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February 1, 2011

Mr. Thomas Zale, Project Manager
Bureau of Land Management
El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243

**Re: Amendment to Notice to Proceed (NTP) Request to Upgrade Imperial Valley Substation,
Segment 1 - Sunrise Powerlink Project**

Dear Mr. Zale:

On December 18, 2008, the California Public Utilities Commission (CPUC) approved the Final Environmentally Superior Southern Route (Decision D.08-12-058) to construct the Sunrise Powerlink Project (Project). The decision grants San Diego Gas & Electric Company (SDG&E) a Certificate of Public Convenience and Necessity and conditionally authorizes construction of the Project with the implementation of preconstruction mitigation measures (MMs). A Notice of Determination was submitted to the State Clearinghouse on December 18, 2008. The Bureau of Land Management (BLM) issued a Record of Decision on January 20, 2009, and Right-of-Way Grants CACA 47658 and CACA 47658-01 on February 24, 2009.

As previously discussed with the BLM, SDG&E intends to construct the Project in Links and Segments to coincide with environmental restrictions, preconstruction mitigation measure implementation scheduling, and planned outages.

SDG&E is formally requesting authorization from the BLM to begin upgrades to the Imperial Valley Substation, which is located at mile marker 16.5 on U.S. Highway 98 in Imperial County. The Imperial Valley Substation is also known as Segment 1 and is the eastern terminus of the Project. The upgrades are required to accommodate termination of the 500 kV circuit into Imperial Valley Substation. Currently, the 500 kV Southwest Power Link transmission line passes through the Imperial Valley Substation as it brings power from Arizona to Imperial Valley and San Diego, and connects to the Imperial Irrigation District transmission infrastructure.

Summary of Upgrade Activities - In addition to a new 60-foot by 120-foot steel storage structure, upgrades to the substation equipment will be made. These upgrades include the addition of five circuit breakers, the installation of A-frame and bus support structures to tie the new 500 kV circuit into the substation, and new control panels and wiring in the existing 500 kV control house. All construction activities will be conducted and associated equipment will be operated and stored within the existing substation fence line in previously disturbed areas. There will be no increase in the total acreage of the substation. The new structures and equipment will be similar to those already in place within the substation.

Schedule - Construction activities at the substation are anticipated to begin upon receipt of the NTP and are scheduled to be completed within one year.

All of the preconstruction MMs applicable to upgrade of the Imperial Valley Substation have been completed or will be implemented prior to mobilizing to the site. A list of all of the preconstruction MMs

that apply to the Imperial Valley Substation upgrade and their status is included as Attachment A: Preconstruction Status Report to this NTP request. SDG&E requests to begin construction activities for upgrades to Imperial Valley Substation based on the following conditions:

1. Project construction is expected to begin outside the general avian breeding season (January 15 through August 15) and/or raptor breeding season (January 1 through September 15). Should construction begin within the aforementioned breeding season, preconstruction surveys for active nests will be conducted by a qualified biologist in accordance with MM B-08a.
2. A public notice mailer will be distributed no less than 15 days prior to construction. The notice will be mailed to all residents or property owners within 1,000 feet of the Imperial Valley Substation in accordance with MM L-01a. A map identifying sensitive receptors has been included as Attachment B to this NTP request.
3. No work will occur until a NTP is received from the BLM.

With the exception of the conditions listed above, all preconstruction measures have been met for the Imperial Valley Substation (see Attachment A). All other required mitigations measures, as stated in the Mitigation Monitoring, Compliance, and Reporting Program, will be implemented during construction. We respectfully request authorization of this NTP request by November 19, 2010. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 650-4064.

Sincerely,

Linda Collins

Linda Collins
Environmental Compliance Lead
San Diego Gas & Electric Co.

Attachments (2): Preconstruction Status Report
Sensitive Receptors Map

cc: Billie Blanchard, CPUC
Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group
Alan Colton, SDG&E

ATTACHMENT A

Mitigation Measure Tracking Table

Attachment A: Preconstruction Status Report

Tuesday, January 18, 2011

11:34:29 AM

Report Criteria:

AGENCY: BLM

LOCATION: Imperial Valley Substation

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

 -To Be Implemented During Construction

 -Complete

 -Pending OR To Be Implemented Immediately Prior to Construction

 -Not Applicable

Note: This table contains U.S. Fish and Wildlife Service Conservation Measures in addition to the mitigation measures and applicant proposed mitigation measures from the Final EIS/EIR. The conservation measures are denoted in the table as G-CM-# or SS-G-#.

The mitigation measure and APM numbers listed in this table reference the actual measures in the MMCRP. The text after the measure number provides a summary of specific tasks within each measure, but is not intended to provide the entire language contained within the MMCRP. Please note that several measures include multiple entries in this table. These multiple entries break out the various requirements or tasks contained within that measure. Please reference the MMCRP for the actual requirements for each measure or visit www.cpuc.ca.gov/Environment/info/aspen/sunrise.

Mitigation Measure and APM	Status
B-01a: Locate surface disturbing components in previously disturbed areas	All work will occur within the fenced boundaries of the Imperial Valley Substation; therefore, disturbance to vegetation and soils will be minimized.
B-01a: Restore sensitive vegetation communities to pre-construction conditions	No sensitive vegetation communities occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Maintain and monitor restoration in ABDSP for 5 years	The Imperial Valley Substation is not located in the ABDSP; therefore, this mitigation measure is not applicable.
B-01a: Double mitigation ratios on lands already in mitigation	Sensitive vegetation communities do not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Delineate all limits of construction	The limits of construction will be delineated with orange construction fencing or flagging prior to the start of construction.
B-01a: Coordinate gate installation 60 days prior to construction	All activities will be restricted to the existing Imperial Valley Substation and access road. No new gates are required at the substation site; therefore, this mitigation measure is not applicable.
B-01a: Submit documentation of coordination with the administering agency of the road/trail 30 days prior to construction	SDG&E will use existing access roads associated with the Imperial Valley Substation; 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 Imperial Valley Substation; 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. The mitigation ratios for unauthorized impacts have been eliminated as described in Conservation Measure G-CM-6 of the reinitiated Biological Opinion, dated November 10, 2010.
B-01a: Submit a Habitat Restoration Plan	Sensitive vegetation communities will not be impacted by construction activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Maintain and monitor habitat restoration for 5 years	Sensitive vegetation communities will not be impacted by construction activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Mitigate for impacted habitat	Sensitive vegetation communities will not be impacted by construction activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
B-01a: Mitigate for the loss of native trees and tree trimming	Removal and trimming of native trees will not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Monitor trimmed native trees for 3 years	Removal and trimming of native trees will not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Mitigate for native tree removal	Removal and trimming of native trees will not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Mitigate trimmed trees	Removal and trimming of native trees will not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Maintain and monitor all restoration for 10 years	Removal and trimming of native trees will not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Acquire off-site mitigation before line is energized	Sensitive vegetation communities will not be impacted by activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Submit a Habitat Acquisition Plan 120 days prior to construction	Sensitive vegetation communities and habitat will not be impacted by activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Submit a Habitat Management Plan	Sensitive vegetation communities and habitat will not be impacted by activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01a: Include legal descriptions of all legal parcels	Sensitive vegetation communities and habitat will not be impacted by activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
B-01c: Send weekly monitoring reports	Monitoring reports will be prepared and submitted on a weekly basis. This mitigation measure will be fulfilled during construction.
B-01c: Send annual monitoring reports	Imperial Valley substation is an existing substation with no existing plant or animal habitat; therefore, post construction annual monitoring reports will not be required and this measure is not applicable.
B-01c: Qualified biologists shall handle all environmental issues and have the authority to issue stop work orders	A qualified biological monitor with the authority to issue stop work orders will be on-site during construction activities. This mitigation measure will be fulfilled during construction.
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-07a: Cover excavations or install fencing when not in use	Steep-walled trenches or excavations will be covered, fencing will be installed or sloped on one end (i.e., ramped) to prevent the entrapment of wildlife during construction. This mitigation measure will be fulfilled during construction.
B-07a: Inspect excavations 3 times per day and before backfilling	During construction, a qualified biological monitor will inspect any open trenches as required.
B-07a: Look under vehicles and equipment before moving for presence of wildlife	During construction, 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.
B-07a: Contact within 48 hours of finding a dead or injured listed species	In accordance with this measure, during construction should a dead or injured listed species be found in a trench or excavation or anywhere in the construction zone or along an access road, a qualified biologist shall contact the CPUC, BLM and the Wildlife Agencies within 48 hours of the finding. The qualified biologist shall report the species found, the location of the finding, the cause of death (if known), and shall submit a photograph and any other pertinent information.

Mitigation Measure and APM	Status
B-07b: Mitigate impact by following all applicable measures in the Flat-Tailed Horned Lizard Rangewide Management Strategy	SDG&E will construct the Imperial Valley Substation consistent with the Flat-tailed Horned Lizard (FTHL) Rangewide Management Strategy, including using existing access roads, limiting work to previously disturbed areas, conducting biological monitoring, and discussing protection measures for FTHL during worker environmental training. Construction of the Imperial Valley Substation will not result in direct impacts to FTHL habitat since all work will occur in areas denuded of vegetation. However, a proffer of monetary contribution form and check in the amount of \$348,450 was provided to the BLM on November 13, 2009 for impacts to FTHL habitat on Link 1, including construction of the towers near the substation.
B-07b: Submit a Habitat Management Plan	A proffer of monetary contribution form and check in the amount of \$348,450 was provided to the BLM on November 13, 2009. Because no FTHL habitat has been acquired, a Habitat Management Plan for acquired FTHL habitat is not required and this mitigation measure is not applicable.
B-07d: Conduct survey within 30 days prior to construction	A burrowing owl survey will be conducted by a qualified biologist within 30 days prior to construction as outlined in this measure.
B-07d: No disturbance shall occur if burrowing owl is present	Daily pre-construction sweeps shall include searching for burrowing owl, their pellets and other sign in the construction zone and 250 feet beyond. Daily sweeps will include searching uncovered pipes and similar construction materials.
B-07d: Inspect construction material daily	This mitigation measure will be fulfilled during construction.
B-07d: Passively relocate owls prior to construction and outside of breeding season September 1-January 31	If owls are found at the site prior to or during construction, passive relocation of burrowing owls will be performed in coordination with the CDFG as outlined in this measure.
B-07d: Mitigate for loss of burrowing owl habitat	Preconstruction surveys for burrowing owls will be required 30 days prior to construction. If burrowing owls are encountered, mitigation for loss of occupied burrowing owl habitat shall occur as outlined in this mitigation measure.
B-07d: Submit a Habitat Management Plan	To date, no burrowing owl occupied or unoccupied burrows have been observed during resource surveys. Pre-construction surveys will be conducted prior to construction to determine if burrowing owl habitat is impacted by construction activities.
B-08a: Clear vegetation August 16-January 14 and remove/trim trees September 16-December 31	There is no vegetation within the fence line of the substation; therefore, this measure is not applicable.
B-08a: Conduct pre-construction avian breeding surveys within 10 days of initiating work January 15-August 15 and submit surveys	If construction should occur during the general avian breeding season, surveys for breeding birds will be conducted by a qualified biologist 10 days prior to construction.
B-08a: Conduct pre-construction raptor breeding surveys within 10 days of initiating work January 1-September 15 and submit surveys	If construction should occur within the raptor breeding season, pre-construction surveys for active raptor nests will be conducted by a qualified biologist within 10 days of construction. Results of the surveys will be submitted to Wildlife Agencies for review and approval.
B-08a: Proceed with construction if no active nests observed	If construction should occur within the general avian breeding season (January 15 through August 15) and raptor breeding season (January 1 through September 15), pre-construction surveys for active avian and raptor nests will be conducted by a qualified biologist.
B-08a: Proceed with construction if active nests found per conditions	If construction should occur within the general avian breeding season (January 15 through August 15) or raptor breeding season (January 1 through September 15) and should active nests be found, work will proceed as outlined in this mitigation measure.
B-08a: Monitor active nests weekly until fledged	If construction should occur within the general avian and raptor breeding seasons, pre-construction surveys for active avian and raptor nests will be conducted by a qualified biologist. If active nests are present, they will be monitored on a weekly basis until the nestlings fledge.
B-08a: Report survey results and monitoring	If construction should occur within the general avian and raptor breeding seasons, pre-construction surveys for active avian and raptor nests will be conducted by a qualified biologist. If active nests are present, they will be monitored on a weekly basis until the nestlings fledge. Results of nesting surveys will be submitted as required and a qualified biologist will continue to monitor the site as appropriate. Weekly monitoring reports will be submitted the appropriate agencies.

Mitigation Measure and APM	Status
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, including the Imperial Valley Substation. The results of the surveys were provided to the resource agencies for review. Work at the Imperial Valley Substation will be limited to previously disturbed areas and existing access roads that are denude of vegetation. No sensitive flora or fauna was identified within proposed work areas; however, the substation is located within flat-tailed horned lizard habitat.
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 on existing paved and unpaved areas of the substation; therefore, this mitigation measure does not apply.
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 substation upgrades; therefore, this mitigation measure is not applicable.
BIO-APM-03: No parking or driving under oak trees	There are no oak trees at the Imperial Valley Substation; therefore, this mitigation measure does not apply.
BIO-APM-03: Observe a 15 mph speed limit on dirt access roads	During construction, in addition to regular watering to control fugitive dust created during clearing, grading, earth-moving, excavation, and other construction activities which could interfere with plant photosynthesis, a 15-mile-per-hour speed limit shall be observed on dirt access roads to reduce dust and allow reptiles and small mammals to disperse.
BIO-APM-04: Restrict project activity to disturbance areas	Project and survey activities will be confined to areas noted in final dimensioned engineering drawings as shown in the final SWPPP, which was submitted to the CPUC on September 29, 2010.
BIO-APM-04: Keep survey vehicles on existing roads	Requirements for restriction of survey vehicles and crews to existing access roads or disturbed areas are not applicable to substation upgrade activities; therefore, this mitigation measure is not applicable.
BIO-APM-04: Obtain prior approval for surveying activities in sensitive habitat	Construction activities will be limited to pre-disturbed areas within the substation, which is fenced and gated. Substation upgrade activities or parking and material storage proposed on the pre-disturbed area east of the substation will not require brush clearing or disturbance of sensitive vegetation. Therefore, this mitigation measure is not applicable.
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 substation upgrades; therefore, this mitigation measure is not applicable.
BIO-APM-05: Obtain permits for streambed crossings and roads constructed parallel to streambeds	There are no streambeds at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
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	There are no sensitive plant populations that exist within the substation; therefore, this mitigation measure is not applicable.
BIO-APM-09: Brush previously cleared and maintained within 2 years or less require no pre-activity survey	There will be no brush clearing at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
BIO-APM-09: Brush clearing will not be conducted during breeding season without a pre-activity survey	There will be no brush clearing at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
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.

Mitigation Measure and APM	Status
BIO-APM-10: Firearms are prohibited	A SWEAP video was approved by the CPUC on March 15, 2010. The SWEAP will be shown to all project personnel. The video includes instructions addresses that firearms are prohibited in all Project areas (with the exception of Security Personnel). The no firearms rule will be 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-16: Schedule tree trimming during non-sensitive times	This mitigation measure is not applicable to construction activities occurring at the substation. There are no trees within the substation area.
BIO-APM-16: Vary tree removal widths to maintain edge diversity	This mitigation measure is not applicable to construction activities occurring at the substation. There are no trees or riparian areas within the substation area.
BIO-APM-17: Close all new access or spur roads not used for future operations and maintenance	No new access roads will be constructed for the substation upgrades; therefore, this mitigation measure is not applicable.
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features	There are no sensitive features or endangered species or sensitive habitat within the existing substation footprint; therefore, this mitigation measure does not apply.
BIO-APM-18: Submit site surveys when constructing poles or roads in high value habitats cannot be avoided	Surveys have been performed to determine the presence or absence of endangered species in sensitive habitats along the project route. These surveys were determined to be complete by the Wildlife Agencies as described in G-CM-32 of the revised Biological Opinion. If new areas of disturbance are identified, site specific surveys will be conducted to determine the presence or absence of endangered species. This measure will be implemented during construction.
BIO-APM-18: Construct crossings at right angles to streambeds if access roads cannot avoid sensitive water features	There are no sensitive features or endangered species or sensitive habitat within the existing substation footprint; therefore, this mitigation measure does not apply.
BIO-APM-19: Use Section 7 process to obtain incidental take authorization	There are no sensitive features or endangered species or sensitive habitat within the existing substation footprint; therefore, implementation of Section 7 of the Endangered Species Act is not applicable.
BIO-APM-20: Leave vegetation in place where re-contouring is not required	No vegetation clearing will occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
BIO-APM-21: Conform to "Suggested Practices for Raptor Protection on Power Lines"	A memo was submitted to the CPUC on Tuesday, September 15, 2010 describing that the conductor spacing meets recommended suggested practices where feasible and the CPUC confirmed compliance with this measure on September 16, 2010. Substation upgrade activities do 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	No vegetation clearing will occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
BIO-APM-23: Remove only minimum amount of vegetation necessary for construction	No vegetation clearing will occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
BIO-APM-23: Conserve topsoil in areas of sensitive habitat	No sensitive habitat is located at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
BIO-APM-24: Secure appropriate covers over excavations	There are no livestock located at the Imperial Valley Substation which is fenced and gated. Steep-walled trenches or excavations will be covered or fencing will be installed as described in mitigation measure B-07a.

Mitigation Measure and APM	Status
BIO-APM-25: Revegetate disturbed soils	Areas disturbed during construction will be returned to pre-construction conditions, to the extent possible.
BIO-APM-26: Slope excavations on one end	This mitigation measure will be fulfilled during construction.
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 an existing raptor nest 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 maternity 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 were submitted on October 1, 2010. The amended report was approved by CPUC on October 11, 2010. No potential bat roost trees were observed on the project; therefore, this mitigation measure is not applicable.
BIO-APM-29: Minimize impacts of exterior lighting adjacent to preserved habitat	During construction, exterior lighting will be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat to the maximum extent practicable.
BIO-APM-29: Minimize vehicle speed and volume	This mitigation measure will be fulfilled during construction.
G-CM-01: Provide biological monitoring and perform periodic inspections once or twice a week	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site and periodic inspections will be performed. (see B-01c)
G-CM-02: Use SDG&Es Water Quality Construction BMP Manual.	SDG&E will implement erosion control techniques outlined in measure WQ-APM-4 and in accordance with the SWPPP submitted on September 29, 2010.
G-CM-03: Obtain NPDES permit and implement a SWPPP.	The SWPPP and NPDES permit associated with WDID #7 13C357488 was submitted to the CPUC on September 29, 2010. The conditions of the permit and SWPPP will be implemented and enforced during the construction to prevent and avoid water quality impacts. (See WQ-APM-14)
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-01a
G-CM-06: Keep all activities within designated temporary and permanent disturbance areas.	Project and survey activities will be confined to areas noted in the April 30, 2010 Mapbook submitted to the CPUC on May 14, 2010 and approved by BLM and CPUC through a Determination Memorandum dated September 22, 2010.
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-07: Brush clearing will require prior approval from the biological monitor in conformance with the CMs.	This measure is not applicable at the Imperial Valley Substation since no brush clearing will be required.
G-CM-08: Wire stringing	This measure will be implemented during construction.
G-CM-09: Disposal of wastes.	See BIO-APM-7
G-CM-10: Emergency repairs will follow 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

Mitigation Measure and APM	Status
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.	There are no sensitive features or endangered species or their sensitive habitat within the substation site; therefore, this mitigation measure does not apply.
G-CM-12: Leave vegetation in place where re-contouring is not required. Restore disturbed soils based on HRP per G-CM-16.	No vegetation clearing will occur at the substation; therefore, this mitigation measure is not applicable.
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
G-CM-14: Locate surface-disturbing activities in previously disturbed areas, to the extent practical.	There are no sensitive features or endangered species or their sensitive habitat within the substation site; therefore, this mitigation measure does not apply.
G-CM-15: Use of construction mats.	Construction will occur within the boundaries of the existing substation. No work will occur requiring the use of temporary construction mats; therefore, this mitigation measure is not applicable.
G-CM-15: Incorporate impact of using mats into HRP (G-CM-16).	Construction will occur within the boundaries of the existing substation. No work will occur requiring the use of temporary construction mats; therefore, this mitigation measure is not applicable.
G-CM-16: Habitat Restoration Plan approval.	See B-01a
G-CM-16: Impacts, compensation, and a qualified habitat restoration specialist.	See B-01a
G-CM-16: Temporary impacts to desert scrub and dune habitats.	See B-01a
G-CM-16: Maintenance and monitoring.	See B-01a
G-CM-17: Provide assurances to fund the acquisitions	This measure is not applicable to the Imperial Valley Substation. No impacts to habitat will occur.
G-CM-17: Off-site compensation and property acquisition.	This measure is not applicable to the Imperial Valley Substation. No impacts to habitat will occur.
G-CM-20: Develop a Weed Control Plan for pre-construction and long-term invasive weed abatement.	A Final Weed Control Plan was approved on September 8, 2010 (See B-03a).
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. (See AQ-01a)
G-CM-24: Implement additional dust control measures	See AQ-01a
G-CM-25: Restrict vehicle movement to access roads.	See BIO-APM-3
G-CM-26: Delineate construction limits.	This measure will be implemented during and following the completion of construction.
G-CM-27: Build access roads at right-angles to stream crossings.	This measure is not applicable to the Imperial Valley Substation. No new access roads will be constructed.
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-01a). Signs will be posted on access roads prohibiting unauthorized users during construction.

Mitigation Measure and APM	Status
G-CM-29: Provide funding for protection from off-road vehicle enthusiasts	This measure is not applicable to the Imperial Valley Substation since the modifications will not require land set aside for habitat conservation.
G-CM-30: Permanently close access roads not required for project on-going maintenance.	See BIO-APM-17
G-CM-32: Surveys for USFWS listed species.	This measure is not applicable at the Imperial Valley Substation since no USFWS listed species occur at this site.
G-CM-33: Delineate plant population boundaries.	See BIO-APM-8
G-CM-35: Rare plants shall be salvaged where avoidance is not feasible.	This mitigation measure is not applicable to construction activities at the Imperial Valley Substation. Construction activities will occur only within previously disturbed area.
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-07a
G-CM-40: Look under vehicles and around equipment for wildlife prior to use.	See B-07a
G-CM-41: Do not dispose of excess fill, brush, or debris within waters of the U.S.	Waters of the U.S. will not be impacted by activities at the substation; therefore, this measure does not apply.
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.	Waters of the U.S. will not be impacted by activities at the substation; therefore, this measure does not apply.
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 substation; therefore, this measure does not apply.
G-CM-43: Qualified biologist present during ROW restoration.	See B-1a
G-CM-44: Determine project limits for temporary and permanent disturbance to occur during maintenance activities.	Construction and maintenance activities will be limited to previously disturbed areas within the substation; therefore, this mitigation measure is not applicable.
G-CM-45: Purchase/dedicate suitable habitat for preservation.	This measure is not applicable to the Imperial Valley Substation since modifications at the substation will not result in new permanent impacts.
G-CM-46: Minimize impacts during O&M Operations.	There will be no disturbance to vegetation, drainage channels, or stream banks during operation and maintenance activities; therefore, this mitigation measure is not applicable.
G-CM-47: Training program to include invasive species identification and control measures.	This measure will be implemented during construction.
G-CM-48: Maintain access roads once every two years.	No new access roads will be installed at the substation as part of the scope of work; therefore, this mitigation measure is not applicable.
G-CM-49: Brush clearing around project facilities for maintenance activities within a two-year period or shorter.	There will be no brush clearing at the substation; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
G-CM-49: Preactivity surveys required in areas not maintained within a two-year period.	There will be no brush clearing at Imperial Valley Substation; therefore, this mitigation measure is not applicable.
G-CM-50: Conduct brush clearing outside of the general avian breeding season.	There will be no brush clearing at the substation; therefore, this mitigation measure is not applicable.
G-CM-50: Implement noise reduction measures is active nests are found in area.	There will be no brush clearing at the substation; therefore, this mitigation measure is not applicable.
G-CM-51: Maintenance activities shall occur outside of the general avian breeding season.	This measure will be implemented post construction. (See B-12a)
SS-CM-01: Conduct ground- or vegetation disturbance outside of the gnatcatcher breeding season	This mitigation measure is not applicable to construction activities at the Imperial Valley Substation. Construction activities will occur only within the previously disturbed, fenced substation boundaries. There are no sensitive species or associated habitat that exist within the substation boundaries.
SS-CM-02: Conduct O&M activities outside of the gnatcatcher breeding season	Coastal California gnatcatcher do not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-03: Survey for gnatcatchers within 10 days prior to initiating activities	Coastal California gnatcatcher do not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-04: Purchase and manage occupied gnatcatcher habitat	Coastal California gnatcatcher do not occur on this component of the project; 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	Least Bell's vireo habitat does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-05: Survey for nesting vireos	Least Bell's vireo do not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-06: Purchase and manage suitable vireo habitat	Least Bell's vireo do not occur at the Imperial Valley Station; therefore, this mitigation measure is not applicable.
SS-CM-07: Monitor construction in critical and occupied Quino habitat	Neither Quino checkerspot butterfly nor its habitat occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-08: Develop site-specific restoration for temporarily impacted Quino habitat	Quino habitat does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-09: Limit impacts to Quino habitat from O&M activities	Quino habitat does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-10: Purchase and manage occupied Quino habitat	Quino habitat does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-11: Implement the Arroyo Toad Translocation and Monitoring Program	Arroyo toad habitat does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-12: Daylight use of access roads to avoid/minimize impacts to arroyo toads.	Arroyo toad breeding habitat does not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-13: No construction activities within arroyo toad breeding habitat.	Arroyo toad breeding habitat does not occur on this component of the project; therefore, this mitigation measure is not applicable.
SS-CM-15: Purchase and manage occupied arroyo toad breeding habitat	Arroyo toad do not occur on this component of the project; 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 Imperial Valley Substation; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
SS-CM-17: Restore suitable bighorn sheep habitat	Peninsular bighorn sheep does not occur at the Imperial Valley Substation; 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 Imperial Valley Substation; 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 Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund Monitoring Program for PBS	Peninsular bighorn sheep do not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-19: Fund aerial surveys for PBS	Peninsular bighorn sheep do not occur at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-19: Avoid water sources used by PBS	Peninsular bighorn sheep do not occur at the Imperial Valley Substation ;therefore, this mitigation measure is not applicable.
SS-CM-20: Implement avoidance, mitigation and compensation measures	Activities at the Imperial Valley Substation will occur within the fenced boundaries of the site; therefore, this mitigation measure is not applicable.
SS-CM-20: Designate a field contact representative	SDG&E has designated Steve Riggs as the environmental field contact representative.
SS-CM-20: Clearly define the limits of work limits	All approved project work areas will be clearly delineated immediately prior to construction along the project alignment. In addition, a SWEAP training video describes project work limits and restrictions and is shown to all project personnel prior to work on the project. These measures will be implemented immediately prior to construction.
SS-CM-20: Minimize disturbance to soil and vegetation in FTHL habitat	Activities at the Imperial Valley Substation will occur within the fenced boundaries of the site; therefore, this mitigation measure is not applicable.
SS-CM-20: Use existing roads whenever possible	Only existing roads will be used to access the Imperial Valley Substation. This measure will be implemented during construction.
SS-CM-20: Monitor construction activities in FTHL habitat	All construction activities will take place within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-20: Fence areas of permanent or long-term projects in FTHL management areas	All construction activities will take place within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
SS-CM-20: Develop habitat restoration plan.	All activities will take place within previously disturbed areas of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
V-01a: Screen construction sites if visible from public areas	Imperial Valley Substation is an existing substation. Upgrades and all staging and material and equipment storage areas will occur within the existing fence line. This mitigation measure is not applicable to upgrades occurring at Imperial Valley Substation.
V-01a: Submit final construction plans 60 days prior to construction	Imperial Valley Substation is an existing substation. Upgrades and all staging and material and equipment storage areas will occur within the existing fence line. This mitigation measure is not applicable to upgrades occurring at Imperial Valley Substation.
V-01b: Design and install lighting to avoid night lighting impacts	Design and installation at construction and storage yards, staging areas, and fly yards shall occur as outlined in this measure.
V-01b: Submit a Construction Lighting Mitigation Plan 90 days prior to construction	The Construction Lighting Mitigation Plan for the Imperial Valley Substation was submitted to the CPUC on June 17, 2010 and resubmitted October 27, 2010. Additional comments were received from the CPUC on January 10, 2011. The comments were incorporated into the final plan and resubmitted to the CPUC on January 11, 2011
V-02a: Construct access and spur roads at appropriate angles	No new access roads will be constructed for the substation upgrades; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
V-02a: Consult with visual resources specialist to evaluate access road visibility prior to final design	No new access roads will be constructed for the substation upgrades; therefore, this mitigation measure is not applicable.
V-02a: Submit table 60 days prior to construction	No new access roads will be constructed for the substation upgrades; therefore, this mitigation measure is not applicable.
V-02a: Submit final construction plans 60 days prior to construction	No new access roads will be constructed for the substation upgrades; therefore, this mitigation measure is not applicable.
V-02b: Submit final construction and restoration plans 60 days prior to construction	All upgrade activities will take place within the fenced limits of the existing substation on previously disturbed areas; therefore, this mitigation measure is not applicable.
V-02c: Treat disturbed soils visible from sensitive public viewing locations	All upgrade activities will take place within the fenced limits of the existing substation on previously disturbed areas; therefore, this mitigation measure is not applicable.
V-02c: Submit final construction and restoration plans 60 days prior to construction	All upgrade activities will take place within the fenced limits of the existing substation on previously disturbed areas; therefore, this mitigation measure is not applicable.
V-02d: Consult regarding helicopter construction techniques	Helicopter construction will not be used during construction at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
V-02d: Conduct Agency Consultations 120 days prior to construction	Helicopter construction will not be used during construction at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
V-07a: Submit Surface Treatment Plan 90 days prior to construction	SDG&E will match existing color schemes within the existing Imperial Valley Substation; therefore, a Surface Treatment Plan will not be required and this mitigation measure is not applicable.
V-07a: Receive approval before vendor specification	SDG&E will match existing color schemes within the existing Imperial Valley Substation; therefore, a Surface Treatment Plan will not be required and this mitigation measure is not applicable.
V-07b: Submit a Screening Plan 90 days prior to screening installation	Upgrades will be installed within the existing boundaries of the substation. No additional visual impacts will occur as a result of the upgrades; therefore, this mitigation measure is not applicable.
VR-APM-04: Do not paint or discolor rocks or vegetation	The SWEAP video was approved by the CPUC on March 15, 2010. The SWEAP video will be shown to all project personnel prior to construction and enforced throughout all phases of the Project. The video includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
L-01a: Submit Construction Notification Plan 45 days prior to construction	The Construction Notification Plan was approved by the CPUC on March 1, 2010.
L-01a: Mail a public notice 15 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses mailing public notifications. Proof of Notification will be submitted to CPUC prior to start of construction for site specific areas of the Project.
L-01a: Advertise in newspapers and bulletins 15 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses newspaper advertisement notifications. Proof of Notification will be submitted to CPUC prior to start of construction for site specific areas of the Project.
L-01a: Post notices of construction at public venues 30 days prior to construction	The Construction Notification Plan that was approved by the CPUC on March 1, 2010 addresses posting of notices of construction at public venues. Proof of Notification will be submitted to CPUC prior to start of construction for site specific areas of the Project.
L-01a: Provide a public liaison person and toll-free hotline number before and during construction	The Construction Notification Plan identifies the public liaison person assigned to the project and the toll-free hotline. The Plan was approved by the CPUC on March 1, 2010.

Mitigation Measure and APM	Status
L-02b: Notify landowners 90 days prior to completing final design of route	A memorandum submitted to CPUC on October 5, 2010 summarizes the landowner notification process. CPUC approved this memo on October 12, 2010. All landowners have been notified within 1000 feet of the project alignment. Landowners not directly affected by project facilities were sent a letter through certified mail in spring 2009 and given the opportunity to request changes. Landowners already in easement acquisition negotiations were notified through the acquisition process and provided the opportunity to request changes. These changes are also addressed in the Project Modification Report and Mapbook, which was submitted to CPUC on May 14, 2010 and approved by BLM and CPUC through a Determination Memorandum dated September 22, 2010.
L-02b: Provide notified parties 30 days to identify conflicts and potential reroutes	SDG&E provided affected landowners 30 days in which to respond to the project notification and discuss changes to the project to accommodate landowner requests. The L-2b Mitigation Measure memorandum (dated October 5, 2010) summarizes the criteria used to evaluate these requests. A summary of each landowner request received is also included with this memo. CPUC approved this memo on October 12, 2010. In addition, the PMR submitted on May 14, 2010 and approved by CPUC and BLM through a Determination Memorandum dated September 22, 2010 addresses several of these changes.
L-02b: Provide written report at or before the time property owners are identified	On March 18, 2009, SDG&E met with CPUC representatives to discuss the interpretation and notification requirements for mitigation measure L-2b. The notification and landowner requests processes were developed based on those discussions. SDG&E did not provide CPUC and BLM with a written report identifying properties that were suspected of having a land use conflict as described in the mitigation measures at or before the time property owners were notified, but SDG&E did consider these impacts in their initial evaluation of the project and with subsequent route changes as described in the Project Modification Report submitted to the CPUC on May 14, 2010 and approved by the BLM and the CPUC through a Determination Memorandum dated September 22, 2010.
L-02b: Provide written report within 30 days of the public notice closing date for responses	A memorandum submitted to CPUC and BLM on October 5, 2010 summarizes the landowner notification process. CPUC approved this memorandum on October 12, 2010. All landowners have been notified within 1000 feet of the project alignment. Landowners not directly affected by project facilities were sent a letter through certified mail in spring 2009 and given the opportunity to request changes. Landowners already in easement acquisition negotiations were notified through the acquisition process and provided the opportunity to request changes. These changes are also addressed in the Project Modification Report and Mapbook submitted on May 14, 2010 and approved by the CPUC and BLM through a Determination Memorandum dated September 22, 2010.
L-02b: Develop specific reroute modifications	The modifications required by this task are located on Links 4 and 5. They are not applicable to the Imperial Valley Substation.
LU-APM-01: Provide advance notice within 300 feet of construction activities	There are no residents, property owners, or tenants within 300 feet of construction activities; therefore, this mitigation measure is not applicable.
LU-APM-04: Provide notification prior to construction	Construction at the Imperial Valley Substation will take place inside the fence-line and as a result, access to adjacent properties will not be affected; therefore, this mitigation measure is not applicable.
LU-APM-08: Coordinate to include Project in General Plans	SDG&E has been coordinating with the County of San Diego and Imperial County to determine whether there are any General Plan updates anticipated during the life of the project that could conflict with construction or operation of the transmission line. SDG&E spoke with LeAnn Carmichael (858-694-3739) at the County of San Diego and Andy Home, Deputy County Executive Officer for Natural Resources Development (760) 482-4727 at Imperial County. No General Plan updates are planned for Imperial County or the City of San Diego in the near future.
LU-APM-09: Obtain ministerial land use permits	No ministerial land use permits are required for the upgrade activities within the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
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 the Imperial Valley Substation. If Native American remains are encountered during construction, this mitigation measure will be implemented.

Mitigation Measure and APM	Status
C-02a: Contact agencies if sites will be affected	There are no known Native American human remains within the Imperial Valley Substation or access roads. If an unanticipated discovery occurs during construction, SDG&E will stop work immediately and notify the BLM and authorities.
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	SDG&E will follow all laws, statues and regulations as appropriate if Native American human remains are encountered during construction.
C-02a: Support in consultations with Native Americans and implement required actions and studies	Government-to-government consultations have been ongoing. Records of consultations are being held with the BLM. This measure will be satisfied during construction.
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	A monitoring process was incorporated into the Historic Properties Management Plan and is summarize in the HPTP. All necessary monitoring will be reported as part of the weekly submittal process during construction.
C-03a: Divert work if buried cultural material discovered and notify archaeologist	This mitigation measure will be fulfilled during construction. There is a detailed Discovery Plan in the approved HPMP for the project.
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-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-12: Conduct cultural surveys for staging areas not yet identified	This mitigation measure is not applicable to construction activities occurring at the Imperial Valley Substation. All activities will take place within the previously disturbed substation site. No cultural resources or historic properties have been identified at or adjacent to the substation site.
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	The Paleontological Monitoring and Treatment Plan was submitted to the CPUC and approved on July 20, 2010. Paleontological monitoring is required at the Imperial Valley Substation and will occur during construction.
PAL-01c: Conduct part-time monitoring of sediments with low marginal undetermined sensitivity	This mitigation measure will be fulfilled during construction.
PAL-01c: Divert construction activities when significant fossils are recovered	This mitigation measure will be fulfilled during construction.
PAL-01d: Implement Treatment Plan if significant paleontological resources are unavoidable	This mitigation measure is not applicable to construction activities occurring at Imperial Valley Substation. Work activities will not take place within the boundary of any known paleontological resource sites.

Mitigation Measure and APM	Status
PAL-01e: Train construction personnel on paleontological resources	The SWEAP video was approved by the CPUC on March 15, 2010. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project and includes instructions on the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction.
N-01a: Obtain a variance for night construction or 200 feet from sensitive receptors 45 days prior to construction	There are no noise sensitive receptors within 200 feet of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
N-01a: Employ noise suppression techniques	There are no noise sensitive receptors within 200 feet of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
N-03a: Investigate and respond to corona noise complaints by implementing measures	This mitigation measure applies to overhead transmission line segments; therefore, it is not applicable to upgrade activities at the Imperial Valley Substation.
N-03a: Patrol transmission line and repair or replace damages	This mitigation measure applies to overhead transmission line segments; therefore, it is not applicable to upgrade activities at the Imperial Valley Substation.
NOI-APM-01: Provide notice to sensitive receptors and residences within 300 feet of construction	Public notice letters will not be required for the substation activities, because there are no residences or businesses within 300 feet of the substation. Therefore, this measure does not apply.
NOI-APM-01: Provide a public liaison person before and during construction.	The Construction Notification Plan, which was approved by the CPUC on March 1, 2010, identifies the public liaison person who will respond to concerns of neighboring receptors about noise disturbances.
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-05a: Protect drainage structures and incorporate measures into access agreement/easement	It is not anticipated that upgrade activities at Imperial Valley Substation will cause damage to roadway drainage features. Should damage occur, provisions of this mitigation measure will be implemented.
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 Imperial County was submitted to CPUC on October 15, 2010.
T-APM-02a: Obtain permits for temporary lane closures	Construction activities at the Imperial Valley Substation will not cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts; therefore, this mitigation measure is not applicable.
T-APM-02b: Submit Detour Plans	Construction activities are not anticipated to cause detours. However, if during construction detours are required, SDG&E will submit detour plans to the County of Imperial, County of San Diego, and CALTRANS.
T-APM-02b: Right-of-Entry permit required for construction and maintenance activities outside of easements in the ABDSP	No project activities will occur within ABDSP; therefore this measure does not apply.
T-APM-02b: Provide a request for maintenance or other earth-disturbing activities within California State Parks	No project activities will occur on California State Park land; therefore, this measure is not applicable.
T-APM-04a: Coordinate in advance with emergency service providers	SDG&E will coordinate with emergency service providers prior to initiation of construction activities that would restrict movements of emergency vehicles.
T-APM-04a: Notify cities and counties regarding construction activities	SDG&E shall notify and provide required information to counties and cities prior to initiation of construction activities that could impact police, fire, ambulance and paramedic services.
T-APM-05a: Coordinate construction activities adjacent to school bus stops with school districts 1 month prior to construction	Work activities associated with construction of the Imperial Valley Substation are not planned at or in proximity to school bus stops; therefore, this mitigation measure is not applicable.

Mitigation Measure and APM	Status
T-APM-05a: Consult with transit authorities 1 month prior to construction	Work activities associated with construction of the Imperial Valley Substation are not planned at or in proximity to transit stops; therefore, this mitigation measure is not applicable.
T-APM-06a: Parking in Imperial County shall comply with County regulations and per an approved traffic control plan	Parking for construction at the Imperial Valley Substation will occur within the limits of the existing substation. No parking will occur on Imperial County-maintained roadways for construction within this substation; therefore, this mitigation measure does not apply.
T-APM-10a: Ensure continuous access to properties	Access to businesses and residences will not be impacted by work activities associated with the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
HS-APM-01: Train personnel using hazardous materials	The SWEAP video that was approved by the CPUC on March 15, 2010 includes training on hazardous materials management procedures. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
HS-APM-01: Develop a Hazardous Communication Plan	The Sunrise Powerlink Hazard Communication Plan (HazCom) was submitted to the CPUC on March 12, 2010 and approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-02: Trained personnel to perform refueling	Refueling will only be performed by operators trained in refueling of vehicles or equipment.
HS-APM-02: Conduct refueling in designated areas or by assigned vehicles	Refueling will be performed in designated areas or by a mobile refueling tanker with secondary containment.
HS-APM-03: Develop applicable safety plans	The Sunrise Powerlink Hazard Communication Plan (HazCom) was submitted to the CPUC on March 12, 2010 and approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDSs. The HMBP, SWPPP and SPCC Plan are provided as Appendices to the HazCom Plan.
HS-APM-05: Investigate impacts of all contaminated sites	The Imperial Valley Substation site is not a Government Code §65962.5 site or known contamination site. The Imperial Valley Substation was reviewed during the Phase I assessment and documented in the Phase I Site Assessment report dated August 18, 2009.
HS-APM-07: Train personnel to recognize UXO	The SWEAP video was approved by the CPUC on March 15, 2010 and discusses training of personnel involved in excavation regarding recognition of UXO.
HS-APM-08: Assign Environmental or Health & Safety Representative	SDG&E has assigned Steve Riggs, Field Monitoring Manager with Burns & McDonnell, as the Environmental Field Representative project-wide.
HS-APM-09: Contact airport representatives within 2 miles	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure HS-APM-9 on September 10, 2010.
HS-APM-10: Store and dispose of hazardous waste per regulations	If hazardous wastes are generated, they will be properly disposed of and stored in accordance with all applicable federal and state regulations. Hazardous material minimization measures shall be employed whenever possible.
HS-APM-11: Develop Fire Prevention and Response Plan	The Fire Plan, acknowledged by the CAL Fire Chief, was submitted to the CPUC on December 14, 2009 and approved on February 2, 2010.
HS-APM-11: Assign Fire Marshal to enforce fire prevention provisions	The Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on February 2, 2010. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP.
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 Imperial Valley Substation will result from project activities; therefore, a TCP is not required.
HS-APM-14: Conduct environmental training to construction workers	The SWEAP video, which was approved by the CPUC on March 15, 2010, provides environmental training to construction workers regarding potential exposure. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
HS-APM-15: Stop work if soil or groundwater contamination is suspected	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.
HS-APM-16: Terminate work and implement health and safety procedures if contamination is suspected	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.

Mitigation Measure and APM	Status
HS-APM-16: Take preliminary samples and send to lab for testing	This mitigation measure will be fulfilled during construction if suspected contaminated soil or water is discovered.
HS-APM-17: Work may proceed if no contamination	This mitigation measure will be fulfilled during construction.
HS-APM-17: Notify agencies if contamination is above regulatory limits	This mitigation measure will be fulfilled during construction.
P-01a: Implement an environmental monitoring plan	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. The SWEAP video was approved by the CPUC on March 15, 2010 and discusses implementation of the Environmental Monitoring Program, maintenance of emergency spill supplies and equipment, the proper use of hazardous materials, development of a Hazardous Communication Plan, development of applicable environmental safety plans associated with hazardous materials, assignment of an Environmental Field Representative and/or General Contractor to the Health & Safety Office for the project; proper disposal/storage of hazardous and solid wastes in accordance with federal, state, and local regulations, and environmental training regarding potential exposure. The SWEAP video will be shown to all project personnel and enforced throughout all phases of the Project.
P-01a: Designate an Environmental Field Representative	The Environmental Monitoring Plan was submitted to CPUC on May 10, 2010. The Plan states that the Environmental Field Representative/ Lead Monitoring Manager for this Project is Steve Riggs.
P-01b: Maintain hazardous material spill kits onsite	During construction, hazardous material spill kits will be maintained on site and information for responding to spills is contained in the facility's SPCC Plan.
P-03a: Collect soil or groundwater samples if contaminated	There is no known environmental contamination at the site. However, in the event that potential contaminated soil or groundwater is encountered during construction, the provisions of this mitigation measure will be implemented.
P-03a: Coordinate with regulatory agencies if contaminated soil or groundwater confirmed by laboratory data	There is no known environmental contamination at the site; however in the event that potential contaminated soil or groundwater is encountered during construction, provisions of this mitigation measure will be implemented.
P-03b: Submit report to agencies of contaminated soil within 30 days of laboratory data receipt	There is no known environmental contamination at the site; however in the event that potential contaminated soil or groundwater is encountered during construction, provisions of this mitigation measure will be implemented.
PS-01a: Limit conductor surface gradient	SDG&E submitted a memorandum to the CPUC for the administrative record on September 30, 2010 demonstrating that SDG&E has limited the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide.
PS-01b: Respond to and record interference complaints after energizing	This mitigation measure applies to overhead transmission line segments; therefore, it is not applicable to upgrade activities at the Imperial Valley Substation.
PS-01b: Refer unresolved disputes to CPUC for resolution	This mitigation measure applies to overhead transmission line segments; therefore, it is not applicable to upgrade activities at the Imperial Valley Substation.
PS-02a: Identify objects within and near ROW for induced voltages and implement electrical grounding	The Imperial Valley Substation has been properly grounded; therefore, this mitigation measure does not apply.
AQ-01a: Pave, apply water 3 times daily, or apply soil stabilizers	A Dust Control Plan was submitted to the CPUC and approved on January 20, 2010. This measure will be implemented during construction, as well as the measures specified in the Dust Control Plan.
AQ-01a: Pre-water sites 48 hours prior to clearing	This mitigation measure will be fulfilled during construction.
AQ-01a: Reduce amount of disturbed area	This mitigation measure will be fulfilled during construction.
AQ-01a: Spray stock-piles daily or as needed	This mitigation measure will be fulfilled during construction.
AQ-01a: Cover loads in trucks or maintain 6 inches of free-board	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
AQ-01a: Pre-moisten import and export dirt prior to transport	This mitigation measure will be fulfilled during construction.
AQ-01a: Sweep public streets daily if soil tracking visible	This mitigation measure will be fulfilled during construction.
AQ-01a: Plant vegetative ground cover following construction	This mitigation measure will be fulfilled following construction.
AQ-01a: Apply soil stabilizers or water on inactive work areas	This mitigation measure will be fulfilled during construction.
AQ-01a: File a Dust Control Plan 30 days prior to construction	The Dust Control Plan was submitted to the CPUC on September 14, 2009 and approved by the CPUC on January 20, 2010 and the Wildlife Agencies on November 10, 2010.
AQ-01b: Maintain construction equipment and use low-emission equipment	SDG&E will use available Tier 3 equipment, minimizing the use of Tier 2 equipment at the yard. Any portable equipment over 50 hp will be permitted with the local Air Pollution Control District (APCD) or the California Air Resources Control Board. Equipment run logs will be maintained on a daily basis and periodically submitted to the CPUC.
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.
AQ-04a: Report quarterly the status of carbon credits	SDG&E sent an email regarding greenhouse gas emissions off-sets to the CPUC on August 27, 2009. The emissions off-sets approach was conditionally approved on September 7, 2009. The CPUC sent an email approving the proposed off-set purchases on November 9, 2009 and SDG&E purchased CRTs to satisfy this measure. SDG&E will report the quarterly status of efforts to create reductions or obtain banked credit and the quantity of construction-phase greenhouse gas emissions offset by credits. The preconstruction component of this measure is complete. The other requirements will be implemented during construction.
AQ-04b: Develop complete GHG inventory and report status of credits annually	A GHG Carbon Credits purchase proposal was approved by the CPUC November 9, 2009. SDG&E is in process of purchasing credits. A complete GHG inventory will be developed and annual reports will be submitted as required. A GHG Carbon Credits purchase proposal was approved by the CPUC November 9, 2009. SDG&E is in process of purchasing credits. A complete GHG inventory will be developed and annual reports will be submitted as required.
AQ-04c: Submit SF6 leak detection and repair program 90 days prior to construction	On April 2, 2010, the CPUC approved the submittals provided by SDG&E that documented its partnership with the U.S. EPA and development of a SF6 Leak Detection and Repair Program, which addressed the requirements included in this measure. The CPUC approval acknowledged satisfaction of this measure.
AQ-04c: Become a Partner in EPA's SF6 Partnership prior to construction.	The Partnership MOU between SDG&E and the U.S. EPA was established on February 24, 2010.
AQ-04c: Report SF6 emissions to CCAR	A SF6 Leak Detection and Repair Program was approved on March 12, 2010 and discusses the reporting procedures to the CCAR. SDG&E will implement the program and submit reports as required,
AQ-04c: Follow established methodologies to develop a complete GHG inventory	The Avoid SF6 Emissions SF6 Mitigation Plan was approved on March 12, 2010. Records of SF6 purchases will be maintained by SDG&E's Substation Construction and Maintenance group and estimates of any greenhouse gas emissions will be added to inventories developed by SDG&E.
AQ-APM-01: Comply with ICAPCD Rule 800 for work in Imperial County	The Dust Control Plan, which was filed with the ICAPCD and approved by the CPUC on January 20, 2010, addresses compliance with ICAPCD Rule 800.
AQ-APM-01: File a Dust Control Plan with ICAPCD for work in Imperial County	The Dust Control Plan was filed with the ICAPCD and approved by the CPUC on January 20, 2010.
AQ-APM-02: Prohibit grading when wind exceeds 25 mph	This mitigation measure will be fulfilled during construction. SDG&E will prohibit construction grading on days when the wind gusts exceed 25 mph.
AQ-APM-02: Cover loads in trucks or maintain 2 feet of freeboard	This mitigation measure will be fulfilled during construction.

Mitigation Measure and APM	Status
AQ-APM-02: Install snow fence-type windbreaks	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Limit vehicle speeds to 15 mph on unpaved roads	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Water unpaved roads	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Apply soil stabilizers	This mitigation measure will be fulfilled during construction.
AQ-APM-02: Contain exposed stockpiles of soil and other material	This mitigation measure will be fulfilled during construction.
AQ-APM-03: Use methods to minimize mud and dust tracking on paved roads	This mitigation measure will be fulfilled during construction. A Dust Control Plan was approved by the CPUC on January 20, 2010. Conditions of the Dust Control Plan will be implemented and enforced throughout the Project.
AQ-APM-04: Encourage carpooling to job sites	The SWEAP video, approved by the CPUC on March 15, 2010, encourages carpooling. This video will be shown to all Project Personnel and enforced throughout all phases of the Project.
AQ-APM-05: Minimize vehicle idling time with common sense approach	The SWEAP video was approved by the CPUC on March 15, 2010. The video addresses vehicle idling. The video will be shown to all Project personnel and enforced throughout all phases of the Project.
AQ-APM-05: Conduct briefings on common sense vehicle use	This mitigation measure will be implemented during construction.
H-02d: Provide vehicle and equipment maintenance log monthly	This mitigation measure will be implemented during construction. A vehicle and equipment maintenance log will be provided to the CPUC and BLM once monthly during project construction.
H-04b: Manage blasting near wells or springs with a Blasting Plan for each site	Blasting will not be required for the substation upgrades; therefore, this mitigation measure is not applicable.
H-07a: Submit a Hazardous Substance Control and Emergency Response Plan 60 days prior to construction	A memo was submitted to the CPUC on Wednesday September 15, 2010 documenting compliance with this mitigation measure and included Waste Discharge Identification numbers assigned by the California State Water Resources Control Board. The existing substation SPCC plan contains emergency response information to assure quick and safe clean-up of spills, as required, to address hazardous substance control and emergency response. The SPCC Plan will not require updating because none of the substation upgrade equipments contains oil over 55 gallons.
WQ-APM-02: Avoid sensitive water features	A memo was submitted to the CPUC for the administrative record documenting compliance with Mitigation Measure WQ-APM-2, on August 30, 2010. There are no sensitive water features within the substation; therefore, this mitigation measure is not applicable.
WQ-APM-03: Clearly mark restricted sites prior to construction	There are no sensitive water resources within the substation; therefore, this mitigation measure is not applicable.
WQ-APM-03: Train construction personnel to recognize markers	The SWEAP video approved by the CPUC on March 15, 2010 includes recognition of markers and equipment movement restrictions. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project.
WQ-APM-04: Maintain adequate distance from stream banks	There are no stream banks or beds located at the substation; therefore this mitigation measure is not applicable.
WQ-APM-04: Use existing bridges to cross major streams	There are no stream banks or beds located at the substation; therefore this mitigation measure is not applicable.
WQ-APM-04: Span riparian areas where feasible	There are no riparian areas located at the substation; 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 WDID #7 13C357488 were 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	There are no water resources located at the substation; therefore this mitigation measure is not applicable.

Location: Imperial Valley Substation

Mitigation Measure and APM	Status
WQ-APM-04: Do not place structures in streambeds or drainage channels	There are no stream banks or beds located at the substation; therefore this mitigation measure is not applicable.
WQ-APM-05: Construct stream crossings and develop a mitigation and restoration plan	There are no stream banks or beds located at the substation; therefore this mitigation measure is not applicable.
WQ-APM-06: Avoid designated surface water protection areas	The Imperial Valley Substation is not near any designated surface water protection areas; therefore, this mitigation measure is not applicable.
WQ-APM-06: No diversions, detention, retention, or consumption of surface waters	The Imperial Valley Substation is not near any designated surface water protection areas; 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-08: Obtain permits prior to discharging groundwater into storm drains	Groundwater supplies will not be used during project construction; therefore, this mitigation measure is not applicable.
WQ-APM-08: Contain and sample if dewatering and then release water according to test results	Discharge of groundwater and dewatering will not be required during construction; therefore, this mitigation measure does not apply.
WQ-APM-09: Storing fuels and hazardous materials prohibited near wells	There are no wells within the substation fence-line or within 400 feet of the substation; therefore, this mitigation measure does not apply.
WQ-APM-10: Minimize stream bank erosion	There are no stream banks or beds in or surrounding the substation; therefore, this mitigation measure is not applicable.
WQ-APM-13: Dispose trash into enclosed containment	A trash enclosure will be provided during construction.
WQ-APM-13: Remove hazardous materials to a hazardous waste facility and promptly clean up if released onto ground	This mitigation measure will be fulfilled during construction.
WQ-APM-14: Obtain NPDES permit and implement a SWPPP	The SWPPP and NPDES permit associated with WDID #7 13C357488 was submitted to the CPUC on September 29, 2010. The conditions of the permit and SWPPP will be implemented and enforced during the construction to prevent and avoid hydrologic impacts.
WQ-APM-15: Adjust route of access roads to avoid sensitive features	Access to the Imperial Valley Substation will be via the existing access road. No new access roads will be required; therefore, the measure does not apply.
WQ-APM-15: Use existing roads or cross-country access routes	Construction access will be provided by existing paved roads leading to the substation and no new construction access roads will be required; therefore, the measure does not apply.
WQ-APM-15: Clearly mark approved construction traffic routes	This mitigation measure will be fulfilled during construction.
WQ-APM-16: Conduct site-specific assessment where sensitive water resources cannot be avoided	There are no sensitive water resources within the substation; therefore, this mitigation measure is not applicable.
WQ-APM-16: Locate staging/storage areas outside of riparian areas	There are no sensitive water resources within the substation; therefore, this mitigation measure is not applicable.
WQ-APM-16: Obtain a Streambed Alteration Agreement when constructing new access through streambeds	The California Department of Fish and Game issued a Streambed Alteration Agreement (SAA) on November 17, 2010. A copy of the SAA will be maintained onsite during construction.

Mitigation Measure and APM	Status
G-03a: Submit design-level geotechnical studies 60 day prior to final project design	The design of the proposed substation upgrades is based on recent and historical geotechnical investigations, the most recent conducted in June 2009 by URS titled "Geotechnical Investigation, Bank 82 Addition, 2nd 500 kV Tie Line, and New 230 kV Yard, Imperial Valley Substation, Imperial County, California". Additionally the following conditions reduce the potential for geotechnical issues occurring due to construction of project components at the site: SDG&E has implemented substation engineering standards for appropriate design measures for protection of proposed reinforcement, concrete, and metal-structural components against corrosion. The site currently supports structures and equipment adjacent to the proposed upgrades that are appreciably more massive and exert significantly higher loadings to the soil than the new upgrades. SDG&E is following the design values used on the existing foundation designs of structures with similar loads already existing at the substation. Applied soil bearing pressures due to the equipment is less than 1000psf. A geotechnical engineer will review the foundation excavation and subgrade condition prior to placing concrete foundations.
GEO-APM-01: No widening or grading of existing access roads if soil is sensitive to disturbance	The FEIR/EIS identified sensitive soils as "natural sand sources that supply the material for sand dune systems throughout the ABDSP." The project no longer impacts ABDSP and there are no sand dune systems along the project route; therefore, this mitigation measure does not apply.
GEO-APM-03: Avoid placing structures in areas of high shrink/swell potential	A report titled, "009 by URS titled "Geotechnical Investigation, Bank 82 Addition, 2nd 500 kV Tie Line, and New 230 kV Yard, Imperial Valley Substation, Imperial County, California" was submitted to CPUC for review and approval on November 12, 2010. Borings performed for this investigation demonstrated granular (non expansive) materials in the near surface. Additionally, an Expansion Index (EI) test, performed on a sample from the recently excavated Bank 82 mat foundation subgrade indicated a low expansion potential. Therefore, this measure does not apply.
GEO-APM-04: Place structures in geologically stable areas	Steel structures supporting equipment will be installed within the existing substation on previously prepared soil substrate. Soil stability is not an issue for construction of proposed upgrades at this site; therefore, this mitigation measure is not applicable.
GEO-APM-05: Implement construction to avoid or minimize new soil disturbance	The existing substation is located on level graded or paved ground and upgrade activities will not disturb manufactured slopes or result in off-site degradation from accelerated sedimentation; therefore, this mitigation measure is not applicable.
GEO-APM-05: Maintain cut and fill slopes with erosion control and repair	The existing substation is located on level graded or paved ground and upgrade activities will not disturb manufactured slopes or result in off-site degradation from accelerated sedimentation; therefore, this mitigation measure is not applicable.
GEO-APM-06: Perform surface restoration for erosion control and re-vegetation	There are no vegetated or previously undisturbed areas at the substation that will be impacted by the upgrades; therefore, this mitigation measure is not applicable.
GEO-APM-08: Remove or stabilize boulders and span structures over landslide areas	There are no steep slopes with boulders within the substation; therefore, this mitigation measure is not applicable.
GEO-APM-09: Implement field mitigation efforts if paleontological resources are encountered	If paleontological resources are encountered during construction, this mitigation measure will be implemented.
GEO-APM-09: Consult with agencies if paleontological resources cannot be avoided	If paleontological resources are encountered during construction, this mitigation measure will be implemented.
PSU-APM-01: Coordinate with utility providers	There are no third party utilities that will be affected by construction at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.

Location: Imperial Valley Substation

Mitigation Measure and APM	Status
PSU-APM-02: Notify Underground Service Alert 48 hours prior to earth-disturbing activities	There are no buried utilities at the substation that would require an Underground Service Alert; therefore, this mitigation measure is not applicable.
PSU-APM-03: Minimize disruption to response times and access for emergency and police services	The Traffic Impact Analysis performed by SDG&E indicated construction of the substation should not cause lane closures or impact emergency and police services. However, SDG&E will work with emergency and police services to ensure disruption to response times and access is minimized.
S-03b: Coordinate with water districts	A Water Use Study has been drafted and was submitted for review on February 22, 2010. Water usage at the Imperial Valley Substation will total approximately 10,000 gallons. Water will be used for concrete preparation, dust control of small stockpiles from trenching and excavation activities, and to pre-condition the soil prior to foundation excavations and drilling. Due to the minimal amount of water needed for work at the site, it is not practical to use reclaimed water for this portion of the project. Accordingly, water will be provided by obtaining surface water from the canal and brought onsite via a small water wagon. The contractor will be responsible for coordinating with the Imperial Irrigation District during construction.
S-03b: Provide letter 60 days prior to construction describing availability of reclaimed water and efforts to obtain for use	A Water Use Study describing the availability of reclaimed water was submitted on February 22, 2010.
F-01a: Submit draft Construction Fire Prevention Plan 90 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and was approved by the CPUC on January 20, 2010.
F-01a: Receive approval of final Plan 30 days prior to construction	A Construction Fire Plan was acknowledged by the CAL FIRE Chief and approved by the CPUC on January 20, 2010.
F-01b: Update the Amended Plan every five years	The Fire Plan will be implemented and enforced during construction
F-01b: Submit the Plan 90 days prior to energization	This mitigation measure will be fulfilled prior to energization.
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.
F-01d: Clear and spread onsite dead and decaying vegetation prior to construction and maintenance	Vegetation clearing is not required at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
F-01e: Contribute an annual sum to be distributed as homeowner grants	This measure will be fulfilled post construction.
F-02a: Establish adequate conductor clearances prior to energization	Vegetation does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
F-02a: Maintain adequate conductor clearances for life of project; perform inspections each spring and submit survey results prior to June 1st each year	Vegetation does not occur within the fenced boundaries of the Imperial Valley Substation; therefore, this mitigation measure is not applicable.
F-02b: Relocate 69 kV lines onto non-specular steel poles using vertical conductor construction	Relocation of 69 kV lines are not included in the construction activities at the Imperial Valley Substation; therefore, this mitigation measure is not applicable.

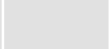
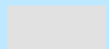
Location: Imperial Valley Substation

Mitigation Measure and APM	Status
F-02c: Perform climbing inspections and submit inspection logs annually	This mitigation measure will be implemented post construction.
F-03b: Adopt a community education and outreach program	This measure will be fulfilled prior to energization.

ATTACHMENT B

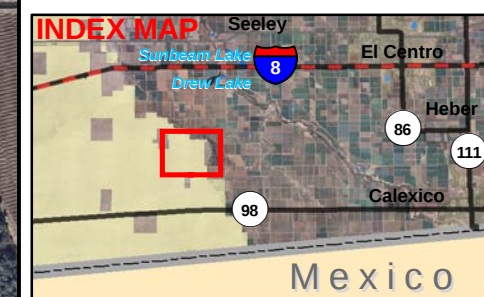
Sensitive Receptor Map

Legend

-  Parcels
-  1,000 Ft. Buffer
-  Property Boundary
-  Substation



0 1,000 2,000
SCALE IN FEET



**NOTIFICATION BUFFER
(1,000')
IMPERIAL VALLEY SUBSTATION**

