

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



October 6, 2010

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

RE: SDG&E Sunrise Powerlink Transmission Line Project - Notice to Proceed (NTP #9)

Dear Mr. Colton,

On June 9, 2010 San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence with construction of at the existing Scripps Switchyard/Substation, Segment 21 of the Sunrise Powerlink Project.

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

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

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

NTP #9 for the Scripps Substation upgrade is granted by CPUC for the proposed activities based on the factors described below.

**SDG&E NTP Request.** Excerpts from the SDG&E NTP request submitted June 9, 2010 are presented below (indented) with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**:

Reconductoring of the existing 69 kV transmission line from Sycamore Substation to Elliot Substation was presented in the certified Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS); however, the associated upgrades at the Scripps Substation necessary to accommodate the reconductoring were not presented. The proposed upgrades to the existing Scripps Substation were addressed in the revised mapbook and Project Modification Report (PMR) that was submitted to the CPUC on May 14, 2010 (Page T-157). As incorporated in the mapbook and PMR, no substantial changes to the effects of the Final Environmentally Superior Southern Route (FESSR) and no new significant impacts would result from these upgrades. The upgrades are required to accommodate the overall operation of SDG&E's existing electric transmission and distribution system, as well as the Project, in accordance with California Independent System Operator (CAISO), State and Federal electric power system reliability criteria, and voltage fluctuation concerns.

Installing upgrades at the Scripps Substation in advance of the 2012 completion date of the Project will maintain system reliability. Construction activities at Scripps are anticipated to begin late 2010 upon issuance of a Notice to Proceed from the CPUC and are scheduled to be completed within six months.

The Scripps Substation is located at 9882 Scripps Lake Drive, San Diego, California, 92131. The enclosed area of the substation site (APN 319-190-10) is approximately 1.1 acres in size and is located in an industrial/commercial area immediately west of Scripps Ranch Boulevard. The Substation is a previously disturbed and developed site that is owned by SDG&E.

The scope of work for the Scripps Substation facility includes installation of three 69 kV/40 kA circuit breakers and six 69 kV/2000 A disconnect switches to accommodate the increased rating on transmission line TL6916. The new circuit breakers and disconnects will be installed throughout the 69 kV yard. Other associated equipment to be installed will include a new aluminum pipe bus, its associated jumpers, and hardware. Protection relay panels will also be replaced. Additional lighting will not be installed at the Substation. The new structures and equipment will be similar to the respective structures and equipment already in place at the Substation.

All work associated with this upgrade will take place within existing fenceline of the Substation, on previously disturbed land. There will be no increase in the total acreage of the Substation, and no additional buildings will be constructed. Since there are no foundations or conduits being installed, ground disturbance will not be necessary. As previously mentioned, these upgrades are necessary to alleviate existing operational issues and to support the future addition of the Sunrise Powerlink line to the existing SDG&E system.

The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since no new structures or foundations will be installed.

Main access to the Substation is via an existing driveway from Scripps Lake Drive to the Scripps Substation. Scripps Lake Drive is a paved, east-west, two-lane road to the south of the Scripps Substation. Other roadways that will be utilized for access to the Substation include: Scripps Ranch Boulevard, Mira Mesa Boulevard, Carroll Canyon Road, and I-15, which has off/on ramps onto Mira Mesa Boulevard and Carroll Canyon Road

These roadways are under jurisdiction of the City of San Diego and Caltrans. Existing drives will be used on-site.

Parking for construction personnel will occur only within the existing Substation fence line.

All entrances are controlled with gates and security. SDG&E protocols exist to ensure the safety and security of personnel, materials, and property when on-site at the Substation. The measures meet California Occupational Health and Safety Administration (CALOSHA) safety requirements.

The following equipment and material are proposed for the Scripps Substation Upgrade: large trucks, large crane, semi-trailer truck and pickup trucks, six 69 kV disconnects, three 69 kV circuit breakers, associated jumpers, aluminum bus,

control cable, and protective relay panels, testing vans, pickup trucks, hand tools and meters, and wiring and Protective relay panels.

In addition, as per hazardous communication requirements, Material Safety Data Sheets will be available for any chemicals or hazardous materials to be located on site. It is anticipated that any materials brought on site will either be less than the reporting threshold required by Hazardous Materials Business Plan (HMBP) requirements or transported off-site at the end of the work day. Should there be a need to bring reportable quantities of materials on site for either temporary or permanent storage; the HMBP will be amended to include those additional materials. **(The amended HMBP shall be submitted to the CPUC.)**

Up to 15 SDG&E employees will be working on the Substation upgrades.

Personnel will travel to and from the Scripps site in SDG&E-owned vehicles from the SDG&E Kearny Transmission Construction and Maintenance facility located at 5488 Overland Avenue in San Diego or from the SDG&E Miramar facility located at 6875 Consolidated Way in San Diego.

The upgrade of the Scripps Substation will not require temporary closure of any roadway and will not restrict the movement of emergency vehicles. The number of vehicle trips associated with worker commutes and equipment transportation will not result in unstable flow, fluctuations in volumes of traffic, or cause substantial drops in operating speeds on surrounding roadways. Construction will have no effect on aviation facilities or traffic. Construction activities will not disturb bus or rail transit or impede pedestrian movements, bike trails, or affect the supply of parking spaces. Work activities will not conflict with planned transportation projects in the area, and there will be no deterioration of surrounding roadway surfaces.

Large substation equipment and materials will be delivered to the Substation via semi-trucks, with approximately three deliveries during a six-month construction period. Smaller equipment and materials will be delivered from SDG&E's Kearny facility or Miramar facility to the Substation in SDG&E vehicles or smaller flatbed trucks.

SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Scripps Substation. *SDG&E's Water Quality Construction BMP Manual* will be referenced for BMP implementation and maintenance. All BMPs are designed to prevent and avoid sediment within surface water runoff and protect the landscape from erosion in accordance with WQ-APM-4. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.

Any areas within the Substation that are not paved or covered with concrete foundations will be surfaced with an approximate four-inch layer of untreated, ¾-inch nominal crushed run rock. The rock will be applied to the finished grade surface after all upgrades have been completed.

Upon completion of the work, the remaining areas of the Scripps Substation will be restored to as close to pre-construction conditions as feasible. This will include clean-ups of the site, removal of unused materials, and collection and proper disposal of any wastes, trash, and debris, regardless of how it was generated.

The new equipment will be set and erected once the old equipment is removed from their existing foundations. If necessary, control cable will be pulled to the equipment, followed by termination and testing. Site restoration and stabilization will be conducted following the completion of all work activities.

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

## **CPUC Evaluation of Mitigation Implementation**

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

Please see also the attached Compliance Status Table documenting pre-construction requirements identified in the Final EIR/EIS. Note that entries shaded in yellow are outstanding and must be completed prior to the start of construction. Entries shaded in purple are to be conducted during construction. Entries shaded in gray have either been fulfilled or are not applicable to this action.

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

**Biological Resources.** This section presents background on biological resources that occur at or near the site. This summary of biological issues was provided by SDG&E in the initial NTP request. The CPUC biological consultant conducted reviews of the initial NTP request and follow-up materials for completeness and compliance with Project mitigation requirements.

SDG&E requests that the Scripps Substation Upgrade NTP be conditioned for conducting pre-construction surveys for nesting birds (Mitigation Measure B-8a) within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction that would occur between January 15 and August 15. In addition nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction that would occur between January 1 and September 15. **Survey results shall be submitted to the United States Fish and Wildlife Service [USFWS], California Department of Fish and Game [CDFG] and CPUC prior to construction.**

Habitat for sensitive plant and animal species does not exist within the existing Substation fence-line. Construction activities will take place within the existing Substation which has a ground cover of crushed stone, pavement, or concrete. There is no vegetation or suitable habitat present within the substation and no impacts to special status plants or wildlife will occur as a result of the upgrade activities.

**Cultural Resources.** The Final Inventory Report of the Cultural Resources within the Approved SDG&E Powerlink Final Environmentally Superior Southern Route concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Scripps Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance.

The Sunrise Project Historic Properties Management Plan (HPMP) was approved July 2010. The conditions of the HPMP shall be implemented during construction.

**Paleontological Resources.** The Paleontological Records Search for the SDG&E Sunrise Powerlink Project was submitted February 25, 2010. There are no paleontological concerns for the Scripps Substation as there will be no ground disturbance.

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

### **Conditions of NTP Approval**

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

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Grey entries have either been fulfilled or are not applicable to this action. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
3. All sensitive receptors and residences within 300 feet of the Scripps Substation Upgrades will be notified of the proposed upgrades within the required timeframe prior to initiating construction and verification will be submitted to the CPUC as per the Construction Notification Plan approved on March 1, 2010
4. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and September 15.
5. "Survey sweeps" will occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, a biological monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted with the approval of CDFG and USFWS, and with prior knowledge of the CPUC.
6. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
7. Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.

8. As provided in the request, construction work will be conducted between the hours of 7:00 a.m. to 7:00 p.m. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC. SDG&E will employ noise suppression techniques as necessary.
9. If any unanticipated lane restrictions or closures are found to be necessary, prior proof of coordination with emergency service providers and all necessary permits shall be submitted to the CPUC.
10. As proposed, the SDG&E Environmental Monitoring Program will be implemented during construction which will include implementation of the applicable environmental plans (as defined in HS-APM-1, HS-APM-2, HS-APM 3, HS-APM-8 and HS-APM-10. SDG&E has designated an Environmental Field Representative for the Scripps Substation. The Representative will be on site to observe and document adherence to the applicable environmental plans.
11. In regard to the Hazard Communication Plan to fully satisfy the intent of mitigation measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.
12. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor shall be notified immediately.
13. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes or changes in technique and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.
14. No clearing or disturbance to vegetation shall occur inside or outside of approved work areas.
15. No ground disturbance shall occur inside or outside of approved work areas.
16. If the application of water is needed to abate dust in construction areas and on dirt roads, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan will be implemented and enforced throughout the Scripps Substation upgrade activities.
17. Per the NTP request, an NPDES storm water discharge permit for construction activities is being obtained. A SWPPP applicable to the Scripps Substation Upgrade and applicable WDID Number shall be submitted to the CPUC prior to construction. The SWPPP shall be implemented where appropriate prior to and during construction.
18. All temporary facilities (i.e., trailers, fencing, etc.) shall be removed from the switchyard at the completion of construction.
19. All complaints received by SDG&E in regard to the yard shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting as well as noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, lighting at the site may need to be modified and/or sound attenuation devices may need to be installed etc., depending on the nature of the complaint.

Please contact me if you have any questions or concerns.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

cc: Ken Lewis, CPUC Program Manager  
Mary Jo Borak, CPUC CEQA Team Manager  
Nicholas Sher, CPUC Legal Division  
Daniel Steward, BLM El Centro Field Office  
Tom Zale, BLM El Centro Field Office  
Holly Roberts, BLM Palm Spring South Coast Field Office  
Robert Hawkins, U.S. Forest Service  
Cliff Harvey, State Water Resources Control Board  
Eric Porter, USFWS  
Doreen Stadtlander, USFWS  
Paul Schlitt, CDFG  
Heather Pert, CDFG  
Kelly Fisher, CDFG  
Erin Wilson, CDFG  
Susan Lee, Aspen Environmental Group  
Vida Strong, Aspen Environmental Group  
Anne Coronado, Aspen Environmental Group  
Hedy Koczwarra, Aspen Environmental Group  
Don Haines, San Diego Gas and Electric Company  
Tina Carter, San Diego Gas and Electric Company

**Sunrise Powerlink Project  
NTP 9 Compliance Table**

<b>Pre-Construction Compliance Status Table as applied to the Scripps Substation (10-6-10)</b>	
<b>Mitigation Measure and APM</b>	<b>Status</b>
<b>Please note that the red text of the mitigation measure conditions are not provided in this table. Complete measures can found in the EIR/EIS and MMCRP.</b>	<b>Please note that cells highlighted in grey have been fulfilled or are not applicable.</b>
<b>Abbreviated conditions of the USFWS Biological Opinion are shown in green highlights.</b>	<b>Cells highlighted in yellow are conditions of the NTP and shall be fulfilled with documentation submitted to the CPUC prior to construction.</b>
	<b>Cells highlighted in purple will be fulfilled during or after construction.</b>
<b>Biological Resources</b>	
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	NA. Project activities will be limited to previously disturbed areas within the substation fence-line. Existing access roads will be utilized at Scripps Substation. There will be no ground disturbance or impacts to sensitive vegetation communities at the substation. There are no trees located at the substation.
B-1c: Conduct biological monitoring	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site and periodic inspections will be performed. During construction, monitoring reports will be prepared and submitted on a weekly basis. Monitoring reports of maintenance activities will be prepared and submitted annually.
B-1k: Re-seed disturbed areas after a transmission line-caused fire	NA. There are no natural areas within the substation fence-line.
B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187	NA
B-2a: Provide restoration/compensation for impacted jurisdictional areas	NA. There are no jurisdictional areas within the substation.
B-3a: Prepare and implement a Weed Control Plan	NA
B-5a: Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Construction activities will occur within the previously disturbed, fenced substation fence-lines. Furthermore, there are no special status plant populations within the Scripps Substation.
G-CM-32 Prior to construction activities, SDG&E will conduct on-the-ground surveys (following Service protocols where they exist) for the following listed species where such surveys had not been conducted in 2007 and 2008, or for those species for which surveys in 2007 and 2008 were not reliable due to lack of sufficient rainfall. San Diego Thornmint ( <i>Acanthomintha ilicifolia</i> ), San Bernardino Bluegrass ( <i>Poa atropurpurea</i> ), Willowy Monardella ( <i>Monardella viminea</i> ), Quino Checkerspot Butterfly ( <i>Euphydryas editha quino</i> ), Arroyo Toad ( <i>Bufo californicus</i> ), Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> ), Least Bell's Vireo ( <i>Vireo bellii pusillus</i> ), Coastal California Gnatcatcher ( <i>Poliotila californica californica</i> ), Stephen's Kangaroo Rat ( <i>Dipodomys stephensi</i> )	NA: Construction activities will occur only within the previously disturbed, fenced substation fence-lines. There are no sensitive species or associated habitat that exist within the Substation fence-lines.
SS-CM-1 San Diego Thornmint. No impacts will occur to the thornmint population at and adjacent to MP 116 or to any thornmint occurrences between MP 114 and 119...In other areas where suitable thornmint habitat (i.e., gabbro and calcareous soils and a slope of 0 to 25 percent) exists, the area to be impacted will be surveyed for thornmint before any impacts may occur. per G-CM-32.	NA: Construction activities will occur only within the previously disturbed, fenced substation fence-lines. There are no sensitive species or associated habitat that exist within the Substation fence-lines.
SS-CM-2 Impacts to San Diego thornmint will first be avoided where feasible, and where not feasible due to physical or safety constraints, impacts will be compensated through salvage and relocation via a restoration program...The CPUC, BLM, USFS and Wildlife Agencies will decide whether the applicant can restore San Diego thornmint populations or will acquire habitat with San Diego thornmint...	NA. See SS-CM-1
B-7a Cover all steep-walled trenches or excavations used during construction to prevent the entrapment of wildlife (e.g. reptiles and small mammals)	NA. Steep-walled trenches or excavations are not proposed as part of the Scripps Substation upgrade scope of work; therefore, this mitigation measure is not applicable.
B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Range wide Management Strategy	NA. There are no Flat-Tailed Horned Lizards or their associated habitat within the Substation
B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat	NA. There are no Peninsular bighorn sheep or their associated habitat within the Substation.
SS-CM-22 Construction activities (including the use of helicopters) in bighorn sheep designated critical habitat will be limited to outside the lambing season (January 1 through June 30) and the period of greatest water need (June 1 through September 30) as defined in the Recovery Plan...	NA. See B-7c
SS-CM-23 Compensation for the loss of occupied bighorn sheep habitat will be implemented...	NA. See B-7c

**Sunrise Powerlink Project  
NTP 9 Compliance Table**

Mitigation Measure and APM	Status
SS-CM-24 A biological consultant approved by the Wildlife Agencies will be retained by SDG&E to collect data on bighorn sheep movements in the area during the construction phase. Prior to construction the biologist shall submit a bighorn sheep monitoring plan that meets the approval of the Wildlife Agencies...	NA. See B-7c
SS-CM-25 To help reconnect desert bighorn sheep subpopulations and at least partially offset impacts to the overall population caused by the project, SDG&E will: Fund the design and construction of an overpass or underpass, or tunnel to facilitate desert bighorn sheep movement across a highway...Fund, design, and construct a system of fences to prevent bighorn sheep from crossing on the surface of westbound Interstate 8...Fund removal of tamarisk, fountain grass, other invasive species, and hazardous fences for the life of the project...	NA. See B-7c
B-7d: Conduct burrowing owl surveys, and implement appropriate avoidance/ minimization/compensation strategies	Surveys for nesting birds shall be conducted within 10-days prior to construction during nesting season and reported to the CPUC.
B-7e: Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There are no least Bell's vireos or their associated habitat within the Substation.
SS-CM-16 During construction, all grading or brushing taking place within riparian habitats occupied by the vireo will be conducted outside the vireo breeding season (defined as March 15 through September 15)...	NA: See B-7e
SS-CM-17 To avoid impacts to vireo, towers, pads, pull stations, access roads, staging areas, and fly yards will be located outside of riparian vegetation, including occupied vireo habitat, where feasible..	NA: See B-7e
SS-CM-18 To minimize adverse impacts from loss of occupied habitat in the Cleveland National Forest, and to minimize predation and parasitism, SDG&E will develop and implement a brown-headed cowbird ( <i>Molothrus ater</i> ) trapping program, in consultation with the USFS.	NA
B-7h: Implement appropriate avoidance/ minimization strategies for eagle nests	NA. No suitable eagle habitat exists within or adjacent to the Scripps Substation.
B-7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There are no Quino checkerspot butterflies or their associated habitat within the Substation.
SS-CM-3 A biologist permitted by the Service will delineate suitable/occupied (quino) habitat areas that will be impacted by project construction...	See B-7i
SS-CM-4 A pre-construction, Service protocol presence/absence survey for the adult Quino will be conducted within the delineated suitable/occupied habitat in the construction zone...	See B-7i
SS-CM-5 Any Service-approved restoration (plan) of impacted (quino) habitat will be conducted in areas with appropriate topographical and biological features to be determined by the Service, BLM, USFS and SDG&E...	See B-7i
SS-CM-6 Due the extreme importance of the Quino population located in the Jacumba Unit of Quino critical habitat, SDG&E will consult with the Service regarding the final design and siting of all permanent and temporary impacts (e.g., towers, pads, access roads, staging areas, pull down areas, helipads, and fuel modification zones) within Quino critical habitat...	See B-7i
SS-CM-7 No new construction will occur during the Quino flight season within 1 km (1 mi) of any known or newly discovered Quino occurrence. If it is not feasible to construct outside of the flight season in these instances, SDG&E must obtain written consent from the Service to proceed with construction.	See B-7i
B-7j: Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There are no arroyo toads or suitable habitat within the Substation.
SS-CM-8 A pre-construction, Service protocol, survey will be conducted for the arroyo toad by a biologist approved by the Service to handle the toad) in all areas of the project located within suitable arroyo toad breeding habitat. The removal of toad riparian breeding habitat will occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles.	See B-7j
SS-CM-9 SDG&E will develop an arroyo toad translocation monitoring program to be implemented during all construction activities that have the potential to adversely affect the arroyo toad...	See B-7j

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
SS-CM-10 To offset the loss of occupied and suitable arroyo toad habitat within the project area, and to offset indirect effects of the project on arroyo habitat, SDG&E will develop and implement an arroyo toad predator control program on USFS lands. The scope and methods for this program will be developed in consultation with the Service and USFS.	See B-7j
SS-CM-11 Compensation for the loss of arroyo toad-occupied habitat will be implemented... Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7j
SS-CM-15 Towers, pads, pull stations, access roads, staging areas, and fly yards will not be located within suitable/potential arroyo toad upland aestivation and riparian breeding habitat to the extent feasible...	See B-7j
B-7i: Conduct coastal California gnatcatcher surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There are no coastal California gnatcatchers or suitable habitat within the Substation.
SS-CM-19 All brushing or grading taking place within occupied habitat of the gnatcatcher 500 ft of any gnatcatcher sightings during construction will be conducted outside of the gnatcatcher breeding season (2-15 through 8-31). When conducting all other construction activities during the gnatcatcher breeding season, within occupied habitat, the following avoidance measures will apply. Vegetation clearing outside of the breeding season (10-1 through 2-14) will take place in the presence of a biological monitor approved by the Service... A Service-approved biologist will survey for gnatcatchers within 10 days prior to initiating activities in an area. The results of the survey will be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities...If an active nest is located, 300-ft no-construction buffer will be established around each nest site... The applicant will contact the Wildlife Agencies to determine the appropriate buffer zone...However, if construction must take place within 300-ft buffer, a qualified acoustician will monitor noise..	See B-7i
SS-CM-20 Compensation for the loss of occupied gnatcatcher habitat will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
SS-CM-21 Compensation for the loss of unoccupied designated critical habitat for the gnatcatcher will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Although the Substation yard is devoid of vegetation, birds may nest within the yard on existing equipment and structures. A qualified biologist will conduct avian breeding surveys within the Substation and along the perimeter of the site within 10 calendar days prior to construction during nesting season. Results of the surveys will be submitted to Wildlife Agencies for review and approval. If active nests are located, a buffer as defined in this measure will be established and monitored on a weekly basis to allow construction to proceed.
B-9a: Survey for bat nursery colonies	NA. There are no bats or areas with potential to support bat nursery colonies at the Substation.
B-10a: Utilize collision-reducing techniques in installation of transmission lines	NA. No new transmission lines will be installed.
B-11a: Prepare and implement a Raven Control Plan	NA. No FTHL habitat or desert tortoise habitat occurs within the Substation.
B-12a: Conduct maintenance activities outside the general avian breeding season	NA. There are no sensitive biological resources within the Substation.
B-12b: Conduct maintenance when arroyo toads are least active	NA. There are no arroyo toads or suitable habitat within the Substation.
B-12c: Maintain access roads and clear vegetation in Quino checkerspot butterfly habitat	NA. There is no Quino checkerspot butterfly habitat within the Substation.
BIO-APM-1: Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted. Implement with B-1a, B-1b, B-2a, B-5a, B-7d, B-7e, B-7g, B-7i, B-7j, B-k, B-7l, B-7m, and B-7o	NA. Habitat for sensitive plant and animal species does not exist within the existing Substation fence-line. Construction activities will take place within the existing Substation which has a ground cover of crushed stone, pavement, or concrete. There is no vegetation or suitable habitat present within the substation and no impacts to special status plants or wildlife will occur as a result of the upgrade activities.
BIO-APM-2: Train personnel regarding the appropriate work practices necessary to effectively implement the biological APMs.	A Safe Worker and Environmental Awareness Program (SWEAP) video, approved by the CPUC on March 15, 2010, includes instructions for required work practices to effectively implement the biological resource mitigation measures and applicant proposed mitigation measures (APMs). SWEAP will be shown to all personnel and enforced throughout all phases of the Project.
BIO-APM-3: Restrict vehicle movement to existing and constructed roads. Implement with B-5a, B-7a, B-8a, B-9a, B-12a, B-12b, and B-12c	NA. All vehicle traffic will be on existing paved and unpaved areas of the Substation.
BIO-APM-4: Comply with project area limits during construction and survey activities	NA. Construction activities will be limited to previously disturbed areas within the existing Substation site.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
BIO-APM-5: Configure access roads in compliance with hydrological resources guidelines. Implement with B-1a, B-2a, B-5a, and B-8a	NA. No new access roads will be constructed for the Substation upgrades.
BIO-APM-6: Comply with all applicable environmental laws and regulations. Implement with B-1a, B-5a, B-8a, and B-12a	During construction and operation of this site, SDG&E will comply with all the necessary environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat. The SWEAP video was approved by the CPUC on March 4, 2010. This SWEAP will be shown to all project personnel to ensure compliance with all applicable laws and regulations, addressing the protection of wildlife and its habitat.
BIO-APM-7: Littering is not allowed. Implement with B-6a, B-8a, and B-12a	SWEAP video addresses the fact that no littering is allowed, including food waste, other waste or any type of debris.
BIO-APM-8: Delineate sensitive plant population boundaries. Implement with B-5a	NA. There are no sensitive plant populations that exist within the Substation.
G-CM-33 Prior to construction, plant population boundaries designated as listed or proposed by the Wildlife Agencies and other resources designated as listed or proposed by SDG&E and other resource agencies will be clearly delineated with visible flagging or fencing, which will remain in place for the duration of construction...Where these areas cannot be avoided, focused surveys for covered plant species will be performed. Notification of presence of any covered plant species to be removed in the work area will occur within ten (10) working days prior to construction activity, during which time the Wildlife Agencies may remove such plant(s) or recommend measures to minimize or reduce the impact...	NA. See BIO-APM-8
BIO-APM-9: Follow brush clearing guidelines. Implement with B-8a and B-12a	NA. There will be no brush clearing at the Substation.
BIO-APM-10: No wildlife, including rattlesnakes, may be harmed except to protect life and limb; Firearms shall be prohibited. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures. The SWEAP also addresses that firearms are prohibited in all project areas, except for security personnel.
BIO-APM-11: Feeding of wildlife is not allowed. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that feeding wildlife is prohibited.
BIO-APM-12: Do not bring pets. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that prohibit project personnel from bringing pets to any project area to minimize harassment or killing of wildlife and prevent the introduction of animal diseases to wildlife populations.
BIO-APM-13: Plant or wildlife species may not be collected for pets or any other reason. Implement with B-5a and B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that prohibit collecting plant or wildlife species for any reason.
BIO-APM-14: Comply with removal of wildlife and transportation guidelines. Implement with B-7a	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Follow APMs during emergency repairs. Implement with B-1a and B-2a	NA. This mitigation measure will be fulfilled during construction, as needed.
BIO-APM-16: Follow sensitive tree trimming guidelines. Implement with B-1a, B-2a, B-8a, and B-12a	NA. There are no trees within the substation area.
BIO-APM-17: Permanently close any new access roads or spur roads constructed as part of the project that are not required as permanent access. Implement with B-1a	NA. No access roads will be constructed for the substation upgrades.
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features. Implement with B-2a and B-5a, B-8a, and B-9a	NA. No access roads will be constructed. There are no sensitive features or endangered species or their sensitive habitat within the Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
G-CM-27 To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location...Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks. Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	NA. See BIO-APM-18
BIO-APM-19: Implement restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM	NA. There are no sensitive features or endangered species or their sensitive habitat with the Substation.
BIO-APM-20: Leave vegetation in place in construction areas where re-contouring is not required. Implement with B-1a	NA. No vegetation clearing will occur at the Substation.
BIO-APM-21: Comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981). Implement with B-10a	NA. Substation upgrade activities do not include installation of additional power line exits or new tall support structures.
BIO-APM-22: Salvage may include removal and stockpiling for replanting. Implement with B-5a	NA. No vegetation clearing will occur at the Substation.
BIO-APM-23: Remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Implement with B-1a and B-3a	NA. No excavation or vegetation clearing will occur at the Substation.
BIO-APM-24: Prevent livestock or wildlife from falling through covers. Implement with B-7a	NA. No excavation will occur at the Substation.
BIO-APM-25: Revegetate disturbed soils. Implement with B-1a and B-3a	NA. No ground disturbing activities will occur at the Substation.
BIO-APM-26: Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles. Implement with B-7a	NA. No excavation will occur at the Substation.
BIO-APM-27: Remove all existing raptor nests from structures that would be affected by Project construction. Implement with B-8a	Per NTP request, existing raptor nests have not been observed within the switchyard fence-line. If nests are found prior to construction and outside of the raptor breeding season, SDG&E will remove nests that would be affected by construction activities per the requirements of this mitigation measure.
BIO-APM-28: Remove potential roost trees	NA. There are no potential bat roost trees located within the Substation.
BIO-APM-29: Reduce construction night lighting on sensitive habitats. Implement with B-7a and B-9a	NA. There will be no additional lighting as a result of upgrade activities at the Substation.
<b>Visual Resources</b>	
V-1a: Reduce visibility of construction activities and equipment	Per the NTP request, the upgrades will be installed within the existing Substation site. There is an existing eight-foot wall that provides appropriate screening. There will not be additional visual impacts to nearby residences as a result of the upgrades.
V-1b: Reduce construction night lighting impacts	NA. Additional lighting is not proposed for the Substation and construction activities will be limited to daylight hours.
V-2a: Reduce in-line views of land scars	NA. Access to this yard will be made via existing roads. No new access roads will be constructed for Substation upgrades.
V-2b: Reduce visual contrast from unnatural vegetation lines	NA. There will be no disturbance and therefore, revegetation will not be necessary at the Substation.
V-2c: Reduce color contrast of land scars on non-Forest lands	NA. The Scripps Substation upgrade area is not visible from sensitive public viewing locations.
V-2d: Construction by helicopter	NA.
V-2f: Reduce land scarring and vegetation clearance impacts on USFS-administered lands	NA. Scripps Substation is not located on USFS-administered lands
V-3a: Reduce visual contrast of towers and conductors	NA. This mitigation measure applies to all tower locations and route segments.
V-7a: Reduce visual contrast associated with ancillary facilities	NA. Colors and textures of all upgraded equipment will match existing equipment.
V-7b: Screen ancillary facilities	NA. The upgrades will be installed within the substation site which has an existing eight-foot perimeter wall that serves as screening for the Substation.
V-21a: Reduce night lighting impacts	NA. Additional lighting is not proposed for the Substation and construction activities will be limited to daylight hours. A Lighting Mitigation Plan is not required.
V-45a Prepare and implement Scenery Conservation Plan	NA. The Scripps Substation is not located within Cleveland National Forest Lands.
V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures	NA. This mitigation measure applies to the Chocolate Canyon Option; therefore, it is not applicable to upgrade activities at the Scripps Substation.
V-68a: Eliminate sky lining of ridgeline towers and conductors	NA. No ridgeline towers will be installed at the Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
VR-APM-1: Place structures at the maximum feasible distance from highway, canyon, and trail crossings.	NA. All upgrade activities will take place in previously disturbed areas within the substation fence-line.
VR-APM-2: Use dulled metal finish on transmission structures and non-specular conductors in visually sensitive areas. Implement with V-3b	NA.
VR-APM-3: Match the spacing of structures where the line parallels existing transmission lines	NA
VR-APM-4: No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits. Implement with V-1c	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-5: Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence. Implement with V-3c	NA. Upgrade activities will take place within the Scripps Substation fence-line and will not impact residences.
VR-APM-6: In scenic view areas place structures to avoid sensitive features and/or allow conductor to clearly span the features. (Need SDG&E input)	NA. There are no sensitive features at the Substation.
<b>Land Use</b>	
L-1a: Prepare Construction Notification Plan	The Construction Notification Plan was approved by the CPUC on March 1, 2010. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1c: Coordinate with MCAS Miramar	NA. Upgrade activities will not occur within MCAS Miramar.
L-2b: Revise project elements to minimize land use conflicts	NA. Construction activities will be limited to the previously disturbed areas within the existing substation fence-line and no new landowners will be affected as part of the scope of work.
LU-APM-1: Provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and SDG&E will appoint a public affairs officer to address public concerns or questions. Implement with L-1d	Property owners and tenants within 300 feet of the Substation will be noticed prior to commencement of construction activities. Verification of such notification will be submitted to the CPUC as per the Construction Notification Plan approved on March 1, 2010.
LU-APM-2: Place new transmission structures more than 330 feet from an existing residence. Implement with L-1d	NA.
LU-APM-4: Notify property owners and tenants in advance of construction activities. Provide alternative access if feasible. Implement with L-1e	NA. Construction at this site will take place inside the existing substation and as a result, access to adjacent properties will not be affected.
LU-APM-5: Coordinate construction activities with appropriate water management representatives. (Need SDG&E input). Implement with L-1a	NA. Irrigation canals and flood management structures are not located at the Substation.
LU-APM-6: Flag ROW boundary and limits of construction activity inside and outside the ROW in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided. Implement with L-1f	NA. Construction will be confined within the Substation fence-line.
LU-APM-7: Install project facilities along the edges or borders of private property, open space parks, and recreation areas	NA.
LU-APM-8: Continue coordination efforts with the Counties of Imperial and San Diego General Plan Updates and the City of San Diego General Plan Updates to include the Proposed Project in their respective General Plans.	NA. The proposed upgrades to the Scripps Substation do not require an update to the San Diego County General Plan.
LU-APM-9: Obtain all necessary and/or appropriate ministerial land use permits	NA. Upgrade activities will take place within the existing Scripps Substation; therefore, ministerial land use permit(s) will not be necessary.
LU-APM-10: Match structure locations with existing transmission facilities. (Need SDG&E input)	NA. No new structures will be built as part of the scope of work for Scripps Substation upgrades.
<b>Wilderness and Recreation</b>	
WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-1b: Provide temporary detours for trail users	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-1c: Coordinate with local agencies to identify alternative recreation areas	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-2a. Develop a reroute for the BCD Alternative Revision to reduce effects on recreation	NA.
WR-2b: Evaluate and Implement PCT Route Revision	NA.
WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2a: Provide advance notice of restriction of conflicts with access routes to recreational use areas. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
R-APM-2b: No construction that affects trail use will be conducted in that area on federal holidays. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2c: Coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2d: Post signs directing vehicles to alternative park access and parking in the event construction temporarily obstructs parking areas near trailheads. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2e: Post signs advising recreation users of construction activities and directing them to alternative trails or bikeways on both sides of all trail intersections. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2f: Post signs advising equestrians of construction timeframes where helicopters are used for construction, at all equestrian trail-access points within the vicinity of the flight paths. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-3a: Construction-related traffic shall be restricted to routes approved by the authorized agencies	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
<b>Agriculture</b>	
AG-1a: Avoid interference with agricultural operations	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-1b: Restore compacted soil	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-1c: Coordinate with grazing operators	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-3b: Consult with and inform aerial applicators	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
LU-APM-3: Compensate farmers for losses of crops along ROW. Implement with L-1d	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
<b>Cultural Resources</b>	
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	The Final Inventory Report of the Cultural Resources concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Scripps Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance.
C-1b: Avoid and protect potentially significant resources	NA. This mitigation measure is not applicable to construction activities occurring at the Substation. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-1c: Develop and implement Historic Properties Treatment Plan	Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1d: Conduct data recovery to reduce adverse effects	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1e: Monitor construction at known ESAs	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1f: Train construction personnel	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions on recognition of possible buried cultural remains and protection of all cultural resources.
C-1g Avoid and protect Old Highway 80 (P-37-024023)	NA. No upgrade activities will take place from MP 18-74.3 to MP 18-80 of the Interstate 8 Alternative.
C-2a: Properly treat human remains	Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-3a: Monitor construction in areas of high sensitivity for buried resources	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-4a: Complete consultation with Native American and other Traditional Groups	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural or historic places resources have been identified at the substation site.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
C-6a: Reduce adverse visual intrusions to historic built environment properties	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at the substation site.
C-6e: Reduce adverse visual intrusions to portions of Old Highway 80	NA. Upgrade activities will not take place on Old Highway 80.
C-6f: Reduce adverse visual intrusions to the Desert View Tower view shed	NA. The Substation is not located in the Desert View Tower viewshed.
CR-APM-1: Instruct construction personnel on the protection and avoidance of cultural resources. Implement with PAL-1e	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and 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.
CR-APM-2: Flag archeological sites that are eligible or potentially eligible for the National Register	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-3: Report any previously unidentified cultural resource (historic or prehistoric site or object) discovered	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-4: Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, and reconstruction of a historical resource consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-5: Follow the guidance described for: Preservation in-place for mitigating impacts to archaeological sites, and preparation of data recovery plans	SDG&E will continue to comply with Cultural Resources mitigation measures as outlined in the MMCRP, therefore following guidelines for cultural resources.
CR-APM-6: Avoid, fence, or barricade historic properties, contributing portions and sensitive features for protection	NA. There are no documented historical resources at the Scripps Substation that will require adherence to cultural resource guidelines.
CR-APM-7: Control erosion, sedimentation, or indirect displacement. Implement with C-2a, C-3a, C-4a, and C-5a	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-8: Avoid and protect elements of the landscape that are essential to the historic setting of the property	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-9: Install permanent fencing or barriers; or control/restrict access to the historic property	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-10: Locate project structures so that conductors span linear historic properties; underground placement of pipelines and conductors will be bored under linear properties to avoid disturbance or intrusion	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-11: Implement standard practices for cultural and paleontological resources on private lands	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-12: Conduct cultural surveys for staging areas that have not yet been identified	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
<b>Paleontological Resources</b>	
PAL-1a: Inventory and evaluate paleontological resources in Final APE	NA. The Paleontological Records Search for the SDG&E Sunrise Powerlink Project was submitted February 25, 2010. There are no paleontological concerns for the Scripps Substation as there will be no ground disturbance.
PAL-1b: Develop Paleontological Monitoring and Treatment Plan	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1c: Monitor construction for paleontology	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
PAL-1d: Conduct paleontological data recovery	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
PAL-1e: Train construction personnel	The SWEAP video, approved by the CPUC on March 15, 2010, 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.
GEO-APM-9: Implement appropriate mitigation efforts if paleontological resources are encountered. Implement with PAL-1d	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
<b>Noise</b>	

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
N-1a: Implement Best Management Practices for construction noise	During construction, work will be conducted between the hours of 7:00 a.m. and 7:00 p.m.. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC.
N-2a: Avoid blasting where damage to structures could occur (SDG&E to define blasting)	NA. No blasting will occur at the Scripps Substation.
N-3a: Respond to complaints of corona noise	NA. This applies to overhead transmission line segments, and not to Substation upgrades.
NOI-APM-1: Provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads; and establish a toll free telephone number for receiving questions/complaints. Implement with L-1a	The Construction Notification Plan was approved by the CPUC on March 1, 2010 addresses public noticing for construction noise. Proof of Notification will be submitted to CPUC prior to start of construction.
<b>Transportation and Traffic</b>	
T-1a: Restrict lane closures	Per the NTP, the upgrade of the Scripps Substation will not require temporary closure of any roadway and will not restrict the movement of emergency vehicles.
T-4a: Ensure pedestrian and bicycle circulation and safety.	NA. Construction activities will not result in the temporary closures of sidewalks, other pedestrian facilities, bike routes or bike path closures.
T-5a: Repair roadways damaged by construction activities	It is not anticipated that upgrade activities at Scripps Substation will cause roadway damage. Should damage occur, provisions of this mitigation measure will be implemented.
T-7a: Notify public of potential short-term elimination of parking spaces	NA. Upgrade activities will be limited to the fenced Scripps Substation and no parking will be eliminated.
T-9a: Prepare Construction Transportation Management Plan	The project-wide Traffic Impact Study determined that there will be no significant traffic impacts for set-up and utilization of this yard. The existing circulation system and intersection controls will function adequately. As a result, a CTMP will not be required.
T-11b: Consult with and inform U.S. Customs and Border Patrol	NA. The Substation is not within the area of border patrol aircraft operations along the Interstate 8 Alternative and Modified Route D Alternative.
T-APM-2a: Obtain required permits for temporary lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-APM-2b: Submit detour plans. Implement with T-1b	NA. Construction activities at Scripps Substation will not require detours, cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts.
T-APM-4a: Coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	During construction, should an unanticipated lane restriction or closure is found to be necessary, advance documentation of coordination with emergency service providers shall be submitted to the CPUC.
T-APM-5a: Consult with County Education Offices, School Districts to coordinate construction activities adjacent to school bus stops	NA. Construction activities are not planned at or in proximity to school bus stops.
T-APM-6a: Comply with county parking ordinances or approved traffic control plan	NA. The Scripps Substation is not located within Imperial County.
T-APM-6b: Prohibit parking on San Diego County-maintained roads and highways unless otherwise noted at specific locations; comply with the County of San Diego Department of Public Works Traffic Guidelines, 2001 whenever possible, or an approved traffic control plan	NA. There will be no parking on San Diego County-maintained roads and highways.
T-APM-8a: Obtain required permits for entering railroad ROW	NA. There will be no entering railroad right-of-ways.
T-APM-9a: Underground all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway. (Need SDG&E input)	NA. There are no new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway.
T-APM-10a: Provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure access to properties when not actively constructing the underground cable alignment	NA. Existing roads will be utilized at Scripps Substation.
<b>Public Health and Safety</b>	
P-1a: Implement Environmental Monitoring Program	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.
P-1b: Maintain emergency spill supplies and equipment	During construction, hazardous material spill kits will be maintained onsite.
P-2a: Test for residual pesticides/herbicides on currently or historically farmed land	NA. Agricultural lands are not located within or adjacent to the Scripps Substation.
P-3a: Appoint individuals with correct training for sampling, data review, and regulatory coordination	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
P-3b: Documentation of compliance with measures for encountering unknown contamination	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
P-7a: Evaluate contaminated sites	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
HS-APM-1: Train personnel involved in using hazardous materials. Develop a Hazardous Communication Plan. Implement with P-1a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes training on hazardous materials management procedures. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project. The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Train personnel in refueling vehicles. Implement with P-1a	Vehicle refueling will not take place at this site.
HS-APM-3: Develop applicable environmental safety plans associated with hazardous materials. Implement with P-1a	All applicable plans have been developed for this portion of the project work, including an SPCC Plan, HMBP, and HazCom Plan. The Substation has an existing Spill Prevention Control and Countermeasure Plan (SPCC) which contains emergency response and spill response information. The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC April 2, 2010. The Substation site Hazardous Materials Business Plan has also been submitted. No new oil-filled equipment will be installed as part of the work activities at the site, so no additional containment will be required and the SPCC Plan will not require changes.
HS-APM-4: Develop a site specific blasting plan of tower footing	NA. Blasting will not be required for the Substation upgrades scope of work.
HS-APM-5: Investigate all Government Code §65962.5 sites or other known contamination sites along the transmission line ROW.	NA. The Substation is not a Section 65962.5 site or known contamination site.
HS-APM-6: Investigate any known or potential areas for Unexploded Ordinance (UXO) used by the military along the ROW	NA. The Scripps Substation has been previously excavated. There is no known or potential for UXO, as this area was not utilized for military purposes. If a UXO is found during pre-construction investigations of known or potential UXO areas, a trained contractor shall remove the UXO.
HS-APM-7: Train personnel involved in excavation and grading or for ROW clearing to recognized UXO and/or potential soil, surface water, and groundwater potential contamination sites	NA. All site documentation reveals that this area was not previously used by the military and the property is not adjacent or near areas used by the military.
HS-APM-8: Assign an Environmental Field Representative and/or General Contractor for Health & Safety. Implement with P-1a	SDG&E has assigned Steve Riggs, Field Monitoring Manager with Burns & McDonnell, 858.547.9869, as the Environmental Field Representative for the Scripps Substation upgrade.
HS-APM-9: Contact airport representative and/or Federal Aviation Administration Authorities regarding work within all existing and proposed transmission line corridors within 2 miles of an airport.	NA. The scope of work is for upgrades to an existing Substation and not construction along the proposed transmission line corridor.
HS-APM-10: Store and dispose of hazardous waste and solid waste in accordance with federal, State, and local regulations. Implement with P-1a	It is not anticipated that hazardous wastes will be generated during construction at Scripps; however, 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 shall be employed whenever possible.
HS-APM-11: Develop Fire Prevention and Response Plan (FPRP). Assign a project Fire Marshal to enforce all provisions of the FPRP	The Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on February 2, 2010 and a project Fire Marshall has been hired onto project and is assigned to enforce the FPRP.
HS-APM-12: Develop a Traffic Control Plan	Per the request construction activities will not cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts. If any unanticipated lane restrictions or closures are found to be necessary, a traffic plan will be developed and submitted to the CPUC prior to implementation.
HS-APM-14: Construction workers shall undergo environmental training regarding potential exposure	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes procedures regarding potential exposure of hazardous materials in accordance with Federal, State, and local authorities.
HS-APM-15: Stop work and notify Health and Safety Officer if during excavation soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
HS-APM-16: Terminate and cordoned off work if soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
HS-APM-17: Notify regulatory agency if the sample testing determines that contamination is found above regulatory limits	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
PS-1a: Limit the conductor surface electric gradient	NA. Substation upgrades will not require changes in existing conductor surface gradients that could affect radio reception.
PS-1b: Document and resolve electronic interference complaints	NA. This mitigation measure applies to overhead transmission line segments and is not applicable to upgrade activities at the Scripps Substation.
PS-2a: Implement grounding measures	NA. All facilities at the substation are properly grounded. During construction, new upgrades will be properly grounded as necessary.
<b>Air Quality</b>	

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
AQ-1a: Suppress dust at all work or staging areas and on public roads	A Dust Control Plan was approved by the CPUC on January 20, 2010 for the entire project. Dust Control Plan measures will be implemented during upgrade activities at Scripps.
AQ-1b: Use low-emission construction equipment	A Construction Emissions Monitoring Plan was approved on January 26, 2010.
AQ-1h: Obtain NOx and particulate matter emission offsets	Construction-phase activities and emissions would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity de minimis thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would be satisfied based upon these lower emissions.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	Emissions off-sets were submitted for review on August 27, 2009. Verification e-mail dated March 10, 2010 indicated that SDG&E purchased Carbon Reduction Tons (CRTs) to satisfy this measure. Quarterly reports will be provided as required.
AQ-4c: Avoid sulfur hexafluoride emissions	Per the NTP request, the Avoid SF6 Emissions Mitigation Plan was approved March 12, 2010. The Partnership MOU between SDG&E and US EPA was approved on February 24, 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-1: Comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]). File a Dust Control Plan with the ICAPCD	NA. Scripps Substation is not located in Imperial County.
AQ-APM-2: Control fugitive dust	NA. No grading will occur at the Scripps Substation. Upgrade activities will be limited to previously disturbed areas within the substation fence-line.
AQ-APM-3: Minimize mud and dust from being transported onto paved roadway surfaces, pave, and gravel	SDG&E will use methods to minimize mud and dust tracking on paved roads. This measure will be fulfilled during construction.
AQ-APM-4: Carpool to the job site	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes promoting carpooling to the job site.
AQ-APM-5: Minimize unnecessary construction vehicle and idling time	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes vehicle idling.
<b>Hydrology and Water Resources</b>	
H-1a: Prepare Substation Grading and Drainage Plan; construct during the dry season	NA. This mitigation measure only applies to new substations; therefore, it is not applicable to Scripps Substation.
H-1a (CC): Construct during the dry season	NA
H-1b: Construction in Los Peñasquitos Canyon Preserve to be in the dry season; SWPPP to be reviewed and approved by San Diego County and City of San Diego	NA
H-1k: Comply with Forest Service conditions	NA. Scripps Substation is not located on USFS-administered lands.
H-1l: Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment-Control Plan	NA
H-2d: Maintain vehicles and equipment	Will occur during construction.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	NA. Blasting will not be required for the Substation upgrades scope of work.
H-5a: Install substation runoff control	NA. The mitigation measure only applies to new substations. No detention/retention basins will be installed.
H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property	NA. There are no streambeds or stream crossings at the Scripps Substation.
H-7a: Develop Hazardous Substance Control and Emergency Response Plan for project operation	The existing Substation SPCC Plan contains emergency response information to assume quick and safe clean-up of spills as required to address hazardous substance control and emergency response. The SPCC Plan will not require an update because
H-8a: Bury power line below 100-year scour depth	NA. There will not be any ground disturbance during upgrading activities at Scripps Substation. The mitigation measure only applies to underground stream crossings.
WQ-APM-1: Minimize disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks	NA. There will not be any disturbance to water resources during construction at the Scripps Substation.
WQ-APM-2: Place structures so as to avoid sensitive features such as watercourses, or to allow conductors to clearly span the features, within limits of safety and standard structure design	NA. There are no sensitive water features inside the Substation.
WQ-APM-3: Clearly mark where construction equipment and vehicles are not allowed on-site; and train personnel	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, 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.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
WQ-APM-4: Maintain adequate distance from stream banks and beds; use existing bridges to cross major streams and culverts in most dry intermittent streams; Span surface water, riparian areas and floodplains; prepare and implement a Storm Water Pollution Prevention Plan (SWPPP)	SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Scripps Substation. SDG&E's Water Quality Construction BMP Manual will be referenced for BMP implementation and maintenance. All BMPs are designed to prevent and avoid sediment within surface water runoff and protect the landscape from erosion in accordance with WQ-APM-4. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.
WQ-APM-5: Construct any stream crossings at low flow periods; and if necessary, develop a site-specific mitigation and restoration plan	NA. There are no stream beds or riparian areas located at the Scripps Substation.
WQ-APM-6: Avoid designated surface water protection areas	NA. There are no water protection areas located at the Scripps Substation. Groundwater supplies will not be used during project construction.
WQ-APM-8: Obtain and comply with required permits for any groundwater discharged to surface waters or storm drains	NA. SDG&E will not be impacting groundwater as part of this project. Discharge of groundwater and dewatering will not be required during construction.
WQ-APM-9: Prohibit storage of fuels and hazardous materials within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells	NA. There are no wells within the Substation fence-line or within 400 feet.
WQ-APM-10: At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, comply with burial depth requirements. Implement with H-6a	NA. There are no stream banks in or surrounding the Scripps Substation.
WQ-APM-11: Test groundwater levels along underground portion of the project drilling pilot borings	NA. This mitigation measure only applies to underground portions of the project.
WQ-APM-13: Do not dispose of hazardous materials onto the ground, the underlying groundwater, or any surface water.	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions on proper disposal of hazardous materials. Trash will be inside an enclosed containment. Any hazardous materials will be transported to a ground.
WQ-APM-14: Secure required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization	See WQ-APM-4.
WQ-APM-15: Construct access roads to avoid streambeds	NA. Construction access will be provided by existing roads to the Substation.
WQ-APM-16: Conduct site-specific assessments for each affected site	NA. There are no sensitive water resource features such as wetlands or waters of the State located inside the Scripps Substation.
<b>Geology, Minerals, and Soils</b>	
G-2a: Protect desert pavement	NA. There is no desert pavement within or adjacent to the Scripps Substation.
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	NA. The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed.
G-4a: Reduce effects of groundshaking	See G-3a
G-4b: Conduct geotechnical investigations for liquefaction	See G-3a
G-5a: Minimize project structures within active fault zones	NA. The Scripps Substation is not located on an active fault.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	NA. The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed. Slope instability is not a concern at the substation.
G-9a: Coordinate with quarry operations	NA. Scripps Substation is not located on an active quarry.
GEO-APM-1: No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable	NA.
GEO-APM-2: Comply with soil disturbance guidelines	NA. There are no geological resources, agricultural soils, or mineral resources at the existing substation. The substation ground surface is paved, covered with equipment footings or crushed stone.
GEO-APM-3: Avoid placing structures in areas of high shrink/swell potential	NA. No new structures will be installed as part of the Scripps Substation upgrades. high shrink/swell potential will be avoided, per the NTP request.
GEO-APM-4: Place structures in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock	NA. No new structures will be installed as part of the Scripps Substation upgrades. high shrink/swell potential will be avoided, per the NTP request.
GEO-APM-5: Avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation	NA. There will be no ground disturbance.
GEO-APM-6: Conduct surface restoration for erosion control and re-vegetation	NA. No surface restoration is necessary because there is no vegetation or previously undisturbed areas at the substation that could be impacted.
GEO-APM-8: Remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage; and position structures to span over potential landslide areas	NA. There are no boulders or hills within the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
<b>Socioeconomics</b>	
S-2a: Notify public of utility service interruption	NA. Scripps Substation will not have planned interruption of services.
S-2b: Protect underground utilities	NA. This mitigation measure applies to underground construction.
S-3a: Recycle construction waste	SDG&E and/or its construction contractor shall recycle a minimum of 90% of inerts and 70% of all other materials generated during construction activities. Documentation from the recycling and/or landfill facilities used for construction will be provided.
S-3b: Use reclaimed water	The water study determined that sufficient supplies of surface water, reclaimed water, and potable water would be available to meet project demand.
PSU-APM-1: Coordinate with all utility providers with facilities located within or adjacent to ensure that design does not conflict with other facilities	NA. There are no affected third party utilities that will be affected by the project.
PSU-APM-2: Notify Underground Service Alert a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines	NA. There are no buried utilities at the substation that would require an Underground Service Alert.
PSU-APM-3: Coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized	There will not be lane closures or other activities associated with construction at the Substation that will interfere with emergency and police service response times or access (if lane closures do need to occur, documentation of prior coordination with emergency service providers shall be submitted to the CPUC).
<b>Fire and Fuels Management</b>	
F-1a: Develop and implement a Construction Fire Prevention Plan	A Construction Fire Plan, acknowledged by the CALFire Chief, was approved by the CPUC on January 20, 2010.
F-1b: Amend and implement Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007)	This mitigation measure will be fulfilled post construction.
F-1c: Ensure coordination for emergency fire suppression	Upgrade activities will be limited within the Scripps Substation fence-line and will not obstruct firefighting equipment or crews or emergency fire suppression efforts.
F-1d: Remove hazards from the work area	NA. There is no vegetation onsite.
F-1e: Contribute to defensible space grants fund	This mitigation measure will be fulfilled post construction.
F-2a: Establish and maintain adequate line clearances	NA. There is no vegetation onsite.
F-2b: Install existing conductors on steel poles	NA. There will be no relocation of existing 69 kV transmission lines at Scripps Substation.
F-2c: Perform climbing inspections	NA. No new structures will be installed as part of the Scripps Substation upgrades.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. This is required to be completed post-construction.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU. It will be implemented prior to energization.

**Sunrise Powerlink Project  
NTP 9 Compliance Table**

<b>Pre-Construction Compliance Status Table as applied to the Scripps Substation (10-6-10)</b>	
<b>Mitigation Measure and APM</b>	<b>Status</b>
<b>Please note that the red text of the mitigation measure conditions are not provided in this table. Complete measures can found in the EIR/EIS and MMCRP.</b>	<b>Please note that cells highlighted in grey have been fulfilled or are not applicable.</b>
<b>Abbreviated conditions of the USFWS Biological Opinion are shown in green highlights.</b>	<b>Cells highlighted in yellow are conditions of the NTP and shall be fulfilled with documentation submitted to the CPUC prior to construction.</b>
	<b>Cells highlighted in purple will be fulfilled during or after construction.</b>
<b>Biological Resources</b>	
B-1a: Provide restoration/compensation for impacted sensitive vegetation communities	NA. Project activities will be limited to previously disturbed areas within the substation fence-line. Existing access roads will be utilized at Scripps Substation. There will be no ground disturbance or impacts to sensitive vegetation communities at the substation. There are no trees located at the substation.
B-1c: Conduct biological monitoring	During construction, a qualified biological monitor with the authority to issue stop work orders will be on-site and periodic inspections will be performed. During construction, monitoring reports will be prepared and submitted on a weekly basis. Monitoring reports of maintenance activities will be prepared and submitted annually.
B-1k: Re-seed disturbed areas after a transmission line-caused fire	NA. There are no natural areas within the substation fence-line.
B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187	NA
B-2a: Provide restoration/compensation for impacted jurisdictional areas	NA. There are no jurisdictional areas within the substation.
B-3a: Prepare and implement a Weed Control Plan	NA
B-5a: Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. Construction activities will occur within the previously disturbed, fenced substation fence-lines. Furthermore, there are no special status plant populations within the Scripps Substation.
G-CM-32 Prior to construction activities, SDG&E will conduct on-the-ground surveys (following Service protocols where they exist) for the following listed species where such surveys had not been conducted in 2007 and 2008, or for those species for which surveys in 2007 and 2008 were not reliable due to lack of sufficient rainfall. San Diego Thornmint ( <i>Acanthomintha ilicifolia</i> ), San Bernardino Bluegrass ( <i>Poa atropurpurea</i> ), Willowy Monardella ( <i>Monardella viminea</i> ), Quino Checkerspot Butterfly ( <i>Euphydryas editha quino</i> ), Arroyo Toad ( <i>Bufo californicus</i> ), Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> ), Least Bell's Vireo ( <i>Vireo bellii pusillus</i> ), Coastal California Gnatcatcher ( <i>Polioptila californica californica</i> ), Stephen's Kangaroo Rat ( <i>Dipodomys stephensi</i> )	NA: Construction activities will occur only within the previously disturbed, fenced substation fence-lines. There are no sensitive species or associated habitat that exist within the Substation fence-lines.
SS-CM-1 San Diego Thornmint. No impacts will occur to the thornmint population at and adjacent to MP 116 or to any thornmint occurrences between MP 114 and 119...In other areas where suitable thornmint habitat (i.e., gabbro and calcareous soils and a slope of 0 to 25 percent) exists, the area to be impacted will be surveyed for thornmint before any impacts may occur. per G-CM-32.	NA: Construction activities will occur only within the previously disturbed, fenced substation fence-lines. There are no sensitive species or associated habitat that exist within the Substation fence-lines.
SS-CM-2 Impacts to San Diego thornmint will first be avoided where feasible, and where not feasible due to physical or safety constraints, impacts will be compensated through salvage and relocation via a restoration program...The CPUC, BLM, USFS and Wildlife Agencies will decide whether the applicant can restore San Diego thornmint populations or will acquire habitat with San Diego thornmint...	NA. See SS-CM-1
B-7a Cover all steep-walled trenches or excavations used during construction to prevent the entrapment of wildlife (e.g. reptiles and small mammals)	NA. Steep-walled trenches or excavations are not proposed as part of the Scripps Substation upgrade scope of work; therefore, this mitigation measure is not applicable.
B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Range wide Management Strategy	NA. There are no Flat-Tailed Horned Lizards or their associated habitat within the Substation
B-7c: Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat	NA. There are no Peninsular bighorn sheep or their associated habitat within the Substation.
SS-CM-22 Construction activities (including the use of helicopters) in bighorn sheep designated critical habitat will be limited to outside the lambing season (January 1 through June 30) and the period of greatest water need (June 1 through September 30) as defined in the Recovery Plan...	NA. See B-7c
SS-CM-23 Compensation for the loss of occupied bighorn sheep habitat will be implemented...	NA. See B-7c

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
SS-CM-24 A biological consultant approved by the Wildlife Agencies will be retained by SDG&E to collect data on bighorn sheep movements in the area during the construction phase. Prior to construction the biologist shall submit a bighorn sheep monitoring plan that meets the approval of the Wildlife Agencies...	NA. See B-7c
SS-CM-25 To help reconnect desert bighorn sheep subpopulations and at least partially offset impacts to the overall population caused by the project, SDG&E will: Fund the design and construction of an overpass or underpass, or tunnel to facilitate desert bighorn sheep movement across a highway...Fund, design, and construct a system of fences to prevent bighorn sheep from crossing on the surface of westbound Interstate 8...Fund removal of tamarisk, fountain grass, other invasive species, and hazardous fences for the life of the project...	NA. See B-7c
B-7d: Conduct burrowing owl surveys, and implement appropriate avoidance/ minimization/compensation strategies	Surveys for nesting birds shall be conducted within 10-days prior to construction during nesting season and reported to the CPUC.
B-7e: Conduct least Bell's vireo and southwestern willow flycatcher surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There are no least Bell's vireos or their associated habitat within the Substation.
SS-CM-16 During construction, all grading or brushing taking place within riparian habitats occupied by the vireo will be conducted outside the vireo breeding season (defined as March 15 through September 15)...	NA: See B-7e
SS-CM-17 To avoid impacts to vireo, towers, pads, pull stations, access roads, staging areas, and fly yards will be located outside of riparian vegetation, including occupied vireo habitat, where feasible..	NA: See B-7e
SS-CM-18 To minimize adverse impacts from loss of occupied habitat in the Cleveland National Forest, and to minimize predation and parasitism, SDG&E will develop and implement a brown-headed cowbird ( <i>Molothrus ater</i> ) trapping program, in consultation with the USFS.	NA
B-7h: Implement appropriate avoidance/ minimization strategies for eagle nests	NA. No suitable eagle habitat exists within or adjacent to the Scripps Substation.
B-7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There are no Quino checkerspot butterflies or their associated habitat within the Substation.
SS-CM-3 A biologist permitted by the Service will delineate suitable/occupied (quino) habitat areas that will be impacted by project construction...	See B-7i
SS-CM-4 A pre-construction, Service protocol presence/absence survey for the adult Quino will be conducted within the delineated suitable/occupied habitat in the construction zone...	See B-7i
SS-CM-5 Any Service-approved restoration (plan) of impacted (quino) habitat will be conducted in areas with appropriate topographical and biological features to be determined by the Service, BLM, USFS and SDG&E...	See B-7i
SS-CM-6 Due the extreme importance of the Quino population located in the Jacumba Unit of Quino critical habitat, SDG&E will consult with the Service regarding the final design and siting of all permanent and temporary impacts (e.g., towers, pads, access roads, staging areas, pull down areas, helipads, and fuel modification zones) within Quino critical habitat...	See B-7i
SS-CM-7 No new construction will occur during the Quino flight season within 1 km (1 mi) of any known or newly discovered Quino occurrence. If it is not feasible to construct outside of the flight season in these instances, SDG&E must obtain written consent from the Service to proceed with construction.	See B-7i
B-7j: Conduct arroyo toad surveys, and implement appropriate avoidance/ minimization/compensation strategies	NA. There are no arroyo toads or suitable habitat within the Substation.
SS-CM-8 A pre-construction, Service protocol, survey will be conducted for the arroyo toad by a biologist approved by the Service to handle the toad) in all areas of the project located within suitable arroyo toad breeding habitat. The removal of toad riparian breeding habitat will occur from October through December to minimize potential impacts to breeding adults (including potential sedimentation impacts to toad eggs) and dispersing juveniles.	See B-7j
SS-CM-9 SDG&E will develop an arroyo toad translocation monitoring program to be implemented during all construction activities that have the potential to adversely affect the arroyo toad...	See B-7j

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
SS-CM-10 To offset the loss of occupied and suitable arroyo toad habitat within the project area, and to offset indirect effects of the project on arroyo habitat, SDG&E will develop and implement an arroyo toad predator control program on USFS lands. The scope and methods for this program will be developed in consultation with the Service and USFS.	See B-7j
SS-CM-11 Compensation for the loss of arroyo toad-occupied habitat will be implemented... Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7j
SS-CM-15 Towers, pads, pull stations, access roads, staging areas, and fly yards will not be located within suitable/potential arroyo toad upland aestivation and riparian breeding habitat to the extent feasible...	See B-7j
B-7i: Conduct coastal California gnatcatcher surveys, and implement appropriate avoidance/minimization/compensation strategies	NA. There are no coastal California gnatcatchers or suitable habitat within the Substation.
SS-CM-19 All brushing or grading taking place within occupied habitat of the gnatcatcher 500 ft of any gnatcatcher sightings during construction will be conducted outside of the gnatcatcher breeding season (2-15 through 8-31). When conducting all other construction activities during the gnatcatcher breeding season, within occupied habitat, the following avoidance measures will apply. Vegetation clearing outside of the breeding season (10-1 through 2-14) will take place in the presence of a biological monitor approved by the Service... A Service-approved biologist will survey for gnatcatchers within 10 days prior to initiating activities in an area. The results of the survey will be submitted to the Wildlife Agencies for review and approval prior to initiating any construction activities...If an active nest is located, 300-ft no-construction buffer will be established around each nest site... The applicant will contact the Wildlife Agencies to determine the appropriate buffer zone...However, if construction must take place within 300-ft buffer, a qualified acoustician will monitor noise..	See B-7i
SS-CM-20 Compensation for the loss of occupied gnatcatcher habitat will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
SS-CM-21 Compensation for the loss of unoccupied designated critical habitat for the gnatcatcher will be implemented...Any acquired habitat will be approved by the CPUC, BLM, USFS, and Wildlife Agencies.	See B-7i
B-8a: Conduct pre-construction surveys and monitoring for breeding birds	Although the Substation yard is devoid of vegetation, birds may nest within the yard on existing equipment and structures. A qualified biologist will conduct avian breeding surveys within the Substation and along the perimeter of the site within 10 calendar days prior to construction during nesting season. Results of the surveys will be submitted to Wildlife Agencies for review and approval. If active nests are located, a buffer as defined in this measure will be established and monitored on a weekly basis to allow construction to proceed.
B-9a: Survey for bat nursery colonies	NA. There are no bats or areas with potential to support bat nursery colonies at the Substation.
B-10a: Utilize collision-reducing techniques in installation of transmission lines	NA. No new transmission lines will be installed.
B-11a: Prepare and implement a Raven Control Plan	NA. No FTHL habitat or desert tortoise habitat occurs within the Substation.
B-12a: Conduct maintenance activities outside the general avian breeding season	NA. There are no sensitive biological resources within the Substation.
B-12b: Conduct maintenance when arroyo toads are least active	NA. There are no arroyo toads or suitable habitat within the Substation.
B-12c: Maintain access roads and clear vegetation in Quino checkerspot butterfly habitat	NA. There is no Quino checkerspot butterfly habitat within the Substation.
BIO-APM-1: Perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted. Implement with B-1a, B-1b, B-2a, B-5a, B-7d, B-7e, B-7g, B-7i, B-7j, B-k, B-7l, B-7m, and B-7o	NA. Habitat for sensitive plant and animal species does not exist within the existing Substation fence-line. Construction activities will take place within the existing Substation which has a ground cover of crushed stone, pavement, or concrete. There is no vegetation or suitable habitat present within the substation and no impacts to special status plants or wildlife will occur as a result of the upgrade activities.
BIO-APM-2: Train personnel regarding the appropriate work practices necessary to effectively implement the biological APMs.	A Safe Worker and Environmental Awareness Program (SWEAP) video, approved by the CPUC on March 15, 2010, includes instructions for required work practices to effectively implement the biological resource mitigation measures and applicant proposed mitigation measures (APMs). SWEAP will be shown to all personnel and enforced throughout all phases of the Project.
BIO-APM-3: Restrict vehicle movement to existing and constructed roads. Implement with B-5a, B-7a, B-8a, B-9a, B-12a, B-12b, and B-12c	NA. All vehicle traffic will be on existing paved and unpaved areas of the Substation.
BIO-APM-4: Comply with project area limits during construction and survey activities	NA. Construction activities will be limited to previously disturbed areas within the existing Substation site.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
BIO-APM-5: Configure access roads in compliance with hydrological resources guidelines. Implement with B-1a, B-2a, B-5a, and B-8a	NA. No new access roads will be constructed for the Substation upgrades.
BIO-APM-6: Comply with all applicable environmental laws and regulations. Implement with B-1a, B-5a, B-8a, and B-12a	During construction and operation of this site, SDG&E will comply with all the necessary environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat. The SWEAP video was approved by the CPUC on March 4, 2010. This SWEAP will be shown to all project personnel to ensure compliance with all applicable laws and regulations, addressing the protection of wildlife and its habitat.
BIO-APM-7: Littering is not allowed. Implement with B-6a, B-8a, and B-12a	SWEAP video addresses the fact that no littering is allowed, including food waste, other waste or any type of debris.
BIO-APM-8: Delineate sensitive plant population boundaries. Implement with B-5a	NA. There are no sensitive plant populations that exist within the Substation.
G-CM-33 Prior to construction, plant population boundaries designated as listed or proposed by the Wildlife Agencies and other resources designated as listed or proposed by SDG&E and other resource agencies will be clearly delineated with visible flagging or fencing, which will remain in place for the duration of construction...Where these areas cannot be avoided, focused surveys for covered plant species will be performed. Notification of presence of any covered plant species to be removed in the work area will occur within ten (10) working days prior to construction activity, during which time the Wildlife Agencies may remove such plant(s) or recommend measures to minimize or reduce the impact...	NA. See BIO-APM-8
BIO-APM-9: Follow brush clearing guidelines. Implement with B-8a and B-12a	NA. There will be no brush clearing at the Substation.
BIO-APM-10: No wildlife, including rattlesnakes, may be harmed except to protect life and limb; Firearms shall be prohibited. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that no wildlife, including rattlesnakes, may be harmed except to protect life and limb. If rattlesnakes are encountered, they will be safely removed by a biologist or staff trained in safe snake handling procedures. The SWEAP also addresses that firearms are prohibited in all project areas, except for security personnel.
BIO-APM-11: Feeding of wildlife is not allowed. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that feeding wildlife is prohibited.
BIO-APM-12: Do not bring pets. Implement with B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that prohibit project personnel from bringing pets to any project area to minimize harassment or killing of wildlife and prevent the introduction of animal diseases to wildlife populations.
BIO-APM-13: Plant or wildlife species may not be collected for pets or any other reason. Implement with B-5a and B-12a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions that prohibit collecting plant or wildlife species for any reason.
BIO-APM-14: Comply with removal of wildlife and transportation guidelines. Implement with B-7a	Wildlife found to be trapped will be removed by a qualified biological monitor. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) will be contacted to remove the wildlife and transport it safely to other suitable habitats.
BIO-APM-15: Follow APMs during emergency repairs. Implement with B-1a and B-2a	NA. This mitigation measure will be fulfilled during construction, as needed.
BIO-APM-16: Follow sensitive tree trimming guidelines. Implement with B-1a, B-2a, B-8a, and B-12a	NA. There are no trees within the substation area.
BIO-APM-17: Permanently close any new access roads or spur roads constructed as part of the project that are not required as permanent access. Implement with B-1a	NA. No access roads will be constructed for the substation upgrades.
BIO-APM-18: Design structures and access roads to minimize impacts to sensitive features. Implement with B-2a and B-5a, B-8a, and B-9a	NA. No access roads will be constructed. There are no sensitive features or endangered species or their sensitive habitat within the Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
G-CM-27 To the extent feasible, access roads will be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E will limit roads constructed parallel to streambeds or washes to a maximum length of 500 ft at any one transmission line crossing location...Culverts will be installed where needed for right angle crossings, but rock crossings will be utilized across most right angle drainage crossings. All construction activities will be conducted in a manner that will minimize disturbance to vegetation, drainage channels, and stream banks. Up to 30 days prior to construction in streambeds and washes, SDG&E will perform a pre-activity survey(s) to determine the presence or absence of threatened or endangered riparian species. Details of protocol survey requirements are listed in the species-specific measures below.	NA. See BIO-APM-18
BIO-APM-19: Implement restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM	NA. There are no sensitive features or endangered species or their sensitive habitat with the Substation.
BIO-APM-20: Leave vegetation in place in construction areas where re-contouring is not required. Implement with B-1a	NA. No vegetation clearing will occur at the Substation.
BIO-APM-21: Comply with "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc., 1981). Implement with B-10a	NA. Substation upgrade activities do not include installation of additional power line exits or new tall support structures.
BIO-APM-22: Salvage may include removal and stockpiling for replanting. Implement with B-5a	NA. No vegetation clearing will occur at the Substation.
BIO-APM-23: Remove only the minimum amount of vegetation necessary for the construction of structures and facilities. Implement with B-1a and B-3a	NA. No excavation or vegetation clearing will occur at the Substation.
BIO-APM-24: Prevent livestock or wildlife from falling through covers. Implement with B-7a	NA. No excavation will occur at the Substation.
BIO-APM-25: Revegetate disturbed soils. Implement with B-1a and B-3a	NA. No ground disturbing activities will occur at the Substation.
BIO-APM-26: Excavations shall be sloped on one end to provide an escape route for small mammals and reptiles. Implement with B-7a	NA. No excavation will occur at the Substation.
BIO-APM-27: Remove all existing raptor nests from structures that would be affected by Project construction. Implement with B-8a	Per NTP request, existing raptor nests have not been observed within the switchyard fence-line. If nests are found prior to construction and outside of the raptor breeding season, SDG&E will remove nests that would be affected by construction activities per the requirements of this mitigation measure.
BIO-APM-28: Remove potential roost trees	NA. There are no potential bat roost trees located within the Substation.
BIO-APM-29: Reduce construction night lighting on sensitive habitats. Implement with B-7a and B-9a	NA. There will be no additional lighting as a result of upgrade activities at the Substation.
<b>Visual Resources</b>	
V-1a: Reduce visibility of construction activities and equipment	Per the NTP request, the upgrades will be installed within the existing Substation site. There is an existing eight-foot wall that provides appropriate screening. There will not be additional visual impacts to nearby residences as a result of the upgrades.
V-1b: Reduce construction night lighting impacts	NA. Additional lighting is not proposed for the Substation and construction activities will be limited to daylight hours.
V-2a: Reduce in-line views of land scars	NA. Access to this yard will be made via existing roads. No new access roads will be constructed for Substation upgrades.
V-2b: Reduce visual contrast from unnatural vegetation lines	NA. There will be no disturbance and therefore, revegetation will not be necessary at the Substation.
V-2c: Reduce color contrast of land scars on non-Forest lands	NA. The Scripps Substation upgrade area is not visible from sensitive public viewing locations.
V-2d: Construction by helicopter	NA.
V-2f: Reduce land scarring and vegetation clearance impacts on USFS-administered lands	NA. Scripps Substation is not located on USFS-administered lands
V-3a: Reduce visual contrast of towers and conductors	NA. This mitigation measure applies to all tower locations and route segments.
V-7a: Reduce visual contrast associated with ancillary facilities	NA. Colors and textures of all upgraded equipment will match existing equipment.
V-7b: Screen ancillary facilities	NA. The upgrades will be installed within the substation site which has an existing eight-foot perimeter wall that serves as screening for the Substation.
V-21a: Reduce night lighting impacts	NA. Additional lighting is not proposed for the Substation and construction activities will be limited to daylight hours. A Lighting Mitigation Plan is not required.
V-45a Prepare and implement Scenery Conservation Plan	NA. The Scripps Substation is not located within Cleveland National Forest Lands.
V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures	NA. This mitigation measure applies to the Chocolate Canyon Option; therefore, it is not applicable to upgrade activities at the Scripps Substation.
V-68a: Eliminate sky lining of ridgeline towers and conductors	NA. No ridgeline towers will be installed at the Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
VR-APM-1: Place structures at the maximum feasible distance from highway, canyon, and trail crossings.	NA. All upgrade activities will take place in previously disturbed areas within the substation fence-line.
VR-APM-2: Use dulled metal finish on transmission structures and non-specular conductors in visually sensitive areas. Implement with V-3b	NA.
VR-APM-3: Match the spacing of structures where the line parallels existing transmission lines	NA
VR-APM-4: No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits. Implement with V-1c	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions prohibiting application of paint or permanent discoloring agents on rocks or vegetation to indicate survey or construction limits.
VR-APM-5: Transmission line structures will not be installed directly in front of residences or in direct line-of-sight from a residence. Implement with V-3c	NA. Upgrade activities will take place within the Scripps Substation fence-line and will not impact residences.
VR-APM-6: In scenic view areas place structures to avoid sensitive features and/or allow conductor to clearly span the features. (Need SDG&E input)	NA. There are no sensitive features at the Substation.
<b>Land Use</b>	
L-1a: Prepare Construction Notification Plan	The Construction Notification Plan was approved by the CPUC on March 1, 2010. Proof of Notification will be submitted to CPUC prior to start of construction.
L-1c: Coordinate with MCAS Miramar	NA. Upgrade activities will not occur within MCAS Miramar.
L-2b: Revise project elements to minimize land use conflicts	NA. Construction activities will be limited to the previously disturbed areas within the existing substation fence-line and no new landowners will be affected as part of the scope of work.
LU-APM-1: Provide advance notice to residents, property owners, and tenants within 300 feet of construction activities and SDG&E will appoint a public affairs officer to address public concerns or questions. Implement with L-1d	Property owners and tenants within 300 feet of the Substation will be noticed prior to commencement of construction activities. Verification of such notification will be submitted to the CPUC as per the Construction Notification Plan approved on March 1, 2010.
LU-APM-2: Place new transmission structures more than 330 feet from an existing residence. Implement with L-1d	NA.
LU-APM-4: Notify property owners and tenants in advance of construction activities. Provide alternative access if feasible. Implement with L-1e	NA. Construction at this site will take place inside the existing substation and as a result, access to adjacent properties will not be affected.
LU-APM-5: Coordinate construction activities with appropriate water management representatives. (Need SDG&E input). Implement with L-1a	NA. Irrigation canals and flood management structures are not located at the Substation.
LU-APM-6: Flag ROW boundary and limits of construction activity inside and outside the ROW in environmentally sensitive areas to alert construction personnel that those areas should be minimize or avoided. Implement with L-1f	NA. Construction will be confined within the Substation fence-line.
LU-APM-7: Install project facilities along the edges or borders of private property, open space parks, and recreation areas	NA.
LU-APM-8: Continue coordination efforts with the Counties of Imperial and San Diego General Plan Updates and the City of San Diego General Plan Updates to include the Proposed Project in their respective General Plans.	NA. The proposed upgrades to the Scripps Substation do not require an update to the San Diego County General Plan.
LU-APM-9: Obtain all necessary and/or appropriate ministerial land use permits	NA. Upgrade activities will take place within the existing Scripps Substation; therefore, ministerial land use permit(s) will not be necessary.
LU-APM-10: Match structure locations with existing transmission facilities. (Need SDG&E input)	NA. No new structures will be built as part of the scope of work for Scripps Substation upgrades.
<b>Wilderness and Recreation</b>	
WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-1b: Provide temporary detours for trail users	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-1c: Coordinate with local agencies to identify alternative recreation areas	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
WR-2a. Develop a reroute for the BCD Alternative Revision to reduce effects on recreation	NA.
WR-2b: Evaluate and Implement PCT Route Revision	NA.
WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2a: Provide advance notice of restriction of conflicts with access routes to recreational use areas. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
R-APM-2b: No construction that affects trail use will be conducted in that area on federal holidays. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2c: Coordinate all construction activities, including temporary trail closures, affecting the parklands and trail systems of San Diego and Imperial Counties with the counties' Parks and Recreation Department. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2d: Post signs directing vehicles to alternative park access and parking in the event construction temporarily obstructs parking areas near trailheads. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2e: Post signs advising recreation users of construction activities and directing them to alternative trails or bikeways on both sides of all trail intersections. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-2f: Post signs advising equestrians of construction timeframes where helicopters are used for construction, at all equestrian trail-access points within the vicinity of the flight paths. Implement with WR-1a	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
R-APM-3a: Construction-related traffic shall be restricted to routes approved by the authorized agencies <b>Agriculture</b>	NA. There are no wilderness or recreation areas located within or adjacent to the Scripps Substation.
AG-1a: Avoid interference with agricultural operations	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-1b: Restore compacted soil	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-1c: Coordinate with grazing operators	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
AG-3b: Consult with and inform aerial applicators	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
LU-APM-3: Compensate farmers for losses of crops along ROW. Implement with L-1d	NA. There are no agricultural fields located within or adjacent to the Scripps Substation.
<b>Cultural Resources</b>	
C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE)	The Final Inventory Report of the Cultural Resources concluded that there are no cultural resources identified within the Area of Potential Effect (APE) for the Scripps Substation. Furthermore, the proposed upgrades are consistent with the activities currently underway in the existing Substation and there will be no ground disturbance.
C-1b: Avoid and protect potentially significant resources	NA. This mitigation measure is not applicable to construction activities occurring at the Substation. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-1c: Develop and implement Historic Properties Treatment Plan	Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1d: Conduct data recovery to reduce adverse effects	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1e: Monitor construction at known ESAs	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-1f: Train construction personnel	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions on recognition of possible buried cultural remains and protection of all cultural resources.
C-1g Avoid and protect Old Highway 80 (P-37-024023)	NA. No upgrade activities will take place from MP 18-74.3 to MP 18-80 of the Interstate 8 Alternative.
C-2a: Properly treat human remains	Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
C-3a: Monitor construction in areas of high sensitivity for buried resources	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-4a: Complete consultation with Native American and other Traditional Groups	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural or historic places resources have been identified at the substation site.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
C-6a: Reduce adverse visual intrusions to historic built environment properties	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at the substation site.
C-6e: Reduce adverse visual intrusions to portions of Old Highway 80	NA. Upgrade activities will not take place on Old Highway 80.
C-6f: Reduce adverse visual intrusions to the Desert View Tower view shed	NA. The Substation is not located in the Desert View Tower viewshed.
CR-APM-1: Instruct construction personnel on the protection and avoidance of cultural resources. Implement with PAL-1e	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and 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.
CR-APM-2: Flag archeological sites that are eligible or potentially eligible for the National Register	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-3: Report any previously unidentified cultural resource (historic or prehistoric site or object) discovered	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-4: Conduct maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, and reconstruction of a historical resource consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources have been identified at the substation site.
CR-APM-5: Follow the guidance described for: Preservation in-place for mitigating impacts to archaeological sites, and preparation of data recovery plans	SDG&E will continue to comply with Cultural Resources mitigation measures as outlined in the MMCRP, therefore following guidelines for cultural resources.
CR-APM-6: Avoid, fence, or barricade historic properties, contributing portions and sensitive features for protection	NA. There are no documented historical resources at the Scripps Substation that will require adherence to cultural resource guidelines.
CR-APM-7: Control erosion, sedimentation, or indirect displacement. Implement with C-2a, C-3a, C-4a, and C-5a	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-8: Avoid and protect elements of the landscape that are essential to the historic setting of the property	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-9: Install permanent fencing or barriers; or control/restrict access to the historic property	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-10: Locate project structures so that conductors span linear historic properties; underground placement of pipelines and conductors will be bored under linear properties to avoid disturbance or intrusion	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-11: Implement standard practices for cultural and paleontological resources on private lands	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
CR-APM-12: Conduct cultural surveys for staging areas that have not yet been identified	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities. No cultural resources or historic places have been identified at or adjacent to the substation site.
<b>Paleontological Resources</b>	
PAL-1a: Inventory and evaluate paleontological resources in Final APE	NA. The Paleontological Records Search for the SDG&E Sunrise Powerlink Project was submitted February 25, 2010. There are no paleontological concerns for the Scripps Substation as there will be no ground disturbance.
PAL-1b: Develop Paleontological Monitoring and Treatment Plan	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
PAL-1c: Monitor construction for paleontology	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
PAL-1d: Conduct paleontological data recovery	NA. Work activities will take place within the previously disturbed Substation site and there will be no ground disturbing activities.
PAL-1e: Train construction personnel	The SWEAP video, approved by the CPUC on March 15, 2010, 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.
GEO-APM-9: Implement appropriate mitigation efforts if paleontological resources are encountered. Implement with PAL-1d	The Final Paleontological Monitoring and Treatment Plan was approved July 2010 and its conditions shall be implemented during construction.
<b>Noise</b>	

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
N-1a: Implement Best Management Practices for construction noise	During construction, work will be conducted between the hours of 7:00 a.m. and 7:00 p.m.. In the event that work needs to take place outside of these hours a variance will be obtained and submitted to the CPUC.
N-2a: Avoid blasting where damage to structures could occur (SDG&E to define blasting)	NA. No blasting will occur at the Scripps Substation.
N-3a: Respond to complaints of corona noise	NA. This applies to overhead transmission line segments, and not to Substation upgrades.
NOI-APM-1: Provide notice by mail to all sensitive receptors and residences within 300 feet of construction sites, staging areas, and access roads; and establish a toll free telephone number for receiving questions/complaints. Implement with L-1a	The Construction Notification Plan was approved by the CPUC on March 1, 2010 addresses public noticing for construction noise. Proof of Notification will be submitted to CPUC prior to start of construction.
<b>Transportation and Traffic</b>	
T-1a: Restrict lane closures	Per the NTP, the upgrade of the Scripps Substation will not require temporary closure of any roadway and will not restrict the movement of emergency vehicles.
T-4a: Ensure pedestrian and bicycle circulation and safety.	NA. Construction activities will not result in the temporary closures of sidewalks, other pedestrian facilities, bike routes or bike path closures.
T-5a: Repair roadways damaged by construction activities	It is not anticipated that upgrade activities at Scripps Substation will cause roadway damage. Should damage occur, provisions of this mitigation measure will be implemented.
T-7a: Notify public of potential short-term elimination of parking spaces	NA. Upgrade activities will be limited to the fenced Scripps Substation and no parking will be eliminated.
T-9a: Prepare Construction Transportation Management Plan	The project-wide Traffic Impact Study determined that there will be no significant traffic impacts for set-up and utilization of this yard. The existing circulation system and intersection controls will function adequately. As a result, a CTMP will not be required.
T-11b: Consult with and inform U.S. Customs and Border Patrol	NA. The Substation is not within the area of border patrol aircraft operations along the Interstate 8 Alternative and Modified Route D Alternative.
T-APM-2a: Obtain required permits for temporary lane closures	NA. Upgrades will take place inside the existing Substation and lane closure permits on public roads will not be necessary or required.
T-APM-2b: Submit detour plans. Implement with T-1b	NA. Construction activities at Scripps Substation will not require detours, cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts.
T-APM-4a: Coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.	During construction, should an unanticipated lane restriction or closure is found to be necessary, advance documentation of coordination with emergency service providers shall be submitted to the CPUC.
T-APM-5a: Consult with County Education Offices, School Districts to coordinate construction activities adjacent to school bus stops	NA. Construction activities are not planned at or in proximity to school bus stops.
T-APM-6a: Comply with county parking ordinances or approved traffic control plan	NA. The Scripps Substation is not located within Imperial County.
T-APM-6b: Prohibit parking on San Diego County-maintained roads and highways unless otherwise noted at specific locations; comply with the County of San Diego Department of Public Works Traffic Guidelines, 2001 whenever possible, or an approved traffic control plan	NA. There will be no parking on San Diego County-maintained roads and highways.
T-APM-8a: Obtain required permits for entering railroad ROW	NA. There will be no entering railroad right-of-ways.
T-APM-9a: Underground all new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway. (Need SDG&E input)	NA. There are no new or relocated utility facilities within 1,000 feet of an Officially Designated Scenic Highway.
T-APM-10a: Provide the ability to quickly lay a temporary steel plate trench bridge upon request in order to ensure access to properties when not actively constructing the underground cable alignment	NA. Existing roads will be utilized at Scripps Substation.
<b>Public Health and Safety</b>	
P-1a: Implement Environmental Monitoring Program	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.
P-1b: Maintain emergency spill supplies and equipment	During construction, hazardous material spill kits will be maintained onsite.
P-2a: Test for residual pesticides/herbicides on currently or historically farmed land	NA. Agricultural lands are not located within or adjacent to the Scripps Substation.
P-3a: Appoint individuals with correct training for sampling, data review, and regulatory coordination	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
P-3b: Documentation of compliance with measures for encountering unknown contamination	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
P-7a: Evaluate contaminated sites	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
HS-APM-1: Train personnel involved in using hazardous materials. Develop a Hazardous Communication Plan. Implement with P-1a	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes training on hazardous materials management procedures. This SWEAP will be shown to all project personnel and enforced throughout all phases of the Project. The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC on April 2, 2010. The HazCom Plan includes site specific information and the location of MSDS.
HS-APM-2: Train personnel in refueling vehicles. Implement with P-1a	Vehicle refueling will not take place at this site.
HS-APM-3: Develop applicable environmental safety plans associated with hazardous materials. Implement with P-1a	All applicable plans have been developed for this portion of the project work, including an SPCC Plan, HMBP, and HazCom Plan. The Substation has an existing Spill Prevention Control and Countermeasure Plan (SPCC) which contains emergency response and spill response information. The Sunrise Powerlink Hazard Communication Plan (HazCom) was approved by the CPUC April 2, 2010. The Substation site Hazardous Materials Business Plan has also been submitted. No new oil-filled equipment will be installed as part of the work activities at the site, so no additional containment will be required and the SPCC Plan will not require changes.
HS-APM-4: Develop a site specific blasting plan of tower footing	NA. Blasting will not be required for the Substation upgrades scope of work.
HS-APM-5: Investigate all Government Code §65962.5 sites or other known contamination sites along the transmission line ROW.	NA. The Substation is not a Section 65962.5 site or known contamination site.
HS-APM-6: Investigate any known or potential areas for Unexploded Ordinance (UXO) used by the military along the ROW	NA. The Scripps Substation has been previously excavated. There is no known or potential for UXO, as this area was not utilized for military purposes. If a UXO is found during pre-construction investigations of known or potential UXO areas, a trained contractor shall remove the UXO.
HS-APM-7: Train personnel involved in excavation and grading or for ROW clearing to recognized UXO and/or potential soil, surface water, and groundwater potential contamination sites	NA. All site documentation reveals that this area was not previously used by the military and the property is not adjacent or near areas used by the military.
HS-APM-8: Assign an Environmental Field Representative and/or General Contractor for Health & Safety. Implement with P-1a	SDG&E has assigned Steve Riggs, Field Monitoring Manager with Burns & McDonnell, 858.547.9869, as the Environmental Field Representative for the Scripps Substation upgrade.
HS-APM-9: Contact airport representative and/or Federal Aviation Administration Authorities regarding work within all existing and proposed transmission line corridors within 2 miles of an airport.	NA. The scope of work is for upgrades to an existing Substation and not construction along the proposed transmission line corridor.
HS-APM-10: Store and dispose of hazardous waste and solid waste in accordance with federal, State, and local regulations. Implement with P-1a	It is not anticipated that hazardous wastes will be generated during construction at Scripps; however, 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 shall be employed whenever possible.
HS-APM-11: Develop Fire Prevention and Response Plan (FPRP). Assign a project Fire Marshal to enforce all provisions of the FPRP	The Fire Plan, acknowledged by the CAL Fire Chief, was approved by the CPUC on February 2, 2010 and a project Fire Marshall has been hired onto project and is assigned to enforce the FPRP.
HS-APM-12: Develop a Traffic Control Plan	Per the request construction activities will not cause lane closures, alternate traffic routing, or other adverse construction-related traffic impacts. If any unanticipated lane restrictions or closures are found to be necessary, a traffic plan will be developed and submitted to the CPUC prior to implementation.
HS-APM-14: Construction workers shall undergo environmental training regarding potential exposure	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes procedures regarding potential exposure of hazardous materials in accordance with Federal, State, and local authorities.
HS-APM-15: Stop work and notify Health and Safety Officer if during excavation soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
HS-APM-16: Terminate and cordoned off work if soil or groundwater contamination is suspected	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
HS-APM-17: Notify regulatory agency if the sample testing determines that contamination is found above regulatory limits	NA. There is no known environmental contamination at the site and there will be no ground disturbing activities at the Scripps Substation.
PS-1a: Limit the conductor surface electric gradient	NA. Substation upgrades will not require changes in existing conductor surface gradients that could affect radio reception.
PS-1b: Document and resolve electronic interference complaints	NA. This mitigation measure applies to overhead transmission line segments and is not applicable to upgrade activities at the Scripps Substation.
PS-2a: Implement grounding measures	NA. All facilities at the substation are properly grounded. During construction, new upgrades will be properly grounded as necessary.
<b>Air Quality</b>	

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
AQ-1a: Suppress dust at all work or staging areas and on public roads	A Dust Control Plan was approved by the CPUC on January 20, 2010 for the entire project. Dust Control Plan measures will be implemented during upgrade activities at Scripps.
AQ-1b: Use low-emission construction equipment	A Construction Emissions Monitoring Plan was approved on January 26, 2010.
AQ-1h: Obtain NOx and particulate matter emission offsets	Construction-phase activities and emissions would be limited in accordance with the AQMPC (June 9, 2009) and the fuel use cap and other activity caps in the CEMP (January 21, 2010). The resultant emissions are expected to remain less than the federal General Conformity de minimis thresholds for the San Diego Air Basin. Mitigation Measure AQ-1h, which involves achieving emission reductions to levels below the federal thresholds, would be satisfied based upon these lower emissions.
AQ-4a: Offset construction-phase greenhouse gas emissions with carbon credits	Emissions off-sets were submitted for review on August 27, 2009. Verification e-mail dated March 10, 2010 indicated that SDG&E purchased Carbon Reduction Tons (CRTs) to satisfy this measure. Quarterly reports will be provided as required.
AQ-4c: Avoid sulfur hexafluoride emissions	Per the NTP request, the Avoid SF6 Emissions Mitigation Plan was approved March 12, 2010. The Partnership MOU between SDG&E and US EPA was approved on February 24, 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-1: Comply with ICAPCD Rule 800 (Fugitive Dust Requirement for Control of Fine Particulate Matter [PM10]). File a Dust Control Plan with the ICAPCD	NA. Scripps Substation is not located in Imperial County.
AQ-APM-2: Control fugitive dust	NA. No grading will occur at the Scripps Substation. Upgrade activities will be limited to previously disturbed areas within the substation fence-line.
AQ-APM-3: Minimize mud and dust from being transported onto paved roadway surfaces, pave, and gravel	SDG&E will use methods to minimize mud and dust tracking on paved roads. This measure will be fulfilled during construction.
AQ-APM-4: Carpool to the job site	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes promoting carpooling to the job site.
AQ-APM-5: Minimize unnecessary construction vehicle and idling time	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes vehicle idling.
<b>Hydrology and Water Resources</b>	
H-1a: Prepare Substation Grading and Drainage Plan; construct during the dry season	NA. This mitigation measure only applies to new substations; therefore, it is not applicable to Scripps Substation.
H-1a (CC): Construct during the dry season	NA
H-1b: Construction in Los Peñasquitos Canyon Preserve to be in the dry season; SWPPP to be reviewed and approved by San Diego County and City of San Diego	NA
H-1k: Comply with Forest Service conditions	NA. Scripps Substation is not located on USFS-administered lands.
H-1l: Construction on Forest Service land to be subject to an approved, site-specific SWPPP and Sediment-Control Plan	NA
H-2d: Maintain vehicles and equipment	Will occur during construction.
H-4b: Avoid blasting where damage to groundwater wells or springs could occur	NA. Blasting will not be required for the Substation upgrades scope of work.
H-5a: Install substation runoff control	NA. The mitigation measure only applies to new substations. No detention/retention basins will be installed.
H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property	NA. There are no streambeds or stream crossings at the Scripps Substation.
H-7a: Develop Hazardous Substance Control and Emergency Response Plan for project operation	The existing Substation SPCC Plan contains emergency response information to assume quick and safe clean-up of spills as required to address hazardous substance control and emergency response. The SPCC Plan will not require an update because
H-8a: Bury power line below 100-year scour depth	NA. There will not be any ground disturbance during upgrading activities at Scripps Substation. The mitigation measure only applies to underground stream crossings.
WQ-APM-1: Minimize disturbance to riparian/wetland vegetation, drainage channels, and intermittent and perennial stream banks	NA. There will not be any disturbance to water resources during construction at the Scripps Substation.
WQ-APM-2: Place structures so as to avoid sensitive features such as watercourses, or to allow conductors to clearly span the features, within limits of safety and standard structure design	NA. There are no sensitive water features inside the Substation.
WQ-APM-3: Clearly mark where construction equipment and vehicles are not allowed on-site; and train personnel	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, 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.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
WQ-APM-4: Maintain adequate distance from stream banks and beds; use existing bridges to cross major streams and culverts in most dry intermittent streams; Span surface water, riparian areas and floodplains; prepare and implement a Storm Water Pollution Prevention Plan (SWPPP)	SDG&E will implement best management practices (BMPs) under a Storm Water Management Plan (SWMP) being prepared for Scripps Substation. SDG&E's Water Quality Construction BMP Manual will be referenced for BMP implementation and maintenance. All BMPs are designed to prevent and avoid sediment within surface water runoff and protect the landscape from erosion in accordance with WQ-APM-4. A National Pollutant Discharge Elimination System (NPDES) general permit for storm water discharges associated with construction activities is being obtained and a supporting Storm Water Pollution Prevention Plan (SWPPP) is being developed. A copy of the NOI confirmation and WDID number and the SWPPP will be submitted to the CPUC prior to construction.
WQ-APM-5: Construct any stream crossings at low flow periods; and if necessary, develop a site-specific mitigation and restoration plan	NA. There are no stream beds or riparian areas located at the Scripps Substation.
WQ-APM-6: Avoid designated surface water protection areas	NA. There are no water protection areas located at the Scripps Substation. Groundwater supplies will not be used during project construction.
WQ-APM-8: Obtain and comply with required permits for any groundwater discharged to surface waters or storm drains	NA. SDG&E will not be impacting groundwater as part of this project. Discharge of groundwater and dewatering will not be required during construction.
WQ-APM-9: Prohibit storage of fuels and hazardous materials within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells	NA. There are no wells within the Substation fence-line or within 400 feet.
WQ-APM-10: At locations where the project would cross below or pass adjacent to streams with erodible bed or banks, comply with burial depth requirements. Implement with H-6a	NA. There are no stream banks in or surrounding the Scripps Substation.
WQ-APM-11: Test groundwater levels along underground portion of the project drilling pilot borings	NA. This mitigation measure only applies to underground portions of the project.
WQ-APM-13: Do not dispose of hazardous materials onto the ground, the underlying groundwater, or any surface water.	The SWEAP video, approved by the CPUC on March 15, 2010, will be shown to all project personnel and enforced throughout all phases of the Project, and includes instructions on proper disposal of hazardous materials. Trash will be inside an enclosed containment. Any hazardous materials will be transported to a ground.
WQ-APM-14: Secure required General Permit for Storm Water Discharges Associated with Construction Activity (NPDES permit) authorization	See WQ-APM-4.
WQ-APM-15: Construct access roads to avoid streambeds	NA. Construction access will be provided by existing roads to the Substation.
WQ-APM-16: Conduct site-specific assessments for each affected site	NA. There are no sensitive water resource features such as wetlands or waters of the State located inside the Scripps Substation.
<b>Geology, Minerals, and Soils</b>	
G-2a: Protect desert pavement	NA. There is no desert pavement within or adjacent to the Scripps Substation.
G-3a: Conduct geotechnical studies for soils to assess characteristics and aid in appropriate foundation design	NA. The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed.
G-4a: Reduce effects of groundshaking	See G-3a
G-4b: Conduct geotechnical investigations for liquefaction	See G-3a
G-5a: Minimize project structures within active fault zones	NA. The Scripps Substation is not located on an active fault.
G-6a: Conduct geotechnical surveys for landslides and protect against slope instability	NA. The design of the proposed Substation upgrades is based on historical geotechnical testing and a geotechnical engineer has determined that new geotechnical studies are not required since there are no ground disturbing activities and no new structures or foundations will be installed. Slope instability is not a concern at the substation.
G-9a: Coordinate with quarry operations	NA. Scripps Substation is not located on an active quarry.
GEO-APM-1: No widening or upgrading of existing access roads will be undertaken where soils are very sensitive to disturbance, except repairs, widening or upgrades necessary to make roads passable	NA.
GEO-APM-2: Comply with soil disturbance guidelines	NA. There are no geological resources, agricultural soils, or mineral resources at the existing substation. The substation ground surface is paved, covered with equipment footings or crushed stone.
GEO-APM-3: Avoid placing structures in areas of high shrink/swell potential	NA. No new structures will be installed as part of the Scripps Substation upgrades. high shrink/swell potential will be avoided, per the NTP request.
GEO-APM-4: Place structures in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock	NA. No new structures will be installed as part of the Scripps Substation upgrades. high shrink/swell potential will be avoided, per the NTP request.
GEO-APM-5: Avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation	NA. There will be no ground disturbance.
GEO-APM-6: Conduct surface restoration for erosion control and re-vegetation	NA. No surface restoration is necessary because there is no vegetation or previously undisturbed areas at the substation that could be impacted.
GEO-APM-8: Remove or stabilize boulders uphill of structures that pose potentially high risk of landslide damage; and position structures to span over potential landslide areas	NA. There are no boulders or hills within the Scripps Substation.

## Sunrise Powerlink Project NTP 9 Compliance Table

Mitigation Measure and APM	Status
<b>Socioeconomics</b>	
S-2a: Notify public of utility service interruption	NA. Scripps Substation will not have planned interruption of services.
S-2b: Protect underground utilities	NA. This mitigation measure applies to underground construction.
S-3a: Recycle construction waste	SDG&E and/or its construction contractor shall recycle a minimum of 90% of inerts and 70% of all other materials generated during construction activities. Documentation from the recycling and/or landfill facilities used for construction will be provided.
S-3b: Use reclaimed water	The water study determined that sufficient supplies of surface water, reclaimed water, and potable water would be available to meet project demand.
PSU-APM-1: Coordinate with all utility providers with facilities located within or adjacent to ensure that design does not conflict with other facilities	NA. There are no affected third party utilities that will be affected by the project.
PSU-APM-2: Notify Underground Service Alert a minimum of 48 hours in advance of earth-disturbing activities in order to identify any buried utility lines	NA. There are no buried utilities at the substation that would require an Underground Service Alert.
PSU-APM-3: Coordinate construction schedules, lane closures, and other activities with installation of the project with emergency and police services to ensure that disruption to response times and access is minimized	There will not be lane closures or other activities associated with construction at the Substation that will interfere with emergency and police service response times or access (if lane closures do need to occur, documentation of prior coordination with emergency service providers shall be submitted to the CPUC).
<b>Fire and Fuels Management</b>	
F-1a: Develop and implement a Construction Fire Prevention Plan	A Construction Fire Plan, acknowledged by the CALFire Chief, was approved by the CPUC on January 20, 2010.
F-1b: Amend and implement Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007)	This mitigation measure will be fulfilled post construction.
F-1c: Ensure coordination for emergency fire suppression	Upgrade activities will be limited within the Scripps Substation fence-line and will not obstruct firefighting equipment or crews or emergency fire suppression efforts.
F-1d: Remove hazards from the work area	NA. There is no vegetation onsite.
F-1e: Contribute to defensible space grants fund	This mitigation measure will be fulfilled post construction.
F-2a: Establish and maintain adequate line clearances	NA. There is no vegetation onsite.
F-2b: Install existing conductors on steel poles	NA. There will be no relocation of existing 69 kV transmission lines at Scripps Substation.
F-2c: Perform climbing inspections	NA. No new structures will be installed as part of the Scripps Substation upgrades.
F-3a: Contribute to Powerline Firefighting Mitigation Fund	On-going efforts with CAL FIRE and local fire agencies are in progress to establish and provide oversight to the Powerline Firefighting Mitigation Fund. This is required to be completed post-construction.
F-3b: Prepare and implement a Multi-agency Fire Prevention MOU	SDG&E has prepared a draft Fire Prevention MOU. Draft comments from CAL FIRE and local fire agencies have been incorporated and on-going efforts are in progress to refine the draft MOU. It will be implemented prior to energization.