

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 23, 2010

Mr. Alan F. Colton  
Manager – Environmental Services  
Sunrise Powerlink Transmission Project  
8315 Century Park Court, CP21G  
San Diego, CA 92123-1550

RE: SDG&E Sunrise Powerlink Transmission Line Project - Notice to Proceed (NTP # 12)

Dear Mr. Colton,

On November 29, 2010 San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to use Rough Acres Construction Yard, Phase II, to support the Sunrise Powerlink Project. NTP #5 was issued by the CPUC on September 28, 2010, for Phase I of the Rough Acres Construction Yard. Under NTP #12, the footprint of the Rough Acres Construction Yard would expand as described below.

The SDG&E Sunrise Powerlink Transmission Line Project was evaluated in accordance with the National Environmental Policy Act and California Environmental Quality Act. The mitigation measures and applicant-proposed measures (APMs) described in the Final Environmental Impact Report/Statement were adopted by the CPUC and BLM as conditions of project approvals. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during implementation. The CPUC voted on December 18, 2008 to approve the Final Environmentally Superior Southern Route ([Decision D.08-12-058](#)) and a [Notice of Determination](#) was submitted to the State Clearinghouse (SCH#2006091071). The BLM issued a [Record of Decision](#) approving the same route on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture; and Forest Service on the Cleveland National Forest; the Forest Service issued its Record of Decision and Supplemental Information report on July 9, 2010. The area requested under this NTP does not fall under Forest Service jurisdiction.

The Sunrise Powerlink Project will be constructed in 26 segments, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/sunrise.htm>). It is anticipated that, even within the 26 project segments, SDG&E will submit multiple separate requests for Notice to Proceed (NTPs) during the construction process. This is a typical process for transmission line projects. Given that the Sunrise Powerlink Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SDG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter and the attached Compliance Status Table document the CPUC's thorough evaluation of all activities covered in this NTP. The evaluation process ensures that all mitigation measures and Biological Opinion conditions applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision and in BLM's Record of Decision.

NTP # 12 for the Rough Acres Construction Yard, Phase II, is granted by CPUC for the proposed activities based on the factors described below.

**SDG&E NTP Request.** Excerpts from the November 29, 2010 SDG&E NTP request and updates are presented below with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**:

The Rough Acres Construction Yard is located approximately three miles northwest of Interstate 8 at 2750 McCain Valley Road in Boulevard, California. The yard is located on private land, which will be leased by SDG&E for the duration of the Project. The total area of the Rough Acres Construction Yard, including both Phase I and Phase II uses, will occupy approximately 92.46 acres. Phase II use will occupy approximately 73.76 acres of this area.

Authorization to begin use of Phase I of the Rough Acres Construction Yard was issued by the CPUC on September 28, 2010 (NTP #5). Phase II of the Rough Acres Construction Yard includes use of the remaining site for additional construction equipment and material laydown, storage, assembly, staging, as well as a fly yard operation.

At this time, SDG&E is formally requesting authorization from the CPUC to begin use of Phase II of the Rough Acres Construction Yard. The Rough Acres Construction Yard was described in detail and fully analyzed in the Final Project Modification Report (PMR), which was approved by the CPUC in a Determination Memorandum dated September 22, 2010. The Rough Acres Construction Yard will be used for the duration of the Project, which is anticipated to occur through December 2012.

**Construction Material Laydown, Storage, Assembly and Staging Area:** The construction material laydown, storage, assembly and storage area identified in Phase I will be expanded. The expanded area will be located north and south of the "airstrip" access road and will accommodate laydown and storage of steel tower components, conductor reels and associated material handling equipment.

Partial assembly, staging and fly out of select tower structures to erection site at right-of way will also occur. This area will be temporarily impacted by mowing and crushing vegetation during set-up and throughout operations. General access road maintenance activities will also be conducted, as necessary, to maintain access to material laydown and storage areas.

**Helicopter Landing and Staging Area:** The helicopter landing and staging area will be located adjacent to the northern site boundary and will consist of multiple landings pads accessed via an existing unimproved road system. Aggregate base and crushed rock will be placed at existing access roads and around the helicopter landing pads for stabilization and dust control. This area will support helicopter landing and staging requirements for all project helicopters including light and medium lift helicopters as well as the air crane. It is anticipated that this area will support helicopter fueling, inspection, and overnight staging as dictated by weather conditions. This area will be temporarily impacted by mowing and removing of vegetation during set-up. General road maintenance activities will also be conducted, as necessary, to maintain access to landing pad areas.

**Contractor Staging Area:** Phase II will also provide additional area at the southeast end of the site for contractor construction equipment and material staging, as well as parking for crew vehicles. Upon completion of the Project, the Rough Acres Construction Yard will be restored to its original condition. This will include removal of any temporary facilities, as well as collection and proper disposal of any waste, trash, and debris. The base for the Phase I portion was placed on previously disturbed areas that was a dirt road. Any base placed on the Phase II portion of the yard will be removed at the end of the project.

Please reference the attached map and site utilization plan identifying the two phased uses of the Rough Acres Construction Yard.

Limits of construction for Rough Acres Phase II use were delineated at the same time delineation occurred for Phase I. This occurred on June 16, 2010. Construction activities at the Rough Acres Construction Yard were designed to avoid jurisdictional areas. The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact.

A noise study for Phase I and Phase II use of the Rough Acres Construction Yard were included in the Rough Acres Construction Yard, Phase I NTP request. The noise study did not identify any sensitive receptors or residences within 300 feet of the Rough Acres Construction Yard.

The final project wide traffic impact study submitted to the CPUC on April 28, 2010 and approved by San Diego County on September 29, 2010 included the Rough Acres Construction Yard. The study found that the temporary additional traffic projected to be generated during simultaneous use of Phase I and Phase II is not expected to have any significant impacts; therefore, no physical traffic mitigation measures were recommended (**by the County**) for the Rough Acres Construction Yard.

The Hazardous Materials Business Plan (HMBP) and Spill Prevention, Control and Countermeasures Plan (SPCC) are currently being developed and will be submitted upon approval by the appropriate Certified Unified Program Agency (CUPA).

A Construction Lighting Mitigation Plan for the Rough Acres Yard Phase II uses has been developed.

**Resource Agency Permitting**– Revised 401, 404 and 1602 permit applications were submitted for review and approval on March 30, 2010. SDG&E received the signed 401 Water Quality Certification on November 15, 2010. The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010 (**the Final SAA was issued by CDFG on November 29, 2010.**). Impacts to streambeds will not occur during Phase II use of the yard.

A project specific Fire Prevention and Response Plan (FPRP) was acknowledged\* by CAL Fire Chief (the plan has been CPUC approved). A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP. (\*In regard to the FPRP the Cal Fire Chief provided "The signatory reviewing officials are acknowledging that SDG&E has a Construction Fire Prevention Plan that is appropriate and necessary to mitigate fire hazard and risk for the SRPL construction and maintenance activities. They do not accept any responsibility for SDG&E interpretation or implementation of this Plan during the construction and maintenance of the SRPL or for any resulting actions associated with these activities.")

### **CPUC Evaluation of Mitigation Implementation**

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological, cultural and paleontological resources, those additional conditions are defined in this section.

Please see also the attached Compliance Status Table documenting pre-construction requirements identified in the Final EIR/EIS. Note that entries shaded in yellow are outstanding and must be completed prior to the start of construction. Entries shaded in purple are to be conducted during construction. Entries shaded in green have been fulfilled. Entries that have not been shaded are not applicable to this Link. NTP #5 for Phase I addressed many mitigation measures that applied to both Phases I and II, such as temporary additional traffic due to yard use, the Stormwater Pollution and Prevention Plan, etc. On October 6, 2010, SDG&E demonstrated compliance with all outstanding mitigation measures and CPUC granted authorization to use/prepare the Phase I portion of the Rough Acres Construction Yard. The attached Compliance Status Table addresses those mitigation measures that apply to Phase II, but were not applicable to Phase I.

Following the discussion of biological, cultural, and paleontological resources, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SDG&E. In these cases, the conditions will not also appear in the Compliance Status Table.

## Biological Resources

This section presents background on biological resources that occur at or near the site. This summary of biological issues was provided by SDG&E in the NTP request.

- USFWS Reinitiated Biological Opinion for the Sunrise Project (FWS-2008B0423-2009F0097) was issued on November 10, 2010.
- The Habitat Management Plan/Habitat Acquisition Plan has been approved by the U.S. Fish and Wildlife Service (USFWS), and the California Department of Fish and Game (CDFG) in a letter issued December 3, 2010.
- The Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas was approved by the CPUC on November 3, 2010.
- The rare plant surveys and an invasive weed inventory were conducted in 2010 by Gonzales Consulting and RECON, and a letter report with the results was provided by RECON on November 3, 2010. CPUC approved the letter report November 5, 2010. The memorandum included two comments on the letter report requesting clarification. This clarification shall be supplied prior to construction.
- SDG&E submitted Quino Checkerspot Butterfly (QCB) 2010 Presence/Absence Survey Reports to Eric Porter, USFWS, and Paul Schlitt, CDFG. The USFWS and CDFG gave approval of the QCB survey reports on October 4 and October 5, 2010 respectively.

**CPUC Review.** The CPUC biological consultant conducted reviews of the initial NTP request and follow-up materials for completeness and compliance with Project mitigation requirements, and reported that SDG&E has submitted all of the biology reports required for the Phase II portion of the Rough Acres Construction Yard.

## Cultural Resources

The CPUC Cultural Resources Specialist reviewed the request for Phase II of the Rough Acres Construction Yard and provided that the Final Inventory Report of Cultural Resources was accepted on June 2, 2010. Two cultural resources sites were identified within the Area of Potential Effects (APE) for the Rough Acres Construction Yard, Phase II. While these sites are within the APE of the Rough Acres Construction Yard, they can be protected from direct impacts with implementation of the following mitigation measures:

- **C-01b: Erect Protective Flagging or Other Markers for ESA;** sites will be flagged off with temporary orange fencing and designated as ESAs. ESA buffers around each site will be established and these sites will be protected as exclusionary zones. Mitigation Measure
- **C-01e: Implement Archaeological Monitoring at Cultural ESAs,** states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required.

In the event of an unanticipated discovery of archaeological materials within a work area during construction monitoring, all ground-disturbing work at the work area will be suspended. Any new

discoveries shall be managed in compliance with the following procedures and guidelines for Treatment of Unanticipated Discoveries as set forth in the Final HPMP.

- **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties,**
- **C-1e: Monitor construction at known ESAs, and**
- **C-3a: Monitor construction in areas of high sensitivity for buried resources.**

#### **Paleontological Resources**

The Paleontological Resources Review letter report pertaining to the Rough Acres Construction Yard was submitted to the CPUC on March 23, 2010. The report was reviewed by the CPUC consultant who provided comments May 14, 2010. "Based on a letter report from the San Diego Natural History Museum, dated 23 March 2010, there is no potential to encounter paleontological resources at the Rough Acres Construction Yard. "

The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.

#### **Conditions of NTP Approval**

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

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Green entries have been fulfilled. Entries that are not shaded are not applicable to this Link. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. In compliance with Mitigation Measure B-3a, the Weed Control Plan shall be implemented immediately prior to, during and post construction as appropriate for the weed species being treated at the sites being covered by NTP #12.
4. The rare plant surveys and an invasive weed inventory were CPUC approved November 5, 2010. The approval memo included two comments requesting further clarification. This clarification shall be supplied prior to construction.
5. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and September 15.

6. Prior to construction and outside of the raptor breeding season, SDG&E will remove unoccupied non-threatened/ endangered or non-eagle raptor species' nests that would be affected by construction activities. Per the USFWS, the golden eagle breeding season is December through June.
7. Monitoring for potential eagle nest locations will be implemented during and post construction.
8. "Survey sweeps" shall occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, a biological monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC.
9. Vegetation removal shall take place between August 16 and January 14, in accordance with Mitigation Measure B-8a and the Biological Opinion. No tree trimming is required within the Phase II portion of the Rough Acres Construction Yard.
10. The jurisdictional drainage located within the Phase II portion of the Rough Acres Construction Yard will be avoided. Any disturbance of vegetation along the jurisdictional drainage will be minimized. Prior to construction the drainage will be flagged for avoidance.
11. Sensitive plant surveys were conducted for Phase II of the Rough Acres Construction Yard. A survey report was submitted to the CPUC on November 3, 2010. Prior to initiating activities at the yard, the boundaries of any sensitive plant populations will be delineated with flagging and avoided, to the extent practical.
12. As required by BIO-APM-23, SDG&E shall conserve topsoil in areas of sensitive habitat.
13. Wildlife found to be trapped shall be removed by a qualified biological Monitor. If the biological resource monitor is not qualified to remove entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
14. Per the mitigation measures (B-01a, LU-APM-6), limits of construction and environmentally sensitive areas shall be delineated with orange construction fencing or flagging prior to the start of construction to alert construction personnel that those areas should be avoided.
15. Archaeological and Native American monitors shall be present for fencing of the designated cultural ESAs.
16. Any ground disturbing activities near the designated cultural ESAs will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final HPMP will be implemented during construction, as required.
17. All construction areas and access roads identified in the NTP request submitted by SDG&E shall be flagged prior to construction. Flagging of construction areas and access roads shall be field verified by the CPUC EM prior to site use.
18. No work or other construction related activities shall occur outside of approved work areas.

19. Verification that BLM has approved the proposed archeological monitor résumés shall be submitted to the CPUC prior to any work requiring archaeological monitoring at the site.
20. If unanticipated biological, cultural or paleontological resources are detected, the CPUC EM shall be notified immediately.
21. As determined by the Traffic Study approved by San Diego County on September 29, 2010 (Permit No. 0910-77), neither detours nor lane closures along public transportation routes to the Yard are anticipated. However, if during construction, detours and or temporary lane closures are necessary, SDG&E shall obtain required permits from the County of San Diego.
22. As determined by the Traffic Study approved by San Diego County on September 29, 2010, it is not anticipated that construction activities will restrict movements of emergency service providers. However, if necessary, during construction SDG&E shall coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
23. Per SDG&E, Hazardous Material Business Plan (HMBP) and Spill Prevention Countermeasure and Control (SPCC) Plans will be developed during construction. The HMBP and SPCC plans shall be submitted to the CPUC and implemented (i. e., installation of secondary containment etc.) prior to bringing any materials as covered by the plans are brought on-site.
24. An NPDES storm water discharge permit for construction activities has been obtained. A SWPPP applicable to the Rough Acres Yard has been submitted to the CPUC. The SWPPP shall be implemented where appropriate prior to and during construction.
25. The Rough Acres Construction Yard site specific SWPPP designates where fueling is permitted to occur. Unless otherwise indicated in the SWPPP, all other areas are considered "No-Fueling Zones".
26. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
27. SDG&E shall comply with local noise rules, standards, and/or ordinances by implementing the noise-suppression techniques and variance standards as outlined in Mitigation Measure N-1a.
28. As proposed, the SDG&E Environmental Monitoring Program will be implemented during construction which will include implementation of the applicable environmental plans (as defined in HS-APM-1, HS-APM-2, HS-APM 3, HS-APM-8 and HS-APM-10). SDG&E has designated an Environmental Field Representative for Rough Acres Phase II. The Representative will be on site to observe and document adherence to the applicable environmental plans.
29. In regard to the Hazard Communication Plan, to fully satisfy the intent of Mitigation Measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.
30. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor shall be notified immediately.
31. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes or changes in technique

and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.

32. If the application of water is needed to abate dust in construction areas and on dirt roads, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan shall be implemented and enforced throughout Rough Acres Yard use.
33. All temporary facilities (i.e., portable toilets, fencing, etc.) shall be removed from the construction disturbance area at the completion of construction.
34. All complaints received by SDG&E in regard to the Rough Acres Yard shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting, noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, activities may need to be modified depending on the nature of the complaint.
35. When significant precipitation events are anticipated, or have occurred, access on project roads may be suspended in order to maintain the integrity of access roads and provide for personnel safety. Access will be suspended for 24 hours following a rain event in order to allow for a dry out period. The parameters for suspending access include, but are not limited to:
  - a. Rutting occurring in excess of 2 inches over a distance of 50 feet
  - b. Rutting and/or soil mixing occurring on 10% of the road
  - c. Rills more than 10 feet in length develop
  - d. Significant soil compaction
  - e. Significant soil adhesion to vehicles and construction equipment

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

cc: Mary Jo Borak, CPUC CEQA Unit  
Nicholas Sher, CPUC Legal Division  
Daniel Steward, BLM El Centro Field Office  
Tom Zale, BLM El Centro Field Office  
Susan Lee, Aspen Environmental Group  
Vida Strong, Aspen Environmental Group  
Anne Coronado, Aspen Environmental Group  
Don Haines, San Diego Gas and Electric Company  
Tina Carter, San Diego Gas and Electric Company  
Robert Hawkins, U.S. Forest Service  
Michael Bennett, BLM Palm Spring South Coast Field Office  
Cliff Harvey, State Water Resources Control Board



Eric Porter, USFWS  
Doreen Stadtlander, USFWS  
Paul Schlitt, CDFG  
Heather Pert, CDFG  
Kelly Fisher, CDFG  
Erin Wilson, CDFG

# Attachment A: Preconstruction Status Report

Thursday, December 16, 2010

2:26:38 PM

## Report Criteria:

AGENCY: CPUC

LOCATION: Rough Acres II

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

MEASURE CATEGORY: Biological; Cultural and Paleontological

- |                                                                                                                                                  |                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
|  -To Be Implemented During Construction                          |  -Complete       |
|  -Pending OR To Be Implemented Immediately Prior to Construction |  -Not Applicable |

Location: Rough Acres II

Mitigation Measure and APM	Status
B-01a: Locate surface disturbing components in previously disturbed areas	The preconstruction portion of this measure is complete. Sensitive resources were mapped using GIS and project structures and work areas were designed to avoid these resources, to the extent possible. The Project Modification Report Mapbook, which was submitted on May 14, 2010 and approved by the BLM and CPUC in a Determination Memorandum on September 22, 2010, shows both sensitive resources and the location of areas that may be disturbed. During construction, vegetation and soil impacts will be minimized.
B-01a: Use construction mats to minimize disturbance	This mitigation measure will be fulfilled during construction.
B-01a: Double mitigation ratios on lands already in mitigation	The Rough Acres Construction Yard does not include lands already in use as mitigation for other projects; therefore, this mitigation measure is not applicable.
B-01a: Delineate all limits of construction	The limits of construction will be delineated immediately prior to use of the Phase II portion of the Rough Acres Construction Yard. The approved areas will be delineated with orange construction fencing or flagging.
B-01a: Coordinate gate installation 60 days prior to construction	SDG&E submitted a memo to CPUC for the administrative record on October 26, 2010 to document coordination of access road gate installation prior to construction. No new gates were requested at the Rough Acres Construction Yard, but the landowner did install a new gate at the property prior to project use.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	SDG&E will utilize existing access roads during use of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-01a: Post signs on access road gates prohibiting unauthorized users	This mitigation measure will be fulfilled during construction.
B-01a: Provide funding for off-road vehicle patrols	Existing access roads will be utilized at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-01a: Mitigate for impacts by unauthorized activity (e.g., exceeding approved construction footprints)	This mitigation measure will be fulfilled during construction.
B-01a: Submit a Habitat Restoration Plan	SDG&E submitted a Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas for review to the CPUC, BLM, USFS and Wildlife Agencies that addresses restoration of temporarily impacted areas on September 24, 2010 and a revised plan incorporating comments was resubmitted on October 25, 2010. This plan was approved by the CPUC on November 3, 2010 and by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion, G-CM-16 (page 33 of the Biological Opinion).

Mitigation Measure and APM	Status
B-01a: Mitigate for impacted habitat	In coordination with the appropriate agencies, off-site purchase and dedication of habitat shall be provided for areas where habitat restoration cannot meet mitigation requirements as outlined in this measure. This will be determined during and post construction during restoration activities.
B-01a: Mitigate for the loss of native trees and tree trimming	No tree trimming or removal will occur at Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-01a: Submit a Habitat Acquisition Plan 120 days prior to construction	The Habitat Acquisition Plan was submitted to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on February 4, 2010. The HAP was further refined and resubmitted on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HAP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
B-01a: Submit a Habitat Management Plan	The Habitat Management Plan was submitted to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service for review and approval on September 22, 2010. The plan includes the requirements as outlined in this mitigation measure. The HMP was approved by the Wildlife Agencies as stated in the reinitiated Biological Opinion dated November 10, 2010.
B-01a: Include legal descriptions of all legal parcels	The Habitat Management Plan, prepared by a qualified biologist, was submitted to the CPUC, BLM, Wildlife Agencies, and USDA Forest Service on September 22, 2010 for review and approval. All the components in this mitigation measure have been included in the HMP.
B-01c: Provide biological monitoring and perform periodic inspections once or twice a week	This mitigation measure will be fulfilled during construction. A qualified biological monitor with the authority to issue stop work orders will be on-site during mobilization and periodically throughout the use of the yard. Weekly monitoring reports will be prepared.
B-01c: Send weekly monitoring reports	This mitigation measure will be fulfilled during construction. During construction, monitoring reports will be prepared and submitted on a weekly basis by a qualified biologist.
B-01c: Qualified biologists shall handle all environmental issues and have the authority to issue stop work orders	This mitigation measure will be fulfilled during construction. A qualified biological monitor with the authority to issue stop work orders will be on-site during construction activities.
B-01k: Re-seed all public and private natural areas burned due to project-caused fire	This mitigation measure will be fulfilled during and post construction, should a project-caused fire occur.
B-01k: Develop re-seeding plan	This mitigation measure will be fulfilled during and post construction, as needed.
B-02a: Avoid impacts to jurisdictional areas	Construction activities at the Rough Acres Construction Yard were designed to avoid jurisdictional areas. The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact.
B-02a: Mitigate impacted areas as required by wetland permitting	Activities within the Rough Acres Construction Yard have been sited to avoid impacts to the jurisdictional feature. The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact; therefore, this mitigation measure is not applicable.
B-02a: Prepare jurisdictional delineation and impact assessment	The entire project area was surveyed and impacts to resources under the jurisdiction of the ACOE, Regional Water Boards, State Water Board, and CDFG were determined. A revised Preliminary Jurisdictional Determination was submitted on February 24, 2010 and accepted as part of the 404 permit application on August 27, 2010. Final Grading Plans and Plan and Profiles were submitted to the CPUC on September 2, 2010 for the administrative record. The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact.
B-02a: Mitigate for jurisdictional wetland habitat	The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact; therefore, this mitigation measure is not applicable.
B-02a: Obtain wetland permits prior to construction	The jurisdictional drainage located on the Phase II portion of the Rough Acres Construction Yard will not be disturbed and will be clearly delineated to avoid impact; therefore, this mitigation measure is not applicable.
B-02a: Delineate all limits of construction	The Project Modification Report and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum on September 22, 2010, illustrates the limits of construction. Limits of construction will be delineated immediately prior to construction with orange construction fencing, flagging, or silt fencing.

Mitigation Measure and APM	Status
B-02a: Install gates and signs at entrances of access roads	This mitigation measure will be fulfilled during construction.
B-02a: Mitigate impacts from unauthorized activity	This mitigation measure will be fulfilled during construction.
B-02a: Submit and implement Wetland Mitigation Plan	Wetland impacts will not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable to this particular component of the project.
B-02a: Submit a Habitat Management Plan that includes jurisdictional areas	Wetland impacts will not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable to this particular component of the project.
B-03a: Submit and implement a Weed Control Plan	A Final Weed Control Plan was approved by the BLM and CPUC on September 8, 2010. Additional comments from the USFWS, City of San Diego and USFS were incorporated into a final plan that was submitted to all agencies on November 10, 2010. The Weed Control Plan has been approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-20).
B-03a: Conduct pre-construction weed inventory	A Final Weed Control Plan was approved by the BLM and CPUC on September 8, 2010. Additional comments from the USFWS, City of San Diego and USFS were incorporated into a final plan that was submitted to all agencies on November 10, 2010. The Weed Control Plan has been approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-20).
B-03a: Implement weed control treatments	The Weed Control Plan will be implemented immediately prior to, during and following construction as appropriate for the weed species being treated.
B-03a: Annually survey for new invasive weeds for 2 years	The Weed Control Plan addresses surveying for invasive exotic species during construction and annually following construction to monitor previously-identified and treated populations and to identify new invasive weed populations for the life of the Project. Treatment of weeds will occur on a minimum annual basis unless otherwise approved by the PCA, San Diego County Agricultural Commissioner, and Cal-IPC. This mitigation measure will be fulfilled during/post construction.
B-03a: Ensure all seeds and other material are certified weed free	This mitigation measure will be fulfilled during/post construction.
B-03a: Wash vehicles and equipment	This mitigation measure will be fulfilled during/post construction.
B-03a: Submit monthly wash logs during construction and annual logs during operation/maintenance	This mitigation measure will be fulfilled during/post construction.
B-05a: Conduct surveys in the spring and submit a special status plant report	A Rare Plant Survey for Phase II of the Rough Acres Construction Yard was completed by a qualified biologist. The survey was submitted to the CPUC for review on November 3, 2010. CPUC approved this survey on November 5, 2010.
B-05a: Stake or flag special status plant populations	A Rare Plant Survey for the Rough Acres Construction Yard was completed by a qualified biologist. The survey was submitted to the CPUC for review on November 3, 2010 and approved by the CPUC on November 5, 2010. Two special status plant species were observed within the boundaries of the Rough Acres Construction Yard. Where feasible, portions of these plant populations will be staked or flagged immediately prior to use of the yard to minimize impacts.
B-05a: Avoid impacts to federal and state listed plant species	A Rare Plant Survey for the Rough Acres Construction Yard was completed by a qualified biologist. The survey was submitted to the CPUC for review on November 3, 2010 and approved by the CPUC on November 5, 2010. No federal or state listed plant species were observed within the boundaries of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-05a: Submit a Restoration Plan for federal and state listed plants	No federal or state listed plant species occur within the boundaries of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-05a: Avoid impacts to moderately sensitive plant species	Moderately sensitive plant species will be affected; therefore, SDG&E has prepared a Restoration Plan for Special Status Plants. This plan was submitted to the agencies for review on November 29, 2010. Impacts to special status plants will not occur until this plan is approved by the agencies.

Mitigation Measure and APM	Status
B-05a: Submit a Restoration Plan for special status plant species	A qualified Habitat Restoration Specialist developed the Restoration Plan for Sensitive Vegetation Communities in Temporary Impact Areas. This plan was approved by the CPUC on November 3, 2010 and the Wildlife Agencies on November 10, 2010, per the Biological Opinion. Reseeding and salvage will be implemented as determined by the restoration specialist in coordination with the resource agencies.
B-05a: Submit a Habitat Management Plan that addresses offsite mitigation for rare plants	A Habitat Management Plan was submitted to the appropriate agencies for review on September 22, 2010 as outlined in this measure. The Habitat Acquisition Plan and Habitat Management Plan were approved by the Wildlife Agencies as stated in the revised Biological Opinion dated November 10, 2010 (G-CM-17).
B-07a: Cover excavations or install fencing when not in use	There will be no trenching or excavation at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07a: Inspect excavations 3 times per day and before backfilling	There will be no trenching or excavation at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07a: Look under vehicles and equipment before moving for presence of wildlife	Workers will be instructed to look under vehicles for wildlife before movement and to report mortality or injury of a listed species within 48 hours. No vehicles or equipment will be moved until the animal has left or is removed by a qualified biologist. This mitigation measure will be fulfilled during construction.
B-07a: Contact within 48 hours of finding a dead or injured listed species	A qualified biological monitor will submit monitoring reports as required by this measure. This mitigation measure will be fulfilled during construction.
B-07c: Limit activities in bighorn sheep critical habitat October 1-December 31 or maintain 1,500-foot ceiling for flights	The Rough Acres Construction Yard is not located within Peninsular bighorn sheep critical habitat; therefore, this mitigation measure is not applicable.
B-07c: Provide compensation for direct loss of critical habitat	The Rough Acres Construction Yard is not located within Peninsular bighorn sheep critical habitat; therefore, this mitigation measure is not applicable.
B-07c: Submit a Habitat Management Plan	The Rough Acres Construction Yard is not located within Peninsular bighorn sheep critical habitat; therefore, this mitigation measure is not applicable.
B-07e: Conduct grading or brushing outside of least Bell's vireo and southwestern willow flycatcher breeding season September 16-March 14	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Survey for least Bells' vireo and southwestern willow flycatcher within 10 days prior to initiating work in area	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Survey once per week if least Bell's vireo and/or southwestern willow flycatcher are present	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Establish 300-foot buffer if active nest found	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Monitor noise if construction occurs within buffer	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Provide mitigation for temporary and permanent impacts	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07e: Submit a Habitat Management Plan that addresses impacts to least Bell's vireo and southwestern willow flycatcher	Least Bell's vireo and southwestern willow flycatcher habitat do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07h: No activities within 4,000 ft. of eagle nest during breeding season	Data was obtained from the USFS and BLM regarding potential eagle nest locations for 2009. 2010 surveys were performed by SDG&E. This measure will be implemented during and post construction.

Mitigation Measure and APM	Status
B-07i: Determine suitable habitat areas of QCB	Per USFWS QCB protocol, site assessments for suitable QCB habitat were conducted in 2009 and 2010 by USFWS permitted biologists. The site assessments identified areas requiring protocol surveys. QCB protocol surveys were completed by a USFWS permitted biologist and a revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. Survey results indicate QCB were found near milepost 36 on Link 1; the Rough Acres Construction Yard is located near milepost 42, no QCB were observed in this area. These surveys results were accepted by the Wildlife Agencies as described in the revised Biological Opinion dated November 10, 2010. The 2010 QCB survey has been completed and the report submitted to the agencies on December 3, 2010.
B-07i: Conduct pre-construction protocol survey for QCB	Per USFWS QCB protocol, QCB surveys were performed in 2009 by a USFWS permitted biologist and a revised 2009 QCB Focused Survey Report was submitted to CPUC for review January 14, 2010. Survey results indicate QCB were found by mileposts 116.5, 110, 79 to 80, 74.5, 71, and 36. The Rough Acres Construction Yard is located near milepost 42, no QCB were observed in this area. These surveys results were accepted by the Wildlife Agencies as described in the revised Biological Opinion dated November 10, 2010.
B-07i: Mitigation required if survey non-conclusive for determining QCB presence	QCB surveys have been conducted in 2009 and 2010. The Rough Acres Construction Yard is located near milepost 42, Quino checkerspot butterfly do not occur at the Rough Acres Construction Yard. All QCB surveys have been conclusive for the project.
B-07i: Submit a Habitat Management Plan that addresses offsite mitigation for QCB habitat	QCB surveys have been conducted in 2009 and 2010. Quino checkerspot butterfly only occur on Link 1 near MP 36; the Rough Acres Construction Yard is located near milepost 42, no QCB were observed in this area. Mitigation for QCB is addressed in the Habitat Acquisition and Habitat Mitigation Plan submitted on September 22, 2010. This plan was approved by the Wildlife Agencies on November 10, 2010 as stated in the revised Biological Opinion.
B-07j: Conduct pre-construction protocol survey for arroyo toad	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Remove toad riparian breeding habitat October-December	Arroyo toad or suitable arroyo toad breeding habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Install exclusion fencing if toad is present and monitor daily during construction	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Conduct pre- and post-exclusion fencing surveys	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Conduct daily surveys in the morning prior to work activities	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Mitigate for the loss of occupied arroyo toad habitat	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-07j: Submit a Habitat Management Plan that includes arroyo toad habitat	Arroyo toad or suitable arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
B-08a: Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	Vegetation removal will take place between August 16 and January 14. No tree trimming is required within the Phase II portion of the Rough Acres Construction Yard.
B-08a: Conduct pre-construction avian breeding surveys within 10 days of initiating work January 15-August 15 and submit surveys	Within 10 calendar days prior to construction, a qualified biologist will conduct avian breeding surveys for construction activities occurring during the general avian breeding season. Results of the surveys will be submitted to the Wildlife Agencies for review and approval.
B-08a: Conduct pre-construction raptor breeding surveys within 10 days of initiating work January 1-September 15 and submit surveys	Pre-construction surveys for active raptor nests will be conducted by a qualified biologist within 10 days of construction if activities will occur during the raptor breeding season. Results of the surveys will be submitted to the Wildlife Agencies for review and approval.
B-08a: Proceed with construction if no active nests observed	This mitigation measure will be fulfilled during construction.



Mitigation Measure and APM	Status
B-08a: Proceed with construction if active nests found per conditions	During construction, if active nests are located, a buffer as defined in this measure will be established and monitored on a weekly basis by a qualified biologist.
B-08a: Monitor active nests weekly until fledged	During construction, if active nests are located, the nest will be monitored on a weekly basis by a qualified biologist until the nestlings fledge.
B-08a: Report survey results and monitoring	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 to the agencies.
B-09a: Conduct habitat assessment for bat nursery colonies prior to construction	A CDFG-approved biologist conducted day and night surveys. No bat nursery colonies were observed during the 2009 bat surveys performed along the Sunrise Powerlink alignment. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010 and approved by the CPUC on October 11, 2010.
B-09a: Conduct survey for bat nursery colonies prior to construction	A CDFG-approved biologist conducted a survey for bat nursery colonies. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. An amendment to the 2009 Bat Survey Report was submitted on October 1, 2010 and approved by the CPUC on October 11, 2010.
B-09a: No direct impacts to bat nursery colonies allowed	This mitigation measure is not applicable to activities at the Rough Acres Construction Yard. There are no bats or areas with potential to support bat nursery colonies at the yard.
B-09a: Implement methods to minimize indirect impacts to bat nursery colonies	This mitigation measure is not applicable to activities at the Rough Acres Construction Yard. There are no bats or areas with potential to support bat nursery colonies at the yard.
B-10a: Install transmission lines using Avian Power Line Interaction Committee standards	Transmission lines will not be installed at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-01: Submit protocol surveys for sensitive plant and wildlife	On-the-ground protocol surveys have been conducted for sensitive plant and animal species as appropriate along the entire alignment. SDG&E has submitted survey reports for the 2009 survey season. All 2010 surveys are complete and SDG&E is in the process of providing 2010 survey reports. The 2010 Riparian Bird Survey Report was submitted to the agencies on October 28, 2010 and approved by the CPUC on November 2, 2010 and the Wildlife Agencies on November 10, 2010. Riparian habitat capable of supporting riparian bird species does not occur at the Rough Acres Construction Yard. The 2010 Quino Checkerspot Butterfly Report was submitted to the agencies on December 3, 2010; Quino checkerspot butterfly do not occur at the Rough Acres Construction Yard. The 2010 Coastal California Gnatcatcher Report was submitted to the agencies on December 13, 2010; habitat for coastal California gnatcatcher does not occur at the Rough Acres Construction Yard. A site-specific survey for rare plants was conducted by SDG&E at the Rough Acres Construction Yard; a survey report was submitted to the CPUC on November 3, 2010 and approved on November 5, 2010. No federal or state listed plants occur at the Rough Acres Construction Yard. The following report will be submitted as soon as it is complete: The 2010 Arroyo Toad Survey Report; arroyo toad habitat does not occur at the Rough Acres Construction Yard. As described in G-CM-32 of the revised Biological Opinion dated November 10, 2010, the Wildlife Agencies state that surveys for federally listed species have been completed.
BIO-APM-02: Environmental training prior to construction	Project personnel shall receive training as outlined in this measure.
BIO-APM-03: Restrict vehicle movement to existing access roads	All vehicle traffic will be restricted to existing access roads and approved project areas within the Rough Acres Construction Yard. The limits of the yard will be clearly delineated with fencing immediately prior to construction.
BIO-APM-03: Avoid constructing roads during nesting season and submit surveys if new roads needed during nesting season	No new access roads will be constructed for the yard activities; therefore, this mitigation measure is not applicable.
BIO-APM-03: No parking or driving under oak trees	Oak trees within the Rough Acres Construction Yard will be marked with ESA flagging to avoid impacts. This mitigation measure will be monitored during construction.
BIO-APM-03: Observe a 15 mph speed limit on dirt access roads	This mitigation measure will be fulfilled during construction.
BIO-APM-04: Restrict project activity to disturbance areas	Final Grading Plans and Plan and Profile drawings have been submitted to the CPUC on September 2, 2010. Project activities will be confined to areas noted in final engineering drawings.

Mitigation Measure and APM	Status
BIO-APM-04: Keep survey vehicles on existing roads	Survey vehicles and crews will utilize existing access roads at the Rough Acres Construction Yard.
BIO-APM-04: Obtain prior approval for surveying activities in sensitive habitat	No brush clearing or disturbance of sensitive vegetation or habitat will occur without prior approval from the project biological resource monitor.
BIO-APM-04: Hiking off roads or paths during survey data collection is permitted	SDG&E survey personnel will implement all appropriate APMs.
BIO-APM-04: Do not apply discoloring agents on rocks or vegetation	No paint or permanent discoloring agents shall be applied as outlined in this measure.
BIO-APM-05: Construct roads at right angles to streambeds and washes	No new access roads will be constructed for the Rough Acres Construction Yard activities; therefore, this mitigation measure is not applicable.
BIO-APM-05: Obtain permits for streambed crossings and roads constructed parallel to streambeds	No new access roads will be constructed for the Rough Acres Construction Yard activities; therefore, this mitigation measure is not applicable.
BIO-APM-05: Minimize disturbance from construction and maintenance activities	The jurisdictional drainage located within the Phase II portion of the Rough Acres Construction Yard will be avoided. Any disturbance of vegetation along the jurisdictional drainage will be minimized.
BIO-APM-06: Comply with all applicable environmental laws and regulations	SDG&E will continue to comply with all applicable environmental laws and regulations during the use of the Rough Acres Construction Yard.
BIO-APM-07: Littering is not allowed	Littering will be prohibited on this project. This mitigation measure will be monitored during construction.
BIO-APM-08: Delineate and avoid sensitive plant populations	Sensitive plant surveys were conducted for Phase II of the Rough Acres Construction Yard. A survey report was submitted to the CPUC on November 3, 2010. Prior to initiating activities at the yard, the boundaries of any sensitive plant populations will be delineated with flagging and avoided, to the extent practical.
BIO-APM-10: Do not harm wildlife	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. This SWEAP will be shown to all project personnel prior to construction and enforced throughout all phases of the Project. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures.
BIO-APM-10: Firearms are prohibited	The SWEAP video, approved by the CPUC on March 15, 2010, addresses the prohibition of firearms in all Project areas, except for those used by security personnel. This SWEAP will be shown to all project personnel prior to use of the Rough Acres Construction Yard and enforced throughout all phases of the Project.
BIO-APM-11: Do not feed wildlife	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that feeding wildlife is prohibited. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
BIO-APM-12: No pets permitted	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that pets are prohibited at the Project site. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
BIO-APM-13: Do not collect plants or wildlife	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions that prohibit collecting plants or wildlife species for any reason. This SWEAP will be shown to all project personnel prior to construction of the Project and enforced throughout all phases of the Project.
BIO-APM-14: Removal of wildlife by qualified biological monitor or wildlife agency	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Submit report of unavoidable environmental damage	This mitigation measure will be fulfilled during construction, as needed.
BIO-APM-16: Schedule tree trimming during non-sensitive times	Tree trimming will not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-16: Vary tree removal widths to maintain edge diversity	Tree trimming will not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-17: Mow vegetation to use as access road	No new access roads will be constructed for use of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.



Mitigation Measure and APM	Status
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features	No new access roads or structures are proposed for the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-18: Submit site surveys when constructing poles or roads in high value habitats cannot be avoided	No new access roads or poles are proposed for the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-18: Construct crossings at right angles to streambeds if access roads cannot avoid sensitive water features	The Rough Acres Construction Yard will not include construction of any new access roads; therefore, this mitigation measure is not applicable.
BIO-APM-19: Implement and comply with BLM mitigation measures	This mitigation measure will be fulfilled during and post construction.
BIO-APM-19: Use Section 7 process to obtain incidental take authorization	SDG&E has obtained an incidental take authorization through the Section 7 process (Refer to Biological Opinion FWS2008BO423-2009F0097). The BO was reinitiated and finalized on November 10, 2010.
BIO-APM-20: Leave vegetation in place where re-contouring is not required	Vegetation will be left in place wherever possible during Phase II use of the Rough Acres Construction Yard.
BIO-APM-21: Conform to "Suggested Practices for Raptor Protection on Power Lines"	Rough Acres Construction Yard activities will not include installation of additional power line exits or new tall support structures; therefore, this mitigation measure is not applicable.
BIO-APM-22: Salvaging may include removal and stockpiling for replanting	This mitigation measure will be implemented during construction.
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	Only the minimum amount of vegetation necessary for use of Phase II of the Rough Acres Construction Yard will be removed. Vegetation removal will be monitored during construction.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	This mitigation measure will be implemented during construction.
BIO-APM-24: Secure appropriate covers over excavations	Excavation activities that would result in open trenches or holes is not anticipated at Rough Acres Construction Yard; however, if excavation does result in a situation that could harm livestock or wildlife, this measure will be implemented as defined.
BIO-APM-25: Revegetate disturbed soils	Areas disturbed during Phase II of the Rough Acres Construction will be returned to pre-construction conditions.
BIO-APM-26: Slope excavations on one end	Excavation activities that would result in open trenches or holes is not anticipated at Rough Acres Construction Yard; however, if excavation does result in a situation that could entrap small mammals or reptiles, this measure will be implemented as defined.
BIO-APM-27: Remove all raptor nests outside breeding season and prior to construction	Prior to construction and outside of the raptor breeding season, SDG&E will remove unoccupied non-threatened/endangered or non-eagle raptor species' nests that would be affected by construction activities. Per the USFS, the golden eagle breeding season is December through June.
BIO-APM-27: Monitor active nests during breeding season	Monitoring of existing raptor nests during the breeding season shall occur as outlined in this mitigation measure, by an approved biologist.
BIO-APM-28: Survey potential bat roost trees to be removed and follow procedures for felling trees	A CDFG-approved biologist conducted a survey for bat roost trees. The 2009 Bat Survey Report was submitted to the CPUC on February 19, 2010. A 2009 Bat Survey Report Amendment-Report and 2009 Bat Survey Amendment - Appendix 1 were submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. No bat roosts were observed at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-29: Minimize impacts of exterior lighting adjacent to preserved habitat	There is no preserved habitat adjacent to the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
BIO-APM-29: Minimize vehicle speed and volume	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
G-CM-01: Provide biological monitoring and perform periodic inspections once or twice a week	See B-1c
G-CM-02: Use SDG&Es Water Quality Construction BMP Manual.	This mitigation measure will be implemented during construction.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	The SWPPP and NPDES permit associated with the following WDID # 737C357440 was submitted to the CPUC on September 29, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts.
G-CM-04: Training to implement conservation measures.	See BIO-APM-2
G-CM-05: Limit vehicle speeds on access roads to minimize fugitive dust.	See BIO-APM-3 and AQ-1a
G-CM-06: Keep all activities within designated temporary and permanent disturbance areas.	Final Grading Plans and Plan and Profile drawings have been submitted to the CPUC on September 2, 2010. Project activities will be confined to areas noted in final engineering drawings. Also see BIO-APM-4.
G-CM-06: Keep survey vehicles on existing roads.	See BIO-APM-4
G-CM-06: No paint or discoloring agents will be applied to rocks or vegetation.	See BIO-APM-4
G-CM-06: Impacts associated unauthorized activity will be mitigated at a 5:1 ratio	This measure will be implemented during construction if unauthorized impacts occur. Also see BIO-APM-4.
G-CM-07: Brush clearing will require prior approval from the biological monitor in conformance with the CMs.	No brush clearing will occur on the project without prior approval from the project biological monitor. This measure will be implemented during construction.
G-CM-08: Wire stringing	Use of the construction yard does not involve wire stringing.
G-CM-09: Disposal of wastes.	See BIO-APM-7
G-CM-10: Emergency repairs will follows the CM's to the extent feasible.	See BIO-APM-15
G-CM-10: Submit written report to agencies having jurisdiction.	See BIO-APM-15
G-CM-10: If required, develop mitigation plan consistent with CMs.	See BIO-APM-15
G-CM-11: Structures and access roads should be designed to minimize impacts to sensitive features.	A memo was submitted to the CPUC documenting compliance with Mitigation Measure BIO-APM-18, on September 1, 2010 for their administrative record. The Project Modification Report (PMR) and Mapbook, which was submitted to the CPUC on May 14, 2010 and approved in a Determination Memorandum on September 22, 2010 illustrates changes to the final design of the alignment to reduce impacts to sensitive features. The USFWS confirmed that this conservation measure has been met through the final project designs (page 32, reinitiated Biological Opinion).
G-CM-12: Leave vegetation in place where re-contouring is not required. Restore disturbed soils based on HRP per G-CM-16.	This mitigation measure will be fulfilled during construction.
G-CM-13: Use lowest illumination allowed for human safety.	See BIO-APM-29
G-CM-13: Vehicle speed limits may not exceed 15 mph to prevent mortality of nocturnal wildlife species.	See BIO-APM-29

Mitigation Measure and APM	Status
G-CM-14: Locate surface-disturbing activities in previously disturbed areas, to the extend practical.	The pre-construction portion of this measure is complete. The project work areas were designed to avoid sensitive vegetation, to the extent possible. During construction, vegetation and soil impacts will be minimized. See B-1a for additional information.
G-CM-15: Use of construction mats.	See B-1a
G-CM-15: Incorporate impact of using mats into HRP (G-CM-16).	See B-1a
G-CM-16: Habitat Restoration Plan approval.	See B-1a
G-CM-16: Impacts, compensation, and a qualified habitat restoration specialist.	See B-1a
G-CM-16: Temporary impacts to desert scrub and dune habitats.	This mitigation measure does not apply to the Rough Acres Construction Yard. No desert scrub or dune habitats exist at this yard.
G-CM-17: Provide assurances to fund the acquisitions	SDG&E has acquired eight of the nine properties listed in this mitigation measure. SDG&E will continue to work with the Wildlife Agencies, as stated in this mitigation measure, regarding funding and preservation of the identified parcels.
G-CM-17: Off-site compensation and property acquisition.	The HAP/HMP was prepared by an approved biologist and was submitted for review and approval on September 22, 2010 as outlined in this mitigation measure. The HMP/HAP was approved by the wildlife agencies as stated in G-CM-17 of the reinitiated Biological Opinion dated November 10, 2010. The remaining requirements of this mitigation measure will be implemented during construction and within the timeframes described in this measure.
G-CM-18: Re-seeding of disturbed areas after a transmission line-caused fire.	See B-1k
G-CM-20: Develop a Weed Control Plan for pre-construction and long-term invasive weed abatement.	See B-3a
G-CM-21: Implementation of erosion control measures.	See GEO-APM-5
G-CM-22: Restoration where ground disturbance is substantial or where recontouring is required.	See GEO-APM-6
G-CM-23: Use appropriately sized equipment.	This measure will be implemented during construction. Vegetation clearing will be minimized to the extent possible for use of the Rough Acres Construction Yard.
G-CM-24: Implement Dust Control Plan.	A Dust Control Plan was approved by the CPUC on January 20, 2010 and the Wildlife Agencies on November 10, 2010. Dust Control Plan measures will be implemented during project construction.
G-CM-24: Implement additional dust control measures	This measure will be implemented during construction.
G-CM-25: Restrict vehicle movement to access roads.	See BIO-APM-3
G-CM-26: Delineate construction limits.	See B-1a
G-CM-27: Build access roads at right-angles to stream crossings.	See BIO-APM-18
G-CM-28: Coordinate with land officer 60 days prior to initiating construction to determine the use of gates and signs at access roads.	The preconstruction component of this measure is complete (see B-1a). Signs will be posted on access roads prohibiting unauthorized users during construction.
G-CM-29: Provide funding for protection from off-road vehicle enthusiasts	See B-1a

**Location:** Rough Acres II

Mitigation Measure and APM	Status
G-CM-31: Mowing of access roads to maintain access for maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	See BIO-APM-1 and B-5a
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8
G-CM-34: Native Tree Restoration	This measure is not applicable to the Rough Acres Construction Yard since no trees will be removed.
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	This measure will be implemented during construction.
G-CM-36: Do not harm wildlife, including rattlesnakes.	See BIO-APM-10
G-CM-37: Do not feed wildlife.	See BIO-APM-11
G-CM-38: Do not bring pets to project areas.	See BIO-APM-12
G-CM-39: Cover steep-walled trenches to avoid entrapping wildlife.	See B-7a
G-CM-40: Look under vehicles and around equipment for wildlife prior to use.	See B-7a
G-CM-41: Do not dispose of excess fill, brush, or debris within waters of the U.S.	The jurisdictional feature within the Rough Acres Construction Yard will be delineated and avoided. This mitigation measure will be monitored during construction.
G-CM-41: Do not dispose of fuel, oil, coolant, and other wastes within or near waters of the U.S. Do not fuel vehicles near waters of the U.S.	This measure will be implemented during construction. The Rough Acres Construction Yard site specific SWPPP designate where fueling is permitted to occur. Unless otherwise indicated in the SWPPP, all other areas are considered "No-Fueling Zones".
G-CM-42: Maintain riparian buffer construction/staging areas and riparian areas.	Waters of the U.S. will not be impacted by activities at the Rough Acres Construction Yard; therefore, this measure does not apply.
G-CM-45: Purchase/dedicate suitable habitat for preservation.	See G-CM-17
SS-CM-01: Conduct ground- or vegetation disturbance outside of the gnatcatcher breeding season	Suitable habitat for coastal California gnatcatcher does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	Suitable habitat for coastal California gnatcatcher does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	Suitable habitat for coastal California gnatcatcher does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-05: Conduct construction and O&M activities outside the vireo breeding season or implement pre-activity surveys	Suitable habitat for least Bell's vireo does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-05: Survey for nesting vireos	Suitable habitat for least Bell's vireo does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-06: Purchase and manage suitable vireo habitat	Suitable habitat for least Bell's vireo does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	Designated critical habitat or occupied habitat for Quino does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Designated critical habitat or occupied habitat for Quino does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-10: Purchase and manage occupied Quino habitat	Designated critical habitat or occupied habitat for Quino does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	Arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	Arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-13: No construction activities within arroyo toad breeding habitat.	Arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-14: Remove all temporary exclusion and construction fencing at conclusion of construction.	Arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	Arroyo toad habitat does not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-16: Prohibit construction and O&M activities during lambing season	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-17: Restore suitable bighorn sheep habitat	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-18: Retain a Project Biologist to oversee and implement the PBS Monitoring Plan	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-19: Purchase habitat to partially offset impacts to PBS population	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-19: Provide funding for protection of PBS and I-8 crossing	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund removal of invasive species and install PBS water sources	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund Monitoring Program for PBS	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund aerial surveys for PBS	Peninsular bighorn sheep do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
SS-CM-20: Implement avoidance, mitigation and compensation measures	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Designate a field contact representative	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Clearly define the limits of work limits	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Minimize disturbance to soil and vegetation in FTHL habitat	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Use existing roads whenever possible	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Block newly created access routes as required by the lead agency	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Monitor construction activities in FTHL habitat	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
SS-CM-20: Fence areas of permanent or long-term projects in FTHL management areas	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
SS-CM-20: Develop habitat restoration plan.	Flat-tailed horned lizards do not occur at the Rough Acres Construction Yard. This species is restricted to the first 23 miles of the Project (Link 1); therefore, this mitigation measure is not applicable.
C-01a: Submit cultural resources inventory prior to construction	A Final Class III Inventory for the entire project was approved by the CPUC and BLM on June 2, 2010. In addition, a Cultural Resource Inventory Report for Phase II of the Rough Acres Construction Yard was submitted to the CPUC for review on July 8, 2010.
C-01a: Stake tower locations prior to cultural resource field surveys	No towers will be constructed as part of the activities at Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
C-01b: Protect potential and register-eligible resources from direct project impacts	A Cultural Resources Inventory report for Phase II of the Rough Acres Construction Yard was submitted to the CPUC for review on July 8, 2010. As recommended in the report, ESAs will be established around cultural resources at the Rough Acres Construction Yard, including a 20 meter buffer to ensure that impacts to these resources are avoided.
C-01b: Undertake additional studies if resources cannot be protected from direct impacts	ESAs will be established around cultural resources located within the Rough Acres Construction Yard, including a 20 meter buffer to avoid impacts to these sites; therefore, this measure is not applicable.
C-01b: Incorporate results of studies in HPTP	ESAs will be established around cultural resources located within the Rough Acres Construction Yard, including a 20 meter buffer to avoid impacts to these sites; therefore, this measure is not applicable.
C-01b: Designate NRHP and/or CRHR resources as ESA if within 50 feet of direct impact	ESAs will be established around cultural resources located within the Rough Acres Construction Yard, including a 20 meter buffer to avoid impacts to these sites. This measure will be implemented immediately prior to construction.
C-01b: Erect protective flagging or other markers for ESA	ESAs will be established around cultural resources located within the Rough Acres Construction Yard, including a 20 meter buffer to avoid impacts to these sites. Protective fencing will be installed and maintained for the duration of activities at the yard. This measure will be implemented immediately prior to construction.
C-01b: Develop and implement monitoring program as part of HPTP	A monitoring program was incorporated into the Historic Properties Management Plan. The HPMP was submitted to the CPUC, BLM, USFS, ACOE and Native American Tribes on May 3, 2010. As required under the Programmatic Agreement, this plan was approved by the CPUC, BLM and USFS on July 13, 2010. This plan will be implemented during construction.
C-01c: Submit Historic Properties Treatment Plan	All cultural resources within the Rough Acres Construction Yard will be avoided; therefore an HPTP is not required for this portion of the project.
C-01d: Conduct data recovery investigations to reduce adverse effects	All cultural resources at the Rough Acres Construction Yard will be avoided; therefore, this mitigation measure is not applicable.
C-01d: Submit field closure report prior to construction within 100 feet of affected resource	All cultural resources at the Rough Acres Construction Yard will be avoided; therefore, this mitigation measure is not applicable.
C-01d: Submit final report of data-recovery investigations within 1 year of completing fieldwork	All cultural resources at the Rough Acres Construction Yard will be avoided; therefore, this mitigation measure is not applicable.
C-01e: Implement archaeological monitoring at cultural ESAs	SDG&E will establish an Environmentally Sensitive Area (ESA) around the cultural resource sites at the Rough Acres Construction Yard, this will include a 20 meter buffer. The ESAs will be installed by a qualified cultural resource professional and will be maintained over the duration of use of the yard. No activity will be permitted within the ESAs. In addition, qualified cultural resource and Native American monitors will be present during all ground disturbing activities to monitor activities at the ESAs.
C-01e: Qualification of archaeologists must be approved	The qualifications of the principal archaeologist and archaeological monitors were submitted to the BLM and CPUC for approval on July 20, 2010. Cultural monitor resumes were approved by the BLM on September 30, 2010. Only monitors approved by the CPUC and BLM will work on the Project. A list of all approved monitors will be updated throughout the project.
C-01e: Retain and schedule any required Native American monitoring	A cultural resource and/or Native American monitor approved by the BLM and CPUC will be present if ground disturbing activities are required near culturally sensitive locations.



Mitigation Measure and APM	Status
C-01e: Submit cultural resources monitoring monthly reports during construction	SDG&E will comply with this monthly reporting requirement during construction.
C-01e: Notify if any damage to cultural resource ESAs and divert work to a buffer distance	This mitigation measure will be fulfilled during construction.
C-01f: Train construction personnel to recognize and protect cultural resources	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 video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
C-02a: Avoid known Native American remains and protect with ESA designation	Government-to-government consultations have been ongoing. SDG&E has avoided direct impacts to known locations of Native American human remains and will continue to avoid direct impacts to Native American human remains. Records of consultations are being held with the BLM. No known locations of Native American remains occur at Rough Acres. If Native American remains are encountered during construction, this mitigation measure will be implemented.
C-02a: Contact agencies if sites will be affected	SDG&E has avoided direct impacts to known locations of Native American human remains and will continue to avoid direct impacts to Native American human remains. Any discoveries will be processed in the manner described in this measure and detailed in the HPMP and HPTP for this project.
C-02a: Assist and support MLD with reinterment location	SDG&E will provide all necessary support to the Most Likely Deceased (MLD) if Native American human remains are encountered during construction.
C-02a: Follow laws that govern treatment of human remains	The Rough Acres Construction Yard is not known to contain Native American remains; therefore, this mitigation measure is not applicable.
C-02a: Support in consultations with Native Americans and implement required actions and studies	Government-to-government consultations have been ongoing and are complete for the Rough Acres Construction Yard. Records of consultations are being held by the BLM.
C-02a: Divert work if human remains are discovered and inform officer	This measure will be implemented as defined if human remains are discovered during construction.
C-03a: Implement archaeological monitoring	Archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified for buried archaeological deposits in the Historic Properties Treatment Plan (HPTP). Monitoring will be conducted per the HPTP and the Historic Properties Management Plan (HPMP). The HPMP was approved by the CPUC and BLM on July 15, 2010. The HPTP will be submitted to the CPUC, BLM, SHPO, and Native American Tribes for review and approval when complete.
C-03a: Divert work if buried cultural material discovered and notify archaeologist	If cultural or paleontological resources are encountered or there is damage to an ESA, work in the immediate area of the find will be diverted and the qualified archaeologist will be notified. Once the find has been inspected, the archaeologist will consult with the appropriate agency to make the necessary plans for evaluation.
C-04a: Assist and support BLM in consultations with Native Americans to assess impacts	The preconstruction component of this measure is complete; however, government-to-government consultations are ongoing. Records of consultations are being held with the BLM.
C-04a: Submit documentation of all pre-construction actions 30 days prior to construction	Written documentation of the completion of all preconstruction consultation actions completed to date was included in the HPMP and the "Inventory Report for Sunrise Cultural Resources." Additional information will be provided to the BLM as the consultation process continues prior to and during construction. Actions that are required during or after construction will be defined, detailed, and scheduled in the Historic Properties Treatment Plan (HPTP) and implemented by the Applicant, consistent with Mitigation Measure C-1c. For the Rough Acres yard, the HPTP is not required because the two sites will be completely avoided.
C-05a: Design a long-term plan to protect NRHP and/or CRHR eligible sites 30 days prior to project operation	There are no NRHP- and/or CRHR-eligible sites located at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
C-06a: Provide inventory to conduct visual analysis of all known and potential historic built environment resources in HPTP	All known historic built environment resources located within 0.5 mile of the project have been inventoried and will be included in the Historic Properties Treatment Plan (HPTP). Historic built environment resources that are eligible for nomination to the National Register were analyzed for visual impacts from the project. The HPTP is currently being prepared and will include mitigation measures for visual impacts. SDG&E will submit the HPTP to the BLM and CPUC for review and approval once it is available. For the Rough Acres yard, the HPTP is not required because the two sites will be completely avoided.
C-06e: Minimize visual intrusion of aboveground portion on Highway 80	Activities at the Rough Acres Construction Yard will not take place on Old Highway 80; therefore, this mitigation measure is not applicable.
C-06e: Include protection plan for Old Highway 80 in HPTP	Activities at the Rough Acres Construction Yard will not take place on Old Highway 80; therefore, this mitigation measure is not applicable.
CR-APM-01: Instruct and provide a contract addressing protection and avoidance of cultural resources	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. A construction contract addressing 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. Records of these contracts will be kept with the monitor. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project.
CR-APM-02: Flag archaeological sites eligible for National Register	Two cultural resource sites within the Rough Acres Construction Yard will be flagged for avoidance immediately prior to construction activities.
CR-APM-02: Implement impact avoidance and APMs during construction	Two cultural resource sites within the Rough Acres Construction Yard will be flagged for avoidance immediately prior to construction activities. During construction, compliance with this measure will be monitored.
CR-APM-03: Report within 24 hours any previously unidentified cultural resource discovered	If cultural or paleontological resources are encountered during use of the Rough Acres Construction Yard, an authorized BLM officer will be contacted within 24 hours of discovery.
CR-APM-03: Suspend operations in the immediate area of the discovered cultural resource	Operations will be suspended in the immediate work area if cultural resources are discovered. This mitigation measure will be fulfilled during construction.
CR-APM-03: Evaluate the discovered resource and determine appropriate actions.	This mitigation measure will be fulfilled during construction.
CR-APM-03: Develop and implement a treatment plan to mitigate impacts	The HPMP, approved by the CPUC and BLM on July 15, 2010, provides direction for discovery and mitigation of impacts to cultural resource sites. In addition, the HPTP, which is currently being prepared, will provide direction for discovery and mitigation of impacts to cultural resource sites. For the Rough Acres yard, the HPTP is not required because the two sites will be completely avoided.
CR-APM-04: Conduct maintenance and other activities in conformance with national standards	There are no historic properties located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-05: Follow guidelines for cultural resources	The Historic Properties Management Plan approved on July 15, 2010 incorporates the guidance provided in this measure. SDG&E will continue to comply with cultural resources mitigation measures as outlined in the MMCRP.
CR-APM-06: Avoid historic properties by fencing or barricading	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-06: Implement a plan if historic properties cannot be avoided	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-07: Control impacts that can deteriorate historic	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-07: Implement protective measures to minimize erosion and weeds	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.



Mitigation Measure and APM	Status
CR-APM-07: Implement control measures to minimize vibration, dust, and fumes	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-07: Minimize deterioration to buildings and structures	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-07: Implement a plan if deterioration cannot be avoided	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-08: Avoid and protect landscaping essential to historic property	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-08: Minimize intrusion to the historic setting	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-09: Restrict construction and operation access	No historic properties are located within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-09: Instruct construction and maintenance personnel to protect sensitive properties	Construction and maintenance personnel will be instructed in protection of sensitive properties.
CR-APM-10: Span conductors over historic property	Conductors will not be installed as part of the construction activities at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-10: Boring shall avoid disturbance to historic property	Historic properties do not occur at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
CR-APM-11: Implement standard practices on private land	SDG&E has conducted cultural surveys for areas not identified in the approved FEIR/EIS. The preconstruction component of this measure has been complete and SDG&E's standard practices will be implemented throughout the duration of the project.
CR-APM-12: Conduct cultural surveys for staging areas not yet identified	Rough Acres Construction Yard activities will not require additional staging areas outside the yard; therefore, this mitigation measure is not applicable.
PAL-01a: Submit an inventory of significant paleontological resources	SDG&E has conducted and submitted a "Paleontological Records" report dated February 25, 2010 and a "Sunrise Powerlink Paleontological Monitoring and Discovery Treatment Plan" dated April 7, 2010. These documents were approved by the CPUC, BLM and other involved land-managing agencies on July 30, 2010.
PAL-01b: Submit a Paleontological Monitoring Treatment Plan	The Paleontological Monitoring and Treatment Plan was developed by a qualified paleontologist based on Society of Vertebrate Paleontology guidelines and was approved by the BLM, CPUC and other agencies with jurisdiction on July 20, 2010.
PAL-01c: Conduct full-time paleontological construction monitoring	There are no paleontological resources within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	There are no paleontological resources within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
PAL-01c: Divert construction activities when significant fossils are recovered	There are no paleontological resources within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	There are no paleontological resources within the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
PAL-01e: Train construction personnel on paleontological resources	The SWEAP video, approved by the CPUC on March 15, 2010, includes instructions on the recognition of possible subsurface paleontological resources and protection of all paleontological resources during use of the yard. The SWEAP video will be shown to all project personnel prior to use of the Rough Acres Construction Yard and enforced throughout all phases of the Project.


**Location:** Rough Acres II


Mitigation Measure and APM	Status
N-01a: Obtain a variance for night construction or 200 feet from sensitive receptors 45 days prior to construction	This mitigation measure will be fulfilled during construction. If it is determined that a variance is needed for construction noise, it will be applied for and obtained prior to conducting activities requiring the variance.
N-01a: Employ noise suppression techniques	This measure will be implemented during construction.
NOI-APM-01: Provide notice to sensitive receptors and residences within 300 feet of construction	Sensitive noise receptors are not located within 300 feet of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
NOI-APM-01: Provide a public liaison person before and during construction.	The Construction Notification Plan identifies a public liaison person who will respond to noise disturbance concerns of neighboring receptors. The plan was approved by the CPUC on March 1, 2010.
NOI-APM-01: Establish a toll free number for questions and complaints	The Construction Notification Plan, which was approved by the CPUC on March 1, 2010, identifies the toll free telephone number established by SDG&E for receiving questions or complaints during construction. The Construction Notification Plan also identifies procedures for responding to callers.
T-09a: Prepare a Construction Transportation Management Plan	A project-wide Traffic Study was submitted on April 28, 2010 and approved by Imperial County on August 19, 2010, San Diego County on September 29, 2010 and Caltrans on August 19, 2010. The Study revealed that there is only one area, Highway 67 on Link 5, where a CTMP will be required. Documentation of coordination with San Diego County and Caltrans was submitted on October 20, 2010.
HS-APM-12: Develop a Traffic Control Plan	A project-wide Traffic Study was completed on March 3, 2010. The Study revealed that no significant traffic impacts relating to emergency vehicles at the Rough Acres Construction Yard will result from project activities; therefore, a TCP is not required.
AQ-01h: Obtain NOx emission reduction credits or fund incentive programs prior to construction	Mitigation measure AQ-01h, which was required to achieve emission reductions to levels below the federal thresholds is no longer applicable. The emissions expected based on the PMR are less than the federal General Conformity de minimus thresholds for San Diego Air Basin as determined in the Memorandum of Determination issued by the CPUC in September 2010. For additional information refer to page 9 of the memorandum.
WQ-APM-03: Clearly mark restricted sites prior to construction	The jurisdictional drainage located within the Phase II portion of the Rough Acres Construction Yard will be flagged and avoided to prevent any impacts. The approved SWEAP video includes instruction on the avoidance of sensitive resources. The video will be shown to all project personnel prior to use of the yard and will be enforced throughout all phases of the project.
WQ-APM-03: Train construction personnel to recognize markers	The identified jurisdictional drainage will be flagged and avoided to prevent impacts. In addition, the SWEAP video approved by the CPUC on March 15, 2010 includes recognition of markers and equipment movement restrictions. This SWEAP video will be shown to all project personnel and enforced throughout all phases of the Project.
WQ-APM-04: Maintain adequate distance from stream banks	The jurisdictional drainage located within Phase II of the Rough Acres Construction Yard will be flagged immediately prior to construction for avoidance.
WQ-APM-04: Use existing bridges to cross major streams	No major streams are associated with the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
WQ-APM-04: Span riparian areas where feasible	No structures are associated with the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
WQ-APM-04: Prepare and implement erosion control BMPs per the SWPPP	The SWPPP and NPDES permit associated with the following WDID # 737C357440 was submitted to the CPUC on September 29, 2010. The conditions of the permit and SWPPP will be implemented and enforced during construction to prevent and avoid hydrologic impacts.
WQ-APM-04: Select upland pull sites to minimize disturbance to water resources	No pull sites will be located at the Rough Acres Construction Yard; therefore, this mitigation measure does not apply.
WQ-APM-04: Do not place structures in streambeds or drainage channels	No structures will be installed at the Rough Acres Construction Yard; therefore, this mitigation measure does not apply.
WQ-APM-06: Avoid designated surface water protection areas	There are no designated surface water protection areas located within Phase II of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
WQ-APM-06: No diversions, detention, retention, or consumption of surface waters	Activities at the Rough Acres Construction Yard will not include the diversion, detention, retention or consumption of surface water; therefore, this mitigation measure is not applicable.
WQ-APM-06: Conduct interviews with affected landowners prior to construction	Groundwater supplies will not be used during project construction; therefore this mitigation measure is not applicable.
WQ-APM-06: Negotiate with landowners to provide alternative water supplies	Groundwater supplies will not be used during project construction; therefore this mitigation measure is not applicable.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	There are no community or municipal wells within 400 feet of the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
WQ-APM-16: Conduct site-specific assessment where sensitive water resources cannot be avoided	Biological, hydrology and cultural resource assessments were completed in accordance with the ACOE and CDFG guidelines. Permit applications for ACOE 404 Nationwide 12, CDFG 1600 Streambed Alteration Agreement and Regional Water Quality Control Board 401 Water Quality Certification were submitted on March 30, 2010.
WQ-APM-16: Locate staging/storage areas outside of riparian areas	The jurisdictional drainage located within Phase II of the Rough Acres Construction Yard will be properly delineated and flagged to prevent impacts.
WQ-APM-16: Obtain a Streambed Alteration Agreement when constructing new access through streambeds	No new access is proposed at the Rough Acres Construction Yard; therefore, this mitigation measure is not applicable.
F-01c: Do not obstruct firefighting equipment or crews	This measure will be implemented during construction.
F-01c: Coordinate fire suppression activities and unobstruct access roads at all times	This measure will be implemented during construction.
F-01c: Cease construction in work areas if fire within 1,000 feet	This measure will be implemented during construction.
F-01c: Contact dispatch centers 2 days prior to helicopter use	This measure will be implemented during construction.



**Legend**

 ESA

 Rough Acres  
Construction Yard

