



September 30, 2011

Ms. Julie A. Fitch, Director, Energy Division
Ms. Billie C. Blanchard, CPUC Project Manager, Sunrise Powerlink
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: SDG&E Sunrise Powerlink Transmission Line Project – Response to Stop Work Order for

Helicopter Operations

Dear Ms. Fitch and Ms. Blanchard,

I received your September 27, 2011, letter directing SDG&E to immediately suspend all helicopter operations related to the Sunrise Powerlink Transmission Line Project (Project). SDG&E takes this matter very seriously. We recognize the California Public Utilities Commission's (CPUCs) concerns about recent events involving helicopters working on the Project and are continually working to improve and maintain safe construction practices. Safety has been and will continue to be the company's top priority in all of our operations. This project is no exception and has achieved an outstanding OSHA safety incident rate of 1.28 presently

SDG&E is committed to maintaining the highest level of safety and compliance for the Project helicopter operations and construction practices and will comply with the additional training and incident reporting requirements contained in the letter. As you may already know, we had notified other representatives in your office last week of our intent to hold a "safety stand down" to review our helicopter operations and had begun working on several of the items requested. On September 26 and 27, SDG&E and the primary construction contractor conducted two safety stand downs for many of the contracted pilots and construction crews prior to receiving your letter.

Your letter identifies four remedial actions that must be completed to the satisfaction of the CPUC prior to allowing helicopter operations to resume. These actions consist of a safety stand down, rigging training, a restructuring of helicopter operations framework, and enhanced incident reporting procedures. The following provides detailed responses as to how these items have been met.

1. Safety Stand Down - A Safety Stand Down was held for Project employees and contractors including pilots and ground personnel, riggers, personnel working in yards, people at TSAPs, and all other appropriate Project staff members such as monitors and people likely to be transported by helicopter. Safety topics covered with Project personnel during the stand down included: Helicopter Operations, Rigging, Working Below Hazards, Equipment Operations, Fire Prevention & Safety, Vehicle Safety, Hand Injuries and Communications. All Project personnel who participated in the training will receive a hard hat sticker which allows them to be transported on Project helicopters. On all flights, the pilot will verify that each passenger has the appropriate sticker prior to boarding the helicopter. Anyone not

having the appropriate sticker will not be permitted to fly. For Project personnel who were unavailable for the stand down due to illness, vacation or other reason, training will continue be provided and will be required for new field personnel. Only those Project personnel who have completed the training are allowed to fly in helicopters and are issued the appropriate hard hat sticker. Dated sign-in sheets for all safety stand down sessions with the names of individuals who were present, as well as a list of all topics covered, are provided in Attachment A to this letter.

- 2. Rigging Training Rigging Training sessions based on the Apprentice Program for Lineman have been implemented. Training included, but was not limited to, proper and safe rigging practices, inspection of rigging, qualifications for riggers, communications, load ratings and calculations. Hard hat stickers are provided for those Project personnel who are qualified to rig loads. Only these individuals will be permitted to rig loads. All riggers will be monitored by SDG&E's Field Safety Advisors. Rigging will be performed by a Journeyman Lineman, an Apprentice with a Journeyman Lineman present or an individual who has had training through the approved rigging class. Dated sign-in sheets for all rigging training sessions with the names of individuals and all appropriate Project staff members who were present, as well as a list of all topics covered, are provided in Attachment B to this letter.
- 3. Helicopter Operations Framework For those work sites with road access, SDG&E will limit helicopter operations to those activities necessary for emergency response and the assembly of towers and transmission poles (Transmission Structures). Assembly of the Transmission Structures includes the transportation of material and personnel (survey, construction, supervision, monitoring, inspection, public relations and training) required to erect towers, foundations, and wire stringing operations. SDG&E will use ground transportation instead of helicopter transportation where adequate access roads and parking exist to allow safe access to the Transmission Structures. SDG&E will reduce other aerial activities as appropriate to minimize overall environmental and safety concerns. These considerations will include, but are not limited to, time of the day, proximity to homes, public safety, worker safety, potential access restrictions and congestion to a public road or area, condition and width of the existing road and parking area, and potential environmental impacts caused by additional road traffic and vehicle parking.
- 4. **Incident Reporting Procedures** SDG&E submitted a proposed draft incident reporting procedure to the CPUC for review and approval on Wednesday, September 28, 2011. SDG&E also met with the CPUC on Thursday, September 29, 2011, to review the draft procedure. A copy of what was submitted to the CPUC is included as Attachment C to this letter. We will continue to work with the CPUC to periodically review and update the reporting procedures as deemed necessary.

Our goal is to ensure helicopter operations for construction of the Project proceed safely for the benefit of our employees, contractors and the public. I am confident we have met the CPUC's requirements, and we look forward to resuming helicopter operations as soon as possible so that we can finish this Project and bring it online as scheduled in the second half of 2012.

In closing, we agree in reaffirming the importance of SDG&E providing timely information to the local community regarding scheduling and construction activities. It is a commitment we have made to the community, and I believe through our frequently updated web site, our community relations office and our

toll free hotline, we will continue to respond to questions and concerns in a timely manner. I would welcome any feedback if these communications channels have not been accessible or responsive. Thank you for reviewing the enclosed information and we look forward to working closely with you in the future on maintaining safe and effective helicopter operations on the Project.

Sincerely,

Patrick T. Lee Vice President Sunrise Powerlink

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Attachments

Cc: Daniel Steward, BLM El Centro Field Office Tom Zale, BLM El Centro Field Office Will Metz, Forest Supervisor, Cleveland National Forest Susan Lee, Aspen Environmental Group Vida Strong, Aspen Environmental Group Anne Coronado, Aspen Environmental Group Fritts Golden, Aspen Environmental Group Mary Jo Borak, CPUC Supervisor Ken Lewis, CPUC Program Manager Jason Reiger, CPUC Attorney Nicholas Sher, CPUC Attorney Arocles Aguilar, CPUC Attorney Paul Clanon, CPUC Executive Director Bob Jackson, SDG&E Alan Colton, SDG&E Laura McDonald, SDG&E Todd Voorhees, SDG&E Billy Blattner, SDG&E

Attachment A Safety Stand Down Sign-in Sheets

and

Meeting Agenda

Safety Awareness Stand Down for all Sunrise Field Personnel

	He	lico	oter Op	perations		
		1.	Reviev	w of Daily Operating Procedures		
			a)	Plan for day, mission, work location		
			b)	Unique hazards in yards		
			c)	Long-lining		
		2.	Daily E	Briefing and checklist		
		3.	Flight	following and daily Garmin push		
		4.	ATA R	Responsibilities		
		5.	Const	ruction Fly Yard Congestion		
		6.	Passe	enger Loading & Unloading	-	
		7.	Cockp	oit Resource Management		
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	3.	De	signati	ng a fire watch (must be noted on tailboard)		
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	1.	1. Speed (15 MPH limit)				
	2.	Ва	cking c	caution in tight yards		
	На	ind	Injuries			
	1.	Re	view of	fincidents		
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	1.	Pr	oper ha	andling of harassment (project opposition)		
	2.	Ind	cident r	eporting protocol	•	
		a)	Mobile	e phone instead radio for incidents.		
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Safety Training

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City: LAKESIDE	Date: 9/6	18/2011
State: CACIFORNIA	PAR Job Númb	er. 0501491
Foreman: Dove 101)	CON	
Topics for Discussion:	SAFETY AWARENES	S STAND DOWN
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COMMUNICATION	<u>.</u>	LAST 4 DIGITS
•	Attendees:	Social Security No.
Signature this Column	Print Name this Column	Social Security No.
Lugmond fell		XXX-XX- 849C
2 002	Afaina Thomas	
3 La fueta	Scott Hampton	-4813
A. Jak	TIM LANERGNE	V 0 4 × -02 30
5	Gustavo A Oftool	2144
6 6 Piong	Enic Vierott	
me &	MARIO ESTRAPA	7490
8 RAYMOND JUARE	Raymond Digo	-9543
9 Francisco Sancher	Trinico Somme	(288X)
1 RICHARD FELL	2.1111	9975
2 Tem Butt	Kovin Barrett	4462
3 Dars & Clare	ROGER F. CHASE	XX- C105
4 Deserve Brist	Jeremy Smith	1678
15 Hann Andre	Kandy Bucke	9255
16 3 Out	BRIAN ARNOLD	4059
17 June Curto	JIMMY CARTER	4009
18 July Dur	VONATHAN VAUS	9873
19	Tim Kenney	3806
20 gayon	- Change	2700
21 Why Poday	Kuhen Kadrigiel	0 + 17
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City:	LAKESIDE		138/2011
State:	CALIFORNI	PAR Job Núi	mber: 050149/
Foreman	1: DOUG 10		
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l opics ic	or Discussion:	SAFETY AWAREN	ESS STAND DOWN

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House		KELL YONK	3265/
10	Int.	DAVID MOSS	त्यंदी
Di D	1	Richard Fortin	3673
The	To see	REBELLA FLYNN	4696
De Ph	<u> </u>	Ben Rosenbaum	1808
Man	2	MAYA MAZON	रक्ष रेजन
Min	(110An=	IVY Watson	5164
12.61	Oc-ex	Dacre 11 Danes	1061
Patt	lu Pace	Matthew Pace	6346
Alla	1 124	Jeff Rleg,	4868
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City: LAKESIDE		28/2011
State: CALIFORNI.		nber: 050149/
Foreman: Doug 101	XON	
Topics for Discussion:	SAFETY AWARENE	SS STAND DOWN
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PREVENTION, VI	EHICLE SAFETY	LAST 4 DIGITS
COMMUNICATION	Attendees:	LAST 4 DIGITS
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1 Must Res	Mart Slavk	XXX-XX- 6400
11-1-W	CHRISTIAN HENDERSON	0546
3 KAR XVI	Knsey Charmon	M006
4	DIANA COMON	(685)
5 Marile	Howard Sander	6810
6 Curry Man	- Jevan May	8756
7	DHILL PGUM	£50 1056
8 / WASTAD	Mattschafter	2/99
9 Europe	SHERI ARANT	6269
O there may us	Philip marquis	5089
1 M. Dank	MitiMA 1> Duilson	1030
2 Dun Ty	DEAN TERRY	8718
3/12/0 W (1/2)	Potrck w Martin	0510
4 Als Cotts	ALAN COLTON	9764
5 James	Jaime Somers	8732
Charis Villy po	Chrs /2115	
7 matt lill	Matt Iveland	1950
8 grant	Josh Nort	6725
9 Jank	Mark Walley	4/12
20 March Water		6465
22 1 5 Ship	Mike Cassellers &	5809
23 LILA GOLDON		3808
Lusti Vaffe	Dustin Vaugha	8846
-tom-the	Tom thilges	3135
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Safety Training

City: LAKESIDE State: CALIFOR Foreman: Doug Di	PAR Job Numb	0501491
Topics for Discussion:	SAFETY AWARENE	55 STAND DOWN
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Signature this Column	Attendees: Print Name this Column	ONLY LAST HOIGITS Social Security No.
1 Rulyng Reed 2 7/11 Roll Jan 3 Mary Mary	Chris Pack ett	\$128 3803 5863
4 July Super	Desse Symon	983 8497 9884
7 Bet Will Selvered	Tarel Bittancoul Kuneth Kister	7170 3354 7959
12 P2	Bobby Edmonds Derrel Acknys TRANS BURKE	2895 8 696 5328
14 July Oller 15 July Telly	CHRIS COLA Steve Wilson	1838 3557 2339
17 Ken J. Stuss 18 Gen Wydoff 19	GENE WYKOU The WINDOWE	7896 1467 3526
20 21 UV	Ty Wishington Nacho Chin	6907 2113 6213 0308
23 Halle	Joe Gratzer ROBERT BRELOFT	4462 9491 7359
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Class_	Date	Company	Location
SDGE Safety Stand Down	28 Sep 2011	Pro Traffic	Old Highway 80

Name	Signature	Last 4 SS#
JASON TONS	pea	1911
Kory Vandervort	Town Vinna	- 935 l
TURREY PARKER	Fr	1458
Kevin Towns	7- Dure	9182
LORANCE DAVIS	Jul Dis	4735
TRON Brown	Thank	0391
Cueris BEEZLES	61361	6410
James Ulsrewoli,	Groft	3198
SACYTEN PONTAGE	Spir flut	5018
Dinney Robinson	hit 5	0513
Juan Carria	(Jum Serr	6799
les SAMLe &	Darghres	8137
Bevardo Hernandez		6816
Hannah Rodriguez	Hale	2882
Daniel Steffers	Dunden	2869
Rav/Beforcont	Roul Bestinget	17422
Jose Morado	Jas March	B 0704
MARVIN CALDERONS X	MacCala	4734
Donald McGylee	AMI MILL	1212
Man Stuckey	har hard.	7849
Chris Ogren	Chris Open	2973
Barry Medin	Bur Medic	828
Curtis Philport	MATIN	40 00000 1701
case embone	[Cal Kankal)	7904



Class	Date	Company	Location
SDGE Safety Stand Down	28 Sep 2011	Pro Traffic	Old Highway 80

Name	Signature	Last 4 SS#
Social Sotoa	1111	040
Damich Joton	Ilm John	8586
Casey Tiumalo /	KEJI	6110
Aliitama Soboa	() too	0759
Pati Soloa	a y	2150
Kim Genn	Mal 195	3649
Daniel Wins	1900	3690
Francisco Palafox	July	20140
Form Mille	Varan m	and
matt shafer	Mean	9889
Codyerallen	ado elec	H459

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MEETING SIGN-IN SHEET

Project: Sunrise Powerlink Project- Helicopter Meeting **Meeting Date:** 9-28-2011

Facilitator: Mike Manry (Helicopter Base Manager) Place/Room: Gillespie Hangar

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Name	Title	Company	Signature	SSN
Doug Deakins	Pilot	SWANSON GROUP		9068
R. Kinball	Pilar	WINCO	Jeff him	0400
CHRIS SAUNDELS	PILOT	Winco	In landon	9601
Dave Bergin	groundcrew	EAC	Diff.	7229
VICTOR JOHNSON	Prot	FAC		7499
Elleen Marks	STAPF	SDGE	Elon	4281
Robet Pisanesoni	Analyst	506E		0067
MAX EVANS	PILOT	EAC	My Eans	1759
BRAD WARREN	PILOT	EAC	Bud aform	5/2/
GARY ROBBINK	PILOT	CORPORATE	San V.	0054
PAT WHALEY	PILOT	HELLOWEST	At Whaley	7887
MIKE MOPHEE	PILOT	HELIQWEST	fort Miller.	6972.
DEREK MElintax	PiLOT	HELT QUEST	Tom	7726
. ~	Priot	Conporate	an-	4929
John Gibson	Pilat	Summit	-flyl	0219
CHARLEYCOMORIUS	PICOT/MECH	SUMMIT	Milyell	5689
PAUL E. HOWE	Pilot	SUMMIT	P.S. House	1867
TONY BOWEN	PILOT "	CORPORALO	made	5920
GREG MATISON	PILET	CHERRY	And As	9872

Facilitator: Mike Manry (Helicopter Base Manager)	Place/Room: Gillespie Hangar
Project: Sunrise Powerlink Project- Helicopter Meeting	Meeting Date: 9-28-2011
MEETING SIGN-IN SHEET	

(last four digits) SSN Name Title **Company** Signature Chris Akin Alot Winco Vin Corey PM Erickson 7880 Plot EAC 5647 Consultant Larry Pravenik EAR 4397 KRESSER DAVID PLI mtn Pia Don Anderson 4301 EAC PILOT MATT PRACH P1105 6560 SMB VIE WARD PILOT MT AIR Iom Brand Hel advisir SDG+E 5976 KANDY LYLE Hel Advisor SDIFE 7826 Deeleuthe Coordinator 5 DGE 9728 Stephen McHabb Aviation Safety 3942 SOGE Black Houle KEN KrAUSS Pilot 8545 Helicopters Corporate Manely Patterson VP, OPS 9388 Roland Rock PAR SARET DIRECTOR 8925 ALAN COLTON 9764 SDGEE MGE. SDGEL Heli Quest Heliques 1 Glenn Comus 432> CORPORATE JARNER SHEPARD 0540 PILOT HELICOPTERS

Facilitator: Mike Manry (Helicopter Base Manager)	Place/Room: Gillespie Hangar	
Project: Sunrise Powerlink Project- Helicopter Meeting	Meeting Date: 9-28-2011	
MEETING SIGN-IN SHEET		

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Name	Title	Company	Signature	SSN
DWIGHT JONES	Tresident	Mtw. Ain Heli		1845
Matt Richter	Pilot	Mth. Air Aeli	(me)	6471
SIEN MARKWE	Manager	PAR		0557
HAROLD SKAAR	P120T	WINCO	Herold Skaan	4932
anin russel	PILOT	CORP.	hal	4139
Sason Altselmer	Pilot	14mberline	gallen	1346
Bran JORGENSON	P:/0+	Timber line	Bir Jorgan	0514
Brian Flaming	SUNTISC BEAC	SDGE	BILL	6207
Patty Sullivan		DR HENAHY (3 de Su	3511
Mike Mary	HEW	SD4'45	Mil Hang	7792
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MEETING SIGN-IN SHEET Project: Sunrise Powerlink Project- Helicopter Meeting			Meeting Date:		
Facilitator: Mike Manry (Helicopter Base Manager)					
Conference Call Participates	Tichcopter base manag	GI)	Place/Room:	Gillespie Hangar	// . c . !! !! \
Name	Title	Company	Signature		(last four digits)
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Myles Elsing					
Jim Woodaman					
Mike McKinney					
Riki Moore					
Morgan Kozloski					
Dave Barn ett					
Eric Weaver				•	
Randy Irwin		·			
Mike Scheel					
Ivor Shier					
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CTORS, ELECTRIC

1010 Tayern Rd Building #3 Alpine Ca 91901 816-949-1012 – Fax 619-445-4009

Safety Meeting

Page 1

City SWAT YARD Date 39-28-11

Topics SAT	sta	STAN	DEDOWN
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Signature	Print Name ARTHOLIAND	Last Four of SS# Par only SDGE
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SCOTT Joeg ers	200 Jones	4810
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Doub Shows	Sarah Shriver	522
Jan M Cuha	JAMES M (RENGHAM)	1790
Ton Quickey	Tom QUIGLEY	4725
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	A Quanta Services Company	





ELECTRICAL CONTRACTORS, INC.

. 10	310 Tavern Rd Building #3 Alpine Ca 91901 816-949-1012 — Fax 619-445-4009	Last Four of SS#
Signature	Print Name	Par only
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CTORS, ELECTRICAL

1010 Tavern Rd Building #3 Alpine Ca 91901 816-949-1012 – Fax 619-445-4009

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	Safety Meeting	Page 1
City SWAT YARD Date OG	7-28-11	
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fright de	Ryan WAvis	
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4-1	Michael Peterson	
Jan Markell	Scott RANdall	
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A Quanta Services Company



ELECTRICAL CONTRACTORS, INC.

1010 Tavern Rd Building #3 Alpine Ca 91901 816-949-1012 – Fax 619-445-4009

Safety Meeting

Page 1

City SWATGARD Date 09-28-11
Topics SAFETS STAND DOWN

Signature	Print Name	Last Four of SS# Par only
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111	Maffher Schule	
	Maz Ahvari	
Alland.	Stacy Warner	
The state of the s	Petetibhetima	
Star W/M	Steve Volan	
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al n	Alex Barren	
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ELECTRICAL CONTRACTORS, INC

1010 Tavern Rd Building #3 Alpine Ca 91901 816-949-1012 – Fax 619-445-4009

City Sup That Date 9-28-11

Topics SAFETU STAND LOURING

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Signature	Print Name 1, 40 The RHORE	Last Four of SS# Par only
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Session Date: 9/29/2011 Alpine KQ 9:30-11:00 Am

LAST	FIRST	SIGNATURE	COMPANY
CALCAGNO	MIKE	mary	SOCIE
MXHCUM	Editti	Ediennas	ASM
Trexel	LUNN	Kynn Freigel	SDGIE
Blackwood	Sherise	Sharge Blackwood	BV
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Beach	Tracy	7,782	BV
Brown	James	mans 10	SPGE
Leyre	Richard	Hickory Layer	SDERE
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Konrad	Paul	Paul m. Kouras	Chambers
Farmer	April	Spal	TRC Solutions
FREMO	DAVE		BUINSMC
SHUSTERMAN	B0(215	Buller	BURNSMC
Michael	Melinda	mel Muharel	SDGSE
am Wight	ames	Mmx Lylit	ECI
AlsBrodes	VAUID		BoMc
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Bunting	Dave	Dan Bunton	Nolte V5
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Session Date: 9/29/11

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MULLIGAN	MARGIE	1 mx R 200	CHAMBERS
HALLER	RODNEY	1/1/19/1/11	TRC
Taylor	Kim	Fen Taylor	SOGE
CHAYEZ	BRIANNA	Dixra Orguez	BMCD
VITALE	MARIO	hilps	- SDGE
Primrosp	Brant	Buth	- Chambers
BORUTER	ANOREN	ALPA	AMEC
Marks	Fileen	& Mino	SD6E
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Payne	Brian	Brium Paugue	Chambers
Buchanan	Buck	S. S.	- Geosyntec
COOPER	TRAUS	Tox low	Chambers
Novik	Victor	West Mad	Chumber
LOHSTROH	BIRIAN	Burns Fac	Chambers
DIPACLA	TRISTA	Topul	chanh
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Bren.+	Riemer	Ash.	CHANTSELES
Shane	Valiere	Showai	
Smith	Jell	AMM AW	Chambers borns & McDoynell.
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Session Date: 9/29/2011

LAST	FIRST	SIGNATURE	COMPANY
Balfour	Donald	Sadd Bake	SDGE
Schuling	MICHAEL	ANT	SPGE
FINO	COLLEEN	Holl to	SDGE
MYCOCO	SAMANTHA	GWX M	SDE
WHITNEY	JEFF	1:2/12	506+E
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BELL	Hybert	1 All	SDGE
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Parmar	Snoha	I will	SNGDE
LOPEZ	JOSE	11 Ao/	=DG&E
Skidmore	Savarah	Squarah Skidmore	Chambers
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Robinson	Michael	signed Paris	Chambers
Gray	Ryan	Many	Geosyntec
Adams	John	Filgury	Geosyntea
Yn	Alfred	Villey	Lopez
Howard	Phillip	Jest H	Chambels
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Rowland	Scott	SMINA	Pangea
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GALATE	MARK	Mak Galak	GEOSYNTEC
WOLDBHICHAEC	YONAS	Mille	506G
Cummings	Gretchen	Lyttchen Cummings	Chambers
Cobb	Henry	Alcary 10	SDGE
murphy	Lisa	Sochy	50GE (04906)
TRACHUK	PETE	Fig M. Dhur	SDG&6
RICHARDS	KEITH_	1	SOCYE

OHLIS GREENE	Fugger Lewis	DANE LOKA	Java Maring	Michael Klein	Dean OwenSIGE	Edward Sullivan	JOSEPH RATURE	D877 M//s	ERIK WATERS	Ricky Hlock	WILLEAM SHIELLEY	Jacob Pickett	Eric Ball	Prici Generice	NAME:	A OURNA SERVES SONBANG	DAY.
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	Jesús E. Almarez		David Woody	FERN BOFFMAN	MARK Foster	Gary Collins	TERRY PAINER	Tun WAII	Report Yours	Kerry Mort	late B. Murphy	Jaron Howse	Justin Tehringon	Lucette AKin	MAT HAY DEN	, NAWE	A O MANUA SERVEE COMPANY	PAR
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SAFETY AWEARNESS STAND-DOWN 9/29/2011

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Session Date: 9.30.11 Alpine HQ; 01-310

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LAST	FIRST	SIGNATURE	COMPANY
Chilvers	Brenda	Dieuda Chilles	80636
Nussbaum	Paul	14/4M2	SPG+E
Garcia	Alhonso	CAL SO	SDG \$E
PADILLA	RIBOBERTO		SDEAE OSS81
GIBSON	Jim	Jim Show	Burns + MeD
Parmar	Sneha	1 mm	SOGRE
Ellio14	Cody .	any a	TieRRA
Coyle	Stephanie	Sephane Goyle	SBGJE
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MUNZ	BEN	Ma you	
Vahencia	Tom	Thank lat	TRC
Francis	Bryan	21	BMCD
Osuna	Patry	Jena	SDGSE
Franz	Harry	Man Just	SDGAE
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Session Date: 9.30.11 Alpine Ha; 01-310

LAST	FIRST	SIGNATURE	COMPANY
BRYANT	Tamara	Pamara J. Bujart	Chambers Group.
CONZALEZ CARELL		- Haraging at	AECOM
Boudreau	Jacqueline	000	Chambus Group
Gorman	"haurie" (laura)	Samtan	Chambers Group
VETTES	CHARLES	C. Hellie	CHAMBERS GROUP
Baez	Rachelle	Middle R. Mass	SDGEE
Haines	Rick	July / Jan	SDG&E
Lohren 2	Kahoru	Calm So	SDGYE
KHONG	KRISTI	1 estilline	5D64E
Butler	Casey	Gase Wish	SOGRE
HIRT	GARY	Nome	AMEC
FOSTER	Robert	1 Maly & forth	SDEDE
AMARE	EYASU.	a distribution	20088
Lakazione	Tyresa	pesa Lacayne	SOGG
Taylor	Renet	Menin aux	SPGJE
FIRENZE	Mich A-el	Mithael Things	SDGGE
Valencia	Tom	Thomstar	TRC
MUNZ	Ben	1/1/2	BM.D
Osuna	Patry	DOSanne	806 TE
Sanford	Denis	non Sulle	87068
Property	Robert		- SPGE
TSusby	Darini	No B	Chamber
Steyers	Andrew	Meltin	Chambers
Evans	Tammy	Tarmy & gran	Chambers
FRANCIS	BRYM	7/10	BMCD
Rogers	LAMBRIA	Mustria Mocers	SDOPS
Giobbi	Alexandria	Attor Solls.	SDGE.
Korstad	Ann	and Bolorof	Buren Veritas
OLIVER	DONOVAN	D. ank (In-	SDGIE
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SUNRISE SAFETY STAND DOWN - SIGN-IN SHEET - ROUGH ACTES
Session Date: Sept 30,2011 - 6:30 p.m.

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Attachment B Rigging Training Sign-in Sheets

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Training Syllabus

Sunrise Powerlink - Qualified Rigger Training

<u>Purpose</u>: Training for all project employees tasked with removing, supporting, and lifting loads using rigging techniques and equipment. It is the intent of PAR Electrical Contractors Training Group for all employees that work with rigging equipment and perform rigging tasks to have an understanding of rigging hazard awareness and the principles behind safe rigging practices.

Listed below are the instructional objectives of this training.

Basic requirements for rigging inspection

- Wire Rope
- Web Slings
- Fiber Rope Slings
- Chain Slings
- Shackles & Eye Bolts
- Blocks

Safe Rigging Practices

- Hitches
- D/d Ratio
- Sling Angle
- Rope & Splices

Load Calculations

- Load Angle Factor
- Determining Weights
- D/d Ratio
- Center of Gravity

Outline of Training Content

- 1. Basic Formulas
- 2. Pre-Quiz
- 3. Define and Discuss the requirements mandated by OSHA
- 4. Equipment Inspection of rigging hardware
- 5. Wire rope care, use, and inspection
- 6. Synthetic Web Slings care, use, and inspection
- 7. Shackles
- 8. Eye Bolts
- 9. Hooks & Snatch Blocks
- 10. Chain Slings care, use, and inspection
- 11. Fiber Ropes care, use, and inspection
- 12.D/d Ratio
- 13. Ropes and Splices
- 14. Hitches
- 15.Sling Angle
- **16.Load Calculations**
- 17. Sunrise specific rigging requirements/protocols
- 18. Final Quiz

HELICOPTER RIGGING TRAINING TOPICS

- On-the-ground rigging shall be performed only by a certified lineman, an apprentice lineman under direct supervision of a certified lineman, or an individual who has been trained through the approved rigging class.
- The helicopter rigging crew is responsible for communications with the pilot before each day's lifting operations begin. A review of lifting practices, procedures, long line conditions, and load conditions scheduled for lifts will be discussed.
- Whenever there is a pilot change and /or a change to the rigging crew all lifting operations must stop and communications between the new pilot and/or crew must address the rigging practices and procedures for that day's lifting operations.
- Rigging crews will insure that appropriate netting is used for sling operations and the load does not exceed rated load capacity of the netting being used for that specific lifting operation.
- Rigging crew will inspect the conditions of lifting slings, eyes, pins, shackles prior to any lifting operations and record inspections daily.
- Rigging crew will inspect the lifted loads for twisted rigging, twisted hooks, clevises and check and insure that the clips on the lifting hooks are in the closed position.
- Effective communications are required for all site arrivals of helicopter loads. All employees at the site must communicate with each other of incoming loads and insure safe practices for the load delivery are followed. All employees not involved with lifting and drilling operations must gather in a predetermined safe zone in full view of the helicopter pilot and rigging crew during lifting operations.
- Rigging crew will insure that all lifting equipment is rated for the load that
 is to be lifted by the helicopter and the long line being used.

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5 Rus/ Flores	Roul Flores	6697
6 Jan L R.	Dose R Rivera	5960
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8 Lelan Rason	LELAND RABON	5939
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Attachment C Draft Event Reporting Procedures

Sunrise Powerlink Communication Protocol for Reporting Unanticipated Events

1. Purpose of Protocol

The construction of the Sunrise Powerlink Transmission Project (Project) involves the efforts of thousands of individuals from numerous organizations working together safely and effectively over a vast and often remote geographic area. As a result, unanticipated events may occur that impact Project personnel, public safety, as well as other resources. With so many individuals and organizations involved in the Project, there must be a clear plan for communicating the occurrence of, and the circumstances surrounding, these unanticipated events. Many, but not all, of these unanticipated events are reportable to one or more government agencies under the Project's permits, approvals, or existing regulations. The purpose of this protocol is to provide clarity on reporting actions that are requested by the California Public Utilities Commission (CPUC) when an unanticipated event occurs on the Project.

2. Responsible Personnel

In order to minimize the number of reporting personnel and simplify the communication structure, the following individuals will be the main points of contact for communications internally and externally for these unanticipated events:

- Bob Jackson Operational Issues For all events that fall under the category of safety or
 operational issues, Robert (Bob) Jackson (General Manager and Director Construction and
 Engineering) will be the principal point of contact for SDG&E and the Regulatory Agencies.
- Alan Colton Environmental Issues For all events that fall under the category of environmental issues, Alan Colton (Manager Environmental Services) will be the principal point of contact for SDG&E and the Regulatory Agencies.

As needed, Bob and Alan will substitute for one another to maintain a single point of contact desired by the government agencies with jurisdiction over Project activities.

3. Reporting Responsibilities

The timely reporting from the field to Sunrise Base of actual and potential events is critical to SDG&E's ability to mitigate risk and ensure safe and compliant operations. Consequently, SDG&E empowers—and requires—all employees and contractors to report immediately improper work practices or events. This requirement applies to all workers including, but not limited to, pilots, monitors, equipment operators, laborers, and management employees.

This reporting requirement is not intended to be punitive, meaning anyone reporting a potential or actual event will not be subject to any retribution for reporting.

SDG&E understands that its contractors and their employees may have additional reporting requirements as dictated by other agencies including, but not limited to, the Federal Aviation Administration (FAA), National Transportation Safety Board (NTSB), and Occupational Safety and Health Administration (OSHA). Notification to SDG&E as described above, in the most expeditious means possible, shall be a requirement for contractors and their employees.

4. Reportable Unanticipated Events

Reportable unanticipated events under this Protocol may be advisory, compliance, or non-compliance occurrences and are described in two categories.

<u>Category 1</u> – Any time SDG&E or its contractors/subcontractors notify a government agency of an unanticipated event, SDG&E will also notify the CPUC, the Bureau of Land Management (BLM), and/or the United States Forest Service (USFS), as appropriate.

<u>Category 2</u> – Unanticipated events that are not otherwise Category 1 events include, but are not limited to the following:

- 1. Any inadvertent releases. (Including any substantial portion of a load.)
- 2. Any allegation of and/or confirmed bird strike.
- 3. Any non-reportable main and tail rotor blade contact.
- 4. Customer complaints related to allegations of residential overflights with external loads.
- 5. SDG&E respectfully requests clarification on additional events, if any, when the CPUC would request a report.

5. Compliance Levels

Project compliance and non-compliance event levels and specific corrective actions are defined in the Mitigation Monitoring Compliance and Reporting Program (MMCRP) and are included below:

- <u>Advisory Level.</u> Activities or actions of a third party not associated with the Project but in
 proximity to Project personnel or work areas (e.g., fires, harassment of Project personnel by the
 public, and public citizens putting themselves in harm's way to photograph Project activities).
 No corrective action or follow-up is necessary.
- <u>Level 0 Compliance</u>. This level indicates that all mitigation measures, permit conditions, or applicable regulatory requirements are being complied with and there are no violations.
 Examples of Level 0 events may fall into a number of categories including, but not limited to, safety incidents occurring on the ROW resulting in an OSHA recordable injury or minor spills. No corrective action is necessary.
- <u>Level 1 Non-Compliance</u>. This level indicates that one aspect of a mitigation measure, permit condition, or applicable regulatory requirement has not been complied with resulting in only partial implementation of a mitigation measure, but no significant impact. An oral warning shall be issued to SDG&E's Environmental Coordinator (or assigned designee) and corrective action

- shall be required within a stated maximum period, to be determined by the CPUC EM. If corrective action is not taken within the stated period, a Project Memorandum will be issued.
- Level 2 Non-Compliance. This level indicates that one or more aspects of a mitigation measure, permit condition, or applicable regulatory requirement have not been complied with, making the requirement ineffective and resulting in minor impacts. If allowed to continue, this non-compliance could result in a significant impact over time. An oral warning followed by a Project Memorandum shall be submitted to SDG&E's Environmental Coordinator (or assigned designee). Corrective action shall begin by the next construction day. If corrective action is not begun by the next construction day, a Non-Compliance Report shall be issued.
- <u>Level 3 Non-Compliance</u>. This level indicates that one or more of the aspects of a mitigation measure, permit condition or applicable regulatory requirement are not complied with and the implementation of a mitigation measure, permit condition, or applicable regulatory requirement is deficient or non-existent, resulting in significant impact(s), or there is immediate threat of major, irreversible environmental damage or property loss. An oral warning, followed by a Non-Compliance Report, shall be submitted to SDG&E's Environmental Coordinator (or assigned designee). Corrective action shall begin immediately.

6. Reporting Process

After a Reportable Unanticipated Event occurs, the following steps must be followed as expeditiously as possible:

- 1. Project and contractor personnel who witness a potential Reportable Unanticipated Event will notify Sunrise Base or their work-related/immediate supervisor for the day (e.g., Contract Administrator, Link Lead) who will notify Sunrise Base. Sunrise Base will notify Bob Jackson and Alan Colton of the alleged Reportable Unanticipated Event.
- 2. Once the event is verified, Bob Jackson or Alan Colton will provide initial verbal notification to the CPUC and other government agencies, as appropriate.
- 3. SDG&E will call and/or submit a Preliminary Notification Form to the appropriate distribution list in Section 7, below.
- 4. SDG&E and/or PAR will investigate the event to verify preliminary information and gather additional information, if any, to determine how to properly characterize the event and whether any further action or notification is required. See Section 8 for the report templates.
- 5. SDG&E will provide the CPUC and other government agencies, as appropriate, a final notification of the findings, if required.

7. Distribution Lists

- 1. Notification of **Construction Operations** Events to outside agencies:
 - a. On Private/State Lands or BLM Lands -
 - i. Initial Phone Notifications
 Billie Blanchard, CPUC (Responsible Party Bob Jackson)

Tom Zale, BLM (Responsible Party – Bob Jackson)
Cassandra Garza, Aspen (Responsible Party – Rachel Briles)

b. On USFS Lands

i. Initial Phone Notifications
 Billie Blanchard, CPUC – (Responsible Party – Bob Jackson)
 Tom Zale, BLM (Responsible Party – Bob Jackson)
 Brian Paul, USFS (Responsible Party – Bob Jackson)
 Cassandra Garza, Aspen (Responsible Party – Rachel Briles)

2. Notification of Environmental Events:

- a. On Private/State Lands or BLM Lands -
 - i. Initial Phone Notifications
 Billie Blanchard, CPUC (Responsible Party Alan Colton)
 Tom Zale, BLM (Responsible Party Alan Colton)
 Cassandra Garza, Aspen (Responsible Party Rachel Briles)
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 Tom Zale, BLM (Responsible Party Alan Colton)
 Brian Paul, USFS (Responsible Party Alan Colton)
 Cassandra Garza, Aspen (Responsible Party Rachel Briles)

8. Report Templates

SUNRISE POWERLINK: PRELIMINARY - UNANTICIPATED EVENT NOTIFICATION FORM

Corps of Engineers File Number: SPL-2007-00704-SAS State Water Resources Control Board File Number: SB09015IN Department of Fish and Game Notification Number: 1600-2009-0365-R5

Date Filed:	#.#.2011						
Date and Time of Event:	#.#.2011; #:## a.m.						
Event Location:							
Aircraft Involved:	Y/N or Company, Tail Number, and Pilot Name						
Injury or Damage:	Y/N or Unknown. If yes, describe.						
Reported by:	Robert Jackson General Manager and Director – Construction and Engineering Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116 rcjackson@semprautilities.com Alan Colton Manager Environmental Services Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116						
Immediate Notification by Phone to:	acolton@semprautilities.com Billie Blanchard, CPUC - #.#.2011; #:## a.m. Tom Zale, BLM - #.#.2011; #:## a.m. Brian Paul, USFS - #.#.2011; #:## a.m. Cassandra Garza, Aspen Environmental - #.#.2011; #:## a.m. [OTHER]						
Brief Description of Event:	The following information is neither complete nor verified. An investigation is ongoing. A subsequent and/or amended report may be submitted upon verification of details, if required.						
Confirmation of Receipt	If you acknowledge receipt of this form and no further action is needed, please retain for your records. If, however, you would like additional information to determine regulatory action needed, please contact Rachel Romani Briles, SDG&E, Environmental Compliance Project Manager, Sunrise Powerlink Project: 858-636-6865 (office) 858-750-0754 (cell) rromani@semprautilities.com						
Diatribution List.							

	Rachel Romani Briles, SDG&E, Environmental Compliance Pro Manager, Sunrise Powerlink Project: 858-636-6865 (office) 858 (cell) rromani@semprautilities.com							
Distribution List:								

SUNRISE POWERLINK: FINAL - UNANTICIPATED EVENT NOTIFICATION FORM

Corps of Engineers File Number: SPL-2007-00704-SAS
State Water Resources Control Board File Number: SB09015IN
Department of Fish and Game Notification Number: 1600-2009-0365-R5

Date Filed:	#.##.2011					
Preliminary Notification Date	#.##.2011 (See attached form.)					
Date/Time of Event:	#.##.2011 at ##:## p.m.					
Event Location						
Reported by:	Robert Jackson General Manager and Director – Construction and Engineering Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116 rjackson@semprautilities.com Alan Colton					
	Manager - Environmental – Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116 acolton@semprautilities.com					
Originator/Reporter:	Name Role on Project Phone and e-mail address					
Witnesses:	Name Role on Project Phone and e-mail address					
Responsible Department(s)	Aviation (Beige section below) Construction/Operations Environmental Public Affairs Safety Waters of the U.S./State (Environmental) (Blue section below)					
Aviation						
Aircraft Involved:	Company Tail Number Type Pilot Name(s)					
Waters of the U.S./State	Must be submitted within 24 hours of incident.					
Effect on Waters of the U.S. and/or Waters of the State	The impacts of this incident are temporary in nature. A restoration assessment will be conducted as soon as possible. A restoration plan will be implemented as soon as feasible.					

Location:	Mapsheet #	Structure or Facility	Water #					
Location.								
UTM or Other								
Coordinates								
Detailed Description of Event:								
Type of Project Impact	Permanent impact							
Associated with incident	Temporary impact							
	Other (Explain)							
Injuries or Property Damage	Y/N or Unknown. If yes, describe.							
Applicable Permit/								
Mitigation Measure								
Compliance Level	CDC05111		to dita of a fact.					
Corrective Action(s)		very seriously and is commit ng corrective actions will oc	· -					
Follow-up Required								
Attachments								
Confirmation of Receipt	If you acknowledge receipt of this form and no further action is needed, please retain for your records. If, however, you would like additional information to determine regulatory action needed, please contact Rachel Romani Briles, SDG&E, Environmental Compliance Project Manager (###-###-#### and email address)							
Distribution List:	. 🗆	🗆						

FINAL

Mitigation Monitoring, Compliance, and Reporting Program

Sunrise Powerlink Project

Prepared for: California Public Utilites Commission U.S. Bureau of Land Management

Prepared by: Aspen Environmental Group



November 19, 2010

3.0 Communication

Communication is a critical component of a successful environmental compliance program. In order to avoid project delays and possible shut-downs, environmental and construction representatives will need to interact regularly and maintain professional, responsive communications at all times. Similarly, SDG&E representatives will need to coordinate closely with CPUC EMs to address and resolve issues in a timely manner. Therefore, this section of the MMCRP provides a communication protocol to accurately disseminate information on on-going surveys and mitigation measures, construction activities, contractors, and planned or upcoming work to all levels of the project.

3.1 Pre-Construction Compliance Coordination

SDG&E is required by the terms of the mitigation measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. During this pre-construction process, SDG&E has been conducting meetings, conference calls, and site visits with technical representatives of the Aspen Team, the CPUC and other agencies, and SDG&E's environmental representatives. The purpose of the pre-construction coordination process has been to discuss document submittal status, document the findings of data reviews and jurisdictional agency approvals, review SDG&E submittals, and document the status of mitigation measures as they apply to the project or phased project segment. The goal of the pre-construction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue Notice to Proceed authorizations for each segment.

Pre-Construction Activities

A pre-construction meeting was held on March 18, 2009 with the CPUC, BLM, SDG&E, and CPUC EMs to review the MMCRP and mutually agree upon the project's communication protocol. Based on discussion at the meeting and ongoing input from each party, this MMCRP has been updated. Other preconstruction activities include the following:

- On May 20, 2009, an introductory meeting was held with the BLM, USFS, State Water Board, and the CPUC and Aspen Team representatives.
- The Cultural Resources Survey Plan has been finalized after a series of meetings with tribal representatives and agency input and comment on the plan itself. The cultural resources surveys were completed in September 2009.
- SDG&E has been coordinating with the USFS to prepare required supporting documentation (Biological Evaluations, Management Indicator Species Reports) and to finalize routing details.
- SDG&E has been coordinating with USFS and Aspen Team visual specialist to define tower colors.
- SDG&E's biologists are completing protocol surveys for species of concern.
- Periodic discussions between SDG&E, CPUC, BLM, USFS, and Aspen Team representatives have been held to clarify implementation requirements and a meeting was held on August 31 and September 1, 2009.
- On November 4, 2009, a meeting was held between SDG&E, CPUC, BLM, USFS, State Water Board, CDFG, City and County of San Diego and Aspen Team representatives to discuss final engineering/routing, construction design plans, and agency coordination.

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3.2 Agency Compliance Website

An interactive website is being set up to make available current versions of reports, maps, and other documents prepared for mitigation compliance. The purpose of the website is to facilitate sharing of data and status reports, which change on almost a daily basis, especially during the pre-construction period, but also during project construction.

The website will be available to all interested Lead and permitting agencies (see Table 1). Access will be by assigned password and email address.

The website will include the following documents:

- Action Item table, tracking status of submitted items and items to be completed by various parties.
- A status table, tracking status of compliance with each mitigation measure.
- SDG&E's current versions of project design drawings and maps.

3.3 Communication Protocol During Construction

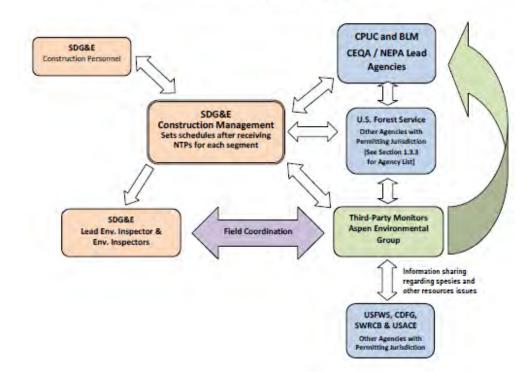
In order to ensure that the CPUC EMs can get accurate information on ongoing surveys, construction work, and schedules, and that SDG&E management is kept in the loop, the following protocols have been formulated:

- The CPUC EM's primary point of contact will be SDG&E's lead environmental monitor. If he/she is
 not available, the construction segment environmental monitor will be the point of contact. If issues
 can't be resolved at the EM/SDG&E environmental monitor level they will be initially elevated to
 CPUC EM Project Manager/SDG&E Mitigation Monitoring Coordinator via e-mail or telephone.
- SDG&E will inform environmental monitors of all survey and construction activity, including status of
 permits and activity locations in a timely manner. Timely notification of activity is that which allows
 reasonable response time for agency monitors to be present for that activity. Notification will
 correspond to organization and roles for each entity as identified in Section 2.1.1.
- The CPUC EM and any other designated agency representatives or staff can talk to anyone on the
 construction site to ask questions about their activity, but the construction personnel may opt to refer
 him/her to the construction segment manager for an answer. Construction segment managers are the
 appropriate contacts for information on construction activity schedules or construction practices.
- SDG&E will provide a list of all construction monitoring personnel and segment managers, identified
 by segment, title, and contact information for each person. Updated distributions will be utilized to
 keep all parties informed of monitor and staff additions/changes. This list of personnel, and all subsequent updates, shall be distributed to all persons on the list throughout the construction process.
- CPUC EMs will continue to point out compliance concerns first to SDG&E and SDG&E environmental
 monitors and give them time to contact resource agencies and resolve compliance before contacting
 resource agencies directly. Documentation of each of these communication efforts, along with documentation of subsequent actions to achieve compliance, will be reported. However, at any time when
 the CPUC EMs have an unresolved concern about compliance, the SDG&E environmental monitors
 and CPUC EMs will call the appropriate resource agency together to discuss the issue.
- The resource agencies will be notified immediately by SDG&E of any issues (e.g., non-compliance events, special status specie sightings, etc.) regarding their respective resources. In addition, the CPUC EM will also receive immediate notification. Subsequent to immediate agency notification, SDG&E will develop

a plan to handle the situation and will follow up with the respective agencies to explain their strategy and receive agency approval.

- SDG&E will submit a timely report of unanticipated events, as described in Section 4.0, that may
 occur during construction.
- If "take" is imminent or there is a danger/hazard, the CPUC EM can request work to be stopped in that area immediately (as long as it can be done safely); this request should be made to the construction segment manager or the segment EM. At any time, anyone can order an activity to be halted temporarily if take or a hazard is imminent.
- Weekly conference calls will include a discussion of construction and compliance activities, with CPUC EMs, SDG&E lead environmental monitor, and agency staff participating.
- The first flowchart below illustrates how information generally flows during construction.

General Communication Protocol During Construction



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The following list and flowchart below take the communication protocol laid out in the flowchart above and further illustrates an example of the communication process that would occur when the CPUC EM identifies a non-compliance event regarding biological resources during construction. If no sensitive species or resources are affected by the non-compliance event, Steps 5 and 6 would not be required. A non-compliance event regarding other environmental resources would involve other applicable agencies. Section 4.1 discusses Mitigation Measures Compliance and Reporting and non-compliance events.

- Step 1. Verbally notify SDG&E and request immediate correction.
- Step 2. Inform CPUC/BLM of status and USFS if on CNF land.
- Step 3. Prepare written Non-Compliance Report (NCR) and give it to SDG&E.
- Step 4. Inform CPUC/BLM of the NCR. Request a Stop-Work Order from CPUC/BLM if required.
- Step 5. Inform applicable resource agency if non-compliance actions have the potential to harm an environmental resource or species.
- Step 6. Resource agencies may order work stoppage and development of strategy for successful resource/species protection.

Communication Protocol During Construction Non-Compliance Events STEP 1. Verbally notify CPUC/BLM of status, Third-Party Monitor CPUC and BLM SDG&E and request immediate correction (CPUC EM) becomes aware and USFS if on CNF CEOA / NEPA Lead Land of non-compliance event Agencies SDG&E Construction Management U.S. Forest Service Other Agencies with Permitting Jurisdiction **Environmental Inspectors** Third-Party Monitor |See Section 1.3.3 (CPUC EM) notes that nonfor Agency List) STEP 4. Inform compliance event is not CPUC/BLM of NCR. nediately corrected. Request Stop-Work STEP 3. Prepare written NCR Threats to protected order from CPUC/BLM and give to SDG&E. Request species may exist. if required Stop-Work order from CPUC/BLM if required. STEP 5. Inform USFWS &/or CDFG of species concerns if non-compliance actions have potential to harm protected species. CPUC and **USFWS & CDFG** Coordination RIM STEP 6. Resource agencies may order work stoppage and development of strategy for auccessful species protection.

3.4 Weekly Progress Meetings During Construction

SDG&E will conduct weekly field meetings with construction managers, contract administrators, contractor supervisors, and SDG&E's environmental representatives to discuss work completed, work anticipated for the following period, and the status of mitigation measures. The weekly field meetings will also be a forum for discussing environmental compliance issues or concerns with the construction contractors. SDG&E may request CPUC's and any other agency's EM(s) to participate in the meeting to help resolve any issue that may have arisen during the previous period. Alternatively, SDG&E or CPUC's EM(s) may recommend a separate meeting to discuss mitigation, variance requests, or other project related issues. These meetings may be held at the field trailer or on the project ROW to discuss a site-specific issue.

In addition to the weekly progress meetings conducted at the field level, the SDG&E Project Manager, SDG&E Construction Manager, SDG&E IM, CPUC Lead EM, CPUC Project Manager, BLM, USFS, and/or other jurisdictional agencies may participate in a weekly teleconference call. The weekly teleconference calls would be similar to the weekly progress meeting; however, the conference calls would focus on the Mitigation Monitoring Program.

3.5 Daily Communication During Construction

Many of the problems that come up during construction can be resolved in the field through regular communication between CPUC EMs, SDG&E, and construction contractors. Field staff will be equipped with cell phones and will be available to receive phone calls at all times during construction. A project contact list has been included in *Attachment B*. The organization chart depicted in Section 2.0 and Communication Protocol in Section 3.3 illustrate the lines of communication to be used during construction. The following provides additional guidelines to ensure effective communication in the field.

CPUC EM

The CPUC EM's primary point of contact in the field is SDG&E's Lead Environmental Inspector. The CPUC EM will contact SDG&E's Lead Environmental Inspector if an activity is observed that conflicts with one or more of the mitigation measures, so that the situation can be corrected. If the CPUC EM cannot immediately reach SDG&E's Lead Environmental Inspector, then the Mitigation Monitoring Coordinator or SDG&E Environmental Manager will be contacted to address the problem. Similarly, the CPUC EM will contact SDG&E's Lead Environmental Inspector for information on where construction crews are working, the status of mitigation measures, and schedule forecasts. The CPUC EM may discuss construction procedures directly with the construction contractors; however, SDG&E may require their contractors to defer questions to an onsite SDG&E representative. In all cases, the CPUC EM will contact the designated SDG&E representative if a problem is noted that requires action from the contractor. The CPUC EM will not direct the contractor, however, the CPUC EM has the authority to stop work, assuming it is safe to do so, if an activity poses an imminent threat or puts a sensitive resource at undue risk (e.g., stopping a clearing crew from unknowingly cutting coastal sage scrub in an exclusion area).

SDG&E

SDG&E will provide the CPUC EM with a list of construction monitoring personnel and construction supervisory staff to contact regarding compliance issues. The contact list will include each person's title, responsibility, contact information, and whether their position is segment-specific. The contact list will be updated as new project personnel are assigned to the project and redistributed as necessary.

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SDG&E will prepare and distribute a weekly environmental compliance status report for distribution to key project members, including the CPUC. The CPUC EM will review the weekly report to ensure that the status of mitigation measures is consistent with observations in the field. Any questions regarding the status of mitigation measures will be directed to the SDG&E Mitigation Monitoring Coordinator. The weekly environmental compliance status report will also be a tool to keep all parties informed of construction progress and schedule changes.

It should be noted that daily and weekly compliance reports would also be prepared by CPUC environmental monitors, as described in Section 4.1.4.

3.6 Communicating Compliance Issues

Section 4.0 below describes procedures to communicate incidences and non-compliances identified by the CPUC EMs during site inspections.

3.7 Coordination with Other Agencies Before and During Construction

As discussed in Section 2.0, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. The CPUC EM will be responsible for contacting resource agencies and immediately notifying them of issues regarding their jurisdiction.

During Construction

The CPUC EM may request copies of email correspondences, phone logs, or other documentation between SDG&E and resource agencies to avoid direct involvement from CPUC EMs. However, if there is an unresolved issue regarding compliance with a mitigation measure or permit requirement under the jurisdiction of a resource agency, the CPUC EM may elect to contact the agency to discuss resolution.

Interagency Conference Calls

During the pre-construction process or during construction, the Lead Agencies and/or SDG&E may determine that conference calls may be necessary or appropriate to discuss the status of specific mitigation compliance with responsible and permitting agencies. These calls will be noticed one to two weeks in advance, by email, and an agenda will be provided prior to each call.

3.8 Mitigation Implementation Dispute Resolution

It is expected that the MMCRP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such event, the following procedure will be used:

- Step 1 Disputes and complaints (including those of the public) should be directed to the CPUC Project Manager for resolution. The Project Manager will attempt to resolve the dispute with SDG&E's Project Manager.
- Step 2 Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Proposed Project or adopted Mitigation Monitoring Program.

- Step 3 If a dispute or complaint regarding the implementation or evaluation of the Program or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- **Step 4** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Involved parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the foregoing procedure.

Separate enforcement steps by the regulatory agencies may not follow these steps. The CPUC Project Manager will coordinate with other permitting agencies for issues outside the CPUC jurisdiction.

3.9 Contact List

A project contact list has been included as *Attachment B*. The contact list includes the names of SDG&E and CPUC monitors, project managers, supervisory staff, and other members of the project team. The list also includes phone numbers, fax numbers, and email addresses where project members can be reached during construction. The contact list will be updated periodically and redistributed to the project team.

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4.0 Environmental Compliance and Field Procedures

4.1 Mitigation Measures Compliance and Reporting

4.1.1 Pre-Construction Compliance Verification

SDG&E is required by the terms of the mitigation measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. Copies of this documentation will be retained by the CPUC third-party monitors, and provided to the CPUC with all files at the completion of the project. The plans, surveys, studies, and other documentation required to be completed by SDG&E before construction are listed in the Mitigation Measure/Applicant Proposed Measure tables in Section 6.3 and as presented in Attachment G.

While these documents are being reviewed by the approving agencies, they are also reviewed by the CPUC. Compliance with all pre-construction mitigation measures and APMs presented will be verified prior to construction, and construction may not start on any segment before SDG&E receives a written Notice to Proceed (NTP) from the CPUC Project Manager.

The CPUC third-party monitors, including Project Management staff and the technical experts, will review all mitigation plans and reports and provide comments. Resource agencies will also be involved in the review of applicable plans and reports, primarily restoration related, and will provide comments. Comments on these documents will be provided to SDG&E to ensure that they adequately accomplish the intended reduction in impacts. For required local and State agency permitting/consultations, the CPUC third-party monitors will track SDG&E's progress as it relates to SDG&E's construction plans and project mitigation and permitting requirements. Based on SDG&E's construction plans, CPUC may authorize construction to begin on a phased basis and the CPUC third-party monitors will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

IMPORTANT: The CPUC will not authorize construction to begin until all pre-construction requirements have been fulfilled for a given phase. To save time, SDG&E should identify extra work space needs required for each phase of construction prior to the start of active construction, so that the locations and their use can be included in the NTP. Refer to Section 3.2.2.2.

4.1.2 Notice to Proceed Procedures

The CPUC Project Manager and all EIR/EIS team reviewers will ensure that the Notice to Proceed (NTP) process is consistent with the adopted CEQA and NEPA documents. The NTP approval(s) shall document that pre-construction mitigation measure requirements, applicable survey and study, as well as project permit requirements have been met. In consideration of linear or phased projects, more than one NTP can be requested for the Project. Each NTP request would be applicable to a defined aspect or segment of construction. Construction is defined as any mobilization activity which would move construction related equipment and/or materials onto a site. In some instances compliance with every requirement cannot be met prior to NTP issuance and in such cases the NTP may be conditioned to define actions to be taken and documented prior to construction or prior to energizing the line. Therefore, a NTP may be issued for

a particular segment or project component upon compliance with applicable mitigation measures and permits, and this process could occur in advance of mitigation compliance for the entire project as a whole.

In general, an NTP request must include the following information:

- A description of the work.
- Detailed description of the location, including maps, photos, and/or other supporting documents.
- Verification that all mitigation measures and Applicant Proposed Measures, have been met or do not
 apply to the work covered by the NTP request.
- Verification that all applicable permit conditions or requirements, project parameters, or other project stipulations have been met for the work covered by the NTP request.
- In the case where some outstanding compliance items cannot be met prior to issuance of the NTP, a
 request shall be submitted which outlines what submittals are outstanding and how they will be met
 and approved in a timely manner prior to construction.
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction.
- Cultural resource surveys or verification that no cultural resources would be significantly impacted.
- All applicable jurisdictional permits or agency approvals (if necessary).
- Date of expected construction and duration of work.

CPUC/Aspen will review the NTP request and pre-construction requirement submittals per the steps outlined below to ensure that all of the information required to process the approval is included.

- 1. SDG&E submits NTP request and posts the request to the collaboration site. Notification of posting to include CPUC, BLM, USFS, CDFG, USFWS, Corps, and SWRCB.
- 2. CPUC/Aspen will distribute the NTP request for review as follows:
 - i.) To the Team biological resources expert for review for biological resources. Review question/comments will be provided in a letter or e-mail.
 - ii.) To the Team cultural resources expert for review for cultural resources. Review question/comment s will be provided in a letter or e-mail which will be forwarded by CPUC/Aspen to BLM with the request. BLM will provide cultural review and will supply any conditions to add to the NTP as well as an approval regarding cultural reporting.
 - iii.) The remaining portions of the NTP request will be sent to issue area reviewers where appropriate.
- 3. CPUC/Aspen will also review and, if needed, will prepare a bullet list of outstanding requirements and where additional information or clarification is needed.
- All questions and comments as well as required additional information or clarifications shall be sent to SDG&E by CPUC/Aspen in an e-mail.
- SDG&E will supply clarifications and/or additional information to be added to the NTP request in a memo or letter format along with responses addressing all comments and questions forwarded by CPUC/Aspen.
- CPUC/Aspen will complete a Compliance Status Table documenting compliance and any outstanding requirements that can be made conditions of the NTP including any conditions supplied by BLM. If

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comments/conditions are provided by CDFG, USFWS, Corps, and/or SWRCB, they will be considered for incorporation into the NTP approval letter and compliance table. Note: BO conditions are included in the table documenting compliance.

- Aspen will prepare the draft NTP approval letter which will document the scope of work, compliance with EIR/EIS and BO mitigation requirements, and bullet outstanding conditions.
- 8. CPUC will review the draft NTP approval letter and send the approval and an updated compliance table to SDG&E.
- 9. CPUC/Aspen will then post the approved NTP documentation on the public CPUC project website.

Please note that variance requests can be submitted with the NTP request for incorporation into the NTP (please see Section 4.2.2 for variance submittal requirements).

4.1.3 Compliance Reporting During Construction

As described in Section 2, the CPUC EMs will perform compliance inspection throughout the construction period to ensure compliance with all applicable mitigation measures, plans, permits, and conditions of approval of the CPUC. Site visits may be coordinated with SDG&E or conducted unannounced. Supplemental information provided by SDG&E, including pre-construction submittals, survey reports, weekly reports, meeting notes, and agency correspondences, will also be used to verify compliance.

The CPUC EMs will document observations along the ROW through the use of field notes and digital photography. The photos are provided in the weekly reports and correlate to a discussion of specific construction or compliance activity. In addition, field inspection forms will be utilized in the field to document compliance of specific crews, construction activities, or resource protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate weekly status reports and update the status of mitigation measures listed in Section 6.3. A sample site inspection form has been included in Attachment C. Weekly reports will be provided to all permitting agencies via e-mail and/or posted on a collaboration website during construction.

Separate enforcement steps by the regulatory agencies may not follow these steps.

4.1.4 Compliance Levels

The CPUC EM shall document all observations and communications in her logbook and will determine whether the observed construction activities are consistent with mitigation measures, APMs, and project parameters, as identified in the Final EIR/EIS and adopted by the CPUC. All compliance issues regardless of level will be documented in the daily/weekly reports, which will be provided to all agencies. Any regulatory agency has the authority to issue compliance violations regardless of CPUC and BLM actions. The CPUC EM shall not direct the work of a construction contractor or subcontractor. A construction activity that deviates from permit conditions or mitigation measures, particularly when the activity puts a resource at risk, would be considered a non-compliance. A non-compliance may also be issued if a mitigation measure is not implemented according to the timing restrictions listed in the mitigation table. Examples of non-compliances include, but are not limited to:

 Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction.

- Encroachment into an exclusion zone or sensitive resource area designated for avoidance.
- Brush clearing outside the approved work limits.
- Activity during seasonal activity restrictions.
- Grading, foundation, or line work without required biological pre-construction surveys or biological monitor onsite.
- Improper installation of erosion or sediment control structures if it puts a sensitive resource at risk.
- Discharge of sediment laden trench or foundation hole water into a waterbody or storm drain.

The CPUC EM will immediately notify the designated SDG&E representative of a non-compliance that requires immediate corrective action. A Non-Compliance Report will be sent to SDG&E from the CPUC Project Manager that outlines the incident, lists actions required to bring the activity back into compliance, and provides a timeline for follow-up. All Non-Compliance Reports and Project Memoranda will be provided to the agencies and applicable jurisdictions.

If a construction activity or observed resource protection measure only slightly deviates from project requirements and does not put a resource at immediate risk, the CPUC EM may elect to issue a Project Memorandum to get the issue corrected. Construction activities that could result in a Project Memorandum include, but are not limited to:

- Failure to properly maintain an erosion or sediment control structure, but the structure remains functional.
- Use of an existing unapproved access road (first offense).
- Project personnel begin work on the ROW without proof of training.
- Work outside the approved work limits where the off-ROW incident is within a previously disturbed area, such as a gravel lot.

Through the issuance of Project Memoranda and Non-Compliance Reports patterns of compliance issues can be discerned, preventative measures can be developed, and remedial work, if needed, can be scheduled. Incident reports (i.e., spills) would also be tracked in the Weekly Reports. Repeated events that individually might not be considered non-compliance may become non-compliance if continued occurrence after initial non-compliance activity is observed and documented. In other words, repeated incidences will result in a non-compliance.

Various unanticipated events may also occur that impact Project personnel, public safety, or other resources. These events may not result in a deviation or violation of a mitigation measure or permit condition, but it is important that these events are reported to the appropriate agencies so they may respond to questions or concerns from the public. Accordingly, SDG&E and/or the CPUC EM will immediately report these events to the CPUC, BLM, and other regulatory agencies as appropriate upon verification of such information. The protocol for communicating these events is provided in Attachment Q.

Compliance and Non-Compliance Violation Levels

Project compliance and non-compliance violation levels and the specific corrective actions are defined as follows:

Level 0 Compliance. This level indicates that all mitigation measures and permit conditions are being
complied with and there are no violations. No corrective action is necessary.

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- Level 1 Non-Compliance. One aspect of a mitigation measure has not been complied with resulting
 in only partial implementation of a mitigation measure, but no significant impact. An oral warning
 shall be issued to SDG&E's Environmental Coordinator (or assigned designee) and corrective action
 shall be required within a stated maximum period, to be determined by the CPUC EM. If corrective
 action is not taken within the stated period, a Project Memorandum will be issued.
- Level 2 Non-Compliance. One or more aspects of a mitigation measure have not been complied with,
 making the mitigation ineffective and resulting in minor impacts. If allowed to continue, this noncompliance could result in a significant impact over time. An oral warning followed by a Project
 Memorandum shall be submitted to SDG&E's Environmental Coordinator (or assigned designee).
 Corrective action shall begin by the next construction day. If corrective action is not begun by the
 next construction day, a Non-Compliance Report shall be issued.
- Level 3 Non-Compliance. One or more of the aspects or a mitigation measure are not complied with and the implementation of a mitigation measure is deficient or non-existent, resulting in significant impact(s), or there is immediate threat of major, irreversible environmental damage or property loss. An oral warning, followed by a Non-Compliance Report, shall be submitted to SDG&E's Environmental Coordinator (or assigned designee). Corrective action shall begin immediately.

All non-compliance activity will be reported by Aspen to the CPUC Project Manager via immediate notification, or daily or weekly reporting based on the severity of the non-compliance. Based on the severity of a given infraction or pattern of non-compliance activity, the CPUC Project Manager has the authority to shut down project construction activities. _If a shutdown of construction activity occurs, construction shall not resume until the CPUC Project Manager authorizes it to do so. No Aspen personnel (PM, CPUC Lead EM, or CPUC EM) has the authority to shut down or restart construction activities on a segment- or project-wide scale. However, the CPUC EM has the authority to redirect work if an immediate threat to safety or a sensitive resource is imminent.

4.2 Project Changes

4.2.1 Transition from Preliminary Design to Final Engineering

The EIR/EIS analysis of the Sunrise Powerlink Project is based on preliminary design, as described in Section B.1 of the Final EIR/EIS, which states that:

[The Project Description] section includes maps of the Proposed Project area that illustrate land-ownership and general routing. Appendix 11 of the Environmental Impact Report/ Environmental Impact Statement (EIR/EIS) includes detailed maps that illustrate the approximate proposed locations of each transmission structure and associated facilities based upon the status of SDG&E's preliminary engineering studies to date.

Because the project has now been approved by CPUC, BLM, and other jurisdictional agencies, SDG&E is in the process of completing final project design and engineering. Some project component locations are being modified as engineering is completed and to comply with mitigation measures requiring resource avoidance to minimize or avoid environmental impacts and reduce or eliminate feasibility constraints. In addition, some project components will be moved to accommodate landowner location preferences where possible, in compliance with Mitigation Measure L-2b (Revise project elements to minimize land use conflicts).

SDG&E will submit to the Lead Agencies a construction plan that illustrates the location of project components at the time of the Final EIR/EIS, and any changes that have been made since that time. All changes will be reviewed by the CPUC and BLM, to ensure that there are no changes that require additional CEQA or NEPA compliance review (i.e., that no new or more severe impacts are created by the changes). A memorandum will be prepared to document the changes and the impacts of the final plan. This memorandum will be approved by the CPUC and BLM. Detailed maps will be presented on the project website.

4.2.2 Project Changes After Final Engineering

At various times throughout project construction (following approval of final design plans), the need for extra workspace or additional access roads may be identified. Similarly, changes to the project requirements (*e.g.*, mitigation measures, specifications, etc.) may be needed to facilitate construction or provide more effective protection of resources. SDG&E in consultation the applicable resource agencies should work together to find solutions when variations or adjustments are necessary for specific field situations to avoid conflicts with adopted mitigation measures, conservation measures or specifications.

4.2.2.1 Variance Procedures

The CPUC and BLM Project Managers along with the CPUC EMs will ensure that any variance process or deviation from the procedures identified under the monitoring program is consistent with CEQA and NEPA requirements. No project variance will be approved by the CPUC or BLM if it creates new significant impacts. A variance should be strictly limited to minor project changes that will not trigger other permit requirements, that does not increase the severity of an impact to a level of significance or create a new significant impact, and that clearly and strictly complies with the intent of the mitigation measure.

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA and/or NEPA review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, and correction of such deviation, will be reported immediately to the CPUC EM for their review. The CPUC EM will review the variance request to ensure that all of the information required to process the variance is included and then forward the request to the CPUC and/or BLM Project Manager for review and approval. The CPUC and/or BLM Project Manager may request a site visit from the CPUC EM or need additional information to process the variance. In some cases, a variance may also require approval by jurisdictional agencies. In general a variance request must include the following information:

- A description of the Variance.
- An explanation of the necessity for the Variance.
- Detailed description of the location, including maps, photos, and/or other supporting documents.
- Which mitigation measure, Applicant Proposed Measure, permit condition or requirement, project parameters, or other project stipulation is the variance being requested for, and a reference to the approved documents.
- · How the variance request deviates from a project requirement.
- Biological resource surveys or verification that no biological resources would be significantly impacted.
- Cultural resource surveys or verification that no cultural resources would be significantly impacted.

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- Landowner approval if the location is not within SDG&E's ROW or property.
- Water/wetland/stormwater related resource information if the variance would approve any additional land disturbance, road distance or width, changes to jurisdictional delineation of waters, changes to water protection BMPs, etc.
- Agency approval (if necessary)
- Date of expected construction at the variance site.

A sample variance request form is included as *Attachment D*. All variances issued throughout project construction are tracked in tabular format in the weekly reports.

4.2.2.2 Temporary Extra Work Space Procedures

For the purposes of this MMCRP, Temporary Extra Work Space (TEWS) is defined as a work space that would be utilized by SDG&E during construction for a period of up to 60 days, and that was not identified and evaluated during the CEQA process. Anything required to be utilized for a period longer than 60 days will require a variance (see Section 3.2.2.1). SDG&E must demonstrate that: the TEWS is located in a disturbed area with no sensitive resources or land uses onsite or adjacent to the proposed work space, SDG&E has permission of the applicable landowner (*e.g.*, municipality or private) to use the work space, and that use of the TEWS would not result in any significant environmental impacts.

In the event that SDG&E determines a need for a construction TEWS, it must submit such a request to the CPUC EM. The CPUC EM will have the authority to approve or deny use of a TEWS, assuming it meets the criteria defined in the previous paragraph. SDG&E will not be permitted to use a TEWS prior to receiving written authorization from the CPUC EM. The CPUC EM will also send a copy of the TEWS to USFWS.

Following is a list of the specific information that SDG&E would be required to submit with its TEWS request:

- Date of request;
- Location of the TEWS (detailed description, including maps if required);
- Property owner of TEWS;
- An explanation of the necessity for the TEWS;
- An analysis that demonstrates no new significant impacts would result from use of the TEWS including: compaction contributing to runoff rates or other stormwater/watershed effects; observed existing impacts to the site, such as old oil spills or other potentially hazardous or polluting substances; abandoned vehicles, equipment or other materials; or other sensitive resources;
- Biological and botanical survey, especially for invasive plants, and mitigation for invasive plants if
 present.
- Duration and dates of expected use of the TEWS.
- Details of the expected condition of the site after use.

A sample TEWS form is included as Attachment E.