUC, BLM, USFS (for sections of the project with restoration on National Forest lands), and Wildlife Agencies, offsite purchase and dedication of habitat will be provided at the ratios provided in Table 2.	POST	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
G-CM-17:Habitat Management Plan	Habitat Management Plan	SDG&E will purchase/dedicate suitable habitat for preservation, at ratios identified in Table 2, to offset permanently impacted areas. A Habitat Management Plan(s) will be required for all off-site parcels and must be approved, in writing, by the CPUC, BLM, USFS, and Wildlife Agencies prior to the initiation of any vegetation clearing activities. The Habitat Management Plan(s) shall include, but will not be limited to: Legal descriptions of all parcels approved by the CPUC, BLM, USFS, and Wildlife Agencies; Legal descriptions of all parcels approved by the CPUC, BLM, USFS, and Wildlife Agencies; Management specifications including, but not limited to, regular biological surveys to compare with baseline; exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to the CPUC, BLM, USFS, and Wildlife Agencies; Baseline biological data for all parcels; Designation of a land management entity approved by the CPUC, BLM, USFS, and Wildlife Agencies to provide in-perpetuity management; A Property Analysis Record (PAR) prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan; and Designation of responsible parties and their roles (e.g., provision of endowment by the applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity).	PRE	N/A	A draft Habitat Management Plan is being developed and will be submitted to the CPUC for review and approval in May 2010; however, this conservation measure is not applicable to the White Star Communication Facility because no sensitive habitat will be impacted.
G-CM-17:Habitat Management Plan	Off-site compensation and property acquisition	All off-site compensation parcels will be approved by the CPUC, BLM, USFS, and Wildlife Agencies and must be acquired or their acquisition must be assured through a mechanism such as a performance bond prior to ground disturbing activities. To demonstrate that such parcels will be acquired, SDG&E will submit a Habitat Acquisition Plan at least 120 days prior to any ground disturbing activities. The Plan will be submitted to the CPUC, BLM, Wildlife Agencies, and USFS for review and approval and will include, but not be limited to: legal descriptions and maps of all parcels proposed to be acquired; acquisition schedule that includes phasing relative to impacts; timing of conservation easement recording; initiation of habitat management activities relative to acquisition; and assurance mechanisms (e.g., performance bonds to assure adequate funding) for any parcels not actually acquired prior to vegetation disturbing activities. SDG&E will fully fund an endowment for in-perpetuity management of all parcels acquired to off-set the permanent impacts of this project. The endowment will be based on the PAR included in the Habitat Management Plan(s) for these parcels and will be fully funded within three (3) months of the approval of the Habitat Management Plan(s).	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because no mitigation parcels are required for construction.
G-CM-26:Delineate construction limits	Delineate construction limits	All limits of construction will be delineated with orange construction fencing. During and after construction, entrances to access roads will be gated to prevent the unauthorized use of these roads by the general public. Signs prohibiting unauthorized use of the access roads will be posted on these gates.	PRE, DUR, POST	N/A	This conservation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated. Additionally, no gates are required at the White Star Communication Facility site.
G-CM-28:Limit road/trail access during construction	Coordinate with an authorized officer 60 days prior to initiating construction to determine the use of gates and signs at access roads	To limit new or improved accessibility into the area, SDG&E shall coordinate with the authorized officer for the applicable Federal, State, or local land owner/administrator at least 60 days before construction in order to determine if gates shall be installed on existing and new access roads, especially trails that will be used as access roads, to prevent unauthorized vehicular access to the ROW. Gate installation shall be required at the discretion of the land management agency. On trails proposed for dual use as access roads, gates shall be wide enough to allow horses, bicycles, and pedestrians to pass through. SDG&E shall document its coordination efforts with the administering agency of the road/trail and provide this documentation to the CPUC, BLM, and all affected jurisdictions 30 days prior to construction. Signs prohibiting unauthorized use of the access roads shall be posted on these gates.	PRE	N/A	This conservation measure is not applicable because no gates are required on the White Star Communication Facility site.
G-CM-29:Fund off-road vehicle enforcement patrols	Provide funding	To control unauthorized use of project access roads by off-road vehicle enthusiasts, SDG&E shall provide funding to land management entities responsible for areas set aside for habitat conservation to provide for off-road vehicle enforcement patrols. The responsible land management entities will formulate what funding is reasonable to control unauthorized use of project access roads.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because the site is located on the existing Tierra Del Sol Road.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-34:Tree trimming guidelines	Tree trimming guidelines	To offset the loss of native trees or native tree trimming, SDG&E shall (1) acquire and preserve habitat where the trees occur and/or (2) restore (i.e., planting) trees on land that will not be subject to vegetation clearing (either in SDG&E's ROW and/or on land acquired and preserved). Any land to be used for this compensation shall be approved by the CPUC, BLM, USFS (for loss of trees on National Forest lands), and Wildlife Agencies. For habitat acquisition and preservation, the compensation ratios shall follow those in Table 2. For all trimmed native trees, the trees shall be monitored for a period of three years. If a trimmed tree declines or suffers mortality during that period, the tree shall be replaced in-kind (by species) at a 2:1 or 5:1 ratio as recommended by the CDFG (see below). If a tree does not decline or suffer mortality, no compensation shall be required. For restoration (planting trees), these guidelines, based on recommendations from the CDFG, shall be followed: Native trees that are removed shall be replaced in-kind (by species) as follows: • Trees less than 12.7 cm (5 in) diameter at breast height (DBH) shall be replaced at 3:1 • Trees between 13 and 31 cm (5 and 12 in) DBH shall be replaced at 5:1 • Trees between 31 and 91cm (12 and 36 in) DBH shall be replaced at 10:1 • Trees greater than 91 cm (36 in) DBH shall be replaced at 20:1 Native trees that are trimmed shall be replaced in-kind (by species) as follows: • Trees less than 30 cm (12 in) DBH shall be replaced at 2:1 • Trees greater than 30 (12 in) DBH shall be replaced at 5:1 All native tree restoration shall be maintained and monitored for a minimum of 10 years. The restoration shall be directed according to a Habitat Restoration Plan approved by the CPUC, BLM, USFS, and Wildlife Agencies.	DUR, POST	N/A	This conservation measure is not applicable to the White Star Communication Facility because no tree trimming or clearing is required.
G-CM-45:Habitat preservation for O&M activities	Purchase/dedicate suitable habitat for preservation	SDG&E will purchase/dedicate suitable habitat for preservation to offset areas permanently impacted by O&M activities. The preservation for O&M activities will be at the same ratios provided in Table 2 for construction activities. A Habitat Management Plan(s) will be required for all off-site parcels and must be approved in writing by the CPUC, BLM, USFS, and Wildlife Agencies. SDG&E may choose to establish conservation banks or purchase conservation credits from existing conservation banks, other than the conservation bank established for SDG&E's Subregional Plan (SDG&E 1995), to provide an efficient process to offset the anticipated minor impacts resulting from O&M activities.	PRE	N/A	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. The Habitat Acquisition Plan discusses mitigation for impacted habitat. However, this conservation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Avoid impacts to jurisdictional areas	Impacts to areas under the jurisdiction of the ACOE, Regional Water Boards, State Water Board, and CDFG shall be avoided to the extent feasible.	PRE, DUR	Completed	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Mitigate impacted areas as required by wetland permitting	Where avoidance of jurisdictional areas is not feasible (including for emergency repairs), the Applicant shall provide the necessary mitigation required as part of wetland permitting by creation/restoration/preservation of suitable jurisdictional or equivalent habitat along with adequate buffers to protect the function and values of jurisdictional area mitigation. The location(s) of the mitigation would be determined in consultation with the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation in ABDSP), USDA Forest Service (for alternatives with mitigation on National Forest lands), ACOE, Regional Water Boards, State Water Board, and CDFG as part of the wetland permitting process. It is anticipated that the sites would be in close proximity to the impacts or in the same watershed.	PRE	Completed	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Prepare jurisdictional delineation and impact assessment	A jurisdictional delineation and impact assessment shall be prepared based on the final alignment and final engineering plans when they are complete.	PRE	Completed	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Mitigate for jurisdictional wetland habitat	Mitigation ratios would range from 1:1 up to 4:1 and would depend on the sensitivity of the jurisdictional habitat and on the requirements of the wetland permitting agencies. The width of wetland buffers would also depend on the sensitivity of the jurisdictional habitat and on the requirements of the wetland permitting agencies. Recommended mitigation ratios for vegetation communities that generally occur in jurisdictional areas are provided in Table D.2-7 for the Proposed Project (see Impacts to Vegetation Communities and Required Mitigation tables in alternatives sections for the alternatives). It is anticipated that at least a 1:1 ratio of the mitigation would include creation of jurisdictional habitat so there would be no net loss of jurisdictional habitat. It is also anticipated that a 1:1 ratio would be required for impacts to jurisdictional non-wetland Waters of the U.S. in the form of wetland enhancement, restoration, or creation as determined in consultation with the permitting agencies.	PRE	Completed	A draft Habitat Acquisition Plan was submitted to the CPUC for review and approval on February 4, 2010. The Habitat Acquisition Plan discusses mitigation for jurisdictional habitat. However, this mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Obtain wetland permits prior to construction	Wetland permits shall be obtained from the ACOE, Regional Water Boards, State Water Board, and CDFG prior to initiating construction in jurisdictional areas.	PRE	Completed	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Delineate all limits of construction	All limits of construction shall be delineated with orange construction fencing and/or silt fencing.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Remove all delineations no later than 30 days after construction is complete	All stakes, flagging, or fencing shall be removed no later than 30 days after construction is complete. If silt fencing is used to delineate the limits of construction or as part of implementation of erosion control BMPs, the silt fencing may be left in place longer than 30 days if erosion control is still necessary.	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Install gates and signs at entrances of access roads	During and after construction, entrances to access roads shall be gated to prevent the unauthorized use of these roads by the general public. Signs prohibiting unauthorized use of the access roads shall be posted on these gates.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no gates required at the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Mitigate impacts from unauthorized activity	Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints) shall be mitigated at a 5:1 ratio, unless otherwise directed by the ACOE, Regional Water Boards, State Water Board, and CDFG: restoration of the unauthorized impacts shall be credited at a 1:1 ratio; the remaining 4:1 (or 4.5:1 in FTHL MA) shall be acquired off site.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Submit and implement Wetland Mitigation Plan	The Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the CPUC, BLM, ACOE, Regional Water Boards, State Water Board, CDFG, State Parks (for restoration in ABDSP), and USDA Forest Service (for alternatives with restoration on National Forest lands). The Habitat Restoration Specialist shall prepare and implement a Wetland Mitigation Plan to be approved in writing by the CPUC, BLM, ACOE, Regional Water Boards, State Water Board, CDFG, State Parks (for ABDSP mitigation), and USDA Forest Service (for alternatives with mitigation on National Forest lands). The Applicant shall work with the above-listed agencies until a plan is approved by all.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Maintain and monitor mitigated habitat for 5 years after installation	The mitigation of habitat shall be maintained and monitored for five years after installation, or until established success criteria (specified percent cover of native and non-native species, species diversity, and species composition as compared with an undisturbed reference site) are met, to assess progress and identify potential problems with the mitigation. Maintenance and monitoring in ABDSP shall be for a minimum of five years, even if established success criteria are met before the end of five years. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken during the maintenance and monitoring period if necessary to ensure the success of the mitigation. If the mitigation fails to meet the established performance criteria after the five-year maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the CPUC, BLM, ACOE, Regional Water Boards, State Water Board, CDFG, State Parks (for ABDSP restoration), and USDA Forest Service (for alternatives with restoration on National Forest lands).	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-2a: Provide restoration / compensation for impacted jurisdictional areas	Submit a Habitat management Plan	A Habitat Management Plan shall be prepared by a biologist approved by the CPUC, BLM, ACOE, Regional Water Boards, State Water Board, CDFG, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) for all acquired off-site mitigation parcels. The Habitat Management Plan must be approved in writing by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) prior to the initiation of any activities which may impact jurisdictional areas. The Applicant shall work with the above-listed agencies until a plan is approved by all. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, offsite mitigation parcels. The Habitat Management Plan shall include, but shall not be limited to: <ul style="list-style-type: none"> • Legal descriptions of all acquired or assured (as defined in Mitigation Measure B-1a) mitigation parcels approved by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands); • Baseline biological data for all mitigation parcels; • Designation of a land management entity approved by the CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands) to provide in-perpetuity management; continued on B-2a-5d-1; • A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan; • Designation of responsible parties and their roles (e.g., provision of endowment by the Applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity); • Management specifications including, but not limited to, regular biological surveys to compare with baseline; exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to CPUC, BLM, Wildlife Agencies, State Parks (for mitigation parcels to be part of ABDSP), and USDA Forest Service (for mitigation parcels to be National Forest lands). 	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no wetlands or waterbodies on the site.
B-3a: Prepare and implement a Weed Control Plan	Submit and implement a Weed Control Plan	The Applicant shall prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive weed abatement. Where the Applicant owns the ROW property, the Weed Control Plan shall include specific weed abatement methods, practices and treatment timing developed in consultation with the San Diego County Agriculture Commissioner's Office and the California Invasive Plant Council (Cal IPC), or the tribal government, as appropriate. On the ROW easement lands administered by public agencies (BLM, USDA Forest Service (for alternatives routes within Cleveland National Forest lands), Wildlife Agencies, and State Parks (ABDSP) the Weed Control Plan shall incorporate all appropriate and legal agency-stipulated regulations. The Weed Control Plan shall be submitted to the ROW land-holding governmental agencies for final authorization of weed control methods, practices, and timing prior to implementation of the Weed Control Plan on public lands. ROW easements located on private lands shall include adaptive provisions for the implementation of the Weed Control Plan. Prior to implementation, the Applicant shall work with the landowners to obtain authorization of the weed control treatment that is required. State Parks shall have review and approval authority over the Weed Control Plan for ROW within or adjacent to the boundaries of ABDSP. Developed land shall be excluded from weed control.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
B-3a: Prepare and implement a Weed Control Plan	Conduct pre-construction weed inventory	The Weed Control Plan shall include the following: A pre-construction weed inventory shall be conducted by surveying the entire ROW and areas immediately adjacent to the ROW (where access/permission can be secured) as well as at all ancillary facilities associated with the project for weed populations that (1) are considered by the San Diego County Agriculture Commissioner or State Parks (for ROW within or adjacent to ABDSP) as being a priority for control; and (2) aid and promote the spread of wildfires (such as cheatgrass [<i>Bromus tectorum</i>], Saharan mustard [<i>Brassica tournefortii</i>] and medusa head [<i>Taeniatherum caput-medusae</i>]). These populations shall be mapped and described according to density and area covered. These species shall be treated (where access and permission can be secured) prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations designed in consultation with the San Diego County Agriculture Commissioner's Office and Cal-IPC, or the tribal government, as appropriate. A pre-construction weed inventory shall be conducted by surveying areas that will be directly impacted by the project for weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006) or are weed species of concern to State Parks (for ROW within or adjacent to ABDSP). These plant species shall be treated prior to construction or at a time when treatments would be most effective based on phenology according to control methods and practices for invasive weed populations designed in consultation with Cal-IPC and State Parks (for treatment in ROW within ABDSP).	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-3a: Prepare and implement a Weed Control Plan	Implement weed control treatments	Weed control treatments shall include all legally permitted chemical, manual and mechanical methods applied with the authorization of the San Diego County Agriculture Commissioner and the ROW easement land-holding agencies where appropriate. The application of herbicides shall be in compliance with all state and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris will follow the regulations set by the San Diego County Agriculture Commissioner. The timing of the weed control treatment shall be determined for each plant species in consultation with the PCA, the San Diego County Agriculture Commissioner, State Parks (for treatment in ABDSP) and Cal-IPC, or the tribal government, as appropriate, with the goal of controlling populations before they start producing seeds.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-3a: Prepare and implement a Weed Control Plan	Annually survey for new invasive weeds for 2 years	From the time construction begins until two years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. After this time, surveying for new invasive weed populations and monitoring of identified and treated populations shall be required at an interval of every two years. However, the treatment of weeds shall occur on a minimum annual basis, unless otherwise approved by the PCA, the San Diego County Agriculture Commissioner, State Parks (for treatment in ABDSP) and Cal-IPC.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-3a: Prepare and implement a Weed Control Plan	Ensure all seeds and other material are certified weed free	During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall be certified weed free by the San Diego County Agriculture Commissioner's Office, or the tribal government, as appropriate.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-3a: Prepare and implement a Weed Control Plan	Wash vehicles and equipment	During project construction and operation/maintenance, vehicles and all equipment shall be washed (including wheels, undercarriages, and bumpers) at an offsite washing facility (e.g., a car wash or truck wash) immediately before project construction begins and prior to returning to project construction should equipment be used in a different construction area. Tools such as chainsaws, hand clippers, pruners, etc. shall be washed at an offsite washing facility immediately before project construction begins and prior to returning to project construction should tools be used in a different construction area. Vehicles, tools, and equipment shall be washed at an offsite washing facility should these vehicles, tools, and equipment have been used in an area where invasive plants have been mapped during the pre-construction weed control inventory and as directed by the biological construction monitor, prior to entering a project area free of populations of invasive plants (as determined by the pre-construction weed control inventory). Vehicles, tools, and equipment used for maintenance shall be washed at an offsite washing facility immediately before each maintenance event. All washing shall take place where rinse water is collected and disposed of in either a sanitary sewer or landfill; an effort shall be made to use wash facilities that use recycled water.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-3a: Prepare and implement a Weed Control Plan	Submit monthly wash logs during construction and annual logs during operation/maintenance	A written daily log shall be kept for all vehicle/equipment/tool washing that states the date, time, location, type of equipment washed, methods used, and staff present. The log shall include the signature of a responsible staff member. Logs shall be available to the CPUC, BLM, USDA Forest Service (for alternative routes within Cleveland National Forest lands), Wildlife Agencies, State Parks (for weeds in ABDSP), tribal governments (for weeds on tribal lands), and biological monitor for inspection at any time and shall be submitted to the CPUC on a monthly basis during construction and submitted annually to the CPUC during operation/maintenance.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
G-CM-20:Weed Control Plan	Develop a Weed Control Plan for pre-construction and non-invasive weed abatement	SDG&E will prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive weed abatement. The Weed Control Plan will be approved by the BLM, USFS, and Wildlife Agencies before implementation Where SDG&E owns the ROW property, the Weed Control Plan will include specific weed abatement methods, practices, and treatment timing developed in consultation with the San Diego County Agriculture Commissioner's Office and the California Invasive Plant Council (Cal-IPC). On the ROW easement lands administered by public agencies (BLM, USFS, and Wildlife Agencies), the Weed Control Plan will incorporate all appropriate and legal agency stipulated regulations. The Weed Control Plan will be submitted to the ROW landholding public agencies for final authorization of weed control methods, practices, and timing prior to implementation of the Weed Control Plan on public lands. ROW easements located on private lands will include adaptive provisions for the implementation of the Weed Control Plan. Prior to implementation, SDG&E will work with the landowners to obtain authorization of the weed control treatment that is required. Developed land will be excluded from weed control.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-20:Weed Control Plan	Contents of the Weed Control Plan	<p>The Weed Control Plan will include the following:</p> <ul style="list-style-type: none"> • A pre-construction weed inventory will be conducted by surveying the entire ROW and areas immediately adjacent to the ROW (where access and permission can be secured), as well as at all ancillary facilities associated with the Project, for weed populations that: (1) are considered by the San Diego County Agriculture Commissioner as being a priority for control and (2) aid and promote the spread of wildfires (such as cheatgrass [Bromus tectorum], Saharan mustard [Brassica tournefortii] and medusa head [Taeniatherum caput-medusae]). These populations will be mapped and described according to density and area covered. These plant species will be treated (where access and permission can be secured) prior to construction or at a time when treatments will be most effective based on phenology according to control methods and practices for invasive weed populations designed in consultation with the San Diego County Agriculture Commissioner's Office and Cal-IPC, as appropriate; • For areas directly impacted by the Project, a pre-construction weed inventory will be conducted for those weed populations rated 'High' or 'Moderate' for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006). These weed species will be treated prior to construction or at a time when treatments will be most effective based on phenology according to control methods and practices for invasive weed populations designed in consultation with Cal-IPC; • Weed control treatments will include all legally permitted chemical, manual, and mechanical methods applied with the authorization of the San Diego County Agriculture Commissioner and the ROW easement land-holding agencies where appropriate. The application of herbicides will be in compliance with all State and Federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris will follow the regulations set by the San Diego County Agriculture Commissioner. The timing of the weed control treatment will be determined for each plant species in consultation with the PCA, the San Diego County Agriculture Commissioner, and Cal-IPC with the goal of controlling populations before they start producing seeds. <p>For the lifespan of the project (i.e., as long as the project is physically present), long-term measures to control the introduction and spread of noxious weeds in the project area will be taken as follows:</p> <ul style="list-style-type: none"> • The survey areas described above would be surveyed annually to monitor previously-identified and treated populations and to identify new invasive weed populations. The treatment of weeds will occur on a minimum annual basis, unless otherwise approved by the PCA, the San Diego County Agriculture Commissioner, and Cal-IPC; • During project construction, all seeds and straw materials will be certified weed free, and all gravel and fill material will be certified weed free by the San Diego County Agriculture Commissioner's Office; • During project construction, vehicles and all equipment will be washed (including wheels, undercarriages, and bumpers) at an off-site washing facility (e.g., a car wash or truck wash) immediately before project construction begins and prior to returning to project construction should equipment be used in a different construction area. In addition, tools such as chainsaws, hand clippers, pruners, etc. will be washed at an off-site washing facility immediately before project construction begins and prior to returning to project construction should tools be used in a different construction area. Vehicles, tools, and equipment will be washed at an off-site washing facility should these vehicles, tools, and equipment have been used in an area where invasive plants have been mapped during the pre-construction weed control inventory and as directed by the biological construction monitor, prior to entering a project area free of populations of invasive plants (as determined by the pre-construction weed control inventory). All washing will take place where rinse water is collected and disposed of in either a sanitary sewer or landfill; an effort will be made to use wash facilities that use recycled water. A written daily log will be kept for all vehicle/equipment/tool washing that states the date, time, location, type of equipment washed, methods used, and staff present. The log will include the signature of a responsible staff member. Logs will be available to the CPUC, BLM, USFS (for Project sections within National Forest lands), Wildlife Agencies, and biological monitor for inspection at any time and will be submitted to the CPUC on a monthly basis during construction. 	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is on a previously disturbed and developed site which is denude of vegetation.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	All vegetation clearing, except tree trimming or removal, shall take place between August 16 and January 14 (i.e., outside of the general avian breeding season of January 15 through August 15). Tree removal or trimming shall take place between September 16 and December 31 (i.e., outside the raptor breeding season of January 1 through September 15).	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Conduct pre-construction avian breeding surveys within 10 days of initiating work January 1-September 15 and submit surveys	If project construction (not vegetation clearing or tree trimming/removal) cannot occur completely outside the general avian breeding season, then pre-construction surveys for non-listed bird species' nests shall be conducted by a qualified biologist within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction that would occur between January 15 and August 15. The results of the survey shall be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities.	PRE	To Be Implemented During Construction	A qualified biologist will conduct avian and raptor breeding surveys at least 10 calendar days prior to construction. Results of the surveys will be submitted to Wildlife Agencies for review and approval.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Conduct pre-construction raptor breeding surveys within 10 days of initiating work January 1-September 15 and submit surveys	If project construction (not vegetation clearing or tree trimming/removal) including the use of helicopters cannot occur completely outside the raptor breeding season, then pre-construction surveys for active raptor nests shall be conducted by a qualified biologist within 500 feet of the construction zone within 10 calendar days prior to the initiation of construction that would occur between January 1 and September 15. The results of the survey shall be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities.	PRE	To Be Implemented During Construction	A qualified biologist will conduct avian and raptor breeding surveys at least 10 calendar days prior to construction. Results of the surveys will be submitted to Wildlife Agencies for review and approval.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Proceed with construction if no active nests observed	If no active nests are observed, construction may proceed.	PRE	To Be Implemented During Construction	A qualified biologist will conduct avian and raptor breeding surveys at least 10 calendar days prior to construction. Results of the surveys will be submitted to Wildlife Agencies for review and approval.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Proceed with construction if active nests found per conditions	If active nests are found, work may proceed provided that construction activity is 1) located at least 500 feet from raptor nests (USFWS, 2007b), 2) located at least 160 to 250 feet from occupied burrowing owl burrows (CDFG, 1995; see Mitigation Measure B-7d), 3) located at least 300 feet from listed bird species nests (see Mitigation Measure B-7e and B-7f), 4) located at least 100 feet from non-listed bird species nests, 5) noise levels do not exceed 60 dB(A) hourly Leq at the edge of nesting territories (American Institute of Physics, 2005) as determined by a qualified biologist in coordination with a qualified acoustician. There may be a reduction of these buffer zones depending on site-specific conditions or the existing ambient level of activity. The Applicant shall contact Wildlife Agencies to determine the appropriate buffer zone. In the case of raptors (except the burrowing owl), the noise level restriction stated above does not apply (USFWS, 2007b). For non-raptors and the burrowing owl, if the noise meets or exceeds the 60 dB(A) Leq threshold, or if the biologist determines that the construction activities are disturbing nesting activities, the biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dB(A) Leq hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction. If active nests are found a buffer (as defined by this measure) will be established and monitored on a weekly basis to allow construction to proceed.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Monitor active nests weekly until fledged	All active nests shall be monitored on a weekly basis until the nestlings fledge.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Report survey results and monitoring	The qualified biologist shall be responsible for documenting the results of the surveys and the ongoing monitoring and for reporting these results to the CPUC, BLM, Wildlife Agencies, State Parks (for construction in ABDSP), and USDA Forest Service (for alternatives with construction on National Forest lands).	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction. Results of surveys will be submitted as required and a qualified biologist will continue to monitor the site as appropriate. Weekly monitoring reports will be submitted.
BIO-APM-1: Survey for sensitive plants and wildlife	Submit protocol surveys for sensitive plant and wildlife	SDG&E would perform any detailed on-the-ground protocol surveys, with regard to specific sensitive plant or wildlife species whose habitat would be impacted by the project based on final design, in accordance with state or federal regulations or statutes. SDG&E would submit results of these surveys to the USFWS and CDFG.	PRE	Completed	The White Star Communication Facility is located on previously disturbed and developed land. There is no suitable habitat or sensitive species located on the White Star Communication Facility site.
BIO-APM-2: Compliance Training	Environmental training prior to construction	Prior to construction, all SDG&E's contractors, subcontractors and project personnel shall receive training regarding the appropriate work practices necessary to effectively implement the biological APMs and to comply with the applicable environmental laws and regulations including appropriate wildlife avoidance, and impact minimization procedures, the importance of these resources and the purpose and necessity of protecting them; and methods for protecting sensitive ecological resources.	PRE, DUR	To Be Implemented During Construction	A final Safe Worker and Environmental Awareness Program (SWEAP) DVD, approved by the CPUC on March 15, 2010, includes instructions for required work practices to effectively implement the biological resource mitigation measures and applicant proposed mitigation measures (APMs). The SWEAP will be shown to all personnel and enforced throughout all phases of the Project.
G-CM-4: Training to effectively implement conservation measures	Training to implement conservation measures.	Prior to construction, all of SDG&E's contractors, subcontractors, and project personnel will receive training regarding the appropriate work practices necessary to effectively implement the Conservation Measures and to comply with the applicable environmental laws and regulations including appropriate wildlife avoidance and impact minimization procedures, the importance of these resources, and the purpose and necessity of protecting them.	PRE	To Be Implemented During Construction	A final SWEAP DVD, approved by the CPUC on March 15, 2010, includes instructions for required work practices to effectively implement the biological resource mitigation measures and applicant proposed mitigation measures (APMs). The SWEAP will be shown to all personnel and enforced throughout all phases of the Project.
BIO-APM-3: Access roads	Restrict vehicle movement to existing access roads	Except when not feasible due to physical or safety constraints, all project vehicle movement shall be restricted to existing access roads and access roads constructed as a part of the project and determined and marked by SDG&E in advance for the contractor, contractor-acquired accesses, or public roads.	PRE, DUR	To Be Implemented During Construction	The White Star Communication Facility is located on Tierra Del Sol Road. Vehicle traffic will be restricted to this existing, paved road.
BIO-APM-3: Access roads	Avoid constructing roads during nesting season and submit surveys if new roads needed during nesting season	New access road construction for the project shall be allowed year-round. When feasible, every effort shall be made to avoid constructing roads during the nesting season. When it is not feasible to keep vehicles on existing access roads or to avoid constructing new access roads during the nesting, breeding, or flight season, SDG&E shall perform a site survey, or more as appropriate, in the area where the work is to occur. This survey shall be performed to determine presence or absence of endangered nesting birds, or other endangered species in the work area. SDG&E shall submit results of this survey to the USFWS and CDFG and consult on reasonable mitigation measures to avoid or minimize for potential impacts, prior to vehicle use off existing access roads or the construction of new access roads. However, this survey shall not replace the need for SDG&E to perform detailed on-the-ground surveys otherwise required by BIO-APM-1.	PRE, DUR	Completed	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads will be constructed. The existing Tierra Del Sol Road will be utilized during construction.
BIO-APM-3: Access roads	No parking or driving under oak trees	Parking or driving underneath oak trees is not allowed in order to protect root structures.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no oak trees within or near the site.
BIO-APM-3: Access roads	Observe a 15 mph speed limit on dirt access roads	In addition to regular watering to control fugitive dust created during clearing, grading, earth-moving, excavation, and other construction activities which could interfere with plant photosynthesis, a 15-mile-per-hour speed limit shall be observed on dirt access roads to reduce dust and allow reptiles and small mammals to disperse.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no dirt access roads will be utilized during construction. The existing, paved Tierra Del Sol Road will be utilized during construction.
G-CM-5: Access road speed limit to minimize fugitive dust	Limit vehicle speeds on access roads to minimize fugitive dust	In addition to regular watering to control fugitive dust created during clearing, grading, earth-moving, excavation, and other construction activities, which could interfere with plant photosynthesis, a 24 km (15 mi) per hour speed limit will be observed on dirt access roads to reduce dust and allow reptiles and small mammals to disperse.	DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because no dirt access roads will be utilized during construction. The existing, paved Tierra Del Sol Road will be utilized during construction.
G-CM-25: Restrict vehicle movement to access roads	Restrict vehicle movement to access roads	Except when not feasible due to physical or safety constraints, all project vehicle movement will be restricted to existing access roads and access roads constructed as a part of the project and determined and marked by SDG&E in advance for the contractor, contractor-acquired accesses, or public roads.	PRE, DUR, POST	To Be Implemented During Construction	The White Star Communication Facility is located on Tierra Del Sol Road. Vehicle traffic will be restricted to this existing paved road.
BIO-APM-4: Project area limits	Restrict project activity to disturbance areas	The area limits of project construction and survey activities would be predetermined based on the temporary and permanent disturbance areas noted on the final design engineering drawings, with activity restricted to and confined within those limits.	PRE, DUR	Completed	The White Star Communication Facility is located on a previously disturbed and developed site.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
BIO-APM-4: Project area limits	Keep survey vehicles on existing roads	Survey personnel shall keep survey vehicles on existing roads.	PRE, DUR	To Be Implemented During Construction	Survey vehicles will remain on the existing Tierra Del Sol Road.
BIO-APM-4: Project area limits	Obtain prior approval for surveying activities in sensitive habitat	During project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat shall require prior approval from the project biological resource monitor in conformance with the APMs.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site. No brush clearing or impact to sensitive habitats will occur.
BIO-APM-4: Project area limits	Hiking off roads or paths during survey data collection is permitted	Hiking off roads or paths for survey data collection is allowed year-round as long as other APMs are met.	PRE	Pending	APMs will be met when hiking off roads or paths to collect survey data.
BIO-APM-4: Project area limits	Do not apply discoloring agents on rocks or vegetation	No paint or permanent discoloring agents shall be applied to rocks or vegetation to indicate limits of survey or construction activity where any sensitive biological resources or wildlife habitats are encountered in the field.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site. No sensitive resources or wildlife habitats exist within the site.
G-CM-6:Construction limits	Keep all activities within designated temporary and permanent disturbance areas	The area limits of project construction and survey activities will be predetermined based on the temporary and permanent disturbance areas noted on the final design engineering drawings, with activity restricted to and confined within those limits.	PRE	Completed	The White Star Communication Facility is located on a previously disturbed and developed site.
G-CM-6:Construction limits	Keep survey vehicles on existing roads	In addition, survey personnel will keep survey vehicles on existing roads.	PRE, DUR	Completed	Survey vehicles will remain on the existing Tierra Del Sol Road.
G-CM-6:Construction limits	No paint or discoloring agents will be applied to rocks or vegetation	No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate limits of survey or construction activity where any sensitive biological resources or wildlife habitats occur.	PRE, DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site. No sensitive resources or wildlife habitats exist within the site.
G-CM-6:Construction limits	Impacts associated unauthorized activity will be mitigated at higher ratios	Any impacts associated it unauthorized activity (e.g., exceeding approved construction limits) will be mitigated at a 5:1 ratio (5.5:1 in FTHL MA). Restoration of the unauthorized impacts will be credited at a 1:1 ratio (i.e., offset by in-place habitat restoration); the remaining 4:1 (or 4.5: in FTHL MA) will be acquired offsite.	DUR, POST	N/A	This conservation measure will be implemented during construction. There is no pre-construction component of this mitigation measure.
G-CM-44:Limits for maintenance and survey activities	Determine project limits for temporary and permanent disturbance to occur during maintenance activities	The area limits of Project maintenance and survey activities will be predetermined based on the temporary and permanent disturbance areas noted on the final design engineering drawings, with activity restricted to and confined within those limits, within SDG&E's ROW. In addition, survey personnel would keep survey vehicles on existing roads. No paint or permanent discoloring agents would be applied to rocks or vegetation to indicate limits of survey or maintenance activity where any sensitive biological resources or wildlife habitats occur.	DUR, POST	Completed	The White Star Communication Facility is located on a previously disturbed and developed site.
BIO-APM-7: Littering	Littering is not allowed	Littering is not allowed. Project personnel shall not deposit or leave any food or waste in the project area, and no biodegradable or non-biodegradable debris shall remain in the right-of-way following completion of construction.	PRE, DUR	To Be Implemented During Construction	A final SWEAP DVD, approved by the CPUC on March 15, 2010, includes instructions prohibiting littering of any kind. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
G-CM-9: No littering	Disposal of wastes	Project personnel will not deposit or leave any food or waste in the project area, and no biodegradable or non-biodegradable debris will remain in the ROW following completion of construction. All refuse will be placed in appropriate wildlife-proof containers and removed from job sites daily.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions prohibiting littering of any kind. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-10: Wildlife and firearms	Do not harm wildlife	No wildlife, including rattlesnakes, may be harmed except to protect life and limb.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-10: Wildlife and firearms	Firearms are prohibited	Firearms shall be prohibited in all project areas except for those used by security personnel.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that firearms are prohibited in all project areas. However, security personnel may carry firearms. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-36: No harm to wildlife	Do not harm wildlife, including rattlesnakes	No wildlife, including rattlesnakes, may be harmed except to protect life and limb. Firearms will be prohibited in all Project areas except for those used by security personnel.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-11: Feeding wildlife	Do not feed wildlife	Feeding of wildlife is not allowed.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that feeding wildlife is prohibited. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
G-CM-37: No feeding wildlife	Do not feed wildlife	Feeding of wildlife by SDG&E personnel or contractors is prohibited.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that feeding wildlife is prohibited. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-12: Pets	No pets permitted	Project personnel are not allowed to bring pets to any project area in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive animal diseases to native wildlife populations.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that prohibit Project personnel from bringing pets to any Project area to minimize harassment or killing of wildlife and to prevent the introduction of animal diseases to wildlife population. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
G-CM-38: No pets in project areas.	Do not bring pets to project areas	To minimize harassment or killing of wildlife and to prevent the introduction of destructive animal diseases to native wildlife populations, Project personnel are not allowed to bring pets into any project area.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that prohibit Project personnel from bringing pets to any Project area to minimize harassment or killing of wildlife and to prevent the introduction of animal diseases to wildlife population. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-13: Plant or wildlife collection	Do not collect plants or wildlife	Plant or wildlife species may not be collected for pets or any other reason.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that prohibit collecting plant or wildlife species for any reason. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
BIO-APM-16: Tree trimming	Schedule tree trimming during non-sensitive times	Environmentally sensitive tree trimming locations for the project would be identified in SDG&E's existing vegetation management database utilized by trim contractors. Trimming would be scheduled during non-sensitive (i.e., outside breeding or nesting) times.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no trees exist within the project site.
BIO-APM-16: Tree trimming	Vary tree removal widths to maintain edge diversity	Where riparian areas with overstory vegetation are crossed, tree removal (i.e., clear-cut) widths shall be varied where feasible to minimize visual landscape contrast and to maintain habitat diversity at established wildlife corridor edges. Where tree removal widths cannot be varied, SDG&E shall consult with the USFWS and CDFG to develop alternative tree removal options that could reasonably maintain edge diversity.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no riparian areas exist within the project site.
BIO-APM-18: Sensitive features	Design structures and access roads to minimize impacts to sensitive features	In areas designated as sensitive by SDG&E or the resource agencies, to the extent feasible structures and access roads would be designed to minimize impacts to sensitive features. These areas of sensitive features include but are not limited to high value wildlife habitats, sensitive vegetation communities, and high value plant habitats, and/or to allow conductors to clearly span the features, within limits of standard structure design. If the sensitive features cannot be completely avoided, structures and access roads would be placed to minimize the disturbance to the extent feasible.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located within a previously disturbed and developed site. No sensitive features exist on the site.
BIO-APM-18: Sensitive features	Submit site surveys when constructing poles or roads in high value habitats cannot be avoided	When it is not feasible to avoid constructing poles or access roads in high value wildlife habitats, SDG&E shall perform a site survey to determine presence or absence of endangered species in sensitive habitats. SDG&E shall submit results of this survey to the USFWS and consult on mitigation measures for potential impacts, prior to constructing structures or access roads. This survey shall not replace the need for SDG&E to perform detailed on-the-ground surveys as otherwise required by BIO-APM-1.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located within a previously disturbed and developed site. No sensitive features exist on the site.
BIO-APM-18: Sensitive features	Construct crossings at right angles to streambeds if access roads cannot avoid sensitive water features	Where it is not feasible for access roads to avoid sensitive water resource features, such as streambed crossings, such crossings shall be built at right angles to the streambeds. Where such crossings cannot be made at right angles, roads constructed parallel to streambeds shall be limited to a maximum length of 500 feet at any one transmission line crossing location. Such parallel roads shall be constructed in a manner that minimizes potential adverse impacts on "waters of the U.S." Streambed crossings or roads constructed parallel to streambeds shall require review and approval of necessary permits from the ACOE, CDFG, and RWQCB.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads will be built for construction. The existing Tierra Del Sol Road will be utilized during construction. Additionally, there are no wetlands or other water features within or near the White Star Communication Facility.
G-CM-27: Access roads	Build access roads at right-angles to stream crossings	To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location. Such parallel roads will be constructed in a manner that minimizes potential adverse impacts on "waters of the U.S." or waters of the state. Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks (e.g., structures will not be located within a stream channel, construction activities will avoid sensitive features). Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	PRE, DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because no new access roads will be built for construction. The existing Tierra Del Sol Road will be utilized during construction. Additionally, there are no wetlands or other water features within or near the White Star Communication Facility.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-11: Sensitive areas and features	Structures and access roads should be designed to minimize impacts to sensitive features	In areas designated as sensitive by SDG&E or the Wildlife Agencies, to the extent feasible, structures and access roads will be designed to minimize impacts to sensitive features. These areas of sensitive features include, but are not limited to, high-value wildlife and plant habitats, sensitive vegetation communities, and habitat occupied by listed species. If the sensitive features cannot be completely avoided or spanned, structures and access roads will be placed to minimize the disturbance to the extent feasible.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is located within a previously disturbed and developed site. No sensitive features exist on the site.
G-CM-11: Sensitive areas and features	Conduct site surveys when not feasible to avoid constructing poles or access roads in designated sensitive areas	When it is not feasible to avoid constructing poles or access roads in designated sensitive areas, SDG&E will perform a site survey to determine presence or absence of endangered species in sensitive habitats as required in G-CM-32 below. SDG&E will submit results of this survey to the Wildlife Agencies prior to constructing structures or access roads.	PRE	N/A	This conservation measure is not applicable to the White Star Communication Facility because it is located within a previously disturbed and developed site. No sensitive features exist on the site.
BIO-APM-27: Raptor nests	Remove all raptor nests outside breeding season of January to July and prior to construction	1. Prior to construction, SDG&E shall remove all existing raptor nests from structures that would be affected by project construction. 2. Removal of nests shall occur outside the raptor breeding season (January to July).	PRE, DUR	To Be Implemented During Construction	Prior to construction and outside of the raptor breeding season, SDG&E will remove existing raptor nests that would be affected by construction activities.
BIO-APM-27: Raptor nests	Monitor active nests during breeding season	3. If it is necessary to remove an existing raptor nest during the breeding season, a qualified biologist shall survey the nest prior to removal to determine if the nest is active. A nest would be considered active if it contains eggs or fledglings. If the nest does not contain eggs or nestlings and is inactive, it shall be removed promptly. If a nest is determined to be active, the nest shall not be removed and the biologist shall monitor the nest to ensure nesting activities/breeding activities are not disrupted. If the biological monitor determines that project activities are disturbing or disrupting nesting activities, the monitor shall make feasible recommendations to reduce the noise and/or disturbance in the vicinity of the nest.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
V-1a: Reduce visibility of construction activities and equipment	Screen construction sites if visible from public areas	Substation construction sites and all staging and material and equipment storage areas including storage sites for excavated materials, and helicopter fly yards shall be appropriately located away from areas of high public visibility. If visible from nearby roads, residences, public gathering areas, or recreational areas, facilities, or trails, construction sites and staging areas and fly yards shall be visually screened using temporary screening fencing. Fencing will be of an appropriate design and color for each specific location. Construction in areas visible from recreation facilities and areas during holidays and periods of heavy recreational use shall be avoided.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
V-1a: Reduce visibility of construction activities and equipment	Submit final construction plans 60 days prior to construction	SDG&E shall submit final construction plans demonstrating compliance with this measure to the BLM and CPUC for review and approval at least 60 days prior to the start of construction. Where the project crosses lands administered by other public agencies (e.g., Forest Service, Anza-Borrego Desert State Park), construction plans shall also be submitted to those agencies for review and approval within the same 60-day timeframe.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
V-1b: Reduce construction night lighting impacts	Design and install lighting to avoid night lighting impacts	SDG&E shall design and install all lighting at construction and storage yards and staging areas and fly yards such that light bulbs and reflectors are not visible from public viewing areas; lighting does not cause reflected glare; and illumination of the Project facilities, vicinity, and nighttime sky is minimized.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no night work is anticipated. Additionally, no permanent lighting will be installed at the site.
V-1b: Reduce construction night lighting impacts	Submit a Construction Lighting Mitigation Plan 90 days prior to construction	SDG&E shall submit a Construction Lighting Mitigation Plan to the BLM (only if on BLM lands), Forest Service (only if on National Forest lands), Anza-Borrego Desert State Park (for Park lands) and CPUC (for all areas) for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SDG&E shall not order any exterior lighting fixtures or components until the Construction Lighting Mitigation Plan is approved by the reviewing agency. The Plan shall include but is not necessarily limited to the following: • Lighting shall be designed so exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources is shielded to prevent light trespass outside the project boundary • All lighting shall be of minimum necessary brightness consistent with worker safety • High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no night work is anticipated. Additionally, no permanent lighting will be installed at the site.
VR-APM-1: Highway, canyon, and trail crossings	Place structures at maximum distance from crossings	At highway, canyon, and trail crossings, structures shall be placed at the maximum feasible distance from the crossing to reduce visual impacts as long as other significant resources are not negatively affected.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no highway, canyon, or trail crossings exist within or near the site.
VR-APM-3: Structure spacing	Match structure spacing when parallel to an existing line	Where the line parallels existing transmission lines, the spacing of structures shall match the existing transmission structures, where feasible, to minimize visual effects.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no transmission line structures associated with the site.
VR-APM-4: Paint and discoloring agents	Do not paint or discolor rocks or vegetation	No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
L-1a: Prepare Construction Notification Plan	Submit Construction Notification Plan 45 days prior to construction	45 days prior to construction, SDG&E shall prepare and submit a Construction Notification Plan to the CPUC and the BLM for approval. The Plan shall identify the procedures SDG&E will use to inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include text of proposed public notices and advertisements.	PRE	Completed	The Construction Notification Plan was approved by the CPUC on March 1, 2010.
L-1a: Prepare Construction Notification Plan	Mail a public notice 15 days prior to construction	Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction, including all helicopter activities. SDG&E shall mail the notice to all residents or property owners within 1,000 feet of the right-of-way, any property owners or tenants that could be impacted by construction activities and specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.	PRE	Pending	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses mailing public notifications. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1a: Prepare Construction Notification Plan	Advertise in newspapers and bulletins 15 days prior to construction	Newspaper advertisements. Fifteen days prior to construction, within a route segment, notices shall be placed in local newspapers and bulletins, including Spanish language newspapers and bulletins. The notice shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed for more than seven days, an additional round of newspaper notices shall be placed to discuss the status and schedule of construction.	PRE	Pending	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses newspaper advertisement notifications. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1a: Prepare Construction Notification Plan	Post notices of construction at public venues 30 days prior to construction	Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, Anza-Borrego Desert State Park offices and campgrounds, Cleveland National Forest Ranger Stations), and other public venues to inform residents and visitors to the purpose and schedule of construction activities. For public trail closures, SDG&E shall post information on the trail detour at applicable resource management offices and post the notice on the trail within two miles of the detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities.	PRE	N/A	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses posting of notices of construction at public venues. Proof of Notification will be submitted to CPUC prior to start of construction. However, this mitigation measure is not applicable to the White Star Communication Facility because no public venues exist within or near the site.
L-1a: Prepare Construction Notification Plan	Provide a public liaison person and toll-free hotline number before and during construction	Public liaison person and toll-free information hotline. SDG&E shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SDG&E shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.	PRE, DUR	Completed	The Construction Notification Plan identifies the public liaison person assigned to the project and the toll-free hotline. The Plan was approved by the CPUC on March 1, 2010.
LU-APM-1: Advance notice of construction	Provide advance notice within 300 feet of construction activities and appoint a public affairs officer	SDG&E will provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and will appoint a public affairs officer to address public concerns or questions.	PRE	Pending	The Construction Notification Plan addresses providing notice within 300 feet of construction activities and appointment of a public affairs officer. The Plan was approved by the CPUC on March 1, 2010. No residences are located within 300 feet of the White Star Communication Facility. However, the White Star Communication Facility is located on San Diego County property. SDG&E is coordinating with the San Diego County regarding this site. A Plan Check application was submitted to San Diego County on May 5, 2010. A copy of the Plan Check receipt is included as Attachment B.
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	Submit cultural resources inventory prior to construction	Prior to construction and all other surface disturbing activities, the Applicant shall have conducted and submitted for approval by the BLM and CPUC an inventory of cultural resources within the project's final Areas of Potential Effect. This survey shall supplement inventories conducted for the EIS/EIR and shall satisfy Section 106 requirements for inventory of historic properties within all Areas of Potential Effect. The nature and extent of this inventory shall be determined by the BLM and CPUC in consultation with the appropriate State Historic Preservation Officer (SHPO) and other land-managing agencies (e.g., Anza-Borrego Desert State Park, U.S. Forest Service, Bureau of Indian Affairs, etc.) and shall be based upon project engineering specifications and in accordance with the Secretary of the Interior's Standards and Guidelines (Secretary's Standards) (36 CFR 61). Area of Potential Effect is the horizontal and vertical extent of anticipated impacts that could affect historic properties. This includes direct impacts (physical disturbance from any project activity during or after construction) and indirect impacts, such as noise, vibration, visual intrusion, or erosion.) A report documenting results of this inventory shall be filed with appropriate State repositories and local governments. As part of the inventory report, the Applicant shall evaluate the significance of all potentially affected cultural resources on the basis of surface observations. Evaluations shall be conducted by professionals meeting the Secretary's Standards and in accordance with those Standards to provide recommendations with regard to their eligibility for the NRHP, CRHR, or local registers. Preliminary determinations of NRHP eligibility will be made by the BLM, in consultation with the CPUC and other appropriate agencies and local governments, and the SHPO. As part of the inventory, the Applicant shall conduct field surveys of sufficient nature and extent to identify cultural resources that would be affected by tower pad construction, reconducting activities, trenching for underground transmission lines, access road installation, and transmission line construction and operation. At a minimum, field surveys shall be conducted along newly proposed access roads, new construction yards, new tower sites, and any other projected areas of potential ground disturbance outside of the previously surveyed potential impact areas. Site-specific field surveys also shall be undertaken at all projected areas of impact within the previously surveyed corridor that coincide with previously recorded resource locations.	PRE	Completed	A cultural resource survey was performed by Engineering-Environmental Management (e ² M), as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	Stake tower locations prior to cultural resource field surveys	The selected right-of-way and tower locations shall be staked prior to the cultural resource field surveys.	PRE	Completed	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
C-1b: Avoid and protect potentially significant resources	Protect potential and register-eligible resources from direct project impacts	Where feasible, potentially register-eligible resources and register-eligible resources shall be protected from direct project impacts by project redesign; complete avoidance of impacts to such resources shall be the preferred protection strategy. On the basis of preliminary National Register of Historic Places (NRHP) eligibility assessments (Mitigation Measure C-1a) or previous determinations of resource eligibility, the BLM and CPUC, in consultation with the SHPO, may request the relocation of the line, ancillary facilities, or temporary facilities or work areas, if any, where relocation would avoid or reduce damage to cultural resource values.	PRE, DUR	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
C-1b: Avoid and protect potentially significant resources	Undertake additional studies if resources cannot be protected from direct impacts	Where the BLM and CPUC, in consultation with the Applicant, decide that potentially NRHP- and/or CRHR-eligible cultural resources cannot be protected from direct impacts by project redesign, or that avoidance is not feasible, the Applicant shall undertake additional studies to evaluate the resources' NRHP- and/or CRHR-eligibility and to recommend further mitigative treatment. The nature and extent of this evaluation shall be determined by the BLM in consultation with the CPUC and the SHPO and shall be based upon final project engineering specifications. Evaluations shall be based on surface remains, subsurface testing, archival and ethnographic resources, and in the framework of the historic context and important research questions of the project area.	PRE	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
C-1b: Avoid and protect potentially significant resources	Incorporate results of studies in HPTP	Results of those evaluation studies and recommendations for mitigation of project effects shall be incorporated into a Historic Properties Treatment Plan consistent with Mitigation Measure C-1c (Develop and implement Historic Properties Treatment Plan).	PRE	N/A	This mitigation measure does not apply because there are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility.
C-1b: Avoid and protect potentially significant resources	Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	All potentially NRHP- and/or CRHR-eligible resources (as determined by the BLM and CPUC, in consultation with the SHPO) that will not be affected by direct impacts, but are within 50 feet of direct impact areas shall be designated as Environmentally Sensitive Areas (ESAs) to ensure that construction activities do not encroach on site peripheries.	PRE, DUR	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
C-1b: Avoid and protect potentially significant resources	Erect protective flagging or other markers for ESA	Protective fencing, or other markers (after approval by CPUC/BLM), shall be erected and maintained to protect ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs shall not be identified specifically as cultural resources.	PRE, DUR	N/A	This mitigation measure does not apply because there are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility.
C-1b: Avoid and protect potentially significant resources	Develop and implement monitoring program as part of HPTP	A monitoring program shall be developed as part of a Historic Properties Treatment Plan and implemented by the Applicant to ensure the effectiveness of ESA protection (as detailed in Mitigation Measure C-1e).	PRE	N/A	This mitigation measure does not apply because there are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
C-1c: Develop and implement Historic Properties Treatment Plan	Submit Historic Properties Treatment Plan	Upon approval of the inventory report and the National Register of Historic Places (NRHP)-eligibility and CRHR-eligibility evaluations consistent with Mitigation Measures C-1a (Inventory and evaluate cultural resources in Final APE) and C-1b (Avoid and protect potentially significant resources), the Applicant shall prepare and submit for approval a Historic Properties Treatment Plan (HPTP) for register-eligible cultural resources to avoid or mitigate identified potential impacts. Treatment of cultural resources shall follow the procedures established by the Advisory Council on Historic Preservation for compliance with Section 106 of the National Historic Preservation Act and other appropriate State and local regulations, as explicated in Section D.7.8. Avoidance, recordation, and data recovery will be used as mitigation alternatives; avoidance and protection shall be the preferred strategy. The HPTP shall be submitted to the BLM and CPUC for review and approval. As part of the HPTP, the Applicant shall prepare a research design and a scope of work for evaluation of cultural resources and for data recovery or additional treatment of NRHP- and/or CRHR-eligible sites that cannot be avoided. Data recovery on most resources would consist of sample excavation and/or surface artifact collection, and site documentation. A possible exception would be a site where burials, cremations, or sacred features are discovered that cannot be avoided (see Mitigation Measure C-2). The HPTP shall define and map all known NRHP- and/or CRHR-eligible properties in or within 50 feet of all project APEs and shall identify the cultural values that contribute to their NRHP- and/or CRHR-eligibility. The HPTP shall also detail how NRHP- and/or CRHR-eligible properties shall be marked and protected as ESAs (in accordance with Mitigation Measure C-1b) during construction. The HPTP shall also define any additional areas that are considered to be of high-sensitivity for discovery of buried register-eligible cultural resources, including burials, cremations, or sacred features. This sensitivity evaluation shall be conducted by an archaeologist who meets the Secretary's Standards and who takes into account geomorphic setting and surrounding distributions of archaeological deposits. The HPTP shall detail provisions for monitoring construction in these high-sensitivity areas for proper implementation of Mitigation Measures C-1e and C-3a. It shall also detail procedures for halting construction, making appropriate notifications to agencies, officials, and Native Americans, and assessing register-eligibility in the event that unknown cultural resources are discovered during construction. For all unanticipated cultural resource discoveries, the HPTP shall detail the methods, the consultation procedures, and the timelines for assessing register-eligibility, formulating a mitigation plan, and implementing treatment. Mitigation and treatment plans for unanticipated discoveries shall be approved by the BLM and CPUC, other appropriate agencies and local governments, appropriate Native Americans, and the SHPO prior to implementation. The HPTP shall also identify all historic built environment resources (structures, roads, dams, etc.) that would be affected indirectly by visual intrusion of the Proposed Project on qualities that contribute to their register eligibility. Although the current analysis has assessed the potential for indirect visual impacts to previously recorded historic built environment resources within 0.5 miles of the Proposed Project and Alternatives, the HPTP shall include an identification effort focused on identifying any such resources that may not have been previously recorded. The scope of this identification effort shall be in accordance with 36 CFR 800, which requires a reasonable effort to identify potentially NRHP-eligible resources that would be adversely affected by indirect project impacts. The HPTP shall also detail the treatment for each affected resource that will minimize those long-term visual impacts (as detailed in Mitigation Measure C-6a). The HPTP shall include provisions for analysis of data in a regional context, reporting of results within one year of completion of field studies, curation of artifacts (except from private land) and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by BLM, and dissemination of reports to local and State repositories, libraries, and interested professionals. The BLM will retain ownership of artifacts collected from BLM managed lands. The Applicant shall attempt to gain permission for artifacts from privately held land to be curated with the other project collections. The HPTP shall specify that archaeologists and other discipline specialists conducting the studies meet the Secretary's Standards (per 36 CFR 61).	PRE	N/A	This mitigation measure does not apply because there are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility.
C-1d: Conduct data recovery to reduce adverse effects	Conduct data recovery investigations to reduce adverse effects	If NRHP- and/or CRHR-eligible resources, as determined by the BLM and SHPO, cannot be protected from direct impacts of the Proposed Project, data-recovery investigations shall be conducted by the Applicant to reduce adverse effects to the characteristics of each property that contribute to its NRHP- and/or CRHR-eligibility. For sites eligible under Criterion (d), significant data would be recovered through excavation and analysis. For properties eligible under Criteria (a), (b), or (c), data recovery may include historical documentation, photography, collection of oral histories, architectural or engineering documentation, preparation of a scholarly work, or some form of public awareness or interpretation. Data gathered during the evaluation phase studies and the research design element of the Historic Properties Treatment Plan (HPTP) shall guide plans and data thresholds for data recovery; treatment shall be based on the resource's research potential beyond that realized during resource recordation and evaluation studies. If data recovery is necessary, sampling for data-recovery excavations shall follow standard statistical sampling methods, but sampling shall be confined, as much as possible, to the direct impact area. Data-recovery methods, sample sizes, and procedures shall be detailed in the HPTP consistent with Mitigation Measure C-1c (Develop and implement Historic Properties Treatment Plan) and implemented by the Applicant only after approval by the BLM and CPUC.	PRE	N/A	This mitigation measure does not apply because there are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility.
C-1d: Conduct data recovery to reduce adverse effects	Submit field closure report prior to construction within 100 feet of affected resource	Following any field investigations required for data recovery, the Applicant shall document the field studies and findings, including an assessment of whether adequate data were recovered to reduce adverse project effects, in a brief field closure report. The field closure report shall be submitted to the BLM and CPUC for their review and approval, as well as to appropriate State repositories, local governments, and other appropriate agencies. Construction work within 100 feet of cultural resources that require data-recovery fieldwork shall not begin until authorized by the BLM or CPUC, as appropriate, to ensure that impacts to known significant archaeological deposits are adequately mitigated. Field closure report due prior to construction within 100 ft of affected resource.	DUR, POST	N/A	There are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility; therefore, this mitigation measure does not apply.
C-1d: Conduct data recovery to reduce adverse effects	Submit final report of data-recovery investigations within 1 year of completing fieldwork	Final report of data-recovery investigations are due within one year of completion of fieldwork.	DUR, POST	N/A	There are no NRHP- and/or CRHR-eligible resources within the White Star Communication Facility; therefore, this mitigation measure does not apply.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
C-1f: Train construction personnel	Train construction personnel to recognize and protect cultural resources	All construction personnel shall be trained regarding the recognition of possible buried cultural remains and protection of all cultural resources, including prehistoric and historic resources during construction, prior to the initiation of construction or ground-disturbing activities. The Applicant shall complete training for all construction personnel and retain documentation showing when training of personnel was completed. Training shall inform all construction personnel of the procedures to be followed upon the discovery of archaeo-logical materials, including Native American burials. Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of artifacts or other cultural materials on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction: <ul style="list-style-type: none"> • All construction contracts shall require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits, their responsibility to avoid and protect all cultural resources, and the penalties for collection, vandalism, or inadvertent destruction of cultural resources. • The Applicant shall provide training for supervisory construction personnel describing the potential for exposing cultural resources, the location of any potential ESA, and procedures and notifications required in the event of discoveries by project personnel or archaeological monitors. Supervisors shall also be briefed on the consequences of intentional or inadvertent damage to cultural resources. Supervisory personnel shall enforce restrictions on collection or disturbance of artifacts or other cultural resources. 	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
C-2a: Properly treat human remains	Avoid known Native American remains and protect with ESA designation	All locations of known Native American human remains shall be avoided through project design and shall be protected by designation as ESAs.	PRE, DUR	Completed	This mitigation measure does not apply to the White Star Communication Facility because there are no known Native American human remains located within this previously disturbed and developed site.
C-2a: Properly treat human remains	Contact agencies if sites will be affected	If the approved Project route will affect sites known to contain human remains that cannot be avoided in their entirety during construction, the Applicant shall contact the California Native American Heritage Commission (NAHC). The NAHC will identify the Most Likely Descendant (MLD), within 48 hours, who will specify the preferred course of treatment in the event that additional human remains are discovered. The Applicant shall also contact the BLM (lead federal agency for the Proposed Project) and any additional land management agencies if the site is located on public lands administered by a State or federal agency other than the BLM. Although subject to the recommendations of the MLD, it is likely that the human remains would be respectfully removed by the MLD and/or qualified archaeologists and reinterred in an area not subject to impacts from the Proposed Project. The reinterment location may be identified as a nearby locale within SDG&E ROW, or an off-site location may be selected.	DUR	N/A	This mitigation measure does not apply to the White Star Communication Facility because there are no known Native American human remains located within this previously disturbed and developed site.
C-2a: Properly treat human remains	Assist and support MLD with reinterment location	The Applicant shall assist and support the MLD in identifying, acquiring, and protecting the reinterment location.	DUR	N/A	This mitigation measure does not apply to the White Star Communication Facility because there are no known Native American human remains located within this previously disturbed and developed site.
C-2a: Properly treat human remains	Follow laws that govern treatment of human remains	The Applicant shall follow all State and federal laws, statutes, and regulations that govern the treatment of human remains (see Section D.7.7).	DUR	N/A	This mitigation measure does not apply to the White Star Communication Facility because there are no known Native American human remains located within this previously disturbed and developed site.
C-2a: Properly treat human remains	Support in consultations with Native Americans and implement required actions and studies	The Applicant shall assist and support the BLM in all required government-to-government consultations with Native Americans and appropriate agencies and commissions, as requested by the BLM. The Applicant shall comply with and implement all required actions and studies that result from such consultations.	PRE, DUR	N/A	This mitigation measure does not apply to the White Star Communication Facility because there are no known Native American human remains located within this previously disturbed and developed site.
C-2a: Properly treat human remains	Divert work if human remains are discovered and inform officer	If human remains are discovered during construction, all work shall be diverted from the area of the discovery and the BLM authorized officer shall be informed immediately.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
C-3a: Monitor construction in areas of high sensitivity for buried resources	Implement archaeological monitoring	The Applicant shall implement archaeological monitoring by a professional archaeologist during subsurface construction disturbance at all locations identified in the Historic Properties Treatment Plan (HPTP) as highly sensitive for buried prehistoric or historical archaeological sites or Native American human remains. These locations and their protection boundaries shall be defined and mapped in the HPTP. Intermittent monitoring may occur in areas of moderate archaeological sensitivity at the discretion of the BLM and CPUC. Monitoring shall be conducted in accordance with procedures detailed in Mitigation Measure C-1e	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is not an area of high sensitivity for buried prehistoric, historical archaeological sites, or Native American human remains.
C-3a: Monitor construction in areas of high sensitivity for buried resources	Divert work if buried cultural material discovered and notify archaeologist	Upon discovery of potential buried cultural materials by archaeologists or construction personnel, or damage to an ESA, work in the immediate area of the find shall be diverted and the Applicant's archaeologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's archaeologist shall consult with the BLM or CPUC, as appropriate, to make the necessary plans for evaluation and treatment of the find(s) or mitigation of adverse effects to ESAs, in accordance with the Secretary's Standards, and as specified in the HPTP.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
C-4a: Complete consultation with Native American and other Traditional Groups	Assist and support BLM in consultations with Native Americans to asses impacts	The Applicant shall provide assistance to the BLM, as requested by the BLM, to complete required government-to-government consultation with interested Native American tribes and individuals (Executive Memorandum of April 29, 1994 and Section 106 of the National Historic Preservation Act) and other Traditional Groups to assess the impact of the approved project on Traditional Cultural Properties or other resources of Native American concern, such as sacred sites and landscapes, or areas of traditional plant gathering for food, medicine, basket weaving, or ceremonial uses. As directed by the BLM, the Applicant shall undertake required treatments, studies, or other actions that result from such consultation.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no traditional cultural properties or other Native American resources of concern exist within the site.
C-4a: Complete consultation with Native American and other Traditional Groups	Submit documentation of all pre-construction actions 30 days prior to construction	Written documentation of the completion of all pre-construction actions shall be submitted by the Applicant and approved by the BLM at least 30 days before commencement of construction activities. Actions that are required during or after construction shall be defined, detailed, and scheduled in the Historic Properties Treatment Plan and implemented by the Applicant, consistent with Mitigation Measure C-1c (Develop and implement Historic Properties Treatment Plan).	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no traditional cultural properties or other Native American resources of concern exist within the site.
CR-APM-1: Construction contract and cultural resources	Instruct and provide a contract addressing protection and avoidance of cultural resources	Prior to construction, construction personnel shall be instructed on the protection and avoidance of cultural resources. To assist in this effort, the construction contract will address state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions regarding the recognition of possible buried cultural remains and protection of all cultural resources. Additionally, the construction contract will address state and federal laws regarding antiquities, fossils, and plants and wildlife, including the collection and removal, as well as the importance of these resources and the purpose and necessity of protecting them will be signed by each individual. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
CR-APM-2: Avoid cultural resources	Flag archaeological sites eligible for National Register	Archeological sites that are eligible or potentially eligible for the National Register will be flagged in the field and spanned or otherwise avoided through routing during construction activities to the extent feasible.	PRE	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
CR-APM-2: Avoid cultural resources	Implement impact avoidance and APMs during construction	Impact avoidance and APMs for cultural resources developed in consultation with appropriate land managing and regulatory (e.g., park personnel and State Historic Preservation Office) and other interested parties will be implemented prior to and during construction.	PRE, DUR	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.
CR-APM-5: Cultural resource guidelines	Follow guidelines for cultural resources	SDG&E will use the following as guidance in the implementation of the project: 1. Preservation in-place is the preferred manner of mitigating impacts to archaeological sites. Preservation in-place maintains the relationship between the artifacts and the archaeological context to the extent feasible. Preservation may also avoid conflict with religious or cultural values of groups associated with the site. 2. Preservation in-place may be accomplished by, but is not limited to, the following: a. planning construction to avoid archaeological sites; or b. incorporation of sites within parks, green space, or other open space; or c. deeding the site into a permanent conservation easement. 3. When data recovery through excavation is the only feasible mitigation, a data recovery plan which makes provisions for adequately recovering the scientifically consequential information from and about the historical resources shall be prepared and adopted prior to any excavation being undertaken. Such study shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5, Health and Safety Code. If an artifact must be removed during project excavation or testing, curation may be appropriate. 4. Data recovery shall not be required for an historical resource if the lead agency through discussion and consultation with Indian Tribes, professional archaeologists and SHPO determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historical resource, provided that the determination is documented in the EIR and that the studies are deposited with the California Historical Resources Regional Information Center.	PRE, DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction. There are no known cultural resources at the White Star Communication Facility. If unanticipated cultural resources are discovered, the guidelines for cultural resources will be implemented.
CR-APM-6: Avoid historic properties	Avoid historic properties by fencing or barricading	Historic property will be avoided and fenced or barricaded for protection. Contributing portions and sensitive features of the historic property will be avoided and fenced or barricaded for protection.	PRE, DUR	N/A	A cultural resource survey was performed by e ² M, as part of SDG&E's East County Substation Project, in February and March 2008. They found that the White Star Communication Facility site does not represent a potential impact to known significant or eligible archaeological sites or features. The area was examined for evidence of archaeological sites, features, and isolates and none were observed within the site. A copy of the Cultural Resource Report is included in Attachment D.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
CR-APM-6: Avoid historic properties	Implement a plan if historic properties cannot be avoided	If historic property cannot be avoided, an approved plan for recordation, relocation, or data recovery will be implemented. Recordation of buildings or structures may include Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) documentation.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
CR-APM-7: Protective measures at historic properties	Control impacts that can deteriorate historic properties	1. Erosion, sedimentation, or indirect displacement that could indirectly deteriorate historic property will be controlled by limitation of activities near property, stabilization of sediments or structures, and erosion control.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
CR-APM-7: Protective measures at historic properties	Implement protective measures to minimize erosion and weeds	2. Protective measures will be implemented to minimize erosion and prevent invasion by aggressive weeds near historic property.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
CR-APM-7: Protective measures at historic properties	Implement control measures to minimize vibration, dust, and fumes	3. Control measures will be implemented to minimize vibration, dust, or fumes affecting property. 4. Protective barriers or materials will be used to minimize the effects of vibration, dust, fumes, or changes in vegetation.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
CR-APM-7: Protective measures at historic properties	Minimize deterioration to buildings and structures	5. Buildings or structures will be stabilized or rehabilitated to minimize deterioration that might be accelerated by construction or operations.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
CR-APM-7: Protective measures at historic properties	Implement a plan if deterioration cannot be avoided	6. If deterioration cannot be avoided, SDG&E will implement an approved plan for recordation, relocation, or data recovery.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no historic properties within or near the site.
NOI-APM-1: Public noticing for construction noise	Provide notice to sensitive receptors and residences within 300 feet of construction	Provide notice prior to construction by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads. The announcement shall state specifically where and when construction will occur in the area. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction.	PRE	N/A	The Construction Notification Plan addresses providing notice to sensitive receptors within 300 feet of construction sites, staging areas, and access roads. The Plan was approved by the CPUC on March 1, 2010. However, this mitigation measure is not applicable to the White Star Communication Facility because there are no known residences within 300 feet of the site.
NOI-APM-1: Public noticing for construction noise	Provide a public liaison person before and during construction.	SDG&E would identify and provide a public liaison person before and during construction to respond to concerns of neighboring receptors, including residents, about noise construction disturbance. Procedures for reaching the public liaison officer via telephone or in person would be included in the above notices.	PRE, DUR	N/A	The Construction Notification Plan identifies a public liaison person that can respond to concerns of neighboring receptors about noise disturbances. The Plan was approved by the CPUC on March 1, 2010. However, this mitigation measure is not applicable to the White Star Communication Facility because there are no known residences within 300 feet of the site.
NOI-APM-1: Public noticing for construction noise	Establish a toll free number for questions and complaints	SDG&E would also establish a toll free telephone number for receiving questions or complaints during construction and develop procedures for responding to callers.	PRE, DUR	Completed	The Construction Notification Plan identifies the toll free telephone number established by SDG&E for receiving questions or complaints during construction and procedures to respond to callers. The Plan was approved by the CPUC on March 1, 2010.
T-APM-2a: Permits for Lane Closures	Obtain permits for temporary lane closures	Required permits for temporary lane closures will be obtained from the County of Imperial, County of San Diego, CALTRANS, and California State Parks (if applicable).	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no lane closures are required during construction.
T-APM-2b: Detour Plans and Right-of-Entry permits	Submit Detour Plans	Detour plans will be submitted to the counties, CALTRANS, and/or California State Parks as part of the permit requirements.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because construction will occur at a previously disturbed and developed site. Additionally, no detours are anticipated as a result of construction.
T-APM-2b: Detour Plans and Right-of-Entry permits	Right-of-Entry permit required for construction and maintenance activities outside of easements	Within the ABDSP, a Right-of-Entry permit is required for any construction and maintenance activities that would occur outside of existing easements, including access roads (would not need ROE for access road maintenance if practical rights of ingress and egress are granted in easements).	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is not located within ABDSP.
T-APM-2b: Detour Plans and Right-of-Entry permits	Provide a request for maintenance or other earth-disturbing activities	SDG&E will provide California State Parks a request in writing for maintenance or other earth-disturbing activities.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is not located on California State Park land.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
T-APM-4a: Coordination with emergency services	Coordinate in advance with emergency service providers	SDG&E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	PRE, DUR	To Be Implemented During Construction	SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles. This measure will be implemented during construction, if necessary; however, work within roads is not anticipated during construction.
T-APM-4a: Coordination with emergency services	Notify cities and counties regarding construction activities	The counties and cities will then notify respective police, fire, ambulance and paramedic services. SDG&E shall notify counties and cities of the proposed locations, nature, timing, and duration of any construction activities and advised of any access restrictions that could impact their effectiveness.	PRE, DUR	Completed	SDG&E will notify and provide required information to counties and cities. A Plan Check Application was submitted to San Diego County on May 5, 2010. A copy of the Plan Check receipt is included as Attachment B.
T-APM-5a: Coordination with school districts and transit authorities	Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	SDG&E will consult with the Imperial County Office of Education, Borrego Springs Unified School District, Warner Unified School District, Julian Union School District, and the Julian Union High School District at least one month prior to construction to coordinate construction activities adjacent to school bus stops. If necessary, school bus stops will be temporarily relocated or buses will be rerouted until construction in the vicinity is complete.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is not located in or near a school bus stop.
T-APM-5a: Coordination with school districts and transit authorities	Consult with transit authorities 1 month prior to construction	SDG&E will also consult with Imperial Valley Transit and the Metropolitan Transit System at least one month prior to construction to reduce potential interruption of transit services.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because construction is not anticipated to interrupt transit services.
P-1a: Implement Environmental Monitoring Program	Implement an environmental monitoring plan	An environmental monitoring program will be implemented by SDG&E or its contractors to ensure that the plans defined in HS-APM-1 (personnel trained in proper use and safety procedures for the chemicals used), HS-APM-2 (personnel trained in refueling of vehicles), HS-APM-3 (preparation of environmental safety plans including spill prevention and response plan), HS-APM-8 (SDG&E's and/or General Contractor environmental/health and safety personnel), and HS-APM-10 (storage and disposal of hazardous and solid waste) are followed throughout the period of construction.	PRE, DUR	To Be Implemented During Construction	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. The SWEAP video, which was approved by the CPUC on March 15, 2010, includes discussion of the implementation of the Environmental Monitoring Program, maintenance of emergency spill supplies and equipment, the proper use of hazardous materials, development of a Hazardous Communication Plan, development of applicable environmental safety plans associated with hazardous materials, assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project, proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations, and environmental training regarding potential exposure. The SWEAP video will be shown to all Project personnel and enforced throughout all phases of the Project.
P-1a: Implement Environmental Monitoring Program	Designate an Environmental Field Representative	SDG&E will designate an Environmental Field Representative who will be on site to observe and document adherence to the plan for all construction spreads.	PRE	Completed	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. The Plan states that the Environmental Field Representative/ Lead Monitoring Manager for this Project is Steve Riggs.
P-7a: Evaluate contaminated sites.	Implement steps 60 days prior to construction if excavation will occur	SDG&E shall implement the following steps, at locations where excavation or significant ground disturbance will occur; all steps be completed at least 60 days prior to project construction, to prevent mobilization of contaminants and exposure of workers and the public: <ul style="list-style-type: none"> • Step 1. Investigate the site to determine whether it has a record of hazardous material contamination which would affect construction activities. This investigation should be performed as a Phase I-Environmental Site Assessment (Phase I ESA). If contamination is found that could potentially affect the health and safety of workers or the public during construction of the Proposed Project, proceed to Step 2. • Step 2. Perform a characterization study of the site to determine the nature and extent of the contamination present at the location before construction activities proceed within the project ROW near the suspect site. • Step 3. Determine the need for further investigation and/or remediation of the soil or groundwater conditions at or near the contaminated site, i.e., within areas of ground disturbance for the Proposed Project. (For example, if there would be little or no contact with contaminated materials, industrial cleanup levels would likely be applicable. If site activities would involve human contact with the contaminated materials, such as would be the case with excavation of contaminated materials during project construction, then Step 4 shall be completed. If no human contact is anticipated, then no further mitigation would be required for the location.) • Step 4. If it is determined that disturbance or excavation of soils or groundwater with contamination would accompany construction at the site, undertake a Phase II Environmental Site Investigation (Phase II ESI) involving sampling and further characterization of potentially contaminated areas with the project ROW or reroute the line away from the contamination area. Should further investigation reveal high levels of hazardous materials, mitigate health and safety risk according San Diego County CUPA or RWQCB regulations or requirements. This would include site-specific Health and Safety Plans, Work Plans, and/or Remediation Plans. 	PRE	Completed	A Phase I ESA was submitted to the CPUC for review on December 2, 2009. However, the project-wide assessment did not include the White Star Communication Facility. Therefore, a subsequent limited Phase I ESA was performed for the White Star Communication Facility by Geosyntec on May 25, 2010. Results of the study are included in Attachment E.
HS-APM-1: Hazardous Communication Plan	Train personnel using hazardous materials	All personnel involved in using hazardous materials shall be trained in the proper use and safety procedures for the chemical and provided with the necessary Personal Protection Equipment (PPE).	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes training on hazardous materials management procedures. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
HS-APM-1: Hazardous Communication Plan	Develop a Hazardous Communication Plan	A Hazardous Communication (HAZCOM) Plan with Material Safety Data Sheets on all hazardous materials used for the project shall be developed.	PRE	Completed	The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Refueling vehicles	Trained personnel to perform refueling	Only personnel trained in refueling vehicles would be allowed to perform this operation.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes training on refueling vehicles. During construction, refueling will only be performed by trained personnel in designated areas or by assigned vehicles.
HS-APM-2: Refueling vehicles	Conduct refueling in designated areas or by assigned vehicles	All refueling operation shall be in designated areas or preformed by assigned vehicles.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
HS-APM-3: Safety plans	Develop applicable safety plans	All applicable environmental safety plans associated with hazardous materials shall be developed for the project. These plans include but are not necessary limited to Hazardous Material Business (HMB) Plan; HAZCOM Plan; Spill Response Plan; 90 days temporary storage and disposal (TSD) facility permit; and Spill Prevention Control and Countermeasure (SPCC) Plan (only if storage is over 1,350 gallons at one location).	PRE	Completed	The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010.
HS-APM-5: Investigate contaminated sites	Investigate impacts of all contaminated sites	All Government Code §65962.5 sites or other known contamination sites along the transmission line ROW or such sites that would affect construction work shall be investigated to determine potential impacts to the project.	PRE, DUR	Completed	A Phase I ESA was submitted to the CPUC for review on December 2, 2009. However, the project-wide assessment did not include the White Star Communication Facility. Therefore, a subsequent limited Phase I ESA was performed for the White Star Communication Facility by Geosyntec on May 25, 2010. Results of the study are included in Attachment E.
HS-APM-8: Environmental field representative	Assign Environmental or Health & Safety Representative	SDG&E will assign Environmental Field Representative and/or General Contractor assigned Health & Safety Officer to the project.	PRE	Completed	The Environmental Monitoring Plan submitted to the CPUC on May 10, 2010 identifies the Environmental Field Representative assigned to the project. SDG&E has a assigned a Health & Safety Officer to the project.
HS-APM-10: Hazardous and solid waste disposal	Store and dispose of hazardous waste per regulations	All hazardous waste and solid waste shall be stored and disposed of in accordance with federal, State, and local regulations. Whenever feasible, hazardous material minimization methods shall be employed and all hazardous materials recycled.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, includes training on hazardous materials management procedures. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project. Additionally, the Sunrise Powerlink HazCom Plan provides information on hazardous materials and the locatoin of the MSDS.
HS-APM-11: Fire Prevention and Response Plan	Develop Fire Prevention and Response Plan	SDG&E will develop Project-specific Fire Prevention and Response Plan (FPRP), which will be developed and reviewed by pertinent regulatory authorities.	PRE	Completed	The Fire Plan, signed by the CAL Fire Chief, was approved by the CPUC on February 2, 2010 and a Project Fire Marshall has been hired onto the Project and is assigned to enforce the FPRP.
HS-APM-11: Fire Prevention and Response Plan	Assign Fire Marshal to enforce fire prevention provisions	A Project Fire Marshal shall be assigned to enforce all provisions of the FPRP as well as performing all other duties related to fire prevention activities for the Proposed Project.	PRE	Completed	The Fire Plan, signed by the CAL Fire Chief, was approved by the CPUC on February 2, 2010 and a Project Fire Marshall has been hired onto the Project and is assigned to enforce the FPRP.
HS-APM-12: Traffic Control Plan	Develop a Traffic Control Plan	A Traffic Control Plan (TCP) shall be developed that addresses all roadway crossings that would be used by the project and could interfere with emergency vehicles.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because construction will occur within the limits of the existing facility.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
HS-APM-14: Environmental training	Conduct environmental training to construction workers	All construction workers shall undergo environmental training regarding potential exposure in accordance with federal, State, or local regulations.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, provides environmental training to construction workers regarding potential exposure. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
HS-APM-15: Soil and groundwater contamination	Stop work if soil or groundwater contamination	If during excavation soil or groundwater contamination is suspected (e.g., unusual soil discoloration or strong odor), the contractor or subcontractor shall immediately stop work and notify the General Contractor's assigned Health & Safety Officer and/or SDG&E's Field Environmental Representative.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
HS-APM-16: Contaminated soil and groundwater testing	Terminate work and implement health and safety procedures if contamination	If soil or groundwater contamination is suspected, work near the immediate excavation site shall be terminated, the work area cordoned off, and appropriate health and safety procedures implemented for the location by the General Contractor's assigned Health & Safety Officer and/or SDG&E's Field Environmental Representative. Work outside the immediate excavation site may continue as determined by the General Contractor's assigned Health and Safety Officer and/or SDG&E's Field Environmental Representative.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
HS-APM-16: Contaminated soil and groundwater testing	Take preliminary samples and send to lab for testing	Preliminary samples of the soil, groundwater, or material shall be taken by an OSHA trained individual. These samples shall be sent to a California Certified Laboratory for characterization.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
HS-APM-17: Contamination notification	Work may proceed if no contamination	If the sample testing determines that contamination is not present, work would be allowed to proceed at the immediate excavation site.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
HS-APM-17: Contamination notification	Notify agencies if contamination is above regulatory limits	However, if contamination is found above regulatory limits, the regulatory agency (e.g., RWQCB or CUPA) responsible for responding to and for providing environmental oversight of the region shall be notified in accordance with State or local regulations.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
PS-1a: Limit the conductor surface electric gradient	Limit conductor surface gradient	As part of the design and construction process for the Proposed Project, the Applicant shall limit the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.	PRE	N/A	This mitigation measure does not apply to the White Star Communication Facility because no conductors will be used at the site.
PS-2a: Implement grounding measures	Identify objects within and near ROW for induced voltages and implement electrical grounding	As part of the siting and construction process for the Proposed Project, SDG&E shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SDG&E's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.	PRE, DUR	N/A	This mitigation measure does not apply to the White Star Communication Facility because no conductors will be used at the site.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Pave, apply water three times daily, or apply soil stabilizers	SDG&E shall: (a) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area;	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is located on a previously disturbed and developed site and no unpaved access roads exist at the site.
AQ-1a: Suppress dust at all work or staging areas and on public roads.	Pre-water sites 48 hours prior to clearing	(b) pre-water sites for 48 hours in advance of clearing;	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no clearing is anticipated at the project site.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Reduce amount of disturbed area	(c) reduce the amount of disturbed area where possible;	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Spray stock-piles daily or as needed	(d) all dirt stock-pile areas should be sprayed daily as needed;	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Cover loads in trucks or maintain 6 inches of free-board	(e) cover loads in haul trucks or maintain at least six inches of free-board when traveling on public roads;	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
AQ-1a: Suppress dust at all work or staging areas and on public roads	Pre-moisten import and export dirt prior to transport	(f) pre-moisten, prior to transport, import and export dirt, sand, or loose materials;	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Sweep public streets daily if soil tracking visible	(g) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets or wash trucks and equipment before entering public streets;	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Plant vegetative ground cover following construction	(h) plant vegetative ground cover in disturbed areas as soon as possible following construction;	POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located on a previously disturbed and developed site.
AQ-1a: Suppress dust at all work or staging areas and on public roads	Apply soil stabilizers or water on inactive work areas	(i) apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for four consecutive days);	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-1a: Suppress dust at all work or staging areas and on public roads	File a Dust Control Plan 30 days prior to construction	and (j) prepare and file 30 days in advance of construction with the ICAPCD, SDAPCD, BLM, and CPUC a Dust Control Plan that describes how these measures would be implemented and monitored at all locations of the project. The Dust Control Plan shall identify nearby sensitive receptors, such as land uses that include children, the elderly, the acutely ill and the chronically ill, and specify the means of minimizing impacts to these populations (for example, by locating equipment and staging areas away from sensitive receptors).	PRE	Completed	The Dust Control Plan was approved on January 20, 2010.
G-CM-24:Dust Control Plan	Develop a Dust Control Plan	To suppress dust during Project construction, SDG&E will prepare and file with the Imperial County Air Pollution Control District, San Diego Air Pollution Control District, BLM, and CPUC, a Dust Control Plan. The Dust Control Plan will include a description of how the plan will be implemented and monitored at all locations of the project and contain the following measures: <ul style="list-style-type: none"> • Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; • Pre-water sites for 48 hours in advance of clearing activities; • Reduce the amount of disturbed area where possible; • Spray all dirt stock-pole areas daily as needed; • Trucks or maintain at least 15.24 cm (six in) of free-board when traveling on public roads; • Pre-moisten, prior to transport, import and export dirt, sand, or loose materials; • Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets or wash trucks and equipment before entering public streets; • Plant vegetative ground cover in disturbed areas as soon as possible following construction; and • Apply chemical soil stabilizers or apply water to form and maintain a crust on inactive construction areas (disturbed lands that are unused for four consecutive days). <ul style="list-style-type: none"> • Cover loads in haul 	PRE	Completed	The Dust Control Plan was approved on January 20, 2010.
G-CM-24:Dust Control Plan	Implement Dust Control Plan	In addition to the Dust Control Plan, the following dust reduction measures will be implemented: <ul style="list-style-type: none"> • Prohibit construction grading on days when the wind gusts exceed 40.2 km per hour (25 mph), to the extent feasible, to control fugitive dust; • All trucks hauling soil and other loose material will be covered or maintain at least 0.61 m (two feet) of freeboard; • Snow fence-type windbreaks will be erected in areas identified as needed by SDG&E; • Vehicle speeds will be limited to 24.1 km per hour (15 mph) on unpaved (no gravel or similar surfacing material) roads; • Unpaved roads will be treated by watering as necessary; • Soil stabilizers will be applied to inactive construction areas on an as-needed basis; and • Exposed stockpiles of soil and other excavated materials will be contained within perimeter silt fencing, watered, treated with soil binders, or covered as necessary. 	DUR	To Be Implemented During Construction	This conservation measure will be implemented during construction.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	Report quarterly the status of carbon credits	SDG&E shall create greenhouse gas emission reductions or obtain and hold for the duration of project construction sufficient carbon credits to fully offset construction-phase greenhouse gas emissions. During construction SDG&E shall report to the CPUC quarterly the status of efforts to create reductions or obtain banked credits and the quantity of construction-phase greenhouse gas emissions offset by credits. At a minimum, SDG&E shall create or obtain and hold carbon credits to offset 55,000 tons of carbon dioxide emissions for each of the two years of construction. Carbon Reduction Tons (CRTs) verified according to the rules of the California Climate Action Registry may be retired by SDG&E to satisfy this requirement.	PRE, DUR	To Be Implemented During Construction	Emissions off-sets were submitted for review on August 27, 2010. This mitigation measure will be implemented during construction.
AQ-4c: Avoid sulfur hexafluoride emissions	Submit SF6 leak detection and repair program 90 days prior to construction	SDG&E shall identify sulfur hexafluoride (SF6) leaks and establish a strategy for replacing leaking equipment to reduce SF6 leaks. To accomplish this, SDG&E shall develop and maintain a record of SF6 purchases, an SF6 leak detection and repair program using laser imaging leak detection and monitoring no less frequently than quarterly, an SF6 recycling program, and an employee education and training program for avoiding or eliminating SF6 emissions caused by the Proposed Project. The SF6 leak detection and repair program shall be provided to the CPUC and BLM 90 days prior to project construction.	PRE	N/A	The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. However, this mitigation measure is not applicable to the White Star Communication Facility because there will be no SF6 emissions.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
AQ-4c: Avoid sulfur hexafluoride emissions	Become a Partner in EPA's SF6 Partnership prior to construction.	Prior to construction, SDG&E shall also become a Partner in the U.S. EPA's SF6 Emissions Reduction Partnership for Electric Power Systems.	PRE	Completed	Partnership MOU between SDG&E and US EPA approved on February 24, 2010.
AQ-4c: Avoid sulfur hexafluoride emissions	Report SF6 emissions to CCAR	SDG&E shall also report SF6 emissions from the Proposed Project to the California Climate Action Registry according to CCAR methodologies or alternate methodology approved by the California Air Resources Board.	PRE	N/A	The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. However, this mitigation measure is not applicable to the White Star Communication Facility because there will be no SF6 emissions.
AQ-4c: Avoid sulfur hexafluoride emissions	Follow established methodologies to develop a complete GHG inventory	To develop a complete GHG inventory, SDG&E shall follow established methodologies to report indirect GHG emissions from energy imported and consumed to support operation of the Proposed Project and indirect GHG emissions from transmission and distribution losses associated with the Proposed Project.	PRE	Completed	The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010.
AQ-APM-1: Dust control in Imperial County	Comply with ICAPCD Rule 800	For activities in Imperial County, the project will comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]).	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is not located in Imperial County.
AQ-APM-1: Dust control in Imperial County	File a Dust Control Plan with ICAPCD	A Dust Control Plan for construction activities would be filed with the ICAPCD.	NTP	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is not located in Imperial County.
AQ-APM-2: Construction BMPs to minimize dust	Prohibit grading when wind exceeds 25 mph	1. Prohibit construction grading on days when the wind gusts exceed 25 mph to the extent feasible to control fugitive dust.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Cover loads in trucks or maintain 2 feet of freeboard	2. All trucks hauling soil and other loose material will be covered or maintain at least two feet of freeboard.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Install snow fence-type windbreaks	3. Snow fence-type windbreaks will be erected in areas identified as needed by SDG&E.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Limit vehicle speeds to 15 mph on unpaved roads	4. Vehicle speeds will be limited to 15 mph on unpaved (no gravel or similar surfacing material) roads.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Water unpaved roads	5. Unpaved roads will be treated by watering as necessary.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Apply soil stabilizers	6. Soil stabilizers will be applied to inactive construction areas on an as-needed basis.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-2: Construction BMPs to minimize dust	Contain exposed stockpiles of soil and other material	7. Exposed stockpiles of soil and other excavated materials will be contained within perimeter silt fencing, watered or treated with soil binders, as necessary.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-3: Minimize dust and mud tracking	Use methods to minimize mud and dust tracking on paved roads	To minimize mud and dust from being transported onto paved roadway surfaces, pave, gravel, use rattle plates or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface. SDG&E will implement this measure where applicable and not conflicting with other requirements.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
AQ-APM-4: Carpooling to job sites	Encourage carpooling to job sites	If suitable park-and-ride facilities are available in the project vicinity, construction workers will be encouraged to carpool to the job site to the extent feasible. The ability to develop an effective carpool program for the Proposed Project would depend upon the proximity of carpool facilities to the job site, the geographical commute departure points of construction workers, and the extent to which carpooling would not adversely affect worker show-up time and the project's construction schedule.	PRE, DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC on March 15, 2010, encourages carpooling. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
AQ-APM-5: Vehicle idling time	Minimize vehicle idling time with common sense approach	To the extent feasible, unnecessary construction vehicle and idling time will be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off.	DUR	To Be Implemented During Construction	The SWEAP video, approved by the CPUC March 15, 2010, addresses vehicle idling. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
AQ-APM-5: Vehicle idling time	Conduct briefings on common sense vehicle use	Construction foremen will include briefings to crews on vehicle use as a part of pre-construction conferences. Those briefings will include discussion of a "common sense" to vehicle use.	PRE	To Be Implemented During Construction	The SWEAP video, approved by the CPUC March 15, 2010, addresses vehicle use. The SWEAP will be shown to all Project personnel and enforced throughout all phases of the Project.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	Manage blasting near wells or springs with a Blasting Plan for each site	Blasting shall be managed with a Blasting Plan for each site. The Plan shall include the blasting methods, distance calculations to estimate the area of effect of the blasting, and surveys for wells and springs within the blast influence area (no less than ½ mile from the blasting location). Blasting shall not be allowed where damage to wells or springs could occur according to the Applicant's Blasting Plan, and a rock anchoring or mini-pile system shall be used if these resources could be damaged as a result of blasting or any earthworking method used as an alternative to blasting. Where inadvertent damage to wells within an EPA-designated Sole Source Aquifer occur as a result of earthwork, the Applicant shall compensate the landowner in the form of well repair or replacement, and shall provide the landowner with a water storage tank and sufficient potable water within 48 hours and throughout the interim between damage and repair or replacement. Where inadvertent damage to other wells or springs occurs as a result of earthwork, the Applicant shall compensate the landowner in the form of remedial cash payment, repair, or replacement, as appropriate. The burden of proof of no impact shall rest with the Applicant.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because blasting is not required.
WQ-APM-4: Erosion control	Maintain adequate distance from stream banks	1. Adequate distance from stream banks and beds will be maintained during construction activities	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters in the vicinity of the site.
WQ-APM-4: Erosion control	Use existing bridges to cross major streams	2. Construction activities will use existing bridges to cross major streams and culverts in most dry intermittent streams.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters in the vicinity of the site.
WQ-APM-4: Erosion control	Span riparian areas where feasible	3. Surface water, riparian areas and floodplains will be spanned where feasible	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters, riparian areas, or floodplains located in the vicinity of the site.
WQ-APM-4: Erosion control	Prepare and implement erosion control BMPs per the SWPPP	4. A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented. 5. Storm Water Best Management Practices (BMPs) for construction will be implemented per the requirements of the project's SWPPP 6. Silt fencing, straw mulch, straw bale check dams would be installed as appropriate to contain sediment within construction work areas and staging areas. Where soils and slopes exhibit high erosion potential, erosion control blankets, matting, and other fabrics and/or other erosion control measures. 7. The potential for increased sediment loading will be minimized by limiting road improvements to those necessary for project construction, operation and maintenance.	PRE, DUR	Completed	The project's SWPPP and BMP manual will be maintained onsite during installation of the White Star Communication Facility.
WQ-APM-4: Erosion control	Select upland pull sites to minimize disturbance to water resources	8. Upland pull sites will be selected to minimize impacts to surface waters, riparian areas, wetlands and floodplains.	PRE, DUR	Completed	The April 30, 2010 Map Book illustrates changes to the final design of the alignment, incorporating the utilization of upland pull sites to the maximum extent possible. A revised PMR and Map Book was submitted to the CPUC on May 14, 2010. However, this mitigation measure does not apply to the White Star Communication Facility because there are no surface waters, riparian areas, wetlands, or floodplains located in the vicinity of the site.
WQ-APM-4: Erosion control	Do not place structures in streambeds or drainage channels	9. Structures will not be placed in streambeds or drainage channels to the extent feasible	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because it is located in a previously disturbed and developed site.
G-CM-2:Water Quality Construction BMPs	Use SDG&Es Water Quality Construction BMP Manual	G-CM-2 Throughout the construction process all crews will use the SDG&E Water Quality Construction Best Management Practices Manual (BMPs) (SDG&E 2002). Following are some of the general guidelines: • Construction activities will use existing bridges to cross major streams and culverts in most dry intermittent streams; • Surface water, riparian areas, and floodplains will be spanned where feasible; A Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented; Storm Water BMPs for construction will be implemented per the requirements of the project's SWPPP; • Silt fencing, straw mulch, and straw bale check dams will be installed as appropriate to contain sediment within construction work areas and staging areas. Where soils and slopes exhibit high erosion potential, erosion control blankets, matting, and other fabrics and/or other erosion control measures will be implemented. • The potential for increased sediment loading will be minimized by limiting road improvements to those necessary for project construction. • Upland pull sites will be selected to minimize impacts to surface waters, riparian areas, wetlands, and floodplains; and • Structures will not be placed in streambeds or drainage channels to the extent feasible.	DUR	To Be Implemented During Construction	This conservation measure will be implemented during construction.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
WQ-APM-5: Stream crossings	Construct stream crossings and develop a mitigation and restoration plan	Any stream crossings will be constructed at low flow periods and, if necessary, a site-specific mitigation and restoration plan would be developed.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters in the vicinity of the site.
WQ-APM-6: Water supplies	Avoid designated surface water protection areas	1. Designated surface water protection areas (source water) will be avoided.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters in the vicinity of the site.
WQ-APM-6: Water supplies	No diversions, detention, retention, or consumption of surface waters	2. There will be no diversions, detention, retention or consumption of surface waters for the project	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no surface waters in the vicinity of the site.
WQ-APM-6: Water supplies	Conduct interviews with affected landowners prior to construction	3. Prior to construction, interviews would take place with affected landowners regarding location of water supply wells located on their property.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because groundwater is not anticipated to be impacted by installation of the Facility.
WQ-APM-6: Water supplies	Negotiate with landowners to provide alternative water supplies	4. SDG&E will negotiate with affected landowner to provide alternative water supplies in the event a supply well or springs dry up directly caused by project activities. Negotiation shall be by either a remedial cash payment to the landowner or by SDG&E contracting for the drilling of a replacement well.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because groundwater supplies will not be used during construction.
WQ-APM-8: Water discharge	Obtain permits prior to discharging groundwater into storm drains	1. In no case will groundwater removed during construction be discharged to surface waters or storm drains without first obtaining any required permits.	PRE, DUR	To Be Implemented During Construction	This mitigation measure is not applicable to the White Star Communication Facility because dewatering is not anticipated to complete installation of the Facility.
WQ-APM-8: Water discharge	Contain and sample if dewatering and then release water according to test results	2. If dewatering is necessary, the water will be contained and sampled to determine if contaminants requiring special disposal procedures are present. 3. If the water tests sufficiently clean and land application is determined feasible per applicable SWRCB and RWQCB requirements, the water would be directed to relatively flat upland areas for evaporation and infiltration back to the water table, used for dust control, or used as makeup for a construction process (e.g., concrete production). 4. Water determined to be unsuitable for land application or construction use would be disposed of in another appropriate manner, such as treatment and discharge to a sanitary sewer system in accordance with applicable permit requirements or hauled offsite to an approved disposal facility.	DUR	To Be Implemented During Construction	This mitigation measure is not applicable to the White Star Communication Facility because dewatering is not anticipated to complete installation of the Facility.
WQ-APM-9: Fuel and hazardous material storage	Storing fuels and hazardous materials prohibited near wells	Storage of fuels and hazardous materials will be prohibited within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
WQ-APM-10: Minimize stream bank erosion	Minimize stream bank erosion	At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, the burial depth shall be extended below the estimated 100 year depth of scour for that stream, or located at a sufficient distance from the bank as to avoid erosion that can reasonably be expected to occur during the life of the project.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no streams located at the site.
WQ-APM-11: Groundwater	Test groundwater levels with pilot borings along underground portion of project	Groundwater levels along the underground portion of the project will be tested by drilling pilot borings. The location, distribution, or frequency of such tests shall be determined to give adequate representation of the conditions. Locations where groundwater depth is less than eight feet below ground surface shall be identified prior to excavation activities and avoided, where possible. Avoidance is especially recommended where shallow groundwater flow direction is not parallel to the orientation of the alignment. Where avoidance is not possible, SDG&E shall consider constructing underground facilities in a shallower excavation, depending upon requirements of the underground method or existing underground facilities and other practical concerns.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because groundwater is not anticipated to be encountered. Groundwater levels are discussed in the geotechnical report provided as Attachment C.
WQ-APM-11: Groundwater	Submit letter report with test drilling results	SDG&E shall document results of test drilling in a letter report to the CPUC construction starts and shall propose specific measures to minimize the impact on groundwater.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because groundwater is not anticipated to be encountered. Groundwater levels are discussed in the geotechnical report provided as Attachment C.
WQ-APM-13: Hazardous waste disposal	Dispose trash into enclosed containment	Totally enclosed containment will be provided for trash.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
WQ-APM-13: Hazardous waste disposal	Remove hazardous materials to a hazardous waste facility and promptly clean up if released onto ground	Hazardous materials will not be disposed of onto the ground, the underlying groundwater, or any surface water. Petroleum products and other potentially hazardous materials would be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials. In the event of a release of hazardous materials to the ground, it will be promptly cleaned up in accordance with applicable regulations.	DUR	To Be Implemented During Construction	This mitigation measure will be implemented during construction.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
WQ-APM-14: NPDES permit	Obtain NPDES permit and implement a SWPPP	Secure any required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization from the State Water Resources Control Board and/or the RWQCB to conduct construction-related activities to build the project and establish and implement a SWPPP during construction to minimize hydrologic impacts.	PRE, DUR	Completed	A copy of the SWPPP will be maintained onsite during work at the White Star Communication Facility.
G-CM-3:NPDES Permit	Obtain NPDES permit and implement a SWPPP.	SDG&E will secure any required General Permit for Storm Water Discharges Associated with Construction Activity (National Pollutant Discharge Elimination System (NPDES permit) authorization from the State Water Resources Control Board and/or the Regional WQCB to conduct construction-related activities to build the project and establish and implement a SWPPP during construction to minimize hydrologic impacts.	PRE, DUR	Completed	A copy of the SWPPP will be maintained onsite during work at the White Star Communication Facility.
WQ-APM-15: Construction access routes	Adjust route of access roads to avoid sensitive features	To the extent feasible, where the construction of access roads would disturb sensitive features such as streambeds, the route of the access road would be adjusted to avoid such impacts. Where it is not feasible for access roads to avoid streambed crossings, such crossings would be built at right angles to the streambeds whenever feasible. Where such crossings cannot be made at right angles, SDG&E would limit roads constructed parallel to streambeds to a maximum length of 500 feet at any one transmission line crossing location. Such parallel roads would be constructed in such a manner that minimizes potential adverse impacts on waters of the U.S. or waters of the state. Streambed crossings or roads constructed parallel to streambeds would require review and approval of necessary permits from the ACOE, CDFG, and SWRCB/RWQCB.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads are required.
WQ-APM-15: Construction access routes	Use existing roads or cross-country access routes	Whenever practicable, construction and maintenance traffic would use existing roads or cross-country access routes (including the ROW) which avoid impacts to the sensitive feature.	DUR, POST	Completed	The White Star Communication Facility is located on Tierra Del Sol Road. Vehicle traffic will be restricted to this existing paved road.
WQ-APM-15: Construction access routes	Clearly mark approved construction traffic routes	To minimize ground disturbance, construction traffic routes will be clearly marked with temporary markers such as easily visible flagging. Construction routes, or other means of avoidance, must be approved by the appropriate agency or landowner before use.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads are required.
WQ-APM-16: Sensitive water resources	Conduct site-specific assessment where sensitive water resources cannot be avoided	If sensitive water resource features contain riparian areas, habitats of endangered species, streambeds, cultural resources, and wetlands which cannot be avoided, a qualified biological contractor shall conduct site-specific assessments for each affected site. These assessments shall be conducted in accordance with ACOE wetland delineation guidelines, as well as CDFG streambed and lake assessment guidelines, and shall include impact minimization measures to reduce wetland impacts to a less than significant effect (e.g., through creation or restoration of wetlands).	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads are required.
WQ-APM-16: Sensitive water resources	Locate staging/storage areas outside of riparian areas	Though construction or maintenance vehicle access through shallow creeks or streams is allowed, staging/storage areas for equipment and materials shall be located outside of riparian areas.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility since there are no water resources in the vicinity.
WQ-APM-16: Sensitive water resources	Obtain a Streambed Alteration Agreement when constructing new access through streambeds	Construction of new access through streambeds that require filling for access purposes would require a Streambed Alteration Agreement from the CDFG and/or consultation/approval with the ACOE and SWRCB/RWQCB. Where filling is required for new access, the installation of properly sized culverts and the use of geo-textile matting should be considered in the CDFG/ACOE consultation process. Where filling is required for new access, the installation of properly sized culverts and the use of geo-textile matting should be considered in the CDFG/ACOE consultation process.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility since there are no water resources in the vicinity of the site.
G-CM-42:Riparian buffer	Maintain riparian buffer construction/staging areas and riparian areas	A minimum of a 30.5-m (100-ft) riparian buffer will be maintained between all construction/staging areas, except where the access roads cross riparian areas.	DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because there are no riparian areas in the vicinity of the site.
G-2a: Protect desert pavement	Avoid or minimize desert pavement grading	Grading for new access roads or work areas in areas covered by desert pavement shall be avoided or minimized. If avoidance of these areas is not possible, the desert pavement surface shall be protected from damage or disturbance from construction vehicles by use of temporary mats on the surface.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no new access roads are proposed for the site and there is no desert pavement in the area.
G-2a: Protect desert pavement	Submit a plan to identify and protect desert pavement 60 days prior to construction	A plan for identification and avoidance or protection of sensitive desert pavement shall be prepared and submitted to the CPUC and BLM for review and approval at least 60 days prior to start of construction.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no desert pavement exists at the site.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	Submit design-level geotechnical studies 60 day prior to final project design	The design-level geotechnical studies to be performed by the Applicant shall identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates. Appropriate design measures for protection of reinforcement, concrete, and metal-structural components against corrosion shall be utilized, such as use of corrosion-resistant materials and coatings, increased thickness of project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems. The geotechnical studies shall also identify areas with potentially expansive or collapsible soils and include appropriate design features, including excavation of potentially expansive or collapsible soils during construction and replacement with engineered backfill, ground-treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Studies shall conform to industry standards of care and ASTM standards for field and laboratory testing. Study results and proposed solutions shall be provided to the CPUC and BLM for review and approval at least 60 days before final project design.	PRE	Completed	A design-level geotechnical study was conducted by Toro International on March 10, 2010. The report is titled <i>Geotechnical Investigation for Gas Company Monopole and Equipment Shelter</i> and includes a summary of the survey results. The entire report is included as Attachment C.
G-4a: Reduce effects of groundshaking.	Submit site-specific seismic analyses 60 days prior to final project design	The design-level geotechnical investigations performed by the Applicant shall include site-specific seismic analyses to evaluate the peak ground accelerations for design of project components. Based on these findings, project structure designs shall be modified/strengthened, as deemed appropriate by the project engineer, if the anticipated seismic forces (high calculated peak vertical and horizontal ground accelerations due to severe groundshaking) are found to be greater than anticipated wind load stresses on project structures. Study results and proposed design modifications shall be provided to the CPUC and BLM for review and approval at least 60 days before final project design.	PRE	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the White Star Communication Facility is suitable for development provided the report geotechnical recommendations are implemented.
G-4b: Conduct geotechnical investigations for liquefaction.	Submit liquefaction studies 60 days prior to final project design	Because seismically induced liquefaction-related ground failure has the potential to damage or destroy project components, the design-level geotechnical investigations to be performed by the Applicant shall include investigations designed to assess the potential for liquefaction to affect the approved project and all associated facilities, specifically at tower locations in areas with potential liquefaction-related impacts. Where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the project designs as deemed appropriate by the project engineer. Design measures that would mitigate liquefaction-related impacts could include construction of pile foundations, ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in cables to allow ground deformations without damage to structures. Study results and proposed solutions to mitigate liquefaction shall be provided to the CPUC and BLM for review and approval at least 60 days before final project design.	PRE	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the subsurface soil at the White Star Communication Facility is not likely to liquefy during an earthquake.
G-5a: Minimize project structures within active fault zones.	Submit a report with studies of active and potential active faults 60 days prior to construction	Prior to final project design SDG&E shall perform a geologic/geotechnical study to confirm the location of mapped traces of active and potentially active faults crossed by the project route. For crossings of active faults, the project design shall be planned so as not to locate towers or other project structures on the traces of active faults and in addition project components shall be placed as far as feasible outside the areas of mapped fault traces. Compliance with this measure shall be documented to the CPUC and BLM in a report submitted for review and approval at least 60 days prior to the start of construction.	PRE	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the nearest active fault is the Elsinore-Coyote Mountain Fault which is approximately 17 miles from the White Star Communication Facility.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	Submit slope stability analyses 60 days prior to construction	The design-level geotechnical surveys conducted by the Applicant shall perform slope stability analyses in areas of planned grading and excavation that cross and are immediately adjacent to hills and mountains. These surveys will acquire data that will allow identification of specific areas with the potential for unstable slopes, landslides, earth flows, and debris flows along the approved transmission line route and in other areas of ground disturbance, such as grading for access and spur roads. The investigations shall include an evaluation of subsurface conditions, identification of potential landslide hazards, and provide information for development of excavation plans and procedures. If the results of the geotechnical survey indicate the presence of unstable slopes at or adjacent to Proposed Project structures, appropriate support and protection measures shall be designed and implemented to maintain the stability of slopes adjacent to newly graded or re-graded access roads, work areas, and project structures during and after construction, and to minimize potential for damage to project facilities. These design measures shall include, but are not limited to, retaining walls, visquene, removal of unstable materials, and avoidance of highly unstable areas. SDG&E shall document compliance with this measure prior to the final project design by submitting a report to the CPUC for review and approval at least 60 days before construction. The report shall document the investigations and detail the specific support and protection measures that will be implemented.	PRE	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. The White Star Communication Facility site is flat and not located on or near a slope.
G-9a: Coordinate with quarry operations	Coordinate to determine status and plans of active quarries	SDG&E shall coordinate with operations and management personnel, and with BLM, to determine status of and plans for active quarries adjacent to or crossed by project alignments.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no active mining areas in the vicinity of the site.
G-9a: Coordinate with quarry operations	Submit plan to avoid impacts to mining operations 60 days prior to construction	SDG&E shall develop a plan to avoid or minimize interference with mining operations in conjunction with mine/quarry operators prior to construction, and submit it for review and approval to the BLM and CPUC. If mine operators are out of compliance with BLM lease requirements, SDG&E shall coordinate with all parties to resolve the situation and shall demonstrate compliance with this measure prior to the start of construction by submitting the plan to the CPUC and BLM for review at least 60 days prior to the start of construction.	NTP	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no active mining areas in the vicinity of the site.
G-9a: Coordinate with quarry operations	Provide map of reroute and summary of impacts to mining areas	If active mining areas require a reroute of the existing SWPL or the Interstate 8 Alternative route, SDG&E shall provide a detailed map documenting proposed new tower and access road location(s), as well as a summary of environmental impacts that would occur (biological and cultural resources surveys must be completed).	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no active mining areas in the vicinity of the site.
GEO-APM-1: Existing access roads	No widening or grading of existing access roads if soil is sensitive to disturbance	No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is accessed from the existing Tierra del Sol Road. No other access roads are needed to complete the work.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
GEO-APM-2: Minimize soil disturbance	Minimize soil disturbance or return to pre-construction contours and condition	<ol style="list-style-type: none"> 1. Vehicle and construction equipment use will be restricted to access roads and areas in the immediate vicinity of construction work sites to help reduce soil disturbance. 2. In agricultural areas, topsoil would be left in roughened condition. 3. When practical, construction activities will be avoided on wet soil to reduce the potential for soil compaction, rutting, and loss of soil productivity. 4. Disturbed areas will be returned to their pre-construction contours and allowed to re-vegetate naturally, or will be reseeded with an appropriate seed mixture if necessary. 5. Affected landowners having property directly impacted by the project will be compensated to disc or till soil upon construction completion. 6. Construction of access roads in inaccessible terrain will be reduced by using helicopters to place structures in select locations. 	DUR, POST	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
GEO-APM-3: Structure location and shrink/swell	Avoid placing structures in areas of high shrink/swell potential	Structure placement in areas of high shrink/swell potential will be avoided where possible.	PRE, DUR	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C. This report concluded that the White Star Communication Facility soils primarily consist of sand and silt which does not contain shrink/swell characteristics.
GEO-APM-4: Structure location and soil stability	Place structures in geologically stable areas	Structures will be placed in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock, etc.	DUR	Completed	The White Star Communication Facility is being installed at an existing communication tower site and in accordance with the recommendations of the geotechnical report included as Attachment C.
GEO-APM-5: Erosion control	Implement construction to avoid or minimize new soil disturbance	Project construction activities shall be designed and implemented to avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation.	PRE, DUR	Completed	This mitigation measure is not applicable to the White Star Communication Facility because it has been located within a previously disturbed and developed site.
GEO-APM-5: Erosion control	Maintain cut and fill slopes with erosion control and repair	Maintenance of cut and fill slopes created by project construction activities would consist primarily of erosion repair. Where re-vegetation is necessary to improve the success of erosion control, planting or seeding with native seed mix would be done on slopes.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no cut and fill slopes associated with the site.
G-CM-21: Avoid/minimize new disturbance	Implementation of erosion control measures	<p>Project construction activities will be designed and implemented to avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation. Where revegetation is necessary to improve the success of erosion control, planting or seeding with native seed mix, approved by the Wildlife Agencies, will be done on slopes. In addition to the measures above, the following erosion control procedures will be implemented:</p> <ul style="list-style-type: none"> • Vehicle and construction equipment use will be restricted to access roads and areas in the immediate vicinity of construction work sites to help reduce soil disturbance; • In agricultural areas, topsoil will be left in roughened condition; • When practical, construction activities will be avoided on wet soil to reduce the potential for soil compaction, rutting, and loss of soil productivity; • Disturbed areas will be returned to their pre-construction contours and allowed to revegetate naturally, or will be reseeded with an appropriate seed mixture if necessary; • Construction of access roads in inaccessible terrain will be reduced by using helicopters to place structures in select locations. 	DUR	N/A	This conservation measure is not applicable to the White Star Communication Facility because there are no cut and fill slopes associated with the site.
GEO-APM-6: Surface restoration	Perform surface restoration for erosion control and re-vegetation	In areas where ground disturbance is substantial or where re-contouring is required (e.g., marshaling yards, tower sites, spur roads from existing access roads), surface restoration will occur as necessary for erosion control and re-vegetation. The method of restoration will normally consist of returning disturbed areas back to their original contour, reseeding (if required), installing cross drains for erosion control, placing water bars in the road, and filling ditches for erosion control. Potential for erosion will be minimized on access roads and other locations primarily with water bars. The water bars will be constructed using mounds of soil shaped to direct the flow of runoff and prevent erosion. Soil spoils created during ground disturbance or re-contouring shall be disposed of only on previously disturbed areas, or used immediately to fill eroded areas. Cleared vegetation can be hauled off-site to a permitted disposal location, or may be chipped or shredded to an appropriate size and spread in disturbed areas of the ROW with the approval of the biological monitor. To limit impact to existing vegetation, appropriately sized equipment (e.g., bulldozers, scrapers, backhoes, bucket-loaders, etc.) will be used during all ground disturbance and re-contouring activities.	PRE, DUR, POST	To Be Implemented During Construction	SDG&E will implement the project's SWPPP during construction of the White Star Communication Facility.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
G-CM-22:Surface restoration after disturbance	Restoration where ground disturbance is substantial or where recontouring is required	In areas where ground disturbance is substantial or where re-contouring is required (e.g., marshalling yards, tower sites, spur roads from existing access roads) surface restoration will occur as necessary for erosion control and revegetation. The method of restoration will normally consist of returning disturbed areas back to their original contour, reseeding (if required), installing cross drains for erosion control, placing water bars in the road, and filling ditches for erosion control. Potential for erosion will be minimized on access roads and other locations primarily with water bars. The water bars will be constructed using mounds of soil shaped to direct the flow of runoff and prevent erosion. Soil spoils created during ground disturbance or recontouring will be disposed of only on previously disturbed areas, or used immediately to fill eroded areas. Cleared vegetation can be hauled offsite to a permitted disposal location, or may be chipped or shredded to an appropriate size and spread in disturbed areas of the ROW with the approval of the biological monitor.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the site is developed.
G-CM-23:Equipment size	Use appropriately sized equipment	To limit impact to existing vegetation, appropriately sized equipment (e.g., bulldozers, scrapers, backhoes, bucket loaders, etc.) will be used during all ground disturbance and re-contouring activities.	DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no vegetation removal is anticipated.
GEO-APM-8: Avoid risk of landslide damage	Remove or stabilize boulders uphill of structures	During construction, SDG&E would remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage to those structures and would position structures to span over potential landslide areas to the greatest extent feasible.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no boulders uphill of the planned site.
GEO-APM-8: Avoid risk of landslide damage	Position structures to span over potential landslide areas	During construction, SDG&E would remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage to those structures and would position structures to span over potential landslide areas to the greatest extent feasible.	DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because there are no boulders uphill of the planned site.
S-2a: Notify public of utility service interruption	Provide copies of posted public notices of planned outages	Prior to construction in which a utility service interruption is known to be unavoidable, SDG&E shall notify members of the public affected by the planned outage by mail of the impending interruption, and shall post flyers informing the public of the service interruption in neighborhoods affected by the planned outage. Copies of notices and dates of public notification shall be provided to the CPUC and BLM.	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no planned outages are required to construct the upgrades.
S-2b: Protect underground utilities	Submit documentation prior to construction of the underground transmission line	Prior to construction of the underground transmission line, SDG&E shall submit to the CPUC and BLM written documentation, including evidence of review by the appropriate jurisdictions, including the following: <ul style="list-style-type: none"> • Construction plans designed to protect existing utilities and showing the dimensions and location of the finalized alignment; • Records that the Applicant provided the plans to affected jurisdiction for review, revision and final approval; • Evidence that the project meets all necessary local requirements; • Evidence of compliance with design standards; • Copies of any necessary permits, agreements, or conditions of approval; • Records of any discretionary decisions made by the appropriate agencies. 	PRE	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no underground cable will be installed.
S-3b: Use reclaimed water	Coordinate with water districts	To the extent feasible, SDG&E shall coordinate with local water districts in advance in order to efficiently obtain reclaimed or potable water for delivery to the construction sites and to meet any restrictions imposed by them.	PRE	N/A	A Water Use Study has been drafted and was submitted to the CPUC for review on February 22, 2010. However, this mitigation measure is not applicable to the White Star Communication Facility since only a negligible amount of water will be required to complete the work.
S-3b: Use reclaimed water	Provide letter 60 days prior to construction	The Applicant shall provide a letter describing the availability of reclaimed water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.	NTP	N/A	This mitigation measure is not applicable to the White Star Communication Facility since only a negligible amount of water will be required to complete the work.
PSU-AMP-1: Coordination with utility providers	Coordinate with utility providers	SDG&E has and will continue to coordinate with all utility providers with facilities located within or adjacent to the Proposed Project. In the event of a conflict, the project will be aligned vertically and/or horizontally as appropriate to avoid other utilities and provide adequate operational and safety buffering. Alternately, the other existing facilities may be relocated. Long-term operations and maintenance of the project will be negotiated through easement, purchased right-of-way, franchise agreement, or joint use agreement.	PRE, DUR	N/A	This mitigation measure is not applicable to the White Star Communication Facility because the communication tower is replacing existing poles and is consistent with the current use at the site.
PSU-AMP-2: Underground Service Alert	Notify USA 48 hours prior to earth-disturbing activities	Underground Service Alert would be notified a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines.	PRE, DUR	To Be Implemented During Construction	SDG&E will contact Underground Service Alert 48 hours prior to any ground-disturbing activities.
PSU-AMP-3: Coordination with emergency services	Minimize disruption to response times and access for emergency and police services	SDG&E will coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized.	PRE, DUR	N/A	A Traffic Impact Analysis was performed and incorporates coordination of construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized. SDG&E will submit the Traffic Impact Analysis when it is complete. However, this mitigation measure is not applicable to the White Star Communication Facility because no lane closures are required to complete the work.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
F-1a: Develop and Implement a Construction Fire Prevention Plan	Submit draft Construction Fire Prevention Plan 90 days prior to construction	SDG&E shall develop a multi-agency Construction Fire Prevention Plan for the SRPL and monitor construction activities to ensure implementation and effectiveness of the plan. Plan reviewers shall include: CPUC, CAL FIRE, San Diego and Imperial Counties, BLM, CNF, and City fire agencies. SDG&E shall provide a draft copy of this Plan to each listed agency at least 90 days before the start of any construction activities. Comments on the Plan shall be provided by SDG&E to all other participants. SDG&E shall resolve each comment in consultation with CAL FIRE.	PRE	Completed	A Construction Fire Plan, signed by the CALFire Chief, was approved by the CPUC on January 20, 2010.
F-1a: Develop and Implement a Construction Fire Prevention Plan	Receive approval of final Plan 30 days prior to construction	The final Plan shall be approved by CAL FIRE at least 30 days prior to the initiation of construction activities.	PRE	Completed	A Construction Fire Plan, signed by the CALFire Chief, was approved by the CPUC on January 20, 2010.
F-1a: Develop and Implement a Construction Fire Prevention Plan	Implement Fire Plan during construction and maintenance	SDG&E shall fully implement the Plan during all construction and maintenance activities. All construction work on the SRPL shall follow the Construction Fire Prevention Plan guidelines and commitments, and Plan contents are to be incorporated into the standard construction contracting agreements for the construction of the SRPL. Primary Plan implementation responsibility shall remain with SDG&E. At a minimum, Plan contents shall include the requirements of Title 14 of the California Code of Regulations, Article 8 #918 "Fire Protection" (Refer to Section D.15.3), all components of the Semptra Utilities Wildland Fire Prevention and Fire Safety Guide (2007) in Appendix 3D, and the elements listed below: <ul style="list-style-type: none"> • During the construction phase of the project, SDG&E shall implement ongoing fire patrols during the fire season as defined each year by local, State, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods; • Fire Suppression Resource Inventory - In addition to CCR Title 14, 918.1(a), (b), and (c), SDG&E shall update in writing the 24 hour contact information and onsite fire suppression equipment, tools, and personnel list on quarterly basis and provide it to the CPUC, BLM, and to State and federal fire agencies; • During Red Flag Warning events, as issued daily by the National Weather Service in SRAs and Local Responsibility Areas (LRA), and when the USFS. Project Activity Level (PAL) is Very High on CNF (as appropriate), all construction and maintenance activities shall cease. Exception for transmission line testing: A transmission line may be tested, one time only, if the loss of another transmission facility could lead to system instability or cascading outages. Utility and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF; • All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow for immediate reporting of fires. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area immediately upon ignition; • Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crewmembers as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect; • Each member of the construction crew shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats; • Each crew member shall at all times be within 100 yards of a vehicle containing equipment necessary for fire suppression as outlined in the final Construction Fire Plan. 	DUR, POST	To Be Implemented During Construction	This mitigation measure will be implemented during construction.
F-1d: Remove hazards from the work area	Clear and spread onsite dead and decaying vegetation prior to construction and maintenance	The Applicant shall clear dead and decaying vegetation from the work area prior to starting construction and/or maintenance work. The work area includes only those areas where personnel are active or where equipment is in use or stored, and may include portions of the transmission right-of-way (ROW), construction laydown areas, pull sites, access roads, parking pads, and any other sites adjacent to the ROW where personnel are active or where equipment is in use or stored. Cleared dead and decaying vegetation shall either be removed or chipped and spread onsite in piles no higher than six (6) inches.	PRE, DUR, POST	N/A	This mitigation measure is not applicable to the White Star Communication Facility because no clearing of vegetation is required to construct Facility.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	Contribute annually to Powerline Firefighting Mitigation Fund	The Applicant shall contribute an annual sum to local, State, and federal fire protection districts in the project vicinity through the mechanism of a new Powerline Firefighting Mitigation Fund, which shall be organized and carried out by SDG&E, and shall be subject to the oversight of the CPUC for the life of the Fund. Funding shall be used toward fire prevention measures and protection equipment and services, as appropriate to each jurisdiction. An increase in funding for fire prevention and suppression services and equipment will increase the probability of a fire being successfully contained, especially during normal weather conditions, and will therefore partially mitigate the significant barrier the transmission line poses to firefighting operations. The annual sum shall be based on an equivalent fuelbreak mitigation (presented as Mitigation Measure F-3a in the Draft EIR/EIS), which is an alternative means of partially mitigating the significant effect that the presence of the transmission line on firefighting operations, but which would be jurisdictionally infeasible. This shall be \$1,000 per acre for the first year plus \$250 per acre for each subsequent year for the life of the project (in 2008 United States Dollars), based on the number of miles of Wildfire Containment Conflict listed in Table D.15 26 (see below). Should CAL FIRE wish to take over administrative authority for the Powerline Firefighting Mitigation Fund, an administrative transfer shall not be in violation of Mitigation Measure F-3a.	POST	To Be Implemented Following Construction	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	Create and implement a Multi-agency Fire Prevention MOU	A Memorandum of Understanding (MOU) for the SRPL shall be created and implemented between SDG&E and the CAL FIRE San Diego Unit, Cleveland National Forest, and other agencies as appropriate using the existing Southwest Powerlink MOU as a template. The MOU shall be adopted prior to energizing the new transmission line. The purpose of this Multi-agency Fire Prevention MOU is to efficiently coordinate all aspects of agency and utility fire prevention plans and practices. The MOU shall integrate the following components of the utility fire plan with existing agency fire plans: fire prevention, firefighter safety, emergency communication, firefighter training of both ground and aerial utility personnel, and others as appropriate. Financial commitments of each participating organization to pre-fire planning, preparedness, and prevention programs shall be stipulated in the MOU. The MOU shall stipulate the mechanism for defensible space grants distribution (Mitigation Measure F-1e). This MOU shall be periodically reviewed and updated at a minimum of once every five years to accommodate changes in regulations and environmental conditions. A key element of the MOU shall be ensuring immediate transmission line de-energizing during fire emergencies and ensuring adequate and immediate coordination to fire agencies of line de-energizing. SDG&E shall provide all appropriate local, State, and federal fire dispatching agencies with an on-call contact person (Fire Coordinator) who has the authority to shut down the line in areas affected by a fire. The transmission line shall be de-energized prior to and during fire suppression activities within 1,000 feet of the transmission corridor to maintain firefighter safety, and re-energizing shall require notification of all fire agencies.	POST	To Be Implemented Prior to Energization	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to finalize the draft MOU.

Mitigation Measures	Task Title	Task Text	Timing: PRE, DUR, PRENG, POST	Status (Completed, Conditioned, N/A)	Comments
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	Adopt a community education and outreach program	A community education and outreach program on the fire prevention plans and practices implemented by the MOU shall be adopted.	POST	To Be Implemented Prior to Energization	This mitigation measure will be completed before the Project is energized.
G-CM-41: Disposal of excess fill, brush or other debris	Do not dispose of excess fill, brush, or debris within waters of the U.S.	The applicant will ensure that the following conditions are implemented during project construction: Disposal or temporary placement of excess fill, brush or other debris will not be allowed in waters of the United States or their banks;	DUR	To Be Implemented During Construction	This conservation measure will be implemented during construction. There is no preconstruction componenet associated with this measure.
G-CM-41:Disposal of excess fill, brush or other debris	Do not dispose of fuel, oil, coolant, and other wastes within or near waiters of the U.S. Do not fuel vehicles near waters of the U.S.	All equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities will occur in designated areas outside of waters of the United States within the fenced project impact limits. These designated areas will be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering waters of the United States, and will be shown on the construction plans. Fueling of equipment will take place within existing paved areas or designated fueling areas designed to contain fuel drips greater than 30.5 m (100 ft) from waters of the United States. Contractor equipment will be checked for leaks prior to operation and repaired as necessary. "No-fueling zones" will be designated on construction plans and/or within the stormwater pollution prevention plan.	DUR	To Be Implemented During Construction	This conservation measure will be implemented during construction. There is no preconstruction componenet associated with this measure.