

FINAL



Mitigation Monitoring, Compliance and Reporting Program

San Diego Gas & Electric Master Special Use Permit and Permit to Construct Power Line Replacement Projects

Application No. A.12-10-009; Decision No. D.16-05-038



June 2017

PREPARED FOR:
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**MITIGATION MONITORING, COMPLIANCE, AND
REPORTING PROGRAM**

for the

**San Diego Gas and Electric Company Cleveland National Forest
(CNF) Power Line Replacement Projects**

Prepared for:

California Public Utilities Commission

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REVISED JUNE 2017

CNF Power Line Replacement Projects Mitigation Monitoring, Compliance, and Reporting Program

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACOE	U.S. Army Corps of Engineers
APM	applicant proposed measure
ASA	Associate State Archeologist
BA	Biological Assessment
BLM	Bureau of Land Management
BO	Biological Opinion
CA	Contract Administrator
CAL FIRE	California Department of Forestry and Fire Protection
CCR	California Code of Regulations
CDFW	California Department of Fish and Game
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CPUC	California Public Utilities Commission
CSP	California State Parks
CWA	Clean Water Act
CWPP	Community Wildfire Protection Plan
DMC	District Maintenance Chief
EA	Easement Agreement
ECL	Environmental Compliance Lead
ECM	Environmental Compliance Manager
EI	Environmental Inspector
EIR/EIS	environmental impact report/environmental impact statement
EM	environmental monitor
EPA	U.S. Environmental Protection Agency
EPC	Engineering, Procurement, and Construction
EPM	Environmental Project Manager
ESA	environmental site assessment
FCP	Forest Carbon Protocol
FEIR/FEIS	Final Environmental Impact Report/Environmental Impact Statement
FESA	Federal Endangered Species Act
FLPMA	Federal Lands Policy and Management Act
FPP	Fire Protection Plan
KV	kilovolt
LEI	Lead Environmental Inspector
LEM	Lead Environmental Monitor
LRA	local responsibility area
MMCRP	Mitigation Monitoring, Compliance, and Reporting Program
MOA	Memorandum of Agreement

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Acronym/Abbreviation	Definition
MSS	Montane Sector Superintendent
MSUP	Master Special Use Permit
NCCP	Natural Community Conservation Plan
NCR	Non-Compliance Report
NEPA	National Environmental Policy Act
NFS	National Forest Service
NPPA	Native Plant Protection Act
NTP	Notice-to-Proceed
PIA	Project Implementation Agreement
PM	Project Manager
PM ₁₀	particulate matter less than 10 microns
PTC	Permit to Construct
ROW	right-of-way
RPM	Reforestation Project Manager
RWQCB	Regional Water Quality Control Board
RWQCB7	Regional Water Quality Control Board, Region 7
SDCFA	San Diego County Fire Authority
SDG&E	San Diego Gas & Electric
SDRFPD	San Diego Rural Fire Protection District
SES	Senior Environmental Scientist
SPRS	Senior Parks and Recreation Specialist
SRA	state responsibility area
SUP	Special Use Permit
SWPL	Southwest Powerlink
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
U.S.C.	United States Code
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program

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1 INTRODUCTION

The Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS) for the San Diego Gas and Electric (SDG&E) Master Special Use Permit and Permit to Construct Power Line Replacement Projects,¹ as adopted by the California Public Utilities Commission (CPUC) on May 26, 2016 (Decision 16-05-038), includes procedures for preparing and implementing a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with mitigation measures approved in the FEIR/FEIS. The CPUC is the lead agency under the California Environmental Quality Act (CEQA). The CPUC issued a Permit to Construct (PTC) on May 26, 2016 (see Attachment A for a Project Overview Map). The lead agency under the National Environmental Policy Act (NEPA) is the U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). The USFS issued a Record of Decision (ROD) approving the project on March 11, 2016, and will issue a Master Special Use Permit (MSUP) for the components of the Project within the administrative boundary of the Cleveland National Forest (CNF). Additionally, California State Parks (CSP) was a responsible agency under CEQA and the Bureau of Indian Affairs (BIA) and Bureau of Land Management (BLM) were cooperating agencies under NEPA due to components of the Project traversing lands administered by these agencies. Portions of the Project also traverse La Jolla, Campo, Pauma-Yuima, and Viejas Indian Reservations (refer to Section 1.3.3 of this MMCRP for additional details).

Section H, Mitigation Monitoring and Reporting, of the FEIR/FEIS provides the recommended framework for the implementation of the MMCRP by the CEQA lead agency, the CPUC, and describes the roles and responsibilities of government agencies in implementing and enforcing adopted mitigation measures. This MMCRP includes the information provided in FEIR/FEIS Section H, as well as specific protocols to be followed prior to and during construction by CPUC third-party environmental monitors (EMs) and SDG&E project staff.

The Project's MMCRP includes direct participation and commitment from SDG&E and CPUC EMs. The success of the program depends on the project management staff, monitors, and construction contractor personnel. Therefore, the goal of the MMCRP is to provide a clear understanding of the Project's organization, establish lines of communication, and effectively document and report compliance with all of the mitigation measures.

The MMCRP was developed to provide guidelines and standardize procedures for environmental compliance on the Project. These procedures have been developed by the CPUC, in coordination with USFS, BLM, BIA, CSP, SDG&E, and other cooperating/responsible agencies to help define

¹ The CPUC Decision D.16-05-038, issued on May 26, 2016 is titled "DECISION GRANTING PERMIT TO CONSTRUCT THE CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS."

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reporting relationships, provide detailed information about the roles and responsibilities of the Project's environmental compliance team members, define compliance reporting procedures, and to establish communication protocol. The communication lists in the MMCRP will be updated as needed throughout construction.

1.1 Authority for the Mitigation Monitoring, Compliance, and Reporting Program

Mitigation monitoring is required through both CEQA and NEPA. Section 21081.6 of the California Public Resources Code requires a public agency, such as the CPUC, to adopt an MMCRP when it approves a project that is subject to preparation of an EIR and where the EIR for the project identifies significant adverse environmental effects. CEQA Guidelines, Section 15097, was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting. The CPUC is solely responsible for implementation of environmental commitments adopted as part of the CPUC Decision and is not responsible for enforcement of other agencies' environmental commitments.

The Council on Environmental Quality (CEQ) has established regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500–1508). NEPA requires mitigation monitoring in 40 CFR 1505.2(c), with additional specificity provided in the USFS NEPA Handbook (FSH 1909.15), Chapter 50, Implementation and Monitoring. The USFS also served as the lead federal agency for Section 7 consultation under the Endangered Species Act, Section 106 consultation under the National Historic Preservation Act, and is responsible for conducting tribal consultation. USFS is responsible for ensuring that mitigation measures adopted in its ROD for the Project are implemented and other terms and conditions associated with the MSUP are adhered to on National Forest System (NFS) lands. Additionally, the BIA and BLM are responsible for ensuring that mitigation measures adopted in their decision documents are implemented and other terms and conditions associated with the right-of-way (ROW) Grants and/or easements are adhered to on BIA or BLM-administered lands. CSP is responsible for ensuring that terms and conditions associated with recorded easement agreements are adhered to on CSP lands.

1.2 Agencies with Jurisdiction

In addition to the CPUC, USFS, BIA, BLM, and CSP, several other local, state, and federal agencies have jurisdiction over lands or resources within the project limits. Table 1 lists jurisdictional agencies associated with the project. Attachment B includes a full project contact list.

The CPUC and USFS, as lead agencies are responsible for ensuring that all mitigation measures are implemented throughout construction and operation, and the CPUC EMs will verify

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SDG&E’s compliance with conditions of permits issued by the CPUC and any permits relied upon from other agencies to reduce and minimize environmental impacts under CEQA. Jurisdictional agencies’ designated representatives may visit construction areas at any reasonable and safe time, and may require information regarding the status of compliance with particular permit conditions. SDG&E is responsible for satisfying requests from jurisdictional agencies and will notify and copy the CPUC and USFS on all correspondence related to final approvals and verifications for the project if not otherwise copied on the correspondence. Additional information on communication protocols is presented in Section 3.

Table 1
Jurisdictional Agencies Associated with the Power Line Replacement Project

Agency	Address	Contact Person	Phone Number	Email
<i>Lead Agencies</i>				
California Public Utilities Commission	505 Van Ness Ave, Fourth Floor San Francisco, California 94102	Lisa Orsaba	██████████	██████████
U.S. Forest Service, Cleveland National Forest	10845 Rancho Bernardo Road Suite 200 San Diego, California 92127	Brad Aughinbaugh	██████████	██████████
<i>Federal Agencies</i>				
Bureau of Land Management	Palm Springs, South Coast Field Office 1201 Bird Center Drive Palm Springs, California 92262	Doug Herrema, Field Manager	██████████	██████████
Bureau of Indian Affairs	2800 Cottage Way Sacramento, California 95825	John Rydzik	██████████	██████████
U.S. Fish and Wildlife Service	6010 Hidden Valley Road, Suite 101 Carlsbad, California 92011	Jesse Bennett Tom Dietsch	██████████ ██████████	██████████ ██████████
U.S. Army Corps of Engineers	5900 La Place Court, Suite 100 Carlsbad, California 92008	Winston Zack	██████████	██████████

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**Table 1
Jurisdictional Agencies Associated with the Power Line Replacement Project**

Agency	Address	Contact Person	Phone Number	Email
Federal Aviation Administration	Western-Pacific Regional Office Air Traffic Division, AWP-520 15000 Aviation Boulevard Hawthorne, California 92060	General Contact	██████████	N/A
<i>State Agencies</i>				
California Department of Fish and Wildlife	South Coast Region 3883 Ruffin Road San Diego, California 92123	Eric Hollenbeck	██████████	████████████████████
California Department of Parks and Recreation (California State Parks)	Colorado Desert District 200 Palm Canyon Drive Borrego Springs, CA 92004	Terry Gerson	██████████	████████████████████
	Montane Sector Office at Cuyamaca Rancho State Park 13652 Highway 79 Julian, California 92036	Kevin Best	██████████	████████████████████
California Department of Transportation	4050 Taylor Street San Diego, California 92110	Jacob Armstrong	██████████	████████████████████
California Department of Toxic Substances Control	PO Box 806 Sacramento, California 95812-0806	General Contact/TBD	██████████	████████████████████
State Historic Preservation Office	1416 Ninth Street #1442-7 Sacramento, California 95814	Julianne Polanco	██████████	████████████████████
Regional Water Quality Control Board, Region 7 (Colorado River)	73-720 Fred Waring Drive Suite 100 Palm Desert, California 92260	Jay Mirpour	██████████	████████████████████
Regional Water Quality Control Board, Region 9 (San Diego)	2375 Northside Drive Suite 100 San Diego, California 92108	Lisa Honma	██████████	████████████████████

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**Table 1
Jurisdictional Agencies Associated with the Power Line Replacement Project**

Agency	Address	Contact Person	Phone Number	Email
California Department of Forestry and Fire Protection (CALFIRE)	2249 Jamacha Road El Cajon, California 92019	Dave Nissen	██████████	██████████
<i>Local Agencies</i>				
County of San Diego	5201 Ruffin Road Suite B San Diego, California 92123	Kenton Jones	██████████	██████████
San Diego County Environmental Health Services:	P.O. Box 129261 San Diego, California 92112-9261	N/A	██████████	N/A
San Diego Rural Fire Districts/ County Fire Authority	5510 Overland Ave. Suite 250 San Diego, Ca 92123	James Pine	██████████	██████████

1.3 Project Description

1.3.1 Project Overview

The CPUC granted a PTC and the USFS issued an MSUP for the CNF Power Line Replacement Project (Project), as defined in the CPUC’s Decision. The goal of the Project is to increase safety and reliability of SDG&E’s electric system by replacing the existing electric infrastructure that currently serves the USFS, emergency service facilities, campgrounds, homes, businesses and other customers within the CNF and surrounding areas.

The Project includes replacement of several existing 12-kilovolt (kV) and 69 kV electric facilities spread throughout an approximately 880-square-mile area in eastern San Diego County. Six (6) 69 kV lines and up to seven (7) 12 kV lines will be rebuilt and approximately 1,800 existing wood poles will be replaced with fire-resistant weatherized steel poles (see Attachment A, Project Overview Map). The majority of the existing electric lines are within the boundary of the USFS CNF; however, there are lines that extend outside the boundaries of the CNF and traverse public lands administered by the BLM, tribal lands administered in part by the BIA and governed by local tribes, lands within the Cuyamaca Rancho State Park administered by CSP, and private lands.

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Additionally, some segments will be converted from single-circuit to double-circuit (such as the TL629); some segments will be converted from overhead to underground (such as sections of C79, C440, C449, which will also require partial removal and co-location with TL 629); some segments will be realigned to avoid resources (such as sections of C78 and C157).²

Associated work and work space requirements as described in the FEIR/FEIS, the CPUC decision, as well as any subsequent approved Project changes, such as Minor Project Refinement and/or Petition to Modify, is as follows:

- Necessary and proper guys, anchorage, cross-arms and braces.
- Ancillary facilities such as pole- or pad-mounted transformers and other equipment needed to effectively support and enable electric transmission and distribution across the system.
- Appurtenant facilities (i.e., weather stations, fire safety and early fire detection equipment, smart-grid system data collection equipment, or other technologies or facilities which may include surveillance cameras).³
- Where existing access roads are damaged, repair consisting of smoothing, stabilizing, and improving the surface will occur.
- SDG&E will utilize approximately 37 staging areas for 69 kV power line activities and 7 staging areas for 12 kV distribution line activities.
- Temporary construction areas at each pole location will require less than 0.1 acre per work area, measuring approximately 20–40 feet in diameter.
- Approximately 395 stringing sites will be required for installing new conductors. Each stringing site will vary in size depending on site conditions, but will result in an average temporary disturbance of approximately 0.2 acre per site.
- A total of 4 fly yards within the CNF and 10 fly yards outside the CNF are planned to be utilized for helicopter take-off and landing, pole and equipment temporary storage, and pole assembly.
- Helicopters will also utilize existing access roads and staging areas for landings. Fly yards will vary in size depending on site conditions, but will result in an average temporary disturbance of approximately 1.1 acres per fly yard.

² Detailed mapping of individual project components will be incorporated as part of the Notice to Proceed Requests submitted by SDG&E to the CPUC.

³ Appurtenant facilities located on Forest Service lands are approved as described in the USFS Final ROD.

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- Construction areas to accommodate the installation of the underground duct banks and vaults, temporary workspaces centered on the duct bank alignments will be established.
- Approximately 179 guard structures will be required for safe road crossings during conductor stringing. Where possible, SDG&E will utilize bucket trucks as temporary guard structures to minimize temporary impacts.
- Removal of existing wood poles will require a less than 0.1-acre work area, measuring approximately 20–40 feet in diameter.

Schedule

SDG&E expects to complete the Project by December 2020. Project-related construction activities will not begin until pre-construction mitigation measures and submittals have been satisfied. Once pre-construction mitigation measures have been satisfied, the CPUC will issue a Notice-to-Proceed (NTP), indicating when construction can commence. The NTP may include CPUC or other agency conditions or requirements that must be satisfied prior to the start of work or during construction. In some cases, it may be appropriate to issue segment- or component-specific NTPs when pre-construction mitigation measures have been completed for one segment or component and not another. Attachment H lists the mitigation measures, the timing for completion, and whether CPUC review or approval is required before construction on the ROW can commence. A map of the construction segments is provided in Attachment A. Table 2 shows the estimated construction schedule (duration) and the anticipated start date.

**Table 2
Construction Schedule**

Power Lines ⁴	Approximate Duration (Months)	Anticipated Start Date
TL625B	6	September 2016*
TL629E	8	September 2016*
C78	6	July 2017
C79A	9	May 2019
TL6931	8	March 2017*
TL682 – Phase I	12	July 2017
TL682 – Phase II	12	August 2017
TL682 – Phase III	6	May 2018
C157	6	September 2017
TL626	5	November 2018
C442	7	July 2017

⁴ SDG&E has broken up several tie-lines and circuits in to smaller segments.

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**Table 2
Construction Schedule**

Power Lines ⁴	Approximate Duration (Months)	Anticipated Start Date
TL629A	9	February 2018
TL625D	7	February 2018
C222	5	February 2019
C79B	7	November 2018
C440 Phase 1	20	August 2017
C449 Phase 2	13	March 2018
TL629C	6	July 2018
TL629D	6	June 2018
TL625C	8	September 2018
TL6923	8	February 2019

* Notes actual construction start date

1.3.2 Project Authorizations by Lead, Responsible, and Cooperating Agencies

This plan is intended to provide pertinent information necessary to successfully implement the MMCRP during construction. The mitigation measures and applicant proposed measures (APMs) listed in Attachments G and H are presented in Sections D.2 through D.13 of the FEIR/FEIS. These sections also present discussions that explain the intent of each mitigation measure and the potential impacts that could result if the mitigation measures are not implemented properly. In addition to complying with the adopted mitigation measures, construction activities must be conducted in accordance with the requirements of a wide range of additional authorizations, as listed below.

Lead Agencies – CPUC and USFS

- CPUC PTC (issued on May 26, 2016); Signatory to the Programmatic Agreement (PA) for the project issued by the Advisory Council on Historic Preservation (ACHP)
- USFS ROD (issued on March 11, 2016) (see Attachment C); MSUP TBD; Signatory to the PA for the Project issued by the ACHP Federal agencies
- BIA ROD (issued on March 30, 2016) (see Attachment D)
- BLM ROD (issued on September 28, 2016)
- U.S. Fish and Wildlife Service (USFWS) Biological Opinion FWS_SD-15B0191-15F0339; SDG&E Natural Community Conservation Plan (NCCP) Incidental Take Permit; Quino Checkerspot Butterfly Low-Effect Habitat Conservation Plan

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- U.S. Army Corps of Engineers (ACOE) Clean Water Act (CWA) Section 404 Nationwide Permit No. 12 – Discharge of dredge and fill to jurisdictional waters of the U.S.

State Agencies

- CPUC (see Lead Agencies)
- California Department of Fish and Wildlife (CDFW): 1602 Lake or Streambed Alteration Agreement (California Fish and Game Code, Sections 1600–1616); NCCP Take Management Authorization, Certification of EIR, Recorded Conservation Easements
- California Department of Transportation: Encroachment Permits; Traffic Control Plans
- California Department of Toxic Substances Control: U.S. Environmental Protection Agency (EPA) Hazardous Waste Generator ID
- California State Historic Preservation Office: Concurrence with the USFS determination of effect; Signatory to the PA for the Project issued by the ACHP
- Regional Water Quality Control Board (RWQCB), Region 7 (Colorado River Basin) and Region 9 (San Diego): CWA Section 401 Water Quality Certification
- State Water Resources Control Board (SWRCB): Stormwater Construction General Permit 99-08 DWQ (issued by the SWRCB, then separately issued by the RWQCB)
- California Department of Forestry and Fire Protection: Concurrent with Fire District Approval of Fire Protection Plans
- California Department of Parks and Recreation: Recorded Easement Agreement.

Local Agencies

- City of San Diego: Amendment to easement documents or issuance of new easements
- San Diego County: Road/Highway Encroachment Permit
- San Diego County Environmental Health Services: Hazardous Materials Business Plan; Hazardous Materials Inventory
- San Diego Rural Fire Districts: Fire District Approval; Fire Service Agreement.

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2 ROLES AND RESPONSIBILITIES

This section describes the roles and responsibilities of key project personnel with respect to the MMCRP.

Figure 1 provides an organizational chart of project members responsible for implementing the MMCRP and their relationship to other staff working on the project. The organization chart also establishes preliminary lines of communication between the project team.

The roles and responsibilities of each position shown in Figure 1 have been defined in Section 2.1.

Attachment B: Project Contact List contains contact information for each position shown in Figure 1.

2.1 Organization and Roles of Each Entity

2.1.1 San Diego Gas & Electric Company

SDG&E Director Major Projects

SDG&E's Director Major Projects referenced in the contact list (Attachment B) provides the overall direction, management, leadership, and corporate coordination for the construction project. The Director's responsibilities related to the environmental program include, but are not limited to:

- Coordinating between financial, safety, public affairs, construction, engineering, land services, and environmental staff
- Providing direction by integrating environmental compliance into all levels of the project organization
- Communicating corporate coordination for all levels of the project organization
- Ensuring financial support, corporate leadership, and management staff effectively to comply with all project policies, requirements, and procedures.

SDG&E Project Managers

SDG&E's Project Managers (PMs) referenced in the contact list (Attachment B) oversee the activities of the assigned construction components. Specific responsibilities of the PMs include, but are not limited to:

- Ensuring compliance with project specifications, drawings, permit conditions, construction contracts, and applicable codes

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- Notifying the Environmental Manager and Environmental Compliance Lead (ECL) of project schedule changes
- Working with the SDG&E Environmental Project Management Team to evaluate and improve the implementation of the MMCRP as construction progresses
- Providing leadership for the engineering, procurement, and construction services by integrating environmental responsibility into the project organization
- Regularly facilitating project meetings
- Managing the engineering, procurement, and construction (EPC) contractor.

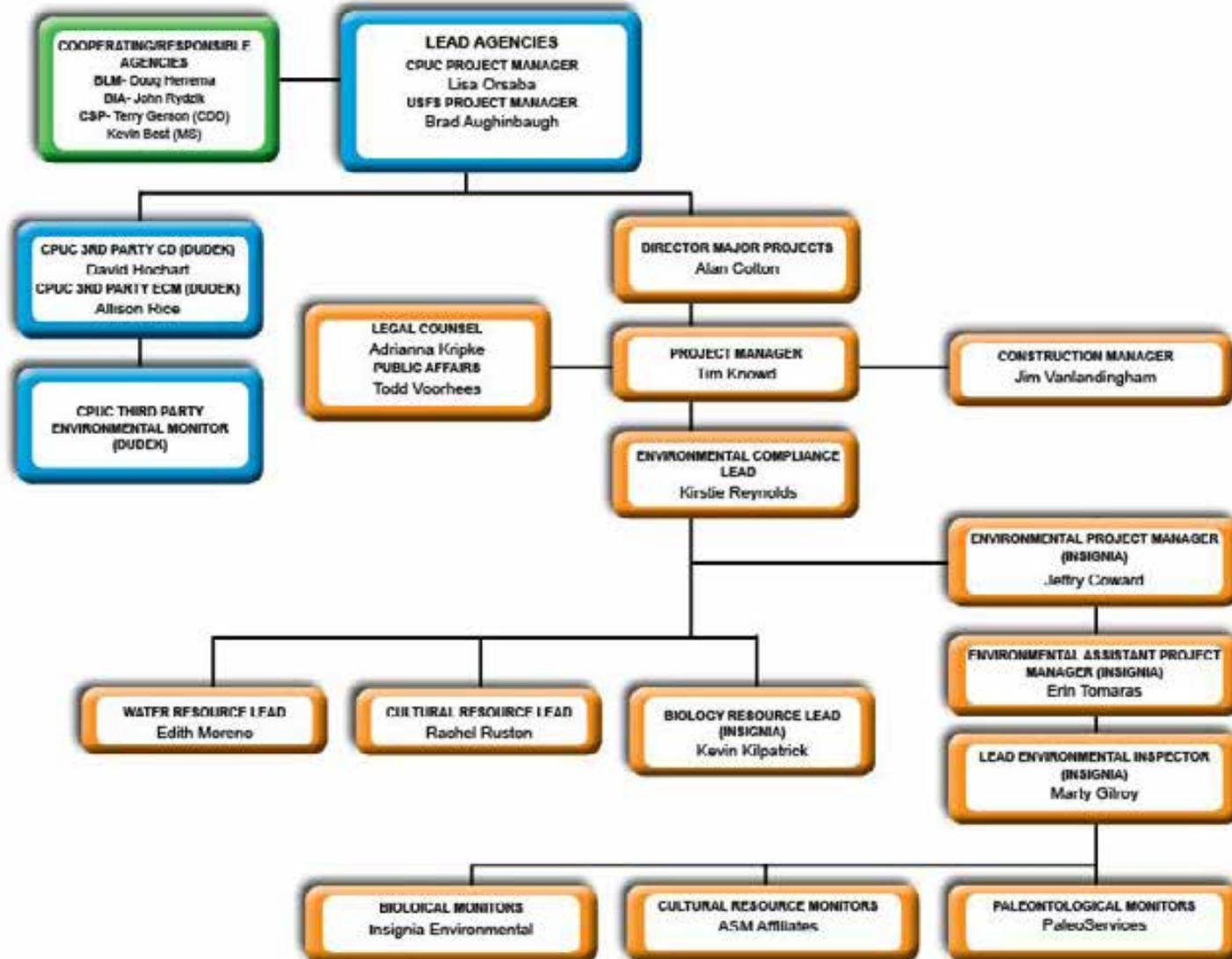
SDG&E Contract Administrators (CA) and Construction Personnel

Construction activity will take place at any given time within multiple construction components. Construction contractors will have significant responsibilities for implementation of and compliance with the environmental requirements of the project. The contractors will be responsible for incorporating all project environmental requirements into their day-to-day construction activities. Key environmental responsibilities for contractors' staff include, but are not limited to:

- Verifying that all construction workers attend the project's Worker Environmental Awareness Program (WEAP) training prior to beginning work on the project
- Reviewing and understanding the environmental requirements
- Implementing and maintaining mitigation measure requirements and conditions during construction
- Responding to requests by SDG&E Environmental Specialists and Environmental Inspectors (EIs) during construction.

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Figure 1 MMCRP Organization – San Diego Gas & Electric Company



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SDG&E Environmental Manager

SDG&E's Environmental Manager (SDG&E EM) referenced in the contact list (Attachment B) is responsible for providing the appropriate level of resources for successful implementation of the MMCRP. The SDG&E EM will provide management, direction, and leadership to the SDG&E Environmental Project Management Team. Specific responsibilities of the SDG&E EM, include, but are not limited to:

- Directing the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Preparing Minor Project Refinement Request forms or assisting SDG&E contractors with preparation of the requests
- Ensuring the development of the WEAP
- Providing the leadership and resources to assure compliance with the MMCRP
- Actively communicating with the lead agencies, particularly in regards to the MMCRP
- Ensuring frequent and clear communication between SDG&E environmental staff, construction personnel, responsible resource agencies, and EIs.

SDG&E Environmental Compliance Lead

SDG&E's Environmental Compliance Lead (ECL) referenced in the contact list (Attachment B) will provide oversight of all activities required for compliance with the MMCRP. The ECL's responsibilities include, but are not limited to:

- Coordinating and tracking MMCRP compliance, including submittal of weekly compliance reports and pre-construction submittals in support of receiving NTPs
- Documenting non-compliant incidents via the communication protocols in Section 3.3 of this MMCRP (i.e., verbal notification and written Non-Compliance Reports)
- Ensuring implementation of the WEAP
- Coordinating with construction groups, engineering groups, and SDG&E PMs and CAs to ensure mitigation measures are understood and implemented
- Ensuring frequent and clear communication between the SDG&E Environmental staff, construction personnel, responsible resource agencies, and EIs regarding construction activities, progress, and mitigation measure implementation
- Reviewing and approving daily inspection reports

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- Submitting weekly summary reports to responsible resource agencies, as applicable
- Coordinating with CPUC EMs to evaluate the effectiveness of mitigation measures.

SDG&E Environmental Resource Lead

SDG&E's Environmental Resource Lead referenced in the contact list (Attachment B) will support the ECL for successful implementation, planning, permitting, and compliance activities required under the MMCRP. The Environmental Resource Leads' responsibilities include, but are not limited to:

- Overseeing the activities of the biological, paleontological, cultural, air, water, visual, wilderness/recreation, and noise mitigation measure requirements
- Supporting the development and implementation of the pre-construction environmental planning, permitting, and compliance activities
- Providing technical assistance to the EIs
- Submitting summary reports to responsible resource agencies, as identified in mitigation or other applicable regulation.

SDG&E Lead Environmental Inspector

- Coordinating with CPUC EMs as appropriate
- Coordinating the mobilization of other resource leads, including cultural, Native American, paleontological, and a stormwater pollution prevention plan (SWPPP) specialist, as required
- Conducting daily inspections of construction activities and reports
- Coordinating the assessment of work area conditions ahead of construction and providing advance notice of conditions and situations that require specific awareness, planning, or notifications
- Working closely with the SDG&E EM, ECL, Californias, CPUC EMs, and agency field representatives to evaluate the effectiveness of mitigation measures
- Providing coordination with the CAs and construction and engineering groups to ensure mitigation measures are understood and implemented
- Providing and documenting WEAP for project personnel
- Assisting the SDG&E EM and ECL with the preparation of Minor Project Refinement Request Forms.

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SDG&E Specialty Environmental Inspectors and Resource Monitors

Several mitigation measures require a qualified specialty inspector during construction, as presented in Attachment H. SDG&E is to provide an on-site specialty inspector to meet the conditions of the mitigation measures identified in Attachment H. Contact information will be completed as it becomes available and as consultant and contract personnel are finalized. The EIs will provide oversight, protection, and direction for compliance within their field of expertise for the applicable construction components.

Additional SDG&E Roles

SDG&E Public Affairs

The SDG&E public affairs manager develops public notice letters and responds to public inquiries via the Project Hotline number, and provides information and guidance to both the project construction management team and the environmental management team, as needed.

SDG&E Environmental Law Department

The SDG&E Senior Counsel for the Environmental Law Department provides information and guidance to both the project construction management team and the environmental management team, as needed.

Mitigation Compliance

SDG&E is responsible for successfully implementing all the adopted mitigation measures and APMs in the MMCRP. The MMCRP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining nondiscretionary permits or avoiding a specific impact entirely. Additional mitigation success thresholds may be imposed by applicable agencies with jurisdiction through the discretionary permit process.

2.1.2 California Public Utilities Commission

CPUC Project Manager

The CPUC PM (see Attachment B, Project Contact List) has the overall responsibility for ensuring that mitigation measures are implemented as adopted by the CPUC. The CPUC PM will determine the effectiveness of the MMCRP based on the success criteria included in the mitigation monitoring program tables. The CPUC delegates field monitoring and reporting responsibilities to Dudek, the third-party monitoring firm and the firm that prepared the

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environmental impact report/environmental impact statement (EIR/EIS) for the CPUC and USFS. The CPUC PM will oversee Dudek's work through telephone calls and review of status reports. The CPUC PM will be notified of all noncompliance situations immediately by telephone call or e-mail and may suggest measures to help resolve the issue(s). All Minor Project Refinement Requests will be submitted to the CPUC PM for review and approval.

The CPUC PM will issue NTPs for construction of each segment identified by SDG&E. Where an NTP covers USFS, BLM, or other jurisdictional lands, the CPUC NTP will serve to document compliance with all relevant mitigation measures and permit conditions and will specify conditions or actions needed (e.g., provide proof of permits) prior to commencement of construction. No construction may occur on USFS or other jurisdictional lands without specific approval (i.e., issuance of permits or notices to proceed) by those agencies.

CPUC Environmental Monitors

The overall monitoring program will be administered under the direction and oversight of the CPUC PM. The CPUC has delegated daily monitoring and reporting responsibilities to Dudek, a third-party monitoring firm. Individual roles are defined in Attachment B, Project Contact List. The number of CPUC EMs and frequency of site inspections will depend on the number of concurrent construction activities and their locations with respect to sensitive resources and land uses, and compliance with project mitigation measures and permit conditions during construction.

SDG&E EIs have primary responsibility for ensuring that construction activities are conducted in accordance with approved project mitigation measures, compliance plans, and permit conditions. The role of the CPUC EMs (Dudek) is to ensure and document compliance is being achieved using verbal and written communications.

- **CPUC (Dudek) Compliance Director.** The CPUC (Dudek) Compliance Director supervises the CPUC (Dudek) Environmental Compliance Manager (ECM) and CPUC (Dudek) EMs. The Compliance Director provides senior-level advisory support to the CPUC PM and the CPUC (Dudek) ECM.
- **CPUC (Dudek) Environmental Compliance Manager (CPUC ECM).** The (Dudek) CPUC ECM will oversee the day-to-day monitoring activities of the EMs and will serve as a primary point of contact for all in-field agency personnel regarding compliance, minor deviations, and processing minor project refinements. The CPUC ECM will work with the CPUC PM, CPUC (Dudek) Compliance Director and CPUC (Dudek) EMs to determine the appropriate level of inspection frequency. The ECM will coordinate with the EMs to prepare regular third-party reports to the CPUC and will coordinate with CPUC's website administrator to post regular updates on compliance progress (NTPs,

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third-party compliance reports and non-compliance reports). The CPUC ECM will have the most direct contact with the CPUC PM on day-to-day issues and will be the main point of contact with CPUC PM for major issues and noncompliance discussions.

- **CPUC Environmental Monitors (CPUC EMs).** CPUC EMs will be an integral part of the project team and will stay apprised of construction activities and schedule changes, and will monitor construction activities for compliance with project mitigation measures, compliance plans, and permit conditions. The CPUC EMs will document compliance through maintaining daily logs and use of a mitigation measure tracking table. The CPUC EMs will also provide input for the draft weekly reports. The CPUC EMs will note problems with monitoring and non-compliance activities, notify designated project members, and report the problems to the CPUC ECM. The enforcement and shut-down authority of the CPUC EM in the field is limited to issues that address imminent resource danger. All other issues will be brought to the attention of the SDG&E EIs to address and report to the CPUC as appropriate.

Enforcement Authority

The CPUC and other jurisdictional agencies are responsible for enforcing adopted monitoring procedures through the CPUC EMs assigned to each project component.

Per Resolution E-4550 (May 9, 2013), the CPUC may impose fines in the event SDG&E does not comply with mitigation measures. CPUC staff will determine whether a fine is appropriate for noncompliance events consistent with Resolution E-4550. Examples of noncompliance that may result in fines being issued by CPUC staff include, but are not limited to, the following:

- Continuing or resuming construction during a temporary stop work order without authorization from the CPUC PM
- Starting construction components that have not been approved or reviewed by the lead agencies
- Violating known nest buffer zones
- Encroachment into an known exclusion zone or sensitive resource area designated for avoidance
- Grading, foundation, line work, or other ground disturbance without required cultural and biological pre-construction surveys or cultural and biological monitors on site
- Use of new access roads, overland travel routes, staging areas, or extra workspaces that have not been approved or reviewed by the lead agencies
- Failure to properly maintain a required erosion or sediment control structure

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- Working outside of approved work hours
- Project personnel working without required training.

Other jurisdictional agencies have the independent authority to halt construction, operation, or maintenance activities associated with the project within their respective jurisdictions if the activities are determined to be a deviation from the approved project, violate a permit condition, or put a sensitive resource at undue risk.

2.1.3 USDA U.S. Forest Service (USFS)

Numerous Project components are located on lands under jurisdiction of the USDA USFS on the CNF. The USFS served as a Lead Agency during preparation of the FEIR/FEIS in compliance with NEPA, the CEQ regulation for implementing NEPA (40 CFR 1500-1508), and the USDA Forest Service Handbook (CFR 1909.15, Environmental Policy and Procedures Handbook). Additionally, because the Project included modification to several facilities permitted under a Special Use Permit (SUP), the USFS considered consolidating the facilities into one MSUP as part of the agency's proposed action.

The USFS issued a ROD for the Project on March 11, 2016, which documents the decision to issue an MSUP to SDG&E for the construction, maintenance, and use of the Project along with ancillary improvements within the Descanso and Palomar Ranger Districts of the CNF. The ROD and MSUP is signed by the Forest Supervisor.

As the NEPA lead agency, the USFS is responsible for ensuring that applicable mitigation measures are implemented on lands within the NFS, CNF. Additionally, USFS is responsible for ensuring that the MSUP holder adheres to terms, conditions, and stipulations within the MSUP while activities are conducted within NFS lands. The USFS intends to work with the CPUC in implementation of mitigation monitoring during construction of the Project. The USFS will have a primary field presence for project inspection and to review and resolve any on-the-ground issues that may arise on NFS land, however, the CPUC EMs will coordinate with the USFS and will serve as field monitors for the CPUC on NFS lands. No activities may occur on NFS lands without approval from the USFS.

Authorized Officer

The Forest Supervisor issued the MSUP for the Project as approved in the ROD, and is responsible for the overall permit administration. Decisions to amend the permit or revoke or suspend permit operations are made at this level.

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Authorized Officer for Administration

The District Ranger is delegated the authority to administer the day-to-day activities associated with the permit. The District Ranger may approve plans and activities as required under the permit, issue NTPs for activities on NFS lands, and would issue letters of non-compliance if necessary.

Permit Administrator

The Forest Special Uses staff handles the permit administration for the District Ranger and Forest Supervisor, including preparation of correspondence, plan review, review of SDG&E NTP requests and draft CPUC NTP approvals, and field inspections.

Permit Monitor

The Permit Monitor is responsible for monitoring compliance with permit requirements in the field. The permit monitor documents observations and provides summaries of key findings to the Permit Administrator and Authorized Officer. Several permit monitors will be assigned to the project.

2.1.4 Bureau of Land Management (BLM)

TL625, TL629, and TL6923 and ancillary facilities traverse public lands administered by the BLM. The BLM will issue a ROD to SDG&E for the construction, operation, maintenance, and decommissioning of the facilities traversing BLM-administered land.

As a cooperating agency under NEPA, and as the agency responsible for authorizing ROWs pursuant to the Federal Lands Policy and Management Act of 1976 (FLPMA) on BLM-administered public lands, BLM is responsible for ensuring that applicable mitigation measures are implemented and that the ROW grant holder (SDG&E) adheres to terms, conditions, and stipulations set forth in the ROW grant.

The CPUC EMs will coordinate with the BLM and will serve as field monitors for the CPUC on BLM lands. BLM's resource specialists may also have a field presence for project inspection and to review and resolve any on-the-ground issues that may arise on BLM land. No activities may occur on BLM-administered lands without BLM approval.

Field Manager

The Palm Springs-South Coast Field Office Manager is the lead officer authorized to make BLM decisions pertinent to this Project. The Field Manager, or his/her authorized representative, will issue all authorizations or permits for the use of BLM land.

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Branch Chief, Lands, Minerals and Recreation

The Palm Springs-South Coast Field Office Branch Chief, Lands, Minerals and Recreation (Branch Chief) is a line officer authorized to make BLM decisions pertinent to this Project. The Branch Chief may issue authorizations permits for the use of BLM land, which includes authorization of variance requests, ROW grant amendments, etc. The Branch Chief is the primary point of contact with SDG&E and other agencies, unless otherwise specified by the Field Manager, for review of documents, reports, mitigation progress, and project planning.

BLM Resource Specialists

Various resource staff will be involved with implementation of this Project. They will assist the Branch Chief with evaluation of conditions and project status relative to mitigation requirements or other stipulations. These support staff will include archaeologists, biologists, geologists, and other staff as required.

2.1.5 Bureau of Indian Affairs (BIA)

The following lines traverse tribal lands with administrative oversight from the BIA: TL682 (to include partial undergrounding within the economic development zone located on La Jolla Reservation, and relocation of several poles) within the La Jolla Reservation, TL629 (to involve fire hardening, adding a double circuit configuration, relocating an existing distribution circuit to this line, and partial undergrounding into the Crestwood Substation) and TL6931 (to involve fire hardening) within the Campo Reservation, and TL 682 (to involve replacing sections of the line with steel poles) within the Pauma-Yuima Reservation.

As a cooperating agency under NEPA, and as the agency responsible for authorizing ROWs on tribal lands, BIA is responsible for ensuring that applicable mitigation measures are implemented. The CPUC EMs will coordinate with the BIA and will serve as field monitors for the CPUC on BIA lands. No activities may occur on tribal lands without required easements and BIA approval.

The BIA Environmental Specialist, as well as tribal monitors may also have a field presence for project inspection and to review and resolve any on-the-ground issues that may arise on tribal land.

2.1.6 California Department of State Parks (CSP)

C79 will consist of 2.84 miles of underground circuit traversing Cuyamaca Rancho State Park lands managed by CSP. As a responsible agency under CEQA, CSP is responsible for ensuring that mitigation measures are implemented on lands managed by CSP and that SDG&E adheres to

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the recorded Easement Agreement (EA), and that no construction work on CSP lands commences prior to the execution of the EA issued by CSP. CSP will have a primary field presence for project inspection and to review and resolve any on-the-ground issues that may arise on CSP land during construction; however, the CPUC EMs will coordinate with CSP during monitoring efforts on CSP lands. CSP personnel identified below have the authority to approve plans and activities as required under the recorded EA and as they pertain to their resource disciplines. All written correspondence, non-compliance reports, summaries of key findings and supporting documentation related to SDG&E activities shall be submitted to the Senior Parks and Recreation Specialist (SPRS) by the appropriate resource personnel who also have the authority to stop work on CSP lands for non-compliance. Rangers may also stop work in the event that human health and safety are a concern. No activities may occur on CSP lands without approval from CSP.

Colorado Desert District Superintendent

The District Superintendent will issue the recorded EA for work being conducted in Cuyamaca Rancho State Park, and is responsible for overall compliance with the limited rights provided by the EA. The District Superintendent may impose fines for non-compliance with the EA.

Montane Sector Superintendent

The Montane Sector Superintendent (MSS) is responsible for oversight of the work activity being conducted at Cuyamaca Rancho State Park. The MSS is delegated the authority to administer the day-to-day activities associated with the EA.

Senior Parks and Recreation Specialist

The SPRS is responsible for overall environmental compliance with CEQA. The SPRS serves as Project Lead for the Project work being conducted on CSP lands and as such is the primary point of contact with the CPUC PM. The SPRS manages the CSP Cultural EMs, the Reforestation Project EMs, and the Specialist EMs. All written correspondence, non-compliance reports, summaries of key findings, and supporting documentation (including photo documentation) from CSP staff will be reviewed, approved, and submitted to the SPRS; the SPRS will submit this documentation to the CPUC.

Senior Environmental Scientist

The Senior Environmental Scientist (SES) is responsible for the protection of all biological resources in the Project area. Additionally, the SES manages the CSP biological EMs.

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Associate State Archeologist

The Associate State Archeologist (ASA) is responsible for the protection of all cultural and historical resources in the Project area. The ASA is delegated the authority to review and approve plans and activities associated with the recorded EA. Additionally, the ASA manages the CSP cultural and historical EMs and is the primary point of contact with all tribal monitors on CSP lands.

District Maintenance Chief

The District Maintenance Chief (DMC) is responsible for the management of the maintenance-related activities, including the rebuilding of Look Out Fire Road in the Project area. The DMC manages any Specialist Monitor as related to maintenance activities.

Reforestation Project Manager

The Reforestation Project Manager (RPM) is responsible for the protection of all carbon pools in the Reforestation Project area and compliance with CEQA, the Reforestation Design Document, the Climate Action Reserve's Forest Carbon Protocol v.3.2 (FCP), and the recorded Project Implementation Agreement (PIA).⁵ The RPM is delegated the authority to review and make recommendations to the plans and activities associated with the recorded EA. Additionally, the RPM coordinates with the Biological, Cultural, Historical, and Specialist EMs for the protection of Biological, Cultural, Historical, and special resources, including habitat, genetic stock, and watershed function in the Reforestation Project Area. Trees or other vegetation determined to be potentially hazardous to the public will be evaluated for removal or hazard mitigation by a qualified SDG&E representative. If the evaluation determines that trees or other vegetation is recommended for removal due to potentially hazardous conditions, SDG&E will mitigate the hazard upon review and approval by CSP.

CSP Environmental Monitors

The CSP EMs include Biological, Cultural and Historical, and Specialist resources monitors. They are responsible for monitoring SDG&E's activities associated with the recorded EA as related to the protection of biological, cultural and historical, and special resources on CSP lands. EMs are responsible for documenting the compliance and non-compliance activities on a day to day basis. Each EM reports to their respective supervisor as listed above, as well as to the Reforestation PM.

⁵ The Project Implementation Agreement (PIA) is an agreement between California State Parks and the Climate Action Reserve (Reserve), recorded at the San Diego County Recorder's Office. The PIA prevents any activities in the Cuyamaca Rancho State Park Reforestation Project Area that intentionally cause reductions in the carbon pools that are tracked for registration with the Reserve. This includes the inventory of existing live trees and the live trees and/or seedlings that have been planted as part of the reforestation project.

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Rangers

A CSP Ranger carries the full authority of the law. CSP Rangers are responsible for human health and safety issues and the protection of resources on CSP lands. The CSP Rangers have the authority to stop work activity for non-compliance as well as human health and safety concerns.

2.1.7 United States Army Corps of Engineers

Section 404 of the CWA (33 United States Code (U.S.C.) 1251 et seq., formerly the Federal Water Pollution Control Act of 1972) authorizes the ACOE to regulate the discharge of dredged or fill material to waters of the U.S. and adjacent wetlands associated with the approved project. The ACOE issues individual site-specific or general (nationwide) permits for such discharges. ACOE issuance of a Section 404 permit triggers the requirement that a Section 401 certification also be obtained.

The CPUC EMs are familiar with the ACOE permit conditions and check for implementation in the field. If an issue arises during construction related to the ACOE permit, the CPUC EMs will notify SDG&E EIs to correct the items. If necessary, the SDG&E ECL will communicate with the ACOE representative so that he/she can take action. At times the CPUC may need to communicate with the ACOE directly, but the SDG&E ECL should be the main point of contact with the ACOE for any items relating to the permit. In addition, the ACOE representative will be asked if he/she would like to be on the weekly report distribution. No activities that would result in a discharge of dredged or fill material to waters of the U.S. or adjacent wetlands may occur until the Section 404 permit is issued or unless covered under an existing nationwide permit.

2.1.8 United States Fish and Wildlife Service

Under Section 7 of the Federal Endangered Species Act (FESA) of 1973, as amended (16 U.S.C. 1531 et seq.), a federal agency that authorizes, funds, or carries out a project that “may affect” a listed species or its critical habitat must consult with USFWS. The federal agencies are relying on implementation of SDG&E’s Subregional Natural Community Conservation Plan (NCCP), and SDG&E low effect Habitat Conservation Plan (HCP) for Quino checkerspot butterfly to meet consultation requirements. The USFS, BIA, and BLM also formally consulted with the USFWS with regards to Laguna Mountain skippers and other species. A Biological Opinion (FWS-SD-15B0191-15F0339) was issued November 19, 2015, for the Project with a “may affect, not likely to adversely affect” finding.

Where conservation measures relate to construction activities, the CPUC EMs will ensure that the conservation measures in the NCCP and HCP are implemented. If a potential violation occurs during construction related to these measures, the CPUC EMs will notify SDG&E EIs

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to correct the items. If necessary, the SDG&E ECL will communicate with the USFWS representative(s) (as well as the CPUC and USFS PMs) so that appropriate action can be taken. At times, the CPUC may need to communicate with the USFWS directly, but the SDG&E ECL should be the main point of contact with the USFWS for any items relating to the NCCP/HCP. USFWS representatives will also be consulted by the CPUC if an issue arises relevant to an adopted conservation measure to protect federally listed species, or if any species addressed in the NCCP/HCP are affected during construction in a manner not anticipated in the NCCP/HCP. In addition, the USFWS representative(s) may be included in the weekly report distribution, if requested.

2.1.9 California Department of Fish and Wildlife (CDFW)

CDFW has jurisdiction over the conservation, protection, and management of California’s fish, wildlife, native plants, and the habitats necessary for their sustenance. CEQA lead agencies have a legal obligation to consult with CDFW as to their projects’ impacts on biological resources.

The California Fish and Game Code, Sections 3511, 4700, 5050, and 5515 provide for the highest level of protection for mammals, birds, reptiles and amphibians, and fish listed as “Fully Protected.” Designated species may not be taken or possessed at any time. CDFW cannot issue permits that authorize the “take of any fully protected species, except for certain circumstances such as scientific research and live capture and relocation to protect livestock.”

Two statutes outside of California Endangered Species Act (CESA) provide protection for birds, nests, and eggs. They include California Fish and Game Code Section 3503 that prohibits the taking, possession, or needless destruction of nests or eggs and Section 3503.5 that prohibits the taking, possession, or destruction of birds of prey (Falconiformes and Strigiformes) or their nests and eggs.

CESA’s protection for plants is subject to the Native Plant Protection Act (NPPA) (Sections 1900–1913). The NPPA afforded the CDFW the authority to designate native plants as “endangered” or “rare” and to protect endangered and rare plants from take.

The CDFW will require a Streambed Alteration Agreement, pursuant to Section 1600 et seq. of the California Fish and Game Code, that prior to the commencement of any activity that will substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream, or lake; use materials from a streambed; and/or result in the disposal or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into any river, stream, or lake. The CDFW’s issuance of a Streambed Alteration Agreement for a project that is subject to CEQA requires CEQA compliance actions

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by the CDFW as a responsible agency. As a responsible agency under CEQA, CDFW may consider the local jurisdiction (lead agency's) CEQA documentation for the project.

The CPUC ECM will coordinate with the CDFW as needed during construction. The CPUC EMs are familiar with the CDFW permit conditions and will ensure implementation in the field. If an issue arises during construction related to a CDFW permit, the CPUC EMs will notify SDG&E EIs to correct the items. If necessary, the ECL will communicate with the CDFW representative (as well as the CPUC and USFS PM) so that appropriate action can be taken. At times, the CPUC may need to communicate with the CDFW directly, but SDG&E's ECL should be the main point of contact with CDFW for any items relating to CDFW permits. In addition, the CDFW representative may be included in the weekly report distribution, if so requested.

2.1.10 California Environmental Protection Agency – State Water Resources Control Board

The Porter-Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., as amended, requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect state waters. The Project is located within the jurisdictional boundary of the Colorado River Basin Regional Water Quality Control Board, Region 7 (RWQCB7) and Region 9. The RWQCB7 and Region 9 to avoid or to minimize impacts to waters of the state associated with the Project. The CPUC EMs shall be familiar with the RWQCB7 and Region 9 permit conditions and shall check for implementation in the field.

The CPUC ECM will include staff trained and experienced in wildland wetland and stream protection, wildland project stormwater management, and restoration/reclamation methods and practices. If an issue arises during construction related to the RWQCB7 or Region 9 permit, the CPUC EMs will notify SDG&E EIs to correct the items. If necessary, the ECL may communicate with the RWQCB7 and/or Region 9 representative so that he/she can take action. At times, the CPUC may need to communicate with the RWQCB7 directly, but SDG&E ECL should be the main point of contact with RWQCB7 for any items relating to RWQCB7 permits. In addition, the RWQCB7 and Region 9 representative may be on the weekly report distribution, if so requested. No activities that could result in a discharge of waste to jurisdictional waters shall occur until the Section 401 certification is issued.

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3 COMMUNICATION

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

3.1 Pre-Construction Compliance Coordination

SDG&E is required by the terms of the mitigation measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction.

During this pre-construction process, SDG&E has been conducting meetings, conference calls, and site visits with technical representatives of the Dudek Team, the CPUC and other agencies, and SDG&E's environmental representatives. The purpose of the pre-construction coordination process has been to discuss document submittal status, document the findings of data reviews and jurisdictional agency approvals, review SDG&E submittals, and document the status of mitigation measures as they apply to the Project or phased Project segment. The goal of the pre-construction process is to complete all required actions so the CPUC and other agencies, as appropriate, can issue NTP authorizations for the Project, or component/segment.

Pre-Construction Activities

As stated in Section 1 of this MMCRP, both Lead and Responsible/Cooperating Agencies under CEQA and NEPA have agreed to use the MMCRP as a tool to define reporting relationships, provide detailed information about the roles and responsibilities of the project's environmental compliance team members, define compliance reporting procedures, and to establish communication protocol. The MMCRP was drafted and distributed by the CPUC to agencies for comment on January 29, 2016. Initial comments were received from BIA on February 29, BLM on March 15, CSP on March 31, and USFS on April 11, 2016. Based on the initial and subsequent comments, the MMCRP has been updated.

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3.2 CPUC Compliance Public Web Site

A CPUC public site has been established for the compliance phase of the Project and content management support is provided by the CPUC's third-party compliance team, Dudek. Dudek will support the CPUC in making available current versions of reports, maps, and other documents prepared for mitigation compliance. The purpose of the website is to facilitate sharing of data and status reports during the pre-construction period and during project construction. Because some information shared by SDG&E is considered confidential under public law (as an example, personal contact information), SDG&E will review documents prior those documents being posted to the public website and provide a redacted versions as necessary.

3.3 Communication Protocol During Construction

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

- The CPUC EM's primary point of contact will be SDG&E's Lead Environmental Inspector (LEI). If he/she is not available, the SDG&E ECL will be the point of contact. If issues can't be resolved at the EM/SDG&E ECL level they will be initially elevated to CPUC PM/SDG&E EM, via email or telephone.
- SDG&E will inform the CPUC ECM and EMs of all survey and construction activity, including status of permits and activity locations in a timely manner. Timely notification of activity is that which allows reasonable response time for agency monitors to be present for that activity. Notification will correspond to organization and roles for each entity as identified in Section 2.
- The CPUC ECM and EM and any other designated agency representatives or staff can talk to anyone on the construction site to ask questions about their activity, but the construction personnel may opt to refer him/her to the appropriate SDG&E Contract Administrator for an answer. Contract Administrators are the appropriate contacts for information on construction activity schedules or construction practices.
- SDG&E will provide a list of all EIs or resource monitors⁶ identified by title and contact information for each person. Updated distributions will be utilized to keep all parties

⁶ Resource monitors include biological, cultural, and paleontological monitors, as well as SWPPP or hazardous materials inspectors.

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informed of monitor and staff additions/changes. This list of personnel, and all subsequent updates, shall be distributed to all persons on the list throughout the construction process.

- CPUC EMs will continue to point out compliance concerns first to SDG&E EIs. Depending on the compliance concern, the CPUC ECM and the SDG&E ECL may follow up with resource agencies as warranted. Documentation of each of these communication efforts, along with documentation of subsequent actions to achieve compliance, will be reported. However, at any time when the CPUC EMs have an unresolved concern about compliance, the SDG&E ECL and CPUC PM will call the appropriate resource agency together to discuss the issue. The CPUC PM may choose to discuss the issue directly with the appropriate resource agency as needed.
- The resource agencies will be notified immediately by SDG&E of any non-compliance events affecting the respective resource or permit condition. The resource agency should also be notified in the event of a newly identified special-status resource within the project footprint or resource effect not previously analyzed. In addition, the CPUC ECM and EM will also receive immediate notification. Subsequent to immediate agency notification, SDG&E will develop a plan to resolve the situation and will follow up with the respective agencies to explain their strategy and receive agency input.
- SDG&E will expeditiously submit a final report regarding any non-compliance event, as described in Section 4.1.
- If “take” is imminent or there is a danger/hazard, the CPUC EM can request work to be temporarily stopped in that area immediately (as long as it can be done safely); this request should be made to the appropriate Contract Administrator or the SDG&E LEI. At any time, anyone can order an activity to be halted temporarily if take or a hazard is imminent.
- SDG&E will expeditiously make a preliminary verbal notification of any potential non-compliance event. If the non-compliance event is confirmed, the verbal notification will be followed by a final report regarding the non-compliance event, as described in Section 4, Environmental Compliance and Field Procedures.

The following list describes the communication process that will occur when the SDG&E EI and/or CPUC EM identifies a non-compliance event during construction:

- **Step 1.** SDG&E ECL and/or CPUC EM verbally notifies SDG&E, CPUC and any applicable land management agency (i.e., USFS, BLM, CSP, BIA) and requests immediate corrective action.

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- **Step 2.** SDG&E ECL and/or CPUC EM informs SDG&E, CPUC and any applicable land management agency (i.e., USFS, BLM, CSP, BIA) of non-compliance event immediately and reports whether SDG&E has corrected the non-compliance event.
- **Step 3.** SDG&E ECL and/or CPUC prepares a written Non-Compliance Report (NCR) and transmits it to SDG&E, CPUC and any applicable land management agency (i.e., USFS, BLM, CSP, BIA).
- **Step 4.** SDG&E ECL, CPUC and any applicable land management agency (i.e., USFS, BLM, CSP, BIA) will inform applicable resource agency if non-compliance actions have the potential to harm an environmental resource or species.
- **Step 5.** Resource agencies may order work stoppage and development of strategy for successful resource/species protection.

Should an agency field representative identify an action during construction that is not in conformance with their respective decision, permit, easement, ROW, etc., the field agency representative may elect to use a similar process to the one described above.

3.4 Progress Meetings During Construction

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

In addition to the progress meetings conducted at the field level, the SDG&E EM, SDG&E Construction Manager, SDG&E ECL, SDG&E LEI, CPUC ECM, CPUC PM, USFS, BIA, BLM, CSP, and/or other jurisdictional agencies may participate in a teleconference call. The teleconference calls would be similar to the progress meeting; however, the conference calls would focus on the MMCRP. Agendas for meetings will be circulated by SDG&E and meeting summaries will be circulated to the participating agencies if requested.

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3.5 Daily Communication during Construction

Many of the problems that come up during construction can be resolved in the field through regular communication between CPUC EMs, SDG&E, construction contractors and agency representatives. Field staff will be equipped with cell phones and will be available to receive phone calls at all times during construction. A project contact list has been included in Attachment B. The organization chart depicted in Section 2 and Communication Protocol in Section 3.3 illustrates the lines of communication to be used during construction. The following provides additional guidelines to ensure effective communication in the field.

CPUC EM

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

SDG&E

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

SDG&E will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC, USFS, BIA, BLM, and CSP. The CPUC ECM and/or EM will review the weekly report to ensure that the status of mitigation measures is consistent with observations in the field. Any questions regarding the status of mitigation measures will be directed to the SDG&E LEI. The weekly environmental compliance status report will also be a tool to keep all parties informed of

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construction progress and schedule changes. It should be noted that daily and weekly compliance reports would also be prepared by CPUC ECM and/or EMs, as described in Section 4.1.3.

3.6 Communicating Compliance Issues

Section 4 describes procedures to communicate minor deviation incidents and non-compliance events identified by the CPUC EMs during site inspections.

3.7 Coordination with Other Agencies Before and During Construction

As discussed in Section 2, several local, state, and federal agencies have jurisdiction over portions of the project. In addition, many of the mitigation measures were derived from specific permit conditions or agency input. The CPUC EM will be familiar with other agencies' permit conditions and will notify the CPUC ECM if questions arise with respect to complying with those conditions so that the CPUC ECM may address questions to SDG&E.

During Construction

The CPUC may request copies of email correspondences, phone logs, or other documentation between SDG&E and agencies to avoid direct involvement from CPUC EMs. However, at any time when the CPUC EMs have an unresolved concern about compliance, the SDG&E ECL, CPUC PM, and CPUC ECM may call the appropriate resource agency together to discuss the issue. The CPUC PM may choose to discuss the issue directly with the appropriate resource agency as needed.

Interagency Conference Calls

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

3.8 Mitigation Dispute Resolution

Issues should be first addressed at the field level informally between the CPUC EMs, SDG&E's EMs, and if applicable, the agency field representative at the regular progress meetings or during site visits. Questions may be raised to the SDG&E ECL or EM and the SDG&E Project Construction Manager. Should the issue persist or not be resolved at these levels, the following procedures will be used:

- **Step 1:** Disputes unresolved in the field and complaints (including those from the public) should be directed to the CPUC PM for resolution. The PM will attempt to

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resolve the dispute informally. Should this informal process fail, the CPUC PM will inform SDG&E prior to initiating Step 2.

- **Step 2:** Should this informal process in the field fail, the CPUC PM may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the Proposed Project or adopted MMCRP.
- **Step 3:** If a dispute or complaint regarding implementation or evaluation of the program or mitigation measures cannot be resolved informally or through a letter request, any affected participant in the dispute or complaint may file a written “notice of dispute” with the CPUC’s Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it to the filer and other affected participants.
- **Step 4:** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the CPUC via a procedure to be specified by the CPUC.

The CPUC and the federal agencies may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate. If the CPUC and the federal agencies determine that, based on the review, any conditions are not adequately mitigating significant environmental impacts caused by the project, the CPUC and federal agencies may impose additional reasonable conditions to effectively mitigate these impacts. These reviews will be conducted in a manner consistent with the CPUC’s rules and practices and federal agency procedures.

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

3.9 Contact List

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

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4 ENVIRONMENTAL COMPLIANCE AND FIELD PROCEDURES

4.1 Mitigation Measures Compliance and Reporting

4.1.1 Pre-Construction Compliance Verification

SDG&E is required by the terms of the mitigation measures and the permitting requirements of various other regulating agencies to prepare plans and obtain approval of these documents, in addition to performing various surveys and studies prior to construction. Copies of this documentation will be retained by the CPUC EMs, and provided to the CPUC with all files at the completion of the Project. The plans, surveys, studies, and other documentation required to be completed by SDG&E before construction are listed in the mitigation measure and APM tables in Attachments G and H as they pertain to the CPUC Decision.

Compliance with all pre-construction mitigation measures and APMs presented will be verified prior to construction, and construction may not start on any segment before SDG&E receives a written NTP from the CPUC PM and/or the applicable underlying land use agency (i.e., USFS, BLM, CSP, and/or BIA) for that segment.

The CPUC EMs, including project management staff and the technical experts, will review all mitigation plans and reports and provide comments. USFS, BIA, BLM, and CSP will review mitigation plans and provide comments as applicable to agency decision and permit requirements. Resource agencies, such as USFWS, CDFW, CALFIRE, etc. will also be involved in the review of applicable plans and reports and will provide comments. Comments on these documents will be provided to SDG&E to ensure that they adequately accomplish the intended reduction in impacts. For required local and state agency permitting/consultations, the CPUC EMs will track SDG&E's progress as it relates to SDG&E's construction plans and project mitigation and permitting requirements. Based on SDG&E's construction plans, CPUC may authorize construction to begin on a phased basis and the CPUC EMs will handle pre-construction compliance review accordingly. CPUC may issue NTPs for construction of each phase separately, as soon as pre-construction compliance is satisfactorily accomplished for that phase.

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

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4.1.2 Notice to Proceed Procedures

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

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

- A description of the work
- Detailed description of the location, including maps, photos, and/or other supporting documents
- Verification that all mitigation measures and APMs have been met or do not apply to the work covered by the NTP request
- Verification that all applicable permit conditions or requirements, project parameters, or other project stipulations have been met for the work covered by the NTP request
- In the case where some outstanding compliance items cannot be met prior to issuance of the NTP, a request shall be submitted that outlines what submittals are outstanding and how they will be met and approved in a timely manner prior to construction
- Up-to-date biological resource surveys or a commitment to survey and submit results prior to construction as applicable
- All applicable jurisdictional permits or agency approvals (if necessary)
- Date of expected construction and duration of work.

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

1. SDG&E submits NTP request and posts the request to the Sharefile site. Notification of posting to include CPUC, USFS and other applicable agencies with jurisdiction.

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Notification of posting to include BIA, BLM, and CSP when the requested activities will occur on lands under the jurisdiction of those agencies).

2. CPUC/Dudek completes a review and, if needed, will prepare a bullet list of outstanding requirements and where additional information or clarification is needed. USFS, BIA, BLM, and CSP also completes a review and, if needed, will prepare a bullet list of outstanding requirements and where additional information or clarification is needed
3. All questions and comments, as well as required additional information or clarifications related to the CPUC NTP request, shall be sent to SDG&E by CPUC/Dudek. The USFS, BLM, BIA and CSP may submit inquiries to SDG&E in addition to those submitted by the CPUC.
4. SDG&E will supply clarifications and/or additional information to be added to the NTP request in a memo or letter format along with responses addressing all comments and questions forwarded by CPUC/Dudek.
5. CPUC/Dudek will complete a Compliance Status Table documenting compliance and any outstanding requirements that can be made conditions of the NTP. CPUC will prepare the draft NTP approval letter, which will document the scope of work, compliance with EIR/EIS and bullet outstanding conditions.
6. The CPUC will send the NTP approval and an updated compliance table to SDG&E. If the NTP includes activities on lands administered/managed by USFS, BLM, BIA, CSP, an NTP may be issued concurrently with CPUC approval or separately by the land management agency in accordance with their procedures.
7. CPUC will then post the approved NTP documentation on the CPUC public website.

4.1.3 Compliance Reporting During Construction

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

The CPUC EMs will document observations along the Project through the use of field notes and digital photography. Photos will be provided in the weekly reports and correlate to a discussion of specific construction or compliance activity. In addition, field inspection forms will be utilized in the field to document compliance of specific crews, construction activities, or resource

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protection measures. The forms will provide a standardized checklist to facilitate inspections, as well as list mitigation measures that were verified during the site visit. Information gathered from the inspection forms and field notes will be used to generate weekly status reports and update the status of mitigation measures listed in Attachments G and H. All reports will be made available to the USFS prior to posting on the public website; similarly to BIA, BLM, and CSP when jurisdictional activities occur or as requested. A sample site inspection form has been included in Attachment E. Weekly reports will be provided to all permitting agencies via email and/or posted on a collaboration website during construction.

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

4.1.4 Compliance Levels

The CPUC EM and SDG&E LEI shall document all observations and communications in a daily site observation form and will determine whether the observed construction activities are consistent with mitigation measures, APMs, and project parameters, as identified in the FEIR/FEIS and adopted by the CPUC. All compliance issues regardless of level will be documented in the daily/weekly reports. Any regulatory agency has the authority to issue compliance violations. The CPUC EM will not direct the work of a construction contractor or subcontractor. A construction activity that deviates from permit conditions or mitigation measures, particularly when the activity puts a resource at risk, would be considered a non-compliance. A non-compliance issue may also be reported by SDG&E LEI or CPUC EM, if a mitigation measure is not implemented according to the timing restrictions listed in the mitigation tables. Examples of non-compliances include, but are not limited to:

- Development of new access roads, staging areas, or additional workspaces not identified within the project description of the Final EIR/EIS or as defined on the on the project drawings approved/reviewed by the lead agencies for use during construction
- Encroachment into an exclusion zone or sensitive resource area designated for avoidance
- Brush clearing outside the approved work limits
- Activity during seasonal activity restrictions or work hour restrictions
- Grading, foundation, or line work without required biological or cultural pre-construction surveys and a biological or cultural monitor on site
- Failure of erosion or sediment control structures if it puts a sensitive resource at risk
- Discharge of sediment-laden trench or foundation hole water into a waterbody or storm drain

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SDG&E will immediately notify the CPUC EM, ECM, and the CPUC PM if any non-compliance events occur, verbally and through e-mail. Similarly, the CPUC EM will immediately notify the designated SDG&E representative of a non-compliance incident that requires immediate corrective action. SDG&E will follow up with a detailed Non-Compliance Report (NCR) of the event within 24 hours. If the non-compliance event occurs on CSP land, SDG&E will immediately notify the Montane Sector Superintendent or his designee verbally and through email.

In the event the non-compliance is observed by a CPUC EM, the CPUC EM will immediately notify the designated SDG&E representative of a non-compliance that requires immediate corrective action. If the non-compliance event occurs on CSP land, the CPUC EM will immediately notify the Montane Sector Superintendent or his designee. Similarly, if the non-compliance event occurs on NFS land, BLM-administered public land or tribal land, the CPUC EM will immediately notify the designated representative. An NCR will be sent to SDG&E from the CPUC PM that outlines the incident. The NCR shall list all actions required to bring the activity back into compliance, and provide a timeline for follow-up.

If the non-compliance event occurs on CSP land, the CSP Project Lead will provide an NCR to SDG&E and concurrent notification to the CPUC Project Manager. SDG&E will work with the CSP Project Lead to determine what activity needs to occur to bring SDG&E back into compliance and provide a timeline for follow-up to the CPUC.

All NCRs will be posted to the CPUC public website.

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

- Failure to properly maintain an erosion or sediment control structure, but structural failure has not occurred
- Project personnel begin work on the ROW without proof of training
- Work outside the approved work limits where the off-ROW incident is within a previously disturbed area, such as a gravel lot.

Through the issuance of NCRs and Project Memoranda, patterns of compliance issues can be discerned, preventative measures can be developed, and remedial work, if needed, can be scheduled.

Incident reports (i.e., reportable spills) would also be tracked in the Weekly Reports. Repeated events that individually might not be considered non-compliance may become non-compliance if

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continued occurrence after initial incident is observed and documented. In other words, repeated incidents will result in non-compliance.

Compliance and Non-Compliance Violation Levels

Project compliance and non-compliance violation levels and the specific corrective actions are defined below. The compliance and non-compliance violation levels should be utilized by both SDG&E LEIs and CPUC EMs to document compliance levels throughout construction.

- **Level 0 Compliance.** This level indicates that all mitigation measures and permit conditions are being complied with and there are no violations. No corrective action is necessary.
- **Level 1 Minor Deviation.** One aspect of a mitigation measure has not been complied with resulting in only partial implementation of a mitigation measure, but no significant impact. A verbal warning shall be issued to SDG&E's LEI or SDG&E ECL and corrective action shall be required within a stated maximum period, to be determined by the CPUC EM. If corrective action is not taken within the stated period, a Project Memorandum will be issued. If the Level 1 Minor Deviation is observed by SDG&E personnel, the SDG&E LEI or SDG&E ECL will provide notification in accordance with the following paragraph, below.
- **Level 2 Non-Compliance.** One or more aspects of a mitigation measure have not been complied with, making the mitigation ineffective and resulting in minor impacts. If allowed to continue, this non-compliance could result in a significant impact over time. A verbal warning followed by a Project Memorandum shall be submitted to SDG&E's ECL. Corrective action shall begin by the next construction or pre-construction workday. If corrective action is not begun by the next construction day or pre-construction workday, a Non-Compliance Report shall be issued. If the Level 2 Non-Compliance is observed by SDG&E personnel, the SDG&E ECL will provide notification in accordance with the following paragraph, below.
- **Level 3 Non-Compliance.** One or more of the aspects or a mitigation measure are not complied with and the implementation of a mitigation measure is deficient or non-existent, resulting in significant impact(s), or there is immediate threat of major, irreversible environmental or cultural resource damage or property loss. A verbal warning, followed by a Non-Compliance Report. The Non-Compliance Report shall be submitted to SDG&E's ECL. Corrective action shall begin immediately. If the Level 3 Non-Compliance is observed by SDG&E personnel, the SDG&E ECL will provide notification in accordance with the following paragraph, below.

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All non-compliance activity will be reported by Dudek and/or SDG&E ECL to the CPUC PM, and other agency representatives as applicable, via immediate notification. Based on the severity or pattern of non-compliance activity, the CPUC PM has the authority to shut-down project construction activities. Similarly, USFS, BIA, BLM, and CSP have the authority to shut-down project construction activities on lands administered by those agencies in accordance with laws, regulations, policies, and/or permit conditions. If a shutdown of construction activity occurs, construction shall not resume until the CPUC PM and land management agency, if applicable, authorizes it to do so. No Dudek personnel has the authority to shut down or restart construction activities on a project-wide scale; however activity-specific shutdown or re-direction or work may be allowed if an immediate threat to safety or a sensitive resource is imminent as described in Section 3.3 of this MMCRP.

4.2 Project Changes

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

4.2.1 CPUC and USFS - Workspace Adjustment Process

The CPUC Energy Division and the USFS may allow workspace adjustments that are necessary due to unanticipated changes in the field (i.e., site conditions, topography, equipment, etc.) and are consistent with the Project Description as defined in the FEIS/EIR. The purpose of the workspace adjustment process is to allow flexibility in the field during construction and facilitate quick turnaround times for review and usage of the adjusted workspaces.

The baseline data for this Project, which was submitted to the CPUC in April 2015 as part of SDG&E's response to Data Request #10, depicted the locations of temporary guard structure sites, stringing sites, pole locations, and staging and fly yards. Other temporary workspaces (including pole workspaces, temporary access workspaces, anchor workspaces, and some existing roads) were not included in the baseline data but are discussed and contemplated in the Project Description in the Final EIR/EIS. The workspace adjustment process will apply to two types of workspace adjustments:

1. Any workspaces to be shifted, reconfigured, or expanded due to changes in the field.

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2. The use of existing permitted⁷ roads on NFS land and existing roads (paved, dirt, navigation; not including new overland travel) that do not require any improvements.⁸

To determine if a Workspace Adjustment is appropriate, SDG&E will complete a desktop and field review of the proposed workspace adjustment area to determine if any new, previously unanalyzed impacts to sensitive resources would result. If not, SDG&E will submit a Workspace Adjustment Memo to the CPUC and the USFS that includes the following information:

- Location and facilities associated with the workspace adjustment
- Description and justification for the workspace adjustment
- Summary table of anticipated change to impacts (vegetation type and square footage)
- Results of the resource analysis including biological, cultural, and hydrological studies
- Confirmation that no new impacts to a previously unanalyzed resource will occur
- Split-level mapping of the workspace adjustment
- Photographs of current site conditions

Any changes in temporary impacts caused by workspace adjustments will be tracked by SDG&E by segment and be provided to CPUC upon request. Once construction is completed along a component, the change in temporary impacts will be captured in a post-construction report following the completion of activities associated with each segment. The report will be used to reconcile actual impacts, including an assessment of mitigation credit drawdown, and will be incorporated into the SDG&E Natural Community Conservation Plan (NCCP) Annual Report submitted to the WLA.

4.2.2 CPUC - Minor Project Refinement Request Process

The CPUC Energy Division may approve requests for minor project refinements that may be necessary due to final engineering of the project so long as such minor project refinements are located within the geographic boundary of the study area of the EIR/EIS and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement.

⁷ “Permitted” as defined by the USFS MSUP

⁸ The use of existing roads was contemplated in the EIR/EIS; therefore, the use of an existing temporary access road that was not previously identified in the baseline data or the NTP process may or may not rise to the level of a Minor Project Refinement Request as long as no improvements are required.

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SDG&E shall seek any other project refinements by a petition to modify the decision. A Minor Project Refinement Request Form is included in Attachment F.

Requests for CPUC staff approval of a refinement must be made in writing and should include the following:

- A detailed description of the proposed refinements, including an explanation of why the refinements are necessary, and a reference to the approved documents (i.e., identification of the APMs, mitigation measures, project parameter, or other project stipulation for which the refinements are being requested, and a reference to the approved documents).
- Photos, maps, and other supporting documentation illustrating the difference between: the existing conditions in the area, the approved project, and the proposed refinements.
- The potential impacts of the proposed refinements, including a discussion of each environmental issue area that could be affected by the refinements with accompanying verification that there will be no substantial increase in the severity of any previously identified significant impacts to resources affected by the project and no new significant impacts, after application of previously adopted mitigation.
- Whether the refinements conflict with any applicant proposed measures or mitigation measures.
- Whether the refinements conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute or policy.
- Water/wetland/storm water related resource information if the refinements would result in any additional land disturbance, road distance or width, changes to jurisdictional delineation of waters, or changes to water protection best management practices.
- Date of expected construction at the refinements site area.

The CPUC PM may request additional information or a site visit in order to process the request.

4.2.2.1 Requirements for Staff Approval of Minor Refinements

To be approved by staff, refinements must meet all of the following fixed standards. Refinements must not:

- Be outside the geographic boundary of the study area utilized in the environmental document;
- Create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document;

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- Trigger additional permit requirements⁹; Conflict with any APMs or mitigation measures or any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy; or
- Require new conditions for approval, without which the refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

Possible examples of refinements that may be approved by staff after final engineering include, but are not limited to:

- Adding a temporary extra work area (no more than 60 days of use) or substituting a work area, including lay-down and staging, for another work area that is as suitable as or more suitable than the originally proposed work area. The temporary extra work area or substitute work area must be located in a disturbed area with no sensitive resources or sensitive land uses adjacent to the proposed area, must not create any permanent impacts, and must be restored to either its initial condition or an improved condition.
- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid unanticipated impacts related to cultural artifacts, buried utility infrastructure, hazardous and toxic substances, and other land use impacts including effects on homeowners, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.
- Adjusting the alignment of a project within the study area that was utilized in the original environmental analysis to avoid or adapt to conditions on the ground that vary from the conditions that existed at the time of the original environmental analysis, so long as the adjustment does not create a new significant impact or a substantial increase in the severity of a previously identified significant impact.

To initiate a project refinement request, SDG&E will fill out a Minor Project Refinement Request (MPRR) form (see Attachment F), prepare the appropriate supporting documentation, and obtain the required signatures. SDG&E will complete and submit the MPRR form and supporting documentation by email (scanned copy) to CPUC with a copy to Dudek. Should the MPRR involve other land management agencies, please review the processes below.

⁹ For example: grading, disposal, water discharge, dredging, a Clean Water Act Section 404 permit or a California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement.

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4.2.3 USFS - Minor Project Refinement Request Process

At this time, the USFS will utilize the same process as the CPUC for reviewing SDG&E minor project refinements. Therefore, when requesting minor project refinements from the CPUC, SDG&E shall send the request concurrently to USFS for review and approval.

4.2.4 BLM – Variance and Amendments Process

Project changes as well as clarifications or corrections to inconsistencies to project permits or decision documents are handled by the BLM through deviation requests, which must be submitted to the BLM Field Manager or designee for review and approval on BLM-administered lands. Types of project deviations requiring BLM approval can be found in Table 3, BLM Deviation (Variance) Description.

**Table 3
BLM Deviation (Variance) Descriptions**

	Level 1	Level 2	Level 3
Description	Minor, site-specific, performance-based changes to project specifications, construction methods, or mitigation measures	Project changes within the previously approved work area, to include changes in facility design or location	<ol style="list-style-type: none"> 1. Project changes outside the previously surveyed or authorized ROW area 2. Project changes not previously identified and analyzed by NEPA 3. Project changes resulting in an increase in disturbed acres 4. Project changes would result in impacts to resource values greater than approved by BLM
Purpose	Improve constructability reflecting actual site conditions, modify mitigation not applicable to the site, provide clarifications or correct inconsistencies	Make modifications within the work area reflecting actual site conditions or unanticipated changes or circumstances	Make modifications outside the work area reflecting actual site conditions or unanticipated changes or circumstances
Deviation Activity Location	Within the approved work area and within the surveyed areas	Outside the approved work area but within the surveyed area	Outside the approved work area and outside the surveyed areas
Environmental Protection	Provide equal or better protection to environmental resources	Provide equal or better protection to environmental resources	Provide equal or better protection to environmental resources

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**Table 3
BLM Deviation (Variance) Descriptions**

	Level 1	Level 2	Level 3
Examples	<ul style="list-style-type: none"> • Use additional access roads that would not require any improvement to the road • Minor variations in site-specific plans that reflect actual site conditions • Minor changes to the project design required due to site-specific restrictions 	<ul style="list-style-type: none"> • Extra workspace or lay down areas • Use of existing roads not previously approved • Increasing width of construction right-of way • Moving or significantly changing a major facility within approved site 	<ul style="list-style-type: none"> • Expansion of the project site • Change in right-of way • Locating a facility outside of the approved site • Change in facility type
Approval Authority	CM ¹ or Compliance Monitor in the field	BLM AO ² or CPM or, if approved by the BLM AO, the CM	BLM AO
Review Process	<ol style="list-style-type: none"> 1. EM³ completes deviation request form 2. EM submits request to CM 3. CM reviews and consults with EM 4. If appropriate, CM approves request 5. CM documents approval and notifies BLM 	<ol style="list-style-type: none"> 1. EM completes deviation request form 2. EM submits request and all supporting analysis to BLM AO or CPM with a copy to the CM 3. BLM AO or CPM reviews and consults with CM 4. CM consults with any applicable agencies and makes a recommendation 5. If appropriate, BLM AO or CPM⁴ approves the request and notifies the CM 	<ol style="list-style-type: none"> 1. EM completes deviation request form 2. EM submits request and all supporting analysis including required surveys to BLM AO or CPM with a copy to the CM 3. BLM AO or CPM reviews and consults with CM 4. CM consults with any applicable agencies, verifies required surveys, and makes a recommendation 5. If appropriate, BLM AO or CPM approves the request and notifies the CM

Source: Bureau of Land Management. 2014. Instruction Memorandum No. 2014-112, Policy for Solar and Wind Energy Inspection and Enforcement, Attachment 1-- Environmental and Compliance Monitoring Plan. Table 3, Deviation (Variance Descriptions). July 3, 2014. Accessed May 13, 2016. http://www.blm.gov/style/mediatlib/blm/wo/Information_Resources_Management/policy/im_attachments/2014.Par.66241.File.dat/Attach%201%20ENVIRONMENTAL%20COMPLIANCE%20MONITORING%20PLAN.pdf.

¹ The "CM" is defined in BLM's Environmental and Compliance Monitoring Plan (ECMP) as the Compliance Manager provided by the third-party contractor to the BLM

² The "AO" is defined in BLM's ECMP as the Authorized Officer representing the Bureau of Land Management

³ The "EM" is defined in BLM's ECMP as the Environmental Monitors for the Project Owner/Right-of-Way Grant Holder

⁴ The "CPM" is defined in BLM's ECMP as the Compliance Project Manager, staff of the BLM

The BLM process for reviewing and approving project Variances is similar to the CPUC process for reviewing and approving MPRRs. Therefore, when requesting minor project refinements from the CPUC, SDG&E shall send the request concurrently to BLM when project refinements have the potential to affect BLM-administered public lands or resources. SDG&E may use the CPUC MPRR form for requesting BLM Variances so long as the form clearly identifies the Variance level consistent with the descriptions and thresholds identified in Table 3, BLM Deviation (Variance) Descriptions.

CNF Power Line Replacement Projects Mitigation Monitoring, Compliance, and Reporting Program

Should the activities or project clarifications identified in MPRR be approved by CPUC, or a Variance approved by the BLM, SDG&E shall not commence activities subject to the MPRR or Variance until both agencies have approved the request.

4.2.4.1 BLM ROW Grant Amendments

Any project-related changes that exceed what can be reviewed and approved in a deviation request must be handled as an amendment to the ROW Grant. For an amendment, SDG&E will discuss with the BLM Field Manager or designee the nature of the request to determine the specific process to be followed. The BLM or other agency with lead authority will determine how the amendment will be processed and whether a full NEPA review will be required based on the nature of the change, potential for undocumented environmental impacts, and permanence of the change. SDG&E will prepare an amendment request including a detailed description of the necessary changes and a supporting environmental analysis and distribute them to the BLM for coordination with all agencies involved in the previous decision. The BLM and other appropriate agencies will review and approve the amendment. The typical process for an amendment will follow a Level 3 deviation as identified above.

4.2.5 BIA Project Refinements

At this time, the BIA anticipates that it will utilize a similar process as the BLM for reviewing SDG&E minor project refinements (refer to Section 4.2.3, Variance and Amendment Process, of this MMRP). The BLM process for reviewing and approving project Variances is similar to the CPUC process for reviewing and approving MPRRs. Therefore, when requesting minor project refinements from the CPUC, SDG&E shall send the request concurrently to BIA when project refinements have the potential to affect tribal lands. SDG&E may use the CPUC MPRR form for requesting BIA Variances so long as the form clearly identifies the Variance level consistent with the descriptions and thresholds identified in Table 3, BLM Deviation (Variance) Descriptions.

Should the activities or project clarifications identified in MPRR be approved by CPUC, or a Variance approved by the BIA, SDG&E shall not commence activities subject to the MPRR or Variance until both agencies have approved the request.

4.2.6 CSP Project Refinements

Similar to the USFS, BLM, and BIA processes outlined above, SDG&E will submit all MPRRs (including supporting documentation) with the potential to affect CSP lands or resources concurrently to the CPUC and CSP for review and approval. SDG&E shall not commence activities subject to the MPRR until both agencies have approved the request.

**CNF Power Line Replacement Projects
Mitigation Monitoring, Compliance, and Reporting Program**

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CNF Power Line Replacement Projects Mitigation Monitoring, Compliance, and Reporting Program

5 RECORDS MANAGEMENT

Daily inspection and weekly status reports prepared by CPUC EMs will be used to prepare a final environmental compliance report following the completion of construction. The final report will provide a discussion on how each mitigation measure in the CPUC Decision was implemented and include copies of submittals required for compliance. In addition, the success criteria will be evaluated and used for future projects.

5.1 Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available by the CPUC for public inspection on request. In order to facilitate the public's awareness, the CPUC will post this MMCRP document, and also will make CPUC weekly reports and other pertinent project documents available on the project website, accessible at: <http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>.

**CNF Power Line Replacement Projects
Mitigation Monitoring, Compliance, and Reporting Program**

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CNF Power Line Replacement Projects Mitigation Monitoring, Compliance, and Reporting Program

6 MITIGATION MONITORING PROGRAM TABLES

6.1 Using the Tables

Attachments G and H identify the APMs and mitigation measures included in the FEIR/FEIS and referenced by the CPUC decision (D. 16-05-038, May 26, 2016), respectively. The APM and mitigation measure tables (separated by environmental issue area) and inclusive of agency/jurisdiction consultation and resulting permit requirements is the core document for environmental requirements on the project and will be the primary guideline for determining compliance with the MMCRP. The CPUC will use an expanded version of the mitigation measure/APM tables during the pre-construction planning and construction monitoring phases of the project to accurately track the status of mitigation measures.

During construction, a copy of the APM and mitigation measure tables with measures to be implemented during construction should be kept at the central construction staging area/construction trailer on the Project, and all supervisory staff working on the project should be familiar with its contents. In addition, copies of all applicable agency decisions, plans and permits compiled prior to construction as a result of the pre-construction measures (e.g., SWPPP, Spill Response and Notification Plan) shall also be kept within the construction trailer and available to all project personnel working on the Project and all supervisory staff working on the Project should be familiar with their contents.

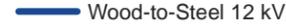
**CNF Power Line Replacement Projects
Mitigation Monitoring, Compliance, and Reporting Program**

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ATTACHMENT A
Project Overview Map

Project Overview

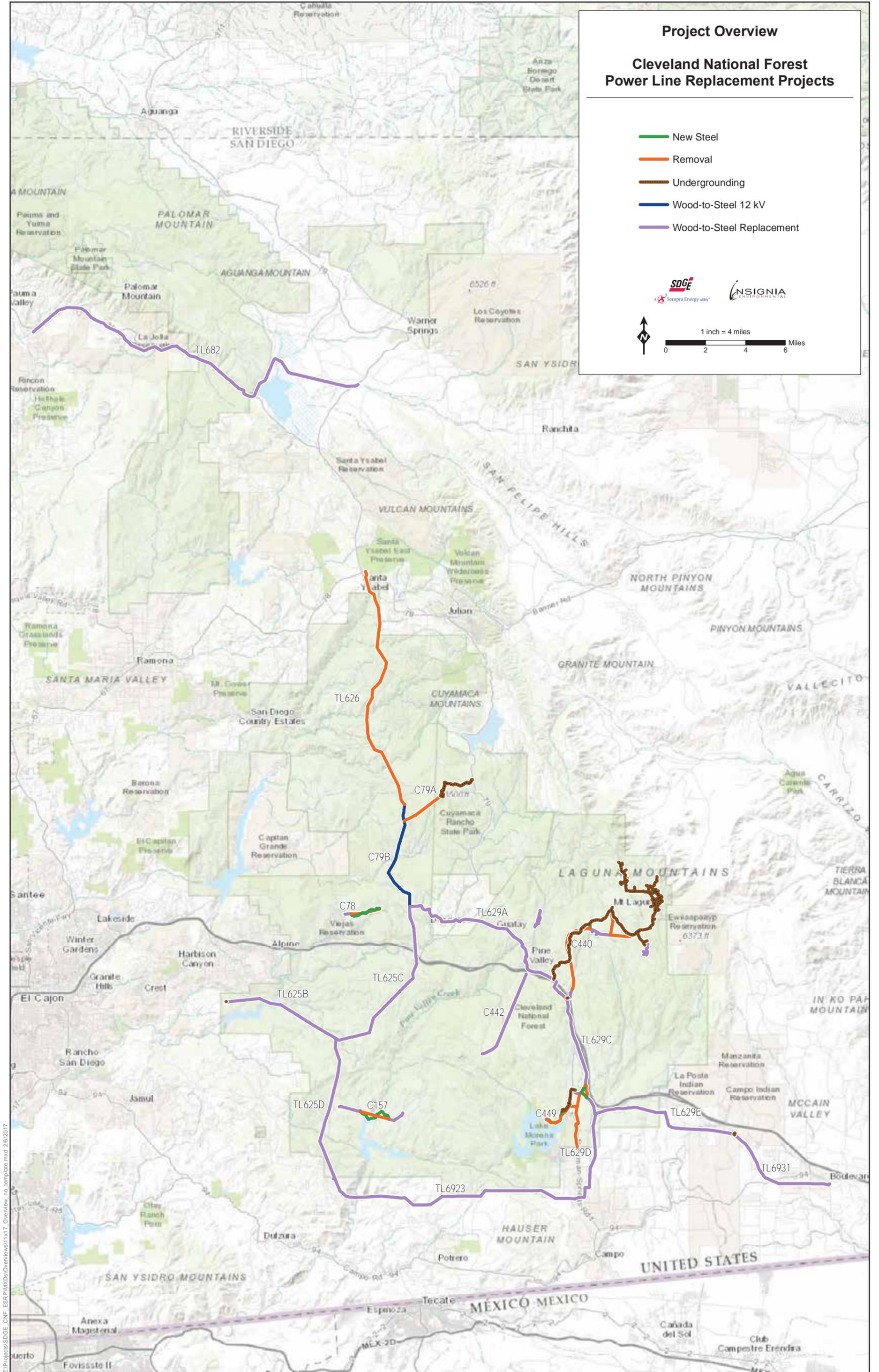
Cleveland National Forest Power Line Replacement Projects

-  New Steel
-  Removal
-  Undergrounding
-  Wood-to-Steel 12 kV
-  Wood-to-Steel Replacement



1 inch = 4 miles

0 2 4 6 Miles



ATTACHMENT B
Project Contact List

ATTACHMENT B Project Contact List

Contact Name & Title	Address	Phone	Cell	Email Address
<i>San Diego Gas & Electric Company (SDG&E) Project Managers</i>				
Tim Knowd Project Manager-Major Projects	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Kirstie Reynolds Team Lead - Environmental Project Management	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Jim Vanlandingham Construction Supervisors	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Denis Sanford Construction Manager	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Jeff Coward Environmental Project Manager	904 2nd Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
<i>SDG&E Environmental Resource Specialists And Monitors</i>				
Kirstie Reynolds Environmental Compliance Lead	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Marty Gilroy Lead Environmental Inspector	904 2nd Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
Rachel Ruston Principal Cultural Resources Specialist	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Cheryl Bowden-Renna Cultural Resources Specialist	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Kevin Kilpatrick Biology Resources Lead	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
<i>SDG&E Additional Roles</i>				
Todd Voorhees Public Affairs Manager	1010 Tavern Road, MS SD1116 Alpine, California 91901	[REDACTED]	[REDACTED]	[REDACTED]
Adrianna Kripke Sr. Counsel, Environmental Law	8330 Century Park CtSan Diego, California 92123	[REDACTED]	[REDACTED]	[REDACTED]

ATTACHMENT B (Continued)

Contact Name & Title	Address	Phone	Cell	Email Address
<i>California Public Utilities Commission (CPUC) Third- Party (DUDEK) Program Leads, Managers, and Environmental Monitors</i>				
David Hochart Environmental Compliance Director Dudek	605 Third Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
Allison Rice Environmental Compliance Manager	605 Third Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
Brock Ortega Biological Resources Manager	605 Third Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
Micah Hale Cultural Resources Manager	605 Third Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
Shane Valiere Environmental Monitor	605 Third Street Encinitas, California 92024	[REDACTED]	[REDACTED]	[REDACTED]
<i>California Public Utilities Commission (CPUC)</i>				
Lisa Orsaba CPUC Project Manager	505 Van Ness, 4th Floor San Francisco, California 94102	[REDACTED]	[REDACTED]	[REDACTED]
<i>U.S. Forest Service (USFS)</i>				
Brad Aughinbaugh Utilities Coordinator Cleveland National Forest	10845 Rancho Bernardo Road Suite 200 San Diego, California 92127	[REDACTED]	[REDACTED]	[REDACTED]
<i>Bureau of Land Management</i>				
Doug Herrema, Field Manager, Palm Springs-South Coast Field Office	1201 Bird Center Drive Palm Springs, California 92262	[REDACTED]	[REDACTED]	[REDACTED]
<i>Bureau of Indian Affairs</i>				
John Rydzik	2800 Cottage Way Sacramento, California	[REDACTED]	[REDACTED]	[REDACTED]
<i>United States Army Corps of Engineers</i>				
Winston Zack	5900 La Place Court, Suite 100 Carlsbad, California 92008	[REDACTED]	[REDACTED]	[REDACTED]

ATTACHMENT B (Continued)

Contact Name & Title	Address	Phone	Cell	Email Address
<i>United States Fish and Wildlife Service</i>				
Jesse Bennett	2177 Salk Ave, Suite 250 Carlsbad, California 92008	[REDACTED]	[REDACTED]	[REDACTED]
Tom Dietsch	2177 Salk Ave, Suite 250 Carlsbad, California 92008	[REDACTED]	[REDACTED]	[REDACTED]
<i>Air Pollution Control District</i>				
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<i>California State Parks</i>				
Terry Gerson	200 Palm Canyon Drive Borrego Springs, California 92004	[REDACTED]	[REDACTED]	[REDACTED]
Kevin Best	Montane Sector Office at Cuyamaca Rancho State Park 13652 Highway 79 Julian, California 92036	[REDACTED]	[REDACTED]	[REDACTED]
<i>County of San Diego</i>				
Kenton Jones	5201 Ruffin Road Suite D, MS 0336 San Diego, California 92123	[REDACTED]	[REDACTED]	[REDACTED]
<i>California Department of Fish And Wildlife</i>				
Eric Hollenbeck	South Coast Region 3883 Ruffin Road San Diego, California 921234949	[REDACTED]	[REDACTED]	[REDACTED]

ATTACHMENT B (Continued)

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ATTACHMENT C
USFS Record of Decision



**FINAL RECORD OF DECISION
SAN DIEGO GAS & ELECTRIC
MASTER SPECIAL USE PERMIT
U.S. FOREST SERVICE
CLEVELAND NATIONAL FOREST
ORANGE AND SAN DIEGO COUNTIES, CALIFORNIA**

A. BACKGROUND

San Diego Gas & Electric (SDG&E) submitted an initial application to the U. S Forest Service (Forest Service), Cleveland National Forest, to obtain a Master Special Use Permit (MSUP) in 2005. The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the Cleveland National Forest. As part of the National Environmental Policy Act (NEPA) review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in 2009. In response to public comments received on that EA, I determined that additional fire risk reduction measures within the Cleveland National Forest (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required.

After publication of the EA in 2009, SDG&E expanded the scope of the proposed MSUP to include fire hardening, undergrounding, and relocation of improvements both within and outside the Cleveland National Forest. The proposed power line replacement projects will require a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC). The project also crosses other federal jurisdictions, including land managed by the Bureau of Indian Affairs (BIA) and the Bureau of Land Management (BLM). SDG&E also proposed new construction within Cuyamaca Rancho State Park (CSP).

The CPUC and Forest Service agreed to develop a joint Environmental Impact Report / Environmental Impact Statement (EIR/EIS) for the MSUP/PTC Power Line Replacement Projects. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. The joint EIR/EIS was prepared to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The joint document is called the "SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIR/EIS." The BLM and BIA joined the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA. The Final EIR/EIS was issued July 10, 2015. The BLM, BIA, and CSP have independent jurisdiction and approval authority for the project segments within their areas of jurisdiction and will be making independent decisions about the project.

B. DECISION

Based on my evaluation of the information provided by the applicant and my review of the analysis disclosed in the Final EIR/EIS, I have decided to implement the components of the Federal Preferred Alternative that are located on the National Forest System lands under my jurisdiction. This decision approves the use proposed by SDG&E with modifications. Authorization of this project will be implemented by issuing a 50 year special use permit for the construction, operation, and maintenance of project facilities. As required by Forest Service policy, the permit will include the standard periodic revision clause so that the permit will be subject to revision at year 25 to reflect changing times and conditions. The permit will also authorize the short-term use of locations needed to support project construction (temporary work areas) that are outside of the long-term special use permit area. The specific improvements authorized in the MSUP include:

Transmission lines – This decision authorizes the operation and maintenance of the sections of TL625, TL629, TL637, TL682, and TL6923 that cross National Forest System lands under my jurisdiction. The authorized operating voltage is 69 kilovolts (kV).

Distribution lines – This decision authorizes the operation and maintenance of the sections of C67, C73, C78, C79¹, C157, C212, C214, C220, C236, C237, C240, C358, C440, C441, C442, C449, C524, C970, C973, C1166, C1243, and C1458 that cross National Forest System lands under my jurisdiction. The authorized operating voltage of the distribution system is 12 kV.

Access roads – This decision authorizes the operation and maintenance of the access roads included in the Federal Preferred Alternative. These include two categories of roads, as follows:

Regularly maintained roads – these include the segments of roads that SDG&E identified in their application for a MSUP as roads that they maintain so that they can access their facilities. The total length of roads is approximately 26.5 miles as shown in Table 1. The MSUP will also authorize an access trail along a section of C442.

Table 1. Access roads authorized in the MSUP.

Power Line	Miles of access Roads	Miles of access Trails
C157	0.3	
C440	0.5	
C441	1.2	
C442	1.9	0.3
C449	0.5	
C73	0.9	

¹ It should be noted that C79 has several existing segments on the Cleveland National Forest. My decision authorizes the segment of C79 that is currently co-located with TL626 as part of the conversion of TL626 to a 12 kV only power line. As discussed later in the decision, the segment of C79 that serves Cuyamaca Peak is not authorized by this decision.

Power Line	Miles of access Roads	Miles of access Trails
C79	3.4	
TL625	8.6	
TL629	6.5	
TL637	0.5	
TL682	1.2	
TL6923	1.1	
Total	26.5	0.3

Roads identified for removal pending a decommissioning plan – The Federal Preferred Alternative adopted portions of the Partial Removal of Overland Access Roads alternative. My decision requires SDG&E to evaluate those roads and develop a plan for alternative access and road decommissioning. This analysis may be done in conjunction with the construction schedule but must be complete prior to fire hardening the individual segments where roads are identified for decommissioning. These roads will temporarily be authorized in the MSUP pending the required evaluation and decommissioning. The total length of roads to be decommissioned is approximately 5.3 miles as shown in Table 2.

Table 2. Partial Removal of Overland Access Roads.

Power Line	Miles of access roads
C79	1.0
C442	1.4
TL625	2.5
TL629	0.4
Total	5.3

System fire hardening – This decision authorizes the fire hardening activities described in the Federal Preferred Alternative (wood-to-steel pole replacement and reconductoring) for the sections of TL625, TL629, TL682, TL6923, C78, C79 (the section co-located with TL626 that will be converted to 12 kV only to serve local residents along the Boulder Creek Road), C157 (using the Option 2 relocation out of wilderness), C442, and C449 that cross National Forest System lands.

Undergrounding – This decision authorizes the relocation of all sections of C440 (those proposed by SDG&E and those included in the Federal Preferred Alternative) to locations within existing roads, where possible. The decision also authorizes the relocation of the proposed underground sections of C449 to underground locations that cross National Forest System lands.

Double Circuit Additions – This decision authorizes SDG&E to add an additional 69 kV circuit along the Loveland Substation to Barrett Tap segment of TL625 and the Cameron Tap to Crestwood Substation segment of TL629 that cross National Forest System lands.

These improvements are shown on the attached figures.

Temporary Work Areas - This decision authorizes those temporary work areas needed to support work activities associated with fire hardening and undergrounding authorized by the MSUP as described and evaluated in the Final EIR/EIS. The MSUP will be amended to remove those temporary work areas from the permit area after they have been restored to my satisfaction.

Other facilities and Improvements

Glen Cliff substation – This decision authorizes the continued operation and maintenance of the small section of the Glen Cliff substation located on National Forest System lands.

Weather stations and other ancillary improvements – This decision authorizes the installation, operation, and maintenance of weather stations, fire detection equipment, and other ancillary improvements needed to support “smart grid” operation. Surveillance cameras are not authorized.

Scope of the Decision

This decision applies only to National Forest System lands. This decision is conditioned on the terms of the special use permit, implementation of the mitigation measures and monitoring program as identified in the Final EIR/EIS, including the applicant proposed measures, and as further described in this ROD. A summary of the applicant proposed measures and mitigation measures is attached in an appendix to this ROD.

This decision does not authorize the use of pesticides on National Forest System land. Although the Final EIR/EIS evaluated the use of pesticides as part of the project, SDG&E did not propose any use of pesticides on National Forest System lands.

This decision does not apply to SDG&E activities fully authorized by prior easement rights held by SDG&E across acquired National Forest System lands. These easement rights were acquired by SDG&E when the lands were in private ownership, and the easement rights are managed as outstanding third party rights when the lands are added to the National Forest System. Any work proposed by SDG&E that is not fully authorized by prior easement rights will be included in the MSUP. Any powerline replacement or fire hardening activities fully authorized by the prior easement rights are subject to CPUC jurisdiction and SDG&E would be required to implement any project mitigation measures adopted by the CPUC.

Associated Land Management Plan Amendments

The Forest Service cannot issue a special use authorization to SDG&E without ensuring its consistency with the Cleveland National Forest Land Management Plan (LMP). Sections D.2.4 and D.10.3 describe three conflicts with the LMP that would be resolved through a project specific plan amendment, as follows:

1. Amending the plan to permit an exception to the Pacific Crest Trail standard for scenery management (CNF S12) where TL629, TL6923, and C449 intersect with the trail.
2. Amending the plan to permit an exception to standards for scenic integrity (S9 and S10) where C157 crosses an area with a High Scenic Integrity Objective.
3. Amending the plan to allow continued authorization of a distribution line and access road (a developed facility) along C442 in a Back Country Non-motorized (BCNM) land use zone.

This decision amends the LMP to provide these exceptions. These exceptions apply only to the MSUP. These project-specific exceptions to the LMP standards and zoning are limited in scope and are not significant amendments to the plan. Consistent with Forest Service Policy (FSM 1926.51), these amendments do not significantly alter the multiple-use goals and objectives for long-term land and resource management or change the plan standards as they apply to other actions. There are no adjustments to management areas or land use zones, and approval of the MSUP will not preclude other actions.

Relationship to the Federal Preferred Alternative described in the Final EIR/EIS

There are several components of the Federal Preferred Alternative that are outside of my jurisdiction and subject to review and approval by the other state and federal agencies. These include sections of TL 629, TL6931 and TL682 that are within the BIA's jurisdiction, and sections of TL625, TL629, and TL6923 that are within the jurisdiction of the BLM. The CPUC has overall jurisdiction on all aspects of the project, and the CSP has jurisdiction over the proposed relocation of C79 in Cuyamaca Rancho State Park.

The Federal Preferred Alternative also included an option for the removal of TL 626 that would have authorized the conversion of approximately six miles of the transmission line to 12kV from Santa Ysabel substation to the Boulder Creek substation, of which approximately 1.1 miles cross National Forest System lands. This decision does not authorize that conversion, and instead relies on the Boulder Creek substation off-grid solution described in Final EIR/EIS. This conversion is not included in the attached maps. If the off-grid solution is found to be infeasible, an on-grid solution will be considered at that time.

C. SITE RESTORATION FOR IMPROVEMENTS NOT INCLUDED IN THE MSUP

With my decision to authorize a MSUP for the improvements included in the Federal Preferred Alternative, the permits for the improvements that are not included in the new MSUP will terminate according to their terms and conditions. Those improvements not authorized in the new MSUP include:

- TL626 and associated roads that will be replaced by a fire hardened TL6931 or converted to a 12 kV only powerline as part of C79 (Permit DRD 4186-06). The section of TL 626 that serves the Boulder Creek Substation will be replaced by the off-grid solution proposed by SDG&E.
- Sections of C79 and associated access roads that provide service to Cuyamaca Peak that will be replaced by an underground alignment through Cuyamaca Rancho State Park (Permit DRD 4186-12)
- Overhead sections of C440 and associated access roads that will be relocated to underground locations within existing roads (Various Permits, including DRD 4186-24, 4186-52, and 4186-72)
- Overhead sections of C449 that will be relocated to underground locations within existing roads (Permit DRD 4186-35)



Although the specific permit condition may vary depending on the permit, the special use permits generally require, in part, that:

“Upon abandonment, termination, revocation, or cancellation of this permit, the permittee shall remove within a reasonable time all structures or improvements except those owned by the United States, and shall restore the site, unless otherwise agreed upon in writing or this permit.”

As we transition to the MSUP, the existing improvements not authorized by the MSUP will remain in place, subject to their existing permits, during the construction of the replacement facilities. This will ensure that a continued supply of electricity is available to customers served by the existing facilities. I will work with SDG&E to establish a restoration work schedule for the removal of the improvements not authorized in the MSUP that is consistent with the transition of the electrical service to the new improvements. This phased approach will ensure that the permit areas are restored within a reasonable time as required by the existing permits. I expect the transition to the new improvements and restoration of the old improvements to be completed within five years.

D. DECISION RATIONALE

My decision to authorize the MSUP and associated fire hardening and relocation projects is based on my goal of selecting the alternative that continues to provide benefits to the public while having the least overall impact to the environment. The Federal Preferred Alternative, which is also the NEPA environmentally preferable alternative (Final EIR/EIS Section E.6), best meets the Forest Service purpose and need by continuing electric service to a variety of users within and adjacent to the Cleveland National Forest in a manner that is the least in conflict with the LMP. This alternative also reduces the fire risk associated with the existing facilities in a high fire hazard area through fire hardening or undergrounding facilities in the Cleveland National Forest. The other alternatives have a greater overall impact to the environment as described in the Final EIR/EIS Section E.

My conclusions are based on a review of the record for the Final EIR/EIS, which documents a thorough analysis of relevant scientific information, a consideration of responsible opposing views, and acknowledgement of uncertainty and risk. I have also considered the issues raised by the public during the environmental review. Several of those issues are directly related to the Cleveland National Forest and are addressed in the following discussion.

Wildfire – One of the primary project purposes was to reduce the risk of power line related wildfires. This issue was addressed by a combination of project design and mitigation. Project design elements include the use of stronger steel towers and stronger wind resistant conductors, and relocating certain sections of the distribution system to underground ducts. As described in the Final EIR/EIS section D.8, fire hardening reduces the risk of power line related wildfires when compared to the existing system. My decision requires SDG&E to implement a fire prevention and protection plan for both construction and operation and maintenance (MM FF-1 and FF-2) which will further reduce the risk of wildfire related to those activities.

Visual – The scenic integrity of the Cleveland National Forest is an important LMP goal. As described in the Final EIR/EIS Section D.2, the steel poles used for fire hardening authorized in

the MSUP are often taller and larger in diameter than the existing wood poles, and have the potential for a greater visual impact on the landscape when compared to the existing poles. My selection of the Federal Preferred Alternative reduces the visual impact of the project by removing some transmission and distribution lines from service to avoid visually sensitive areas, and includes additional undergrounding in the Laguna Recreation Area. My decision also requires SDG&E to develop a Scenery Conservation Plan (MM VIS-1) so that the impacts of specific poles can be further reduced during the final design of the project.

Even with those actions and mitigation, relocating and fire hardening of C157 to avoid designated wilderness and fire hardening TL629, TL6923, and C449 in the vicinity of the Pacific Crest Trail would not meet the LMP scenic integrity standards, and my decision includes a project specific amendment to address that conflict. Mitigation Measure VIS-2 requires compensation for impacts that are not consistent with the LMP Scenic Integrity Objectives.

Wildlife Habitat – Impacts to wildlife and wildlife habitat are addressed in the Final EIR/EIS in Section D.4. While there will be some new permanent and temporary impacts to habitat, SDG&E has designed the project to minimize those impacts by reducing the size of work areas, and locating them in non-habitat areas when possible. The combined habitat impacts are within the take thresholds established by SDG&E’s Subregional Natural Community Conservation Plan (NCCP). Implementing the Federal Preferred Alternative will also reduce the overall habitat impact of the project by removing TL626 from service, relocating C440 and C449 out of sensitive habitat and into underground ducts located within existing roads, and reducing the overall length of roads needed to access the electrical system. My decision also includes mitigation that will require SDG&E to restore temporary work areas (MM BIO-4), compensate for permanent habitat loss (MM BIO-5), and protect nesting birds (MM BIO-28).

Roads – The impact of SDG&E’s access roads on water quality is addressed in the Final EIR/EIS Section D.9, and roads in general are addressed in D.14. My decision would remove approximately 19 miles of access road from National Forest System land through a combination of relocating lines to existing roads and removing some lines and their associated access roads from service. I am also requiring SDG&E to develop a plan to develop alternate access and remove approximately 5.3 miles of road as part of the MSUP (MM-HYD-3). The sections of the remaining 26.5 miles of road that are included in the MSUP that are over 15% road gradient will be evaluated and a plan developed to stabilize those roads (MM HYD-4). Implementation of the MSUP will reduce the overall water quality impacts associated with the existing access road system.

Land use – The relationship of the project with land use plans is addressed in the Final EIR/EIS Section D.10. Although my decision to adopt the Federal Preferred Alternative does not avoid all conflicts with the LMP, it does avoid conflicts with designated wilderness by relocating C157 into the corridor between the Pine Creek and Hauser Wilderness and avoids an area of Recommended Wilderness in Cedar Creek by removing TL626 from service. Selecting Option 2 for the C157 relocation also accommodates the City of San Diego’s plan for city owned property around Barrett Reservoir. The Federal Preferred Alternative does not conflict with other state or local plans.

Growth inducing effects – Growth inducing effects are addressed in the Final EIR/EIS in Section G.1. While implementation of any of the alternatives is not expected to increase growth related to employment, the analysis acknowledges that certain aspects of fire hardening, particularly the use of the stronger conductors, will increase the capacity of the transmission lines to carry power (measured by amperage). Although the fire hardening would increase capacity to move electricity, thereby removing a possible obstacle to growth of new local renewable generation projects, none of the modifications proposed as part of the Federal Preferred Alternative would allow interconnections of a new local renewable generation project.

Required Mitigation – SDG&E, as the applicant, proposed numerous measures to protect resources as described in the Final EIR/EIS Section B.7.1. The Forest Service and CPUC, as lead agencies, identified additional measures throughout the Final EIR/EIS Section D. Both the applicant proposed measures and the agency required mitigation measures will be included in the MSUP as permit requirements, and implemented as part of the Mitigation, Monitoring, Compliance, and Reporting Program described in the Final EIR/EIS Section H.

Transfer of impacts - I am sensitive to the concern that some of the options selected in the Federal Preferred Alternative transfer impacts to other areas. Removing TL626 from service and replacing it with a fire hardened TL6931 was of particular concern in the Boulevard area. Based on the comparison of alternatives in the Final EIR/EIS Section E, I have concluded that removing 18 miles of transmission line from service, and replacing it by fire hardening an existing 6 mile transmission line has less overall impact on the environment, and that the impacts associated with fire hardening TL6931 can be effectively mitigated.

Summary - Taken as a whole, the transmission lines and distribution circuits included in the Federal Preferred Alternative will continue to provide benefits to the public by providing electrical service to remote residences and critical infrastructure, and will continue to provide the backbone transmission system for the eastern half of San Diego County. The system will continue to provide those services in a manner that reduces the risk of power line related wildfire, and reduce the impact of the improvements on the environment by reducing the project footprint, particularly as it relates to access roads. I have concluded occupancy of National Forest System lands is appropriate and the project is in the public interest.

E. PURPOSE AND NEED

The Forest Service purpose is to authorize the power lines and associated facilities needed to continue electric service to a variety of users within and adjacent to the Cleveland National Forest through an MSUP in a manner that is consistent with the LMP. This action is needed because the 70 individual permits or easements for the existing facilities have expired, and a permit is required for the continued occupancy and use of National Forest System lands. Further, the purpose of this action is to reduce fire risk associated with the existing facilities in a high fire hazard area through fire hardening of facilities in the Cleveland National Forest. This action is needed for resource protection as well as public safety.

F. OTHER REQUIRED PERMITS AND APPROVALS

My decision is only one part of the regulatory approvals needed by SDG&E for this project to go forward. In addition to obtaining a permit to occupy and use National Forest System lands, SDG&E must obtain other agency approvals as described in section A.6.5 of the Final EIR/EIS.

Activities that require certification from the State Water Resources Control Board under Section 401 of the Clean Water Act (Title 33 United States Code (USC) § 1341) cannot be authorized under a Forest Service permit until such a certificate is granted or waived. Other applicable approvals and permits described in the Final EIR/EIS must also be secured by SDG&E prior to the Forest Service approving any ground disturbing activities.

G. PUBLIC INVOLVEMENT

A notice of intent to prepare an EIS was published in the Federal Register on September 23, 2013 (78 FR 58270), and the scoping comment period was open for 45 days. In addition, the proposed action was listed in the Cleveland National Forest Schedule of Proposed Actions and updated periodically during the environmental analysis. People were invited to review and comment through direct distribution of a joint Forest Service and CPUC Notice of Preparation and by legal notices published in local papers. A supplemental scoping period was offered starting on January 17, 2014 and ending on March 7, 2014. Public meetings were held in Alpine and Julian during the first scoping period, and in Alpine during the supplemental scoping period. All project information was maintained on the project webpage (<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>) hosted by the CPUC.

Issues were identified from scoping comments and were summarized in the Scoping Report dated January 16, 2014, and were updated in March 2014 after the supplemental scoping period. The issues significant to the proposed action are summarized Table A-1 of the Final EIR/EIS.

The Draft EIR/EIS was published for review and comment on September 5, 2014 when the Environmental Protection Agency published the Notice of Availability in the Federal Register (79 FR 53061). Notices were distributed to the project mail list, and copies of the Draft EIR/EIS were available on the web, at local libraries, and provided to those who requested copies. Notice of the opportunity to comment was published in the San Diego Union-Tribune on September 5, 2014. A public meeting was held in Alpine on October 1, 2014. The 60 day comment period closed on November 4, 2014.

The Forest Service and CPUC received comment on the Draft EIR/EIS from two federal agencies, seven state and local agencies, two Native American tribes, eight community groups, the applicant, and fifteen individuals. The comments and responses are presented in the Final EIR/EIS Volume 2. Summaries of the public participation process are discussed in the Final EIR/EIS Section I.

H. ALTERNATIVES CONSIDERED IN DETAIL

In addition to the selected alternative, I considered six other alternatives in detail as described below. A comparison of the alternatives considered in detail can be found in the Final EIR/EIS Section E.

SDG&E's Proposed Project – SDG&E's proposed project would include issuance of a MSUP for the SDG&E system, including 102 miles of electric lines within the SDG&E system totaling approximately 146 miles both on and off the Cleveland National Forest. I did not select this alternative because the proposal to fire harden C157 within the Hauser Wilderness area would not be consistent with the Wilderness Act, and the proposal to fire harden TL626 would conflict with the LMP water quality standards and Recommended Wilderness land use zone.

Federal Proposed Action – The Federal Proposed Action modifies certain actions proposed by SDG&E on National Forest System lands and the La Jolla Indian Reservation. Under this alternative TL626 would be relocated to the east of the Cedar Creek canyon, and relocated to the east of the Inaja Fire Memorial Overlook. This alternative also requires additional undergrounding for C440 within the Laguna Recreation Area, and also requires a short section of undergrounding for TL682 within the La Jolla Indian Reservation. I did not select this alternative because the relocation of TL626 east of Cedar Creek canyon would create greater impacts, particularly on private land, when compared to other options evaluated for TL626.

No Action Alternative – No MSUP Issued – Under this required alternative the Forest Service would not issue a MSUP and the existing permits would terminate according to their terms. SDG&E would be required to remove all the improvements according to the permit terms. I did not select this alternative because it would not meet the purpose and need of continuing to supply power to a variety of users within and adjacent to the Cleveland National Forest.

No Project Alternative – Under this alternative, which is required under CEQA, the existing alignments within the Cleveland National Forest would be maintained as they are currently, under their approximately 70 separate permits and easements. In addition, none of SDG&E's proposed power line replacement projects including proposed fire hardening activities would be authorized. This alternative also does not meet the purpose and need because it does not authorize the uses in a manner consistent with the LMP, and does not reduce the fire risk.

Partial Removal of Overland Access Roads – This alternative, which is based on the Proposed Project, would remove up to 10.5 miles of regularly maintained access roads that are in general greater than 25% grade and in close proximity to creeks, particularly along TL626 (Boulder Creek) and TL625 (Barber Mountain/Carveacre). I did not select this alternative because it included the same project components of the Proposed Project that caused the conflict with the LMP.

Removal of TL 626 from Service – Under this alternative, TL 626 would be removed from service and replaced by one of two options described in the Final EIR/EIS Section C.4.2. The remaining system components would be treated the same as the Proposed Project. Even though this alternative had a better option for TL626, I did not select this alternative because of LMP conflicts with other project components such as C157.

The Federal Preferred Alternative – As described in the Final EIR/EIS Section E.6, the federal preferred alternative is a composite of three alternatives. The Federal Proposed Action is the basis of the preferred alternative; however the TL626 relocation option has been replaced by the TL626 Removal From Service Alternative Option 1 (the upgrade to TL6931), combined with the off-grid solution for the Boulder Creek substation. The Federal Preferred Alternative also analyzed the conversion of TL626 to 12 kV to continue service to the Boulder Creek substation

if the off-grid solution was not feasible. As discussed earlier in the ROD, my decision does not authorize this conversion. The Federal Preferred Alternative would also convert a 6.8 mile section of TL626 that is co-located with C79 to a 12kV fire hardened line to serve local residences along Boulder Creek Road. The Federal Preferred Alternative adopts Option 2 for the C157 relocation out of the Hauser Wilderness. The Federal Preferred Alternative also incorporates the portions of the Partial Removal of Overland Access Roads applicable to TL626/C79, TL625, C442, and TL629. This alternative as modified and adopted in this ROD best meets the purpose and need for the reasons described in my decision rationale.

I. ALTERNATIVES ELIMINATED FROM DETAILED STUDY

In addition to the alternatives considered in detail, I also considered fifteen additional alternatives but eliminated them from detailed study as described in the Final EIR/EIS Section C.5. As described in Section C.5, alternatives that were not carried forward for full analysis did not meet project objectives, feasibility or environmental effectiveness criteria.

J. ENVIRONMENTALLY PREFERRED ALTERNATIVE

As described in the Final EIR/EIS Section E.7, the environmentally preferred alternative is the Federal Preferred Alternative as described above. This alternative would improve scenic quality where powerlines are removed or placed underground, reduce impacts to vegetation and associated habitat, reduce fire risk associated with overhead powerlines, reduce watershed and water quality impacts, and better meet the resource goals identified in local, federal, and tribal plans by reducing the total miles of overhead powerline, placing powerlines underground, relocating a powerline from wilderness, and removing excessively steep roads from sensitive watersheds.

K. TRIBAL CONSULTATION

During the early planning stages of this analysis (March 2013), the Forest Service conducted informal consultation with the Inaja-Cosmit Band of Indians and the Bureau of Indian Affairs (BIA) to discuss TL626 relocation options that have the potential to have direct effects on reservation lands. The Forest Service also invited the four tribal governments with reservation lands that would potentially be directly affected by SDG&E's proposed project (Viejas, Barona, Campo, and Inaja) and the BIA to become cooperating agencies in April 2013.

The BIA, on behalf of the Forest Service, consulted with tribal leaders for the La Jolla Band of Luiseño Indians in the design of the Federal Proposed Action for TL682. The Forest Service, in conjunction with the BIA, also conducted informal consultation with tribal leaders for the Campo Kumeyaay Nation in May and October 2014 to discuss SDG&E's proposal to upgrade TL6931 in order to replace TL626.

When the Draft EIR/EIS was published, all Tribes, including federally recognized and unrecognized Tribes, were invited by the Forest Service, on behalf of the cooperating federal agencies, to initiate formal consultation on the proposed project. The intent was to engage in meaningful consultation with tribes regarding concerns or comments they may have about the proposed project, and taking those into consideration in the decision-making process. Tribes

were also provided with a copy of the draft Programmatic Agreement and an outline of the proposed Historic Properties Management Plan (HPMP), and invited to comment and/or engage in consultation on those documents.

In conjunction with the government-to-government consultation process, federally recognized tribes in the project area have been, and will continue to be, included in all project notifications, as appropriate.

L. FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

L.1 National Forest Management Act

The National Forest Management Act (NFMA) requires projects and permits to be consistent with the LMP (16 USC § 1604(i)). If a proposed site specific decision is not consistent with the applicable plan, I may modify the proposed decision to make it consistent with the plan, reject the proposal; or amend the plan to authorize the action.

Consistency with the LMP is discussed in the Final EIR/EIS Section D.10. That section discusses the LMP and describes the three interrelated documents that provide direction and policies for the Cleveland National Forest, while evaluating the proposed project and the alternatives consistency with the plan components. Final EIR/EIS Chapter D.10.9 describes the LMP amendment process that would be implemented as part of MM LU-2.

As described in Final EIR/EIS Section D.10.2.1, the LMP consists of three interrelated documents. Part 1 is the vision for the forest expressed through goals and desired conditions. Not every goal and desired condition is implemented by or applicable to every site-specific project. As described in the LMP, desired conditions are not commitments and may only be achievable over the long term. (LMP Part 1, page 2). Goal 4.1 is applicable to the proposed project and provides that energy development should be managed to facilitate energy production while protecting ecosystem health. This goal is implemented through the strategic direction provided in Part 2 of the LMP, which consists of program strategies (Appendix B) and suitable uses consistent with the achievement of the desired conditions in Part 1 (LMP Part 2, page 2). Part 2 establishes suitable uses through land use zones. Part 3 contains LMP standards, which are mandatory requirements that apply to site-specific projects. The following discussion will summarize the key plan components that I considered in my decision.

LMP Part 1, Goals and Desired Conditions

As described in Final EIR/EIS Section D.10, the desired condition associated with Goal 7.1 is to minimize the area encumbered by special use authorizations, and authorize those uses that provide public benefit and conform to resource management and protection objectives. My decision meets the intent of that goal by selecting the alternative that continues to provide benefits to the public with the least overall impact to the environment.

Under Goal 6.2, the LMP identifies twelve MIS for habitat types and issues shown in the table in LMP Part 1, page 46. Although habitat and species diversity is managed at the forest level, the analysis presented in Final EIR/EIS Section D.4.1.7 describes the MIS species considered in the analysis, and the analysis for Impact BIO-6 in Sections D.4.3 through D.4.6 presents the effects.

Based on the analysis, implementation of the Federal Preferred Alternative will not alter or contribute to existing forest-wide habitat trends for management indicator species.

LMP Part 2, Land Use Zones

Land use zones (CFR 219.11(c)) were used to map the Cleveland NF for the purpose of identifying appropriate management types of ‘uses’ that are consistent with the achievement of the desired conditions described in Part 1 of the LMP. These land use zones are used to demonstrate management’s intent and to indicate the anticipated level of public land use in any area of the national forest. The activities that are allowed in each zone are expected to result in progress along the pathway toward the realization of the desired conditions.

The types of suitable uses for commodities and commercial uses are outlined in LMP Part 2, Table 2.2.3. Portions of SDG&E’s proposed project with associated access roads are considered Developed Facilities, while portions lacking roads are considered Non-recreational Special Uses: Low Intensity Land Use. Low intensity uses are suitable in designated areas for Developed Area Interface (DAI), Back Country (BC), and Back Country Motorized Use Restricted (BCMUR) zones, and allowed by exception for Back Country Non-Motorized (BCNM), Critical Biological (CB), and Wilderness (W). Developed facilities are suitable in designated areas for Developed Area Interface (DAI), Back Country (BC), and Back Country Motorized Use Restricted (BCMUR) zones, and not suitable for Back Country Non-Motorized (BCNM), Critical Biological (CB), and Wilderness (W) (LMP, Part 2, page 4).

Sections of C442 with access roads cross through areas of BCNM land use zone, and approving this continued occupancy of the line with motorized access requires a plan amendment. My decision includes that project specific amendment.

LMP Part 2 and 3, LMP Standards

The LMP adopts standards that apply to projects proposed on the forest. Part 2 identifies standards that are specific to the Cleveland National Forest and Part 3 identifies standards that apply to all four southern California national forests. Based on the Final EIR/EIS discussion in Chapters D.2 and D.10, authorizing construction, operation, and maintenance of the power line replacement projects in a MSUP, including mitigation, would require a LMP amendment. My decision incorporates an amendment to the LMP to address the following plan requirements:

Pacific Crest Trail Standards (LMP Part 2, page 68)

The plan standards require:

CNF S12 - Pacific Crest National Scenic Trail - Protect scenic values in accordance with adopted scenic integrity objectives. Protect foreground views from the footpath as well as designated viewpoints. Where practicable avoid establishing unconflicting land uses within the viewshed of the trail (Morena, Laguna, Aguanga Places).

Aesthetic Management Standards (LMP Part 3, page 6)

The plan standards require:

S9: Design management activities to meet the Scenic Integrity Objectives (SIOs) shown on the Scenic Integrity Objectives Map.

S10: Scenic Integrity Objectives will be met with the following exceptions:

- Minor adjustments not to exceed a drop of one SIO level is allowable with the Forest Supervisor's approval.*
- Temporary drops of more than one SIO level may be made during and immediately following project implementation providing they do not exceed three years in duration.*

The SIO's along the route selected for C157 and along the Pacific Crest Trail are mapped as High. Even with implementation of mitigation measure MM VIS-1, the Final EIR/EIS concludes that the project will not meet these requirements (Final EIR/EIS sections D.2.4.2). My decision includes exceptions to these requirements.

As described in Sections D.2 and D.10, the other improvements included in the Federal Preferred Alternative are consistent with LMP direction.

L.2 Endangered Species Act

Under Section 7 of the Endangered Species Act, a federal agency that authorizes, funds, or carries out a project that “may affect” a listed species or its critical habitat must consult with U.S. Fish and Wildlife Service (FWS). The federal agencies are relying on implementation of SDG&E's Subregional Natural Community Conservation Plan (NCCP), and SDG&E low effect Habitat Conservation Plan (HCP) for Quino checkerspot butterfly to meet consultation requirements. The Forest Service also consulted with the FWS with regards to Laguna Mountain skippers, and asked for concurrence with a “may affect, not likely to adversely affect” finding.

Consultation was concluded with the FWS concurrence letter and Biological Opinion issued November 17, 2015. The concurrence letter included general conservation measures and conservation measures for southwestern willow flycatcher, least Bell's vireo, and arroyo toad. The opinion included incidental take of Stephens' kangaroo rat subject to implementation of the listed reasonable and prudent measures and terms and conditions. Consistent with this consultation, I am incorporating the applicable requirements from the NCCP, HCP, concurrence letter and Biological Opinion in this decision and will include those requirements in the MSUP.

L.3 Clean Water Act

The Federal Preferred Alternative is expected to meet the requirements of the Clean Water Act (CWA). The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Point source discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process, outlined in CWA Section 402. NPDES permitting authority is delegated to, and administered by, California's nine Regional Water Quality Control Boards. California's State Water Resources Control Board regulates the NPDES storm water program. In addition, Section 404 of the CWA authorizes the U.S. Army Corps of Engineers (ACOE) to regulate the discharge of dredged or fill materials into navigable waters of the U.S., including certain wetlands and other waters of the United States. The ACOE issues individual site-specific or general (nationwide) permits for such discharges.

As discussed in the Final EIR/EIS section D.9.3 to 9.6, potential impacts to water quality will be mitigated by adoption of mitigation measures that require an Erosion Control Plan (MM HYD-1), an Access Road Decommissioning Plan (MM HYD-3), and an Access Road Evaluation and Repair Design Report (MM HYD-4). Implementation of these and other measures, along with reducing the total length of access roads, will reduce the overall impact of the construction, operation, and maintenance of the improvements authorized by the MSUP, particularly when compared to the existing condition.

Depending on the final designs, SDG&E may need to obtain approvals from the ACOE and the State or Regional Water Resources Control Board under the CWA, including certification (or a waiver) under Section 401 from the State that the proposed discharge complies with water quality standards. As discussed earlier in the ROD, activities subject to the CWA certification requirement will not be authorized until SDG&E obtains certification under the CWA or such certification is waived. I will amend project conditions, if necessary, to respond to any certification issued by the State or Regional Water Resources Control Board.

L.4 Clean Air Act

Implementation of the MSUP is expected to meet the requirements of the Clean Air Act. Section 176(c) of the Clean Air Act prohibits federal agencies from, among other things, issuing licenses or permits or approving any activity which does not conform to an approved State Implementation Plan. As described in Final EIR/EIS section D.3.1.1, the San Diego Air Basin is designated as non-attainment for ozone. Federal conformity regulations presume conformity with state plans where project emissions are below applicable thresholds (the “de minimis thresholds”) and where no “regionally significant” emissions would occur. The applicable de minimis thresholds are 100 tons per year for VOCs (O₃ precursor), NO_x (O₃ precursor), and CO. A regionally significant action would occur only where the direct and indirect emission of any pollutant represents 10 percent or more of a non-attainment area’s emissions inventory for that pollutant.

Additionally, where, as here, the Federal action is a permit, license, or other approval for some aspect of a nonfederal undertaking, the relevant activity for conformity purposes is the part, portion, or phase of the nonfederal undertaking that requires the Federal permit, license, or approval. The Forest Service does not have any practical control over emissions resulting from activities on non-National Forest System lands. As a result, this conformity evaluation is limited to direct and indirect emissions associated with construction activity on National Forest System lands.

As discussed in the Final EIR/EIS section D.3.3, the construction, operation, and maintenance of the improvements authorized by the MSUP would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Emissions would not exceed the federal de minimis thresholds for VOC, NO_x, and CO emissions. Therefore, the project would be considered to be in compliance with the general conformity requirements and would not conflict with local air quality attainment or maintenance plans to achieve or maintain federal ambient air quality standards.

SDG&E has proposed APMs AIR-01 through AIR-05, which would include construction dust and emission controls, which would be implemented as part of the MSUP to reduce impacts related to air quality (see Section B.7 of the Final EIR/EIS). I am adopting the air quality applicant proposed measures as a condition of this decision.

L.5 National Historic Preservation Act

The process for identifying, evaluating, and avoiding the potential for effects to historic properties (cultural resources listed or eligible for listing on the National Register of Historic Places) is defined in Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Section 106 requires federal agencies to identify and avoid or mitigate potential effects to historic properties within the Area of Potential Effects (APE) of undertakings on federal land.

As described in the Final EIR/EIS Section D.5.2.1, compliance with Section 106 of the NHPA will be accomplished through the development and implementation of a project specific Programmatic Agreement (pursuant to 36 CFR 800.14(b)) between the California State Historic Preservation Officer (CASHPO), the Cleveland National Forest, the CPUC and SDG&E. The Programmatic Agreement was executed by the Forest Service on February 10th, 2016, and the CASHPO on February 11th, 2016. The BLM, the BIA, and Native American Tribes were invited to sign the Programmatic Agreement as concurring parties.

Mitigation Measure CUL-1 in the Final EIR/EIS outlines the comprehensive approach to the protection and preservation of historic properties that is contained in the Programmatic Agreement, which also requires the preparation and implementation of a Historic Properties Management Plan (HPMP) and Historic Properties Treatment Plan (HPTP) for the undertaking. The requirements of the project specific Programmatic Agreement will be incorporated into the MSUP and will apply to the proposed fire hardening, undergrounding, and relocation of improvements within the Cleveland National Forest during the construction phase.

An Operation and Maintenance plan incorporating the requirements of the Forest Service Regional Programmatic Agreement of 2013 will be prepared and implemented to avoid potential effects to historic properties associated with operation and maintenance activities conducted by SDG&E within the boundary of the MSUP for the duration of the permit.

L.6 Federal Land Policy and Management Act

Special use permits for transmission lines on National Forest System lands are authorized under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA). FLPMA requires, in part, that right-of-way authorizations contain conditions to minimize damage to scenic and aesthetic values, fish and wildlife habitat and otherwise protect the environment. Adopting the applicant proposed measures and the agency required mitigation measures described in the Final EIR/EIS ensures that the project is in compliance with this requirement. FLPMA also requires location of the right-of-way along a route that will cause least damage to the environment, taking into consideration feasibility and other relevant factors. The Federal Preferred Alternative, which relocates power lines away from sensitive areas and reduces the



impact of access roads, best meets the Forest Service purpose and need while minimizing the impact to the environment. My decision to authorize the MSUP and power line replacement projects on National Forest System lands is consistent with the requirements of FLPMA.

L.7 Forest Service Regulations and Policy

Inventoried Roadless Areas (IRAs)

The 2001 Roadless Rule (36 CFR Part 294) establishes prohibitions on road construction, road reconstruction, and timber harvesting within inventoried roadless areas on National Forest System lands unless those activities fall within one of the circumstances identified in the rule. As described in the Final EIR/EIS Sections D.2, D.10, and D.13, sections of C79 that currently share the same poles as TL626 cross through the Sill Hill and No Name IRAs. The Federal Preferred Alternative would authorize C79 as a 12 kV line only through these areas, using the existing roads. The existing access road that crosses Boulder Creek in the Sill Hill IRA was included in the Partial Removal of Overland Access Roads alternative, and would not be authorized as part of the Federal Preferred Alternative. This would reduce the impacts on riparian areas, water quality, and avoid a conflict with the BCNM land use zone. My decision to authorize the fire hardening of C79 in its current location, including the use of some of the existing access roads is consistent with the 2001 Roadless Rule.

Special Uses

Forest Service special use regulations are found at 36 CFR Part 251 Subpart B, § 251.54.g.4 states:

“Based on evaluation of the information provided by the applicant and other relevant information such as environmental findings, the authorized officer shall decide whether to approve the proposed use, approve the proposed use with modifications, or deny the proposed use.”

My decision to approve SDG&E’s proposed use with modifications is consistent with that direction.

The Forest Service Manual (FSM) and Handbooks provide policy direction for implementing the laws and regulations guiding special uses management on the National Forests. Special Use Management policy is found in the 2700, 2710, and 2720 sections of the manual. As described in the Final EIR/EIS Section D.10.2.1, Region 5 Supplement to FSM 2700 (R5 No. 2700-2011-1) contains direction for power lines on National Forests in the Pacific Southwest Region in order to eliminate or mitigate long-term conflicts between power lines and the management of National Forest lands and resources and to eliminate identified fire and safety hazards. The following direction is provided in Chapter 2720 for power lines up to and including 35 kV and power lines over 35 kV:

“Power Lines Up To and Including 35 kV. Place all new power line installations underground, except where the environmental analysis indicates that aerial construction provides better protection for National Forest resource and environmental values. The authorizing officer shall require undergrounding of existing aerial power line

installations, especially when the holder proposes those lines for upgrading, replacement, or reconstruction, except where the environmental analysis clearly indicates that aerial construction provides better protection for National Forest resource and environmental values.

Powerlines Over 35 KV. Forest Service officers may authorize aerial construction, except for those areas where the environmental analysis clearly indicates unacceptable affects on National Forest resource and environmental values. While it is technically feasible to underground electric powerlines over 35 KV, construction costs and operational problems increase substantially. Consider undergrounding only after a thorough assessment of the situation by the authorizing officer.”

My decision requires additional undergrounding of C440 along with the undergrounding of C440 and C449 already included in SDG&E’s Proposed Project. While there may be some short term impacts associated with placing additional sections of C440 underground, the long term benefits of reduced habitat disturbance, reduced vegetation management needs, improved scenic integrity, and eliminating the risk of power line related wildfires provide better protection for National Forest resources.

Several of the alternatives considered but eliminated from detailed consideration proposed more extensive undergrounding, including undergrounding 146 miles of existing 69 kV transmission lines and 12 kV distribution lines, or undergrounding 45 miles of 69 kV transmission lines along roadways. While these alternatives would meet the project purpose and need, they were not feasible due to construction limitations associated with steep terrain and roadway encroachment limitations for roads managed by other jurisdictions. Undergrounding in steep terrain also has greater environmental impact, offering less protection for National Forest resources.

The Federal Preferred Alternative adopts additional undergrounding in an area with moderate terrain and suitable access roads under Forest Service jurisdiction. Additionally, no new power lines are included, and so my decision to adopt the additional undergrounding only for C440 is consistent with this policy.

Sensitive Species

Forest Service policy (FSM 2670.32) requires a review of all Forest Service permitted activities for possible effects on endangered, threatened, proposed, or sensitive species. The analysis presented in Final EIR/EIS Section D.4.1.7 describes the Sensitive Species considered in the analysis, and the analysis for Impact BIO-6 in Sections D.4.3 through D.4.6 presents the effects. Appendices BIO-1 through 6 provide a detailed review of special status species, including sensitive species, with habitat in the project area. For this project SDG&E will be following the requirements of their NCCP. The NCCP provides for the conservation and preservation of most sensitive species. The NCCP and other measures will be incorporated into the Operating Plan as enforceable conditions of the permit, and actions identified in the NCCP will be extended to species on the Regional Forester’s Sensitive Species list. Based on the analysis in the Final EIR/EIS, implementing the Federal Preferred Alternative on National Forest System lands will not result in loss of species viability or create significant trends toward federal listing for any Regional Foresters’ list plant or animal species.

L.8 Environmental Justice

Executive Order 12898 requires an assessment of whether implementation of the proposed action would disproportionately affect minority or low-income populations. As described in the Final EIR/EIS Section G.5, the project (or alternatives) would not create disproportionately high or adverse effects on minority or low-income populations as the construction footprint is minimal and the work will replace existing improvements. Operations and maintenance activities would remain essentially the same as they currently are conducted.

M. OBJECTION PROCESS

The proposed decision by the Forest Service to authorize SDG&E facilities on National Forest System lands was subject to the Forest Service predecisional administrative review (referred to as “objection”) process pursuant to 36 CFR 218, Subparts A and B. Legal notice of the 45 day objection period was published in the San Diego Union Tribune on Friday July 10, 2015. The objection period closed on August 24, 2015.

M.1 Objections Filed

Objections were filed by the following entities and individuals: SDG&E, Gerald Fisher, the Cleveland National Forest Foundation, Backcountry Against Dumps, Nathan Weflen, Cindy Buxton, and the Sierra Club. The objectors asked that the decision be changed in the following ways:

SDG&E – asked that the MSUP not be delayed pending the 401 Certificate, and that the wording for two required mitigation measures be clarified.

Fisher – asked that additional undergrounding of facilities be required, particularly as it relates to TL 682.

Cleveland National Forest Foundation – asked that additional alternatives that utilize microgrid technology or other alternatives that do not increase transmission capacity be considered and adopted.

Backcountry Against Dumps – asked that the full undergrounding alternative be considered along with alternatives that do not increase the system capacity.

Weflen – asked that C79 be constructed underground along the Boulder Creek road.

Buxton – asked that all distribution lines be constructed underground, that C79 specifically be reconstructed underground along the Boulder Creek Road, that TL 682 be replaced with an underground alternative, that the permit term be reduced to 30 years, and that the conversion of TL 626 between Santa Ysabel and the Boulder Creek substation be removed from the document.

Sierra Club – referenced the Buxton objection and requested the same changes as described above.

M.2 Response to the Objections

Deputy Regional Forester Jennifer Eberlien, acting as the Reviewing Officer, convened a resolution meeting with the objectors on October 9, 2015. Each objector was given an opportunity to discuss their issues directly with the Reviewing Officer. The Reviewing Officer issued a response to the objections on November 9, 2015. The Reviewing Officer evaluated 21 objection points and concluded the “Forest Supervisor’s rationale for this project is clear and the reasons for the project are logical and responsive to direction contained in the CNF LRMP. As described above, I made a reasonable and appropriate effort to resolve the concerns that were brought forward while maintaining a balanced approach to managing the lands and meeting the purpose of the project.”

M.3 Instructions to the Responsible Official

The Reviewing Officer identified five instructions that I must address before issuing a Final ROD. The instructions and my response are discussed below.

Instruction 1 - Objection Point 1. The Responsible Official should clarify that state CWA certification is not necessary prior to permit issuance authorizing activities where a 401 certification is not required, but is necessary prior to permitting new activities which require a 401 certification.

Response – The text of the Final ROD sections F and L.3 has been edited to clarify that activities requiring a 401 certificate can’t be authorized until a certificate is granted. The decision would allow a permit to be issued for those activities that do not require 401 certification.

Instruction 2 – Objection Point 2. The Responsible Official should clarify SDG&E’s responsibility in Mitigation Measure PSU-1 to reflect SDG&E’s jurisdictional concerns (if the FS requires AT&T to co-locate with SDG&E, then SDG&E needs to work with AT&T.)

Response – I have reviewed the text of Mitigation Measure PSU-1 and have consulted with CPUC staff regarding the implementation of this measure. This measure was designed to mitigate a potentially significant impact and applies to SDG&E activities both on and off the Cleveland National Forest. As noted in the objection review, this measure can only be applied through the special use permit if the Forest Service requires AT&T to co-locate their facilities. SDG&E does not have the authority to require AT&T to take this action. I’ve directed my staff to clarify the jurisdictional concerns as part of the Mitigation, Monitoring, Compliance, and Reporting Program developed jointly between the Forest Service and the CPUC during project implementation.

Instruction 3 – Objection Point 3. The Final ROD should more clearly define the gate protocol requirements that will apply during construction, operation and maintenance to SDG&E for the life of the MSUP, and should specify which roads are subject to those requirements. Specific consequences of SDG&E not following these protocols should be addressed via clause IV.F of the special use permit; therefore, I instruct the Responsible Official to remove them from Mitigation measure REC-2.

Response – This mitigation measure applies to National Forest System lands and is intended to protect those lands from unauthorized access. I have modified the text of the measure in the appendix to this ROD to address this instruction. The measure will apply only to those roads included in the MSUP. The consequences for non-compliance have been removed from the measure and will be covered by the standard permit conditions.

Instruction 4 – Objection Point 20. Clarify in the Final ROD:

- a. Why changes to the Preferred Federal Alternative were incorporated into the FEIR/EIS.
- b. That the selected alternative differs from the Federal Preferred Alternative as described in the ROD language and map. To clarify, this decision only selects the off-grid solution and not the back-up option to convert the northern end of TL 626 to 12 kV should the off-grid solution not be implemented.

Response – The FEIR/EIS included a map (Figure ES-3) that displayed the conversion of TL 626 to 12 kV between the Santa Ysabel and Boulder Creek substations. The map was designed to display the Environmentally Superior Alternative under CEQA and the Federal Preferred Alternative under NEPA. The section of line raised in the objection was an option considered in the Federal Preferred Alternative, but not an option that was selected in the Final ROD. I have expanded the discussion in sections B and H of this Final ROD to clarify that my decision does not include the conversion of TL 626 north of the Boulder Creek substation that was included in the Final EIR/EIS. Section B contains a new paragraph that explains the relationship between my decision and the Federal Preferred Alternative and that an on-grid solution will be considered at a later time if the off-grid solution is found to be infeasible. Section H expands the discussion of the Federal Preferred Alternative to explain how the conversion of this northern section of TL 626 was an option that was considered but not selected in this decision.

Instruction 5 – Objection Point 21. The Responsible Official should specify in the MSUP the intervals/years this permit will be subject to revision as per 2709.11 Chapter 50, E8.

Response – Section B of this Final ROD has been modified to include this requirement. The MSUP will be subject to revision at year 25.

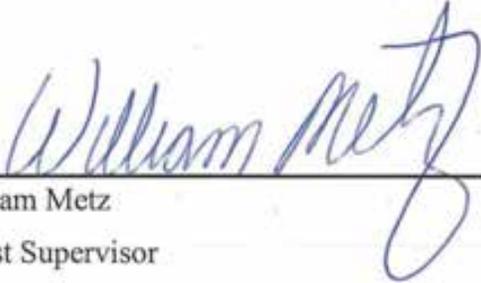
In addition to my response to the instructions, I am directing my staff to evaluate the possibility of additional undergrounding of C79 in the Sill Hill area when SDG&E begins the design stage for the TL626 conversion. The concept of undergrounding shorter sections of C79 (described as a hybrid alternative) was identified during the objection resolution meeting. While this concept was suggested too late in the process to be fully evaluated, I have the discretion to consider this concept as we move forward, and have chosen to evaluate that concept as we implement the conversion of TL626.

N. IMPLEMENTATION

This decision may be implemented on the date of my signature.

O. CONTACT

For additional information concerning this decision, contact Jeff Heys, Forest Planner, Cleveland National Forest, at 858-674-2959, or jaheys@fs.fed.us.



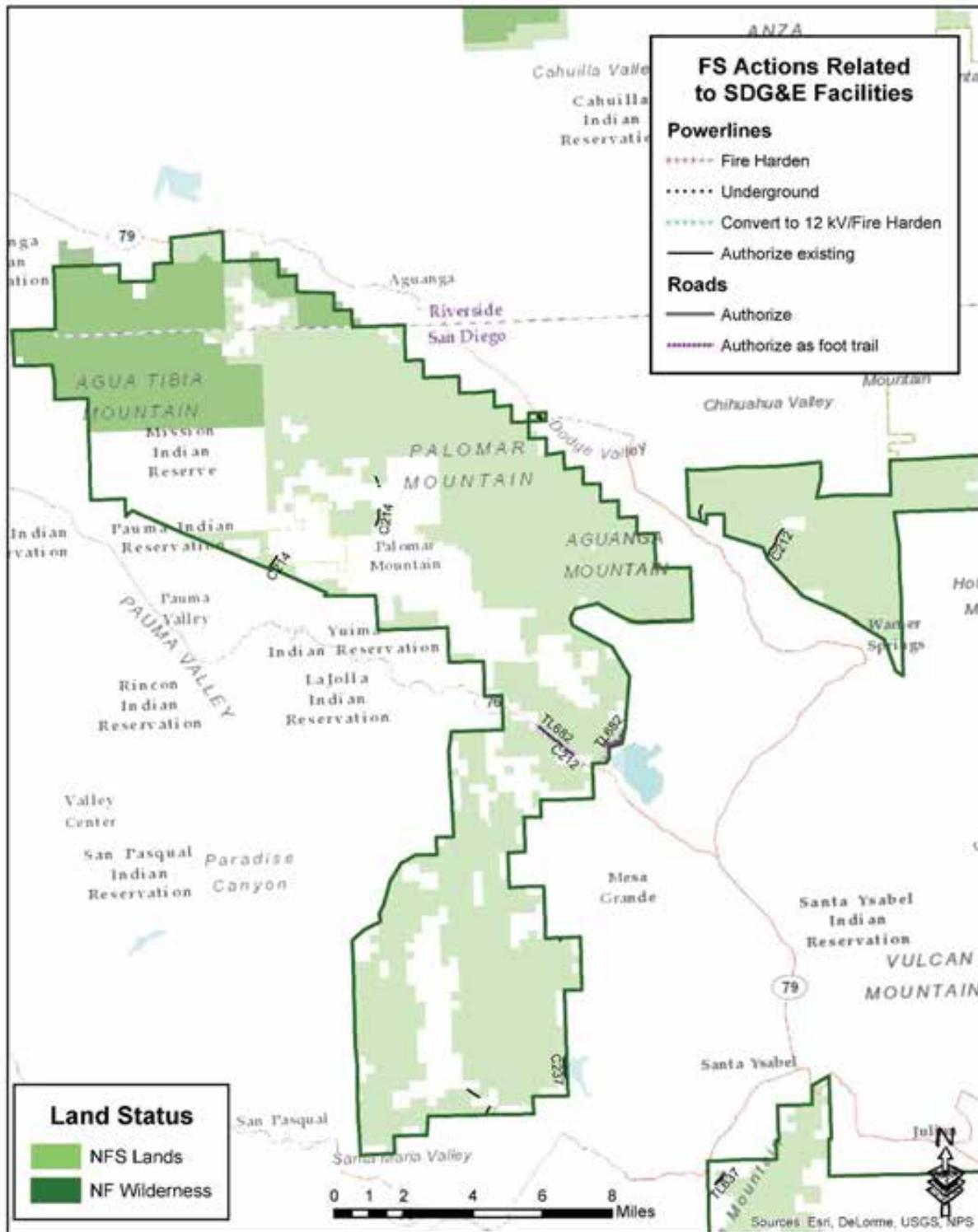
William Metz
Forest Supervisor



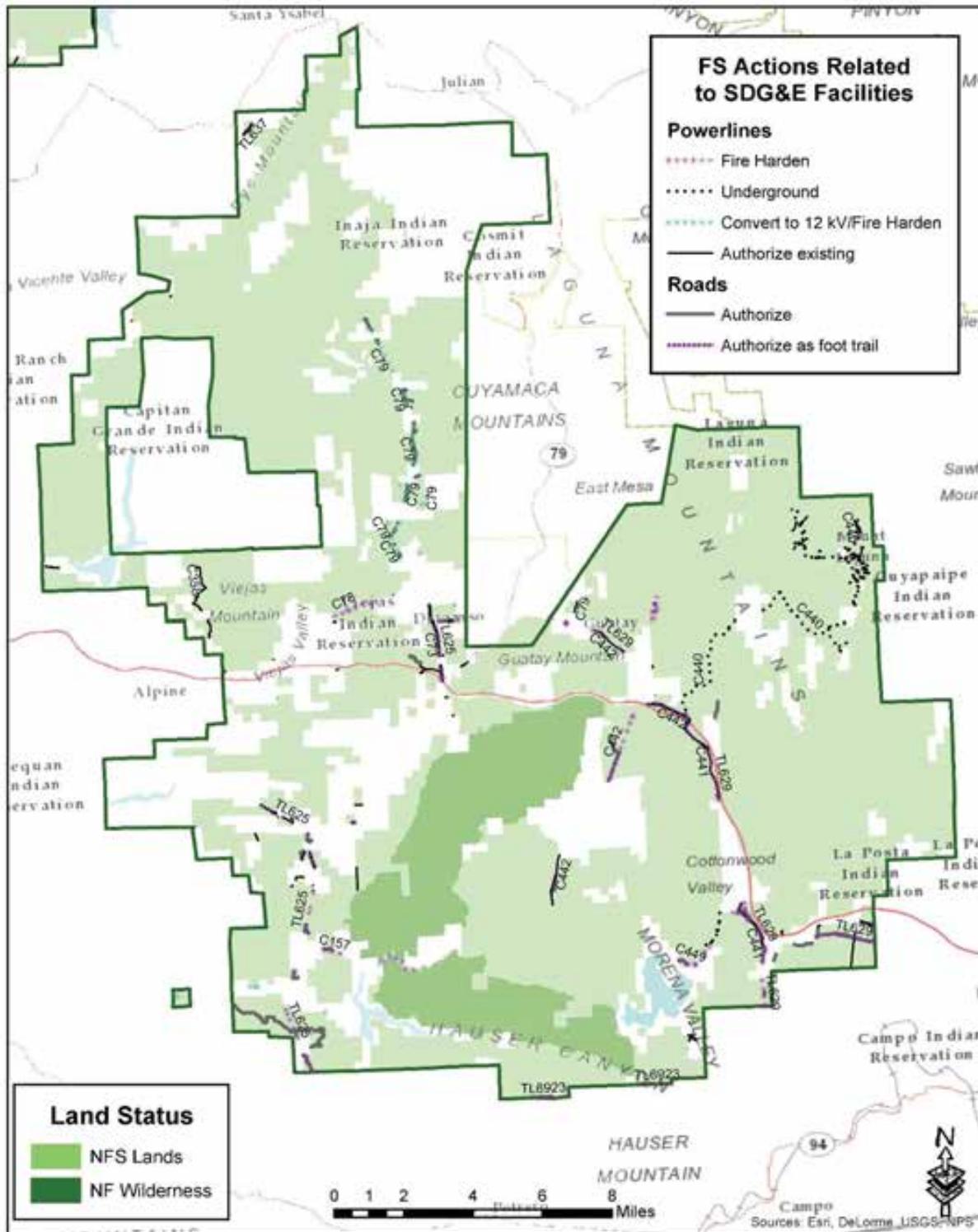
Date

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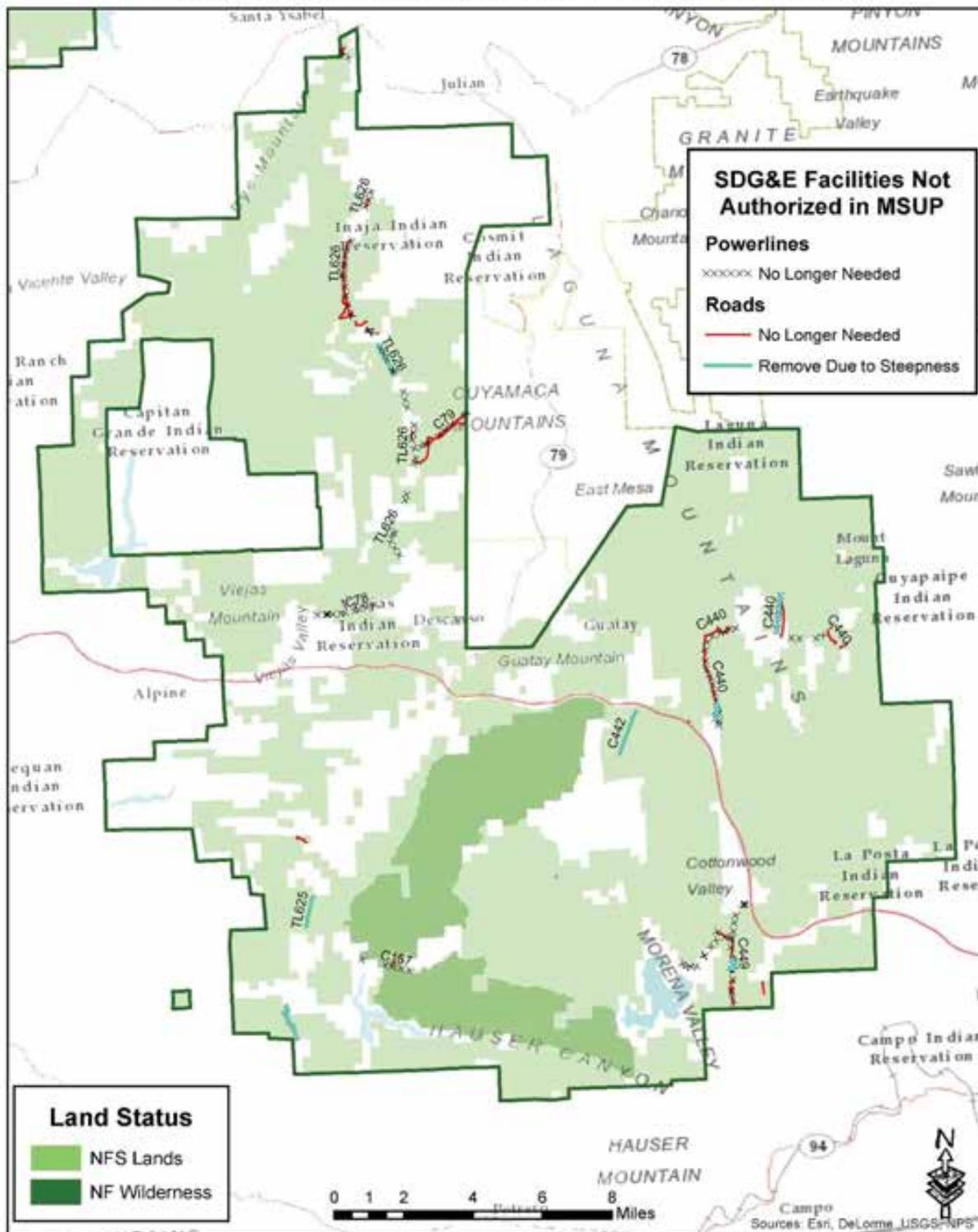
SDG&E Master Special Use Permit, CNF North



SDG&E Master Special Use Permit, CNF South



SDG&E Master Special Use Permit, CNF South





Final Record of Decision

Mitigation Appendix

This appendix compiles the applicant proposed measures and the text of the mitigation measures from the Final EIR/EIS into one document for reference. The mitigation measure text reflects the final version of the requirement in “clean” text. The Final EIR/EIS text is in “track-change mode” to disclose any edits between draft and final. Please refer to the Final EIR/EIS for the full description of the mitigation and monitoring requirements for each measure, which can be found at the end of the applicable resource chapters.

Mitigation Measures

The following mitigations were developed by the Forest Service and the CPUC to provide a consistent mitigation approach across all jurisdictions. Mitigation measures supersede the Applicant Proposed Measures (APMs) described later in this appendix.

Visual Resources

MM VIS-1 Prepare and Implement a Scenery Conservation Plan.

SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. Each 69 kV power line or 12 kV distribution line segment will be covered under an individual section of the plan, and each section will be reviewed and approved by the appropriate agencies prior to any ground-disturbing activities for the specific segment. The purpose of this plan is to identify and implement specific actions that will minimize the project’s visual disturbance to the naturally established scenery. Specific actions shall also be identified and implemented for individual poles to protect existing views from established scenic vistas and roadways located outside of the CNF. Power and distribution line support towers shall be designed to minimize their visual prominence and contrast to the natural landscape. Individual poles anticipated to create adverse effects to scenic vistas and/or particularly noticeable visual contrast in existing views shall be designed, located, shaped, textured, and/or screened as necessary to minimize their visual contrast, blend and complement the adjacent forest and community character. Methods such as limiting the number of climbing pegs and identifying less visually intrusive pole markings for high voltage lines, consistent with CPUC requirements, shall be considered. SDG&E shall also be required to provide photorealistic visual simulations of typical proposed designs that include design features that may be incorporated into poles identified for visual treatment to demonstrate the effectiveness of such features in reducing visual contrast and prominence as viewed from sensitive viewsheds.

MM VIS-2

If the Forest Service selects to fire harden TL626, TL629, TL6923 or C157 or relocate TL626 (Options 1,2,3a,3b,4 and 5, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management

Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives.

Biological Resources

MM BIO-1 Confine all construction and construction-related activities to the minimum necessary area.

All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified in Section B, Project Description, Table B-7. The limits of approved work spaces (not including existing access roads) shall be delineated with stakes and/or flagging prior to beginning work in any area. In areas where SDG&E will not work within exclusive-use easements, SDG&E will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H).

MM BIO-2 Conduct contractor training for all construction staff.

Prior to construction, all developer, contractor, and subcontractor personnel shall receive training regarding the appropriate work practices necessary to implement the mitigation measures and comply with environmental regulations, including plant and wildlife species avoidance, impact minimization, and best management practices. Sign-in sheets and hard hat decals shall be provided that document contractor training has been completed for construction personnel.

MM BIO-3 Conduct biological construction monitoring.

An authorized biological monitor must be present at the construction sites during all initial ground-disturbing and vegetation-removal activities in undeveloped areas (i.e., not roads or existing developed areas). The monitor shall survey the construction project footprint and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.

MM BIO-4 Restore all temporary construction areas pursuant to a Habitat Restoration Plan (HRP).

All previously undisturbed temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. Restoration techniques may include the following: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and

relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process for use in the restoration of sites requiring restoration. Wherever possible, vegetation will be left in place or mowed, and not grubbed, per the NCCP, to avoid excessive root damage and allow for natural regrowth following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas does not meet success criteria per the HRP, the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-5).

Specifically, the HRP will include the following sections:

- Introduction
- Mitigation Measure Summary
- Plan Objectives
- Plan Implementation
 - Pre-Construction Documentation
 - Clearing and Grading
 - Cleanup
 - Seeding
 - Other Planting Methods
- Schedule
 - Restoration
 - Seeding and Planting
- Restoration Monitoring
 - Monitoring Success Criteria, and Remedial Measures
 - Reporting
 - Completion of Restoration Program
- References

The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and Forest Service) who will oversee implementation of the HRP. The HRP shall be submitted to the CPUC and the Forest Service for review and approval prior to implementation.

MM BIO-5 Provide habitat compensation or restoration for permanent impacts to native vegetation communities.

Permanent impacts to all native vegetation communities shall be mitigated by either on- or off-site restoration of suitable but degraded habitat, or by the procurement and protection of off-site habitat as compensation for permanent impacts. Permanent impacts shall be compensated at a minimum of a 1:1 ratio and in accordance with SDG&E NCCP 7.4 Mitigation Credits or as required by the permitting agencies. Where discrepancies occur, the higher of the two ratios will be applied, but these ratios are not additive (i.e., ratios of 1:1 and 2:1 do not equal 3:1. Mitigation would be applied at the 2:1 ratio only). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland. “Disturbed” habitat is to be mitigated per ratio for the surrounding vegetation. Forest Service requirements related to MM BIO-5 will only apply to National Forest System lands.

Habitat compensation shall be accomplished through agency-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the proposed power line replacement projects. Land preservation or mitigation fee payment for habitat compensation must be completed within 36 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on private lands shall include long-term management and legal protection assurances.

MM BIO-6 Implement fire prevention best management practices during construction and operation activities.

Fire prevention best management practices shall be implemented during construction and operation of the project as specified by the Construction Fire Prevention/Protection Plan (to be developed as required under MM FF-1 and MM FF-2). The PALS system will be followed for any work on National Forest System lands.

MM BIO-7 Prepare and implement a Stormwater Pollution Prevention Plan.

Prepare a Stormwater Pollution Prevention Plan pursuant to the specifications described in APM HYD-05 and MM HYD-1.

MM BIO-8 Procedural requirements for herbicide applications.

Herbicide applications shall follow measures as described in MM HYD-5 and MM BIO-23. In addition, herbicides shall only be applied to the minimum area necessary to achieve fire safety objectives and not used in excess or inadvertently be applied to special-status plant species in the vicinity. Special-status plant species of concern are listed below under Impact BIO-6 (a total of

48 species, of which 46 are further described in Table D.4-11). If the professional is unfamiliar with the identification of special-status plant species, an SDG&E biologist shall provide additional supplemental training prior to the application of herbicides along the project as described in MM BIO-23. This training will be administered by an SDG&E biologist and shall include an overview of special-status species along the ROW, identification features, and avoidance measures.

MM BIO-9

SDG&E shall identify all proposed replacement pole locations within the vicinity of RCAs to identify those poles and associated access roads that can be reasonably relocated outside these areas and consult with the Forest Service for authorization of their relocation and proposed placement. These Forest Service requirements will only apply to National Forest System lands.

MM BIO-10 Limit temporary and permanent impacts to jurisdictional features to the minimum necessary.

Formal jurisdictional delineation and permits are required prior to construction for all work areas located within or adjacent to jurisdictional wetlands and waters. The applicant shall obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit from the ACOE, a Clean Water Act Section 401 water quality certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement with the California Department of Fish and Wildlife for impacts to jurisdictional features prior to project construction. These permits are anticipated to be approved under the MSUP. The terms and conditions of these authorizations shall be implemented.

In addition, prior to conducting work or establishing the final design of a selected transmission line alignment, a planning-level assessment of aquatic resources will be conducted to identify the environmentally preferred alternative. The assessment will include review of the National Hydrography Dataset, National Wetland Inventory, U.S. Geological Survey topographic maps, high-resolution digital photography, and necessary field checking. Once the environmentally preferred alternative is identified, a jurisdictional delineation will be conducted of the selected transmission line to ensure the final design is the Least Environmentally Damaging Practicable Alternative (LEDPA) and is in compliance with the Clean Water Act (CWA) Section 404(b)(1) Guidelines. The CWA Section 404 permit authorization will be obtained for any discharges into waters of the United States and the widths of access roads and construction of bridges over waters of the United States will be minimized to the extent feasible.

MM BIO-11 Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands.

Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or and restoration at a minimum of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage (as discussed in SDG&E NCCP 7.2 Habitat Enhancement Measures). Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly. All habitat creation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.

MM BIO-12 Where drainage crossings are unavoidable, construct access roads at right angles to drainages.

Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features

MM BIO-13 Conduct preconstruction surveys for special status plants in areas not accessible during previous rare plant surveys.

Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) and Forest Service to conduct a focused rare plant survey on site during the time period when the previously described special-status plant species are detectable.

Table D.4-12 in EIR/EIS describes the 40 blooming plant species that shall be surveyed, months they shall be surveyed (i.e., blooming periods), and the TL/circuits on which they occur. Cuyamaca cypress and tecate cypress can be surveyed anytime of the year. Surveys shall be conducted in areas not included during rare plant surveys (see Chambers Group Inc. 2012b, Table 2).

Of the 40 species described, there is some potential for 8 of these species to occur in vernal pools, including California Orcutt grass*, Cuyamaca larkspur, long-spined spineflower, Orcutt's brodiaea*, San Diego goldenstar*, San Diego thornmint*, Santa Lucia dwarf rush, and

variegated dudleya*. These 8 species are also included in Table D.4-12. These species will also be protected through implementation of, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands (MM BIO-10 through MM BIO-12).

Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing.

Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a Covered Species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided.

The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC and Forest Service. CPUC and Forest Service will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.

MM BIO-14 Install fencing or flagging around identified special-status plant species populations in the construction areas.

Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities.

Cutting down or damaging coniferous trees that occur along C79 within California Department of Parks and Recreation lands is prohibited. Equipment within staging areas will be situated to avoid damage to coniferous trees. If avoidance to coniferous trees along C79 within California Department of Parks and Recreation lands is not feasible, the applicant will work closely with the California Department of Parks and Recreation to determine alternative staging location(s). In addition, all areas along C79 associated with the Cuyamaca Rancho State Park Reforestation Project will be avoided, including disturbance to these areas and the temporary establishment of staging and stringing sites. This reforestation project is registered with the Climate Action Reserve (www.climateactionreserve.org), where more details can be found.

MM BIO-15 Implement special-status plant species compensation.

Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the Forest Service. Land preservation must be completed within 36 months of initiation of construction. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required. Forest Service requirements will only apply to National Forest System lands.

MM BIO-16 Install fencing or flagging around identified special-status butterfly host species populations in the construction areas and road maintenance.

Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for larvae or adult (nectar sources or egg laying sources) plant for the following species: Hermes copper butterfly, Laguna Mountains skipper, or Quino checkerspot butterfly. These host plants include Cleveland's horkelia, western plantain, bird's beak, owl's clover, California buckwheat, and spiny redberry. Similar protective measures for special-status plants (identified in MM BIO-13 and MM BIO-14) shall be implemented. Occupied or suitable habitat for these species shall be avoided to the greatest extent feasible. In addition to the implementation of SDG&E NCCP Operational Protocols, site visits will be conducted prior to construction and road maintenance. Prior to site visits, a digital database of known host plant populations will be reviewed. Site visits will verify the known locations of host plant populations in the area and, if present, avoid those locations.

MM BIO-17 Conduct protocol surveys for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterflies within 1 year prior to project construction activities in occupied habitat.

The project proponent shall conduct preconstruction protocol surveys for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that SDG&E's low-effect habitat conservation plan (HCP) for Quino (SDG&E 2007) adequately protects the species, historical surveys are adequate, or as superseded by consultation with the USFWS and Forest Service) in any project construction area known to support the species.

Surveys shall be conducted by a qualified biologist¹ in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be reported to USFWS and the CDFW South Coast Regional Office within 45 days of the completion of the survey. Surveys for Hermes copper butterfly shall follow County of San Diego Guidelines.² A qualified biologist shall survey all potential habitat for Hermes copper which includes any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. If California buckwheat is within 15 feet of a mature spiny redberry shrub, additional vegetation within 15 feet should also be considered potential habitat for Hermes copper. All butterfly protocol survey data shall be provided to the CDFW South Coast Regional Office.

MM BIO-18 Provide compensation for temporary and permanent impacts to Occupied or Critical Habitat for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat through conservation and/or restoration.

Temporary and permanent impacts to Quino checkerspot butterfly and Laguna Mountains skipper shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for occupied non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Forest-related impacts will be mitigated at the ratios provided above on Forest Service lands and in coordination with the Forest Service. Habitat compensation shall be accomplished through U.S. Fish and Wildlife Service-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly or Laguna Mountains skipper as appropriate. Mitigation for Hermes copper butterfly shall consist of 1:1 replacement of temporary impacts to occupied habitat, where host plants are impacted, and at a 2:1 ratio where permanent impacts occur. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.

¹ A qualified biologist is defined as a biologist (permitted or not) who has a demonstrated background in butterfly survey techniques and identification.

² County of San Diego (2010) Attachment C of the Report Format and Content Requirements – Biological Resources.

MM BIO-19 Final design of power and distribution line and access roads through Quino checkerspot and Laguna Mountains skipper critical habitat and Hermes copper occupied habitat shall maximally avoid host plants for these species.

The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by these species based on safety and other superseding regulatory requirements. The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications to minimize impacts to host plants in critical habitat for these species, and it shall obtain agency approval of the final design through this area. If impacts are not avoided, compensatory mitigation, as described per MM BIO-18, will be required. This measure shall apply to all locations that have been designated as critical or occupied habitat for these species.

MM BIO-20 Obtain and implement the terms of agency permit(s) with jurisdiction federal or state-listed species.

In addition to the obligation of the Forest Service consulting with the USFWS on the project, if federally listed wildlife species not already covered by SDG&E's NCCP (including any species that may be listed prior to issuance of the PTC and MSUP) may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species not already covered by SDG&E's NCCP may be impacted by the project, SDG&E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). In addition, take authorization for golden eagles will require coordination with the USFWS and CDFW. SDG&E shall implement and/or adhere to all USFWS recommendations stipulated by the Forest Service in the Special Use Permit; SDG&E shall implement and/or adhere to all requirements in CDFW permit. SDG&E will not need a Section 2081 permit if the potentially impacted species or action is covered by SDG&E's NCCP. The Forest Service is required to consult with the USFWS for their federal action (approving the MSUP) as identified in Section A, Table A-3.

When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&E shall implement all applicable protocols to avoid and minimize impacts to this species defined in the SDG&E Low-Effect Habitat Conservation Plan for Quino. Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&E shall implement all impact minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which includes:

1. Prior to project work, a qualified biologist shall identify all LMS habitat (to include host plant and nectar sources) within 10 meters of the proposed project(s) ROW. SDG&E facilities that are within designated critical habitat for Laguna Mountains skipper are shown on USFWS Critical Habitat maps (71 FR 74592–74615). During any maintenance activities, a qualified biologist will be present to monitor work and ensure that Laguna Mountains skipper habitat is not affected.

2. Chipping of vegetation shall not be allowed in known or potential Laguna Mountains skipper habitat. This includes the ROW within or adjacent to (within 10 meters) known or potential Laguna Mountains skipper habitat. Potential habitat shall be identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW work.
3. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to Laguna Mountains skipper habitat. Prior to operation of vehicles on existing roads or trails, a qualified biologist will ensure that the road or trail itself does not contain host plants or nectar sources.
4. Any project that may adversely affect the Laguna Mountains skipper shall require consultation with the U.S. Fish and Wildlife Service.

If the NCCP is not used, then formal consultation with the USFWS and CDFW will need to occur to determine the need for take permits.

MM BIO-21 If construction occurs in occupied and/or suitable habitat for sensitive butterfly species, SDG&E will implement the following:

Quino checkerspot: SDG&E will comply with the avoidance and minimization measures outlined in the existing Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly.

Hermes copper: Because this species is not state- or federally listed, the following will only be required for activities: While performing construction activities within the flight season, a qualified biological monitor will be on-site for all project activities to assure that both impacts to host plants and direct take of Hermes copper butterflies are avoided to the greatest extent feasible. The biological monitor may temporarily stop work in the event a Hermes copper butterfly is observed within the immediate construction area (i.e., the flagged work areas currently being used for construction activities.)

Laguna Mountains skipper butterfly: Construction will occur outside of the flight season OR at least 10 meters (33 feet) away from all host plant locations. If there is a known or newly discovered occurrence during the flight season, construction shall be prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service determines construction activities may commence. The Laguna Mountains skipper flight season occurs from April to July.

MM BIO-22 Biologists will monitor construction activities.

San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site monitoring, and documentation of violations and compliance.

Monitors shall also delineate pre-determined access routes using markers or signs and ensure the maintenance of markers or signs on a regular basis.

SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report shall, at a minimum, include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns, and general wildlife observations.

MM BIO-23 Biologists will inspect open holes at the end of each workday.

At the end of each workday, any open holes (including large/steep excavations) shall be inspected by the on-site biologist and subsequently fully covered with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.

MM BIO-24 Enforce speed limits in and around all construction areas.

Vehicles shall not exceed 15 miles per hour on unpaved roads (as stated in SDG&E NCCP 7.1 Operational Protocols) and the right-of-way accessing the construction site or 10 miles per hour during the night.

MM BIO-25 Minimize night construction lighting adjacent to native habitats.

Lighting of construction areas at night shall be the minimum necessary for personnel safety and shall be low illumination, selectively placed, shielded and directed away from adjacent native habitats.

MM BIO-26 Prohibit littering and remove trash from construction areas daily.

Littering shall not be allowed by the project personnel. All food-related trash and garbage shall be removed from the construction sites on a daily basis.

MM BIO-27 Prohibit the harm, harassment, collection of, or feeding of wildlife.

Project personnel shall not harm, harass, collect, or feed wildlife. No pets shall be allowed in the construction areas.

MM BIO-28 Implement Bird Protection Measures.

- A. Construction activities, including but not limited to tree trimming, road maintenance (i.e., re-establishing of existing access roads), grading, or site disturbance, may occur during

the avian bird breeding season that runs between March 1 and September 1, for non-listed birds, and other seasons as defined below for special-status species, in compliance with the procedures and provisions of this mitigation measure. To avoid avian disturbance by construction activities, an Avian Protection Plan, including a Nesting Bird Management Plan, shall be developed in coordination with the Wildlife Agencies prior to project onset to develop measures based on site specific conditions to protect birds. This Avian Protection Plan shall be implemented by SDG&E and their biological monitors with oversight by the CPUC and the Forest Service. The Plan shall include procedures to allow the Wildlife Agencies open communication with the biological monitor(s) and access to scientific data collected that will be electronically stored in a database approved by the CPUC, the Forest Service, and the Wildlife Agencies. Between February and September during project construction, SDG&E shall provide a monthly summary of nesting bird monitoring activities and at the completion of each nesting season shall provide an evaluation of the data collected to date as specified in the Nesting Bird Management Plan.

- B. The Project's transmission pole and line design may have an impact on certain raptor species. Consequently, in addition to the construction activities, the Plan shall address avian mortality related to line strikes through the use of adaptive management (i.e., measures to make the lines more visible to the suite of species affected), in response to reported mortalities.
- C. The Avian Protection Plan shall include the following measures:
 - a. Compliance with the Migratory Bird Treaty Act
 - b. Compliance with Fish and Game Code Sections 3503, 3503.5, and 3511
 - c. Activities shall be prohibited within:
 - i. Approximately 0.25 mile of California spotted owl active nest sites (or activity centers) during the breeding season (February 1 through August 15) unless surveys confirm that California spotted owls are not nesting within the 0.25-mile radius;
 - ii. 500 feet of raptor and owl active nests;
 - iii. 500 feet of federally and/or state-listed birds active nests;
 - iv. 250 feet of occupied burrowing owl burrows from February 1 to August 31 or within 160 feet from September 1 through January 31; and
 - v. 150 feet of non-listed birds and as specified in the avian protection plan for other bird species of concern.

If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue through coordination with the CDFW and monitoring. If it appears that the burrowing owls may be directly impacted,

then a relocation plan will be developed for the specific burrowing owl(s). This plan would include the methods to relocate, location of the relocation, and post-relocation monitoring. Active relocation and banding of birds is not required. Similar buffers will be utilized for non-Forest Service lands as specified in the Avian Protection Plan and Nesting Bird Management Plan. “Nest” is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. “Active nest” is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an “active nest” if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.

- d. Apply APLIC Measures. Specific APLIC measures to be applied must, at a minimum, must allow the circuits to meet National Electric Safety Code (NESC) requirements and should provide general information on specialized construction designs to meet APLIC standards. In particular, conductor separation between the energized and grounded hardware should meet the current state of the art requirements to protect species up to California condor. If appropriate separation is not feasible, then the energized parts and hardware should be covered. As appropriate, bird diverters should be deployed as well.
- D. The database shall include special features to accommodate additional variables (covariate) information requested by the Wildlife Agencies designed for this Project that will provide data which will contribute to the scientific standards of effective avian avoidance measures. In order to help evaluate buffer effectiveness, nests shall be monitored on a daily basis by a qualified biologist during disturbance and-related activities (i.e., brushing, tree trimming, ground-disturbing activities, mechanized or manual construction/removal/installation, and restoration activities) and every 4 days following disturbance until nest fates have been determined for entry into the database. Daily nest monitoring will be conducted by a qualified biologist, from as far away as possible while still being able to observe activity. The biologist need not observe the actual contents of the nest, but may extrapolate status based on adult behaviors. Actual surveys of the nest contents must not occur more than weekly (i.e., allow at least 7 days between nest visits) and visits should be very brief, paths should go by the nest without stopping if possible, the biologist should not touch leaves or branches, and should take a new route each time they pass by the nest. If brown-headed cowbirds or potential nest predators (e.g., scrub jays, crows, ravens) are in the area, then the visit should be postponed until they are gone.

At a minimum, the plan(s) shall include the following sections:

- Plan Objectives
- Applicable Mitigation Measures
- Environmental Awareness Program

- Existing Avian Resources
- Construction Process and Timing (related to avian resource protection)
- Specific APLIC measures to be Applied
- Nest Survey and Monitoring Methods
 - Surveyor Experience and Training
 - Nesting Bird Survey Protocol
 - Standard Buffer Distances as determined in consultation with Wildlife Agencies
 - Protections of Listed Species, Raptors, and Eagles
 - Nest Monitoring
 - Data Collection
- Avian Reporting System
 - Nest Monitoring Log to include fates of all nests monitored
 - Reporting including update of database accessible to Wildlife Agencies
- Nest Management
 - Nesting Habitat Reduction
 - Nesting Deterrents
 - Nest Removal
- Risk Assessment and Mortality Reduction
- Quality Control and Effectiveness
- Avian Enhancement
- Key Resources
- Prior to the start of construction and implementation, SDG&E shall submit the plan to the U.S. Fish and Wildlife Service, CDFW, CPUC, and Forest Service for review and approval.

In order to identify locations of current bald eagle (*Haliaeetus leucocephalus*), golden eagle (*Aquila chrysaetos*), California spotted owl (*Strix occidentalis*), American peregrine falcon (*Falco peregrinus anatum*), or federally and/or state-listed or fully protected bird nests, the monitoring biologists will coordinate with the U.S. Forest Service (Forest Service), U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife (CDFW) to ensure that the most up to date information is made available to monitoring biologists. If work will be

conducted within a 1 mile buffer of historic and currently known nests during the bald or golden eagle breeding season (December 15 through July 31), SDG&E will survey the historic and currently known nests sites to determine if they are active. If nests are determined to be active, then work within 1 mile of active nests shall be rescheduled until after the completion of nesting activity at those nests. Alternatively, SDG&E may plan work activities to occur outside of the 1 mile buffers during the breeding season.

MM BIO-29 Rock blasting.

In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC.

If the CPUC-approved biologist observes an active nest (as defined in MM BIO-28) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric shall postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions.

MM BIO-30 Prior to work being conducted, measures will be employed to protect (a) Townsend's bat and (b) bats in general.

(A) Townsend's bat protection measures

Prior to work being conducted, qualified biologists will conduct a literature search for potential roost sites and follow-up surveys for Townsend's big-eared bat maternity roosts within 500 feet of project lines during the breeding/pupping season (April–mid-September). Typical Townsend's big-eared bat roosts occur in mines, caves, buildings, long and dark culverts, and older bridges (pre-1960) (Pierson and Rainey 1994). If any potential structures or features for Townsend's big-eared bat are present within the project area they shall be surveyed.

Inspections of potential roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Where active roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number present at the time of visit (count or estimate); 3) the location, amount, distribution, and age of all droppings shall be described and pinpointed on a map; and 4) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance.

If non-maternity roosts are identified, the CDFW will be notified and consulted. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 500 feet of the roost location until the end of the pupping season or until the roost is determined to be unoccupied by Townsend's big-eared bat. For the protection of young (i.e., unable to fly) and hibernating adults all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.

(B) General bat protection measures for other bat species

Prior to work being conducted, qualified biologists will conduct a literature search for known general bat roost sites and follow-up surveys within 100 feet of project lines during the breeding/pupping season (April–mid-September). In general, bat species may roost in rock outcrop, dense tree canopies, flaking tree bark, snags, bridges, mine, caves, flumes, and buildings. If any known sites for bats in general are present within the project area they shall be surveyed.

Inspections of known roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Bats shall be identified to the most specific taxonomic level possible. Where active bat roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the specific was identified); 4) the location, amount, distribution, and age of all bat droppings shall be described and pinpointed on a map; and 5) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance.

If potential roosts are determined to be present then the roosts must be analyzed further to determine if Townsend's big-eared bats are present and if maternity roosts are present. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 100 feet of the roost location until the end of the pupping. For the protection of young (i.e., unable to fly) and hibernating adults, all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.

MM BIO-31 Biologists will conduct surveys for Stephens' kangaroo rat.

In locations where Stephens' kangaroo rat habitat assessments were not accessible during the 2010 surveys (including the extensive parcels of land westward of Santa Ysabel owned by a single landowner – Map Pages MS-016-025 [Chambers Group Inc. and SJM Biological Consultants 2012; Appendix A] and the large parcel immediately south of Old Highway 80 and southward of southern end of Kitchen Creek Road [Map Page MS-069 [Chambers Group Inc. and SJM Biological Consultants 2012]; Appendix A]), a pedestrian preconstruction survey for

potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC)-approved biologist to assess the potential areas for Stephens' kangaroo rat to occur within SDG&E's proposed project area.

Any burrows, utilized habitat, or signs of Stephens' kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephens' kangaroo rat occupied habitat. If Stephens' kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephens' kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to the project work area for complete avoidance of Stephens' kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.

MM BIO-32 Procedural requirements for pesticide applications.

Herbicide application shall occur under the direction of a professional applicator with an Agricultural Pest Control Adviser License. If the professional has only obtained a Qualified Applicator License, an SDG&E biologist shall provide additional supplemental training prior to the application of pesticides along the project right-of-way. This training will be administered by an SDG&E biologist and shall include topics, such as pertinent laws and regulations (California Department of Fish and Game Code, Migratory Bird Treaty Act, and Endangered Species Act), that may impact special-status wildlife species.

MM BIO-33 Focused surveys for arroyo toad shall be conducted.

Prior to initiating construction, all riverbed areas within 1,000 feet of construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31)³ for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed. If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring plan that includes the following measures, in consultation with the USFWS:

1. The applicant shall retain a qualified biologist with demonstrated expertise with arroyo toads to monitor all construction activities in potential arroyo toad habitat and assist the project applicant in the implementation of the monitoring program. This person will be approved by the CPUC and Forest Service prior to the onset of ground-disturbing activities. This biologist will be referred to as the "authorized biologist" hereafter. The

³ Since at higher elevations breeding season may occur between February 1 and July 31, on Forest Service land breeding season limited operating period will be set with a project-specific consultation with the Forest Service.

authorized biologist will be present during all activities immediately adjacent to or within habitat that supports populations of arroyo toad.

2. Prior to the onset of construction activities, the authorized biologist shall provide all personnel who will be present on work areas within or adjacent to the project site with the following information:
 - a. A detailed description of the arroyo toad, including color photographs;
 - b. A description of the protection the arroyo toad receives under the Endangered Species Act (ESA) and possible legal action that may be incurred for violation of the act;
 - c. The protective measures being implemented to conserve the arroyo toad and other species during construction activities associated with the proposed project; and
 - d. A point of contact if arroyo toads are observed.
3. All trash that may attract predators of the arroyo toad will be removed from work sites or completely secured at the end of each workday.
4. Prior to the onset of any construction activities, the project applicant shall meet on site with staff from the USFWS and the authorized biologist. The applicant shall provide information on the general location of construction activities within habitat of the arroyo toad and the actions taken to reduce impacts to this species. Because arroyo toads may occur in various locations during different seasons of the year, the project applicant, USFWS, and authorized biologists will, at this preliminary meeting, determine the seasons when specific construction activities would have the least adverse effect on arroyo toads. The goal of this effort is to avoid mortality of arroyo toads during construction.
5. Where construction can occur in habitat where arroyo toads are widely distributed, work areas will be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat. The authorized biologist⁴ will assist in determining the boundaries of the area to be fenced in consultation with the USFWS. All workers will be advised that equipment and vehicles must remain within the fenced work areas.
6. The authorized biologist will direct the installation of the fence and conduct a minimum of three nocturnal surveys to move any arroyo toads from within the fenced area to suitable habitat outside of the fence. If arroyo toads are observed on the final survey or during subsequent checks, the authorized biologist will conduct additional nocturnal surveys if he or she determines that they are necessary in concurrence with the USFWS.
7. Fencing to exclude arroyo toads will be at least 24 inches in height.

⁴ Authorized biologist is a biologist whose resume has been reviewed and approved by the Forest Service and CPUC.

8. The type of fencing must be approved by the authorized biologist and the USFWS.
9. Construction activities that may occur immediately adjacent to breeding pools or other areas where large numbers of arroyo toads may congregate will be conducted during times of the year (fall/winter) when individuals have dispersed from these areas. The authorized biologist will assist the project applicant in scheduling its work activities accordingly.
10. If arroyo toads are found within an area that has been fenced to exclude arroyo toads, activities will cease until the authorized biologist moves the arroyo toads.
11. If arroyo toads are found in a construction area where fencing was deemed unnecessary, work will cease until the authorized biologist moves the arroyo toads. The authorized biologist, in consultation with USFWS, will then determine whether additional surveys or fencing are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist and USFWS.
12. Any arroyo toads found during clearance surveys or otherwise removed from work areas will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. Clearance surveys shall occur on a daily basis in the work area.
13. The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed.
14. Staging areas for all construction activities will be located on previously disturbed upland areas designated for this purpose. All staging areas will be fenced within potential toad habitat.
15. To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force (DAPTF 2009) will be followed at all times.
16. Drift fence/pitfall trap surveys will be implemented in toad sensitive areas prior to construction in an effort to reduce potential mortality to this species. Prior to any construction activities in the project site, silt fence shall be installed completely around the proposed work area and a qualified biologist should conduct a preconstruction/clearance survey of the work area for arroyo toads. Any toads found in the work area should be relocated to suitable habitat. The silt fence shall be maintained for the duration of the work activity.

On Forest Service lands, occupied arroyo toad breeding habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo

toad habitat (or designated critical habitat) will be mitigated at 2:1⁵. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined.

The applicant shall restrict work to daylight hours, except during an emergency⁶, in order to avoid nighttime activities when arroyo toads may be present on the access road. Traffic speed should be maintained at 15 mph or less in the work area.

Cultural Resources

MM CUL-1

In order to avoid adverse effects to historic properties, SDG&E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements:

1a. – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE). Prior to any ground disturbing activities, SDG&E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall supplement surveys done for the EIR/EIS and will satisfy Section 106 requirements.

1b. – Avoid and protect potentially significant resources. Where feasible, complete avoidance of impacts shall be the preferred strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a Historic Properties Management Plan as described below.

1c. – Develop and Implement Historic Properties Management Plan. After completing the inventory and avoidance phase of site design, SDG&E will prepare and submit for approval a Historic Properties Management Plan (HPMP) to avoid or mitigate identified potential impacts.

1d. – Conduct data recovery to reduce adverse effects. If eligible resources, as determined by the federal agencies and the SHPO, cannot be protected from direct impacts of the project or alternatives, data-recovery investigations shall be conducted by SDG&E to reduce adverse effects to the characteristics of each property that contribute to its eligibility, using procedures described in the HPMP.

1e. – Monitor construction activities. Incorporate monitoring as described in APM CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify the Principal Investigator, who will notify the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.

⁵ Per Robert Hawkins (pers. comm. 2014)

⁶ Emergencies are described in SDG&E 1995 (Section 2.2) and SDG&E 2013a (Attachment C).

MM CUL-2

In order to reduce adverse effects and significant impacts to historic resources along C79, C440, and C442 as identified in Table D.5-12 of the EIR/EIS, the original exterior materials on the cabins shall not be removed, modified, or covered. If equipment attached to the cabins must be replaced, the equipment shall retain its original appearance in terms of materials and size. If this cannot be met, then a cultural monitor is required to be present during the replacement of the lines to minimize modifications to the cabin exteriors.

MM CUL-3

During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. Further, when on City-owned land (portions of C157, T625, and C449), the City's Land Development Manual – Historical Resource Guidelines per the San Diego Municipal Code, Chapter 14, Article 3, Division 2, Section 14.0201, shall be followed (<http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division02.pdf>).

Public Health and Safety

MM PHS-1 San Diego Gas & Electric (SDG&E) shall provide written documentation that all staff, including contractor, and subcontractor project personnel, have received training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures.

MM PHS-2 San Diego Gas & Electric (SDG&E) shall implement best management practices (BMPs) to prevent impacts from release of hazardous materials during construction, operation, and maintenance activities. Typical BMPs could include, but would not be limited to, practices such as the use of absorbent pads for spill containment, specified locations for vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible. No hazardous material, as defined by 40 CFR 355, shall be stored on site above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355. All vehicle maintenance activities shall be conducted at designated locations within approved staging areas or other locations specified for this activity. In the event emergency maintenance is required on site, or removal of the equipment to an off-site repair facility is determined by SDG&E to be infeasible, SDG&E will use BMPs to prevent the release of hazardous materials during these emergency maintenance activities. SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction.

MM PHS-3 In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the

County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions:

- The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas & Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.
- The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the *Blasting Guidance Manual* of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.
- The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.

MM PHS-4

Prior to construction, all San Diego Gas & Electric (SDG&E), contractor, and subcontractor project personnel anticipated to work between poles Z173105 and Z173109 shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid any ground disturbance in the area.

MM PHS-5

Prior to flight operations for helicopter use during construction as well as operations, San Diego Gas & Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration (FAA) regulations regarding helicopter use to prevent conflicts with air traffic generated by local airstrips. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction and operations and maintenance activities. SDG&E shall prepare an Aviation Safety Plan for Forest Service approval prior to any use of helicopters in support of activities on the Cleveland National Forest. The Aviation Safety Plan will outline the

procedures used to ensure safe transportation of external loads, and will identify coordination requirements with Forest Service aviation resources operating in the area.

MM PHS-6

If, during construction activities, it is anticipated or planned that helicopters will be used for external load operations, including carrying structures, San Diego Gas & Electric (SDG&E) will prepare a Helicopter Lift Plan. This plan will be prepared in accordance with and comply with all relevant FAA regulations, as well as SDG&E's Aviation Operations Manual. Prior to initiation of construction activities for each alignment, if determined that helicopters would be used, the Helicopter Lift Plan will be provided to the California Public Utilities Commission.

MM PHS-7 Conduct geotechnical investigations.

The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction measures that meet California Building Code (CBC), CPUC General Order 95, and Electric Power Research Institute (EPRI) Moment Foundation Analysis and Design parameters shall be incorporated into the project designs.

MM PHS-8 Facilities inspections conducted following major seismic event.

If large levels of ground shaking (such as Modified Mercalli Intensity VI or greater) are experienced or a major earthquake (magnitude 6.0 and above) occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer employed or contracted by SDG&E shall perform facilities inspections as quickly as possible. Careful examination shall be conducted of all project facilities within the identified area of effect. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised.

Fire and Fuels Management

MM FF-1 Develop and Implement a Construction Fire Prevention/Protection Plan.

SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service, Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of lead agencies. SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&E. At minimum, the plan will include the following:

- Procedures for minimizing potential ignition
 - Vegetation clearing
 - Fuel treatment area establishment

- Parking requirements
- Smoking restrictions
- Hot work restrictions
- Red Flag Warning restrictions
- Fire coordinator role and responsibility
- Fire suppression equipment on site at all times work is occurring
- Requirements of Title 14 of the California Code of Regulations, 918 “Fire Protection” for the private land portions
- Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice 113-1 (July 2012)
- Emergency response and reporting procedures
- Emergency contact information
- Worker education materials; kick-off and tailgate meeting schedules
- Other information as provided by responsible and commenting agencies (as appropriate for each project).

Additional restrictions will include the following:

- During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily construction and hotwork.
- Fire Suppression Resource Inventory – In addition to 14 CCR 918.1(a), (b), and (c), the applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE.
- During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest Service Project Activity Level (PAL) is “E” on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under a Hot Work Procedure. The Hot Work Procedure will be in compliance with the applicable sections in NFPA 51-B “Fire prevention during welding, cutting, or other hot work” and CFC Chapter 26 “Welding and other Hot Work.”
- The applicant and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF.

- All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area as soon as the fire is identified/discovered.
- Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect.
- 50 feet of fire suppression equipment, as outlined in ESP 113.1.

SDG&E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The final plan will be approved by the responsible lead agencies with input from the fire and permitting agencies, as desired, prior to the initiation of construction activities and provided to SDG&E for implementation during all construction prior to the initiation of construction activities. All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.

MM FF-2 Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan.

The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) within the Cleveland National Forest (CNF), and other project facilities off the CNF, and will be implemented during all operational maintenance work associated with the project for the life of the project. This plan will satisfy the requirements of the SDG&E Project Specific Fire Plan, as identified in SDG&E's Electric Standard Practice 113-1. Important fire safety concepts that shall be included in the plan and make it an essential overall mitigation measure are the following:

- Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans)
- Fuel treatment area maintenance
- When vegetation work will occur (prior to any other work activity)
- Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread
- Coordination procedures with fire authority
- Integration of the project's Construction Fire Prevention/Protection Plan content

- Personnel training and fire suppression equipment
- Red Flag Warning restrictions for operation and maintenance work
- Fire safety coordinator role as manager of fire prevention and protection procedures, coordinate with fire authority and educator
- Communication protocols
- Incorporation of responsible agency review and approved Response Plan mapping and assessment.
- Other information as provided by responsible and commenting agencies, as applicable.

SDG&E will provide a draft copy of the Operations and Maintenance Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the completion of the first project segment. The final plan will be approved by the CPUC and Forest Service prior the first construction segment being deemed complete and the final plan will be provided to SDG&E for implementation during all operations and maintenance activities.

Hydrology and Water Quality

MM HYD-1 Erosion Control Plan / Stormwater Pollution Prevention Plan.

SDG&E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gulying . The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization) and incorporate Construction General Permit SWPPP requirements for each construction segment as the SWPPP(s) for that segment are completed. Additionally, the ECP shall complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4. The ECP shall be updated for each construction segment and provided to the CPUC and the federal agencies for review and approval prior to each agency's Notice to Proceed issuance for that construction segment.

As required by the Construction General Permit, SDG&E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project or for individual construction segments, as required, to reduce soil erosion during construction. The SWPPP(s) and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance for the respective construction segment. SDG&E shall provide the CPUC and Forest Service with subsequent amendments to the SWPPP as part of SDG&E's weekly compliance reports. In weekly construction compliance reports, SDG&E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water Multiple Application and Report Tracking System (SMARTS) following storm events.

MM HYD-2a Documentation of purchased water source(s).

For water that is to be purchased from one or more public or private water/utility district(s), private landowners, or from tribes, SDG&E shall provide to the CPUC written documentation from such district(s) and/or landowners indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The documentation shall also indicate the type of water (potable or reclaimed) and the specific source of the water (groundwater well or surface diversions). The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC prior to notice to proceed for each project component.

MM HYD-2b Groundwater Evaluations of Off-Site Water Import Sources.

For identified water sources that derive their water supply from groundwater, SDG&E shall commission a groundwater study by a registered/certified hydrogeologist, as reviewed and approved by CPUC, to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner's permission) in the vicinity of proposed well location/water sources and to verify that the proposed source is capable of supplying the amount of water needed. The groundwater study shall evaluate whether the volume and duration of the proposed groundwater use would exceed County of San Diego thresholds for impacts with respect to groundwater supply and well interference. If the evaluation indicates the potential for significant impacts, the registered/certified hydrogeologist shall recommend feasible mitigation measures (e.g., a groundwater monitoring program) to avoid exceeding applicable thresholds. The groundwater evaluation shall be provided along with the documentation of purchased water sources, and the CPUC shall not authorize construction of the project unless such documentation have been provided by SDG&E and approved by CPUC. If the evaluation finds that impacts cannot be avoided given the volume and duration of the proposed groundwater use, the CPUC will not authorize use of the water source and shall require SDG&E to seek other viable sources of water.

Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project. SDG&E shall submit monthly water logs documenting compliance with the water supply plan and groundwater thresholds.

MM HYD-3 Access Road Decommissioning Plan.

SDG&E shall prepare an Access Road Decommissioning Plan for review and approval by the CPUC and Forest Service within 1 year of project approval or permit issuance. The plan will be prepared by qualified professionals (e.g., PG, PE, or CEG contracted by SDG&E) whose qualifications are reviewed and approved by the CPUC and the Forest Service. The plan will include a schedule for decommissioning activities.

Under the plan, SDG&E shall be responsible for the prevention and control of soil erosion and gullyng in areas proposed for access road removal and shall implement the following activities:

- Remove any flagging, signs, or other markings within or around sensitive resource areas after road removal, except where such signs are necessary for long-term access control and interpretation purposes.
- Remove temporary fill and structures to the extent practical.
- Provide appropriate access control for temporary work areas, such as fencing posts, and/or signage, and ensure gates are locked in accordance with MM-REC-1 to minimize unauthorized traffic and/or access road circumvention during construction
- Ensure that the road surface is in stable condition when the road is closed. Seed and fertilize disturbed surfaces as necessary.
- To facilitate regeneration, back blade or otherwise scarify road beds where appropriate. Use native grass or forb mixes if available.
- All earthwork shall be confined to the road corridor and no soil shall be sidecast onto adjacent areas; if necessary, excess soil material shall be incorporated into restoration activities or hauled off site to an approved disposal facility.
- Activities will complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4.

MM HYD-4 Access Road Condition Evaluation and Repair Design Report.

Planned grading and repair activities along SDG&E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within RCAs, or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, or CEG contracted by SDG&E and reviewed and approved by the CPUC and the Forest Service) prior to initiating construction on the associated segment, who will identify areas experiencing chronic erosion and drainage issues. At a minimum, segments shall include, but are not limited to, the following:

TL626 south of Eagle Creek Road and north of Boulder Creek Road

TL625 in the Vicinity of Barber Mountain Road

TL625 north of Lyons Valley Road and south of Carveacre Road

C442 east of Oak Valley and south of I-8, on the western flanks of Long Peak

Short segments of TL629 on either side of Cameron Valley and east of Pine Valley

The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues prior to beginning work on those facilities associated with the problematic access road. The designed solution(s) shall be included into the

approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments.

Examples of such solutions could include, but are not limited to the following:

- Crowning road sections with gentle slopes to prevent standing water on the road
- Outsloping roads at 3%-5% wherever possible
- Where required for proper maneuvering and safety, insloping roads at 3-5% into properly designed ditches
- Installing rolling dips, ditch relief culverts, and/or water bars at intervals appropriate for the road-grade and the soil erosivity
- Minimizing the number of water crossings, and maintaining crossings as close to a 90-degree angle as possible to the streambed.
- Constructing perennial and seasonal/ephemeral stream crossings so as not to change the cross-sectional area of the stream channel or impede fish migration.
- Constructing perennial and seasonal/ephemeral stream crossings with materials that will not degrade water quality (e.g., concrete, coarse rock, riprap and/or gabions)
- Surfacing roads with erosion-resistant materials such as rock or asphalt concrete.

The Access Road Condition Evaluation and Repair Design Report shall identify locations, if any, where no feasible and/or effective solutions can be implemented to adequately handle runoff or comply with Forest Service soil and water quality management standards as contained in Forest Service Handbook 2509.22 (Section 12.2). The report will be updated for each construction segment according to SDG&E's final construction schedule.

In these locations, the qualified professional shall recommend options for access road removal (i.e., requiring access by helicopter) or realignment (e.g., to achieve a lower slope) that would still achieve project objectives.

Construction of each segment shall not proceed until the report section pertaining to that segment has been reviewed and approved by CPUC and Forest Service. In the event there are disputes regarding specific problem locations, CPUC and Forest Service will allow construction to proceed on those portions of the construction segment not impacted by access roads requiring evaluation under this measure; however, SDG&E shall not work in areas under dispute until resolution is achieved.

MM HYD-5 Procedural Requirements for Pesticide and Herbicide Applications.

Pesticide and herbicide application shall occur under the direction of a professional pesticide applicator with either a Qualified Applicator License (QAL) or an Agricultural Pest Control Adviser License in the State of California (see MM-BIO-32 for additional biological training requirements for applicators with a QAL). Label instructions and all applicable laws and

regulations shall be strictly followed in the application of pesticides and herbicides and disposal of excess materials and containers. Only those materials registered by the EPA for the specific purpose planned shall be authorized for use. Before applying any pesticides or herbicides on National Forest System land, SDG&E shall receive approval from the Forest Service for all pesticides and herbicides proposed for use on National Forest System land prior to their application on these lands. For portions of the project crossing BLM lands, SDG&E shall obtain a BLM Pesticide Use Permit as well. Additionally, prior to any pesticide or herbicide use, SDG&E shall submit an anticipated schedule to the Forest Service for planned use within the CNF on an annual basis, or more frequently as needed, and will work with the Forest Service to determine the appropriate pesticide and herbicide per location.

MM HYD-6 Implementation of Creek-Crossing Procedures.

Where creek crossings can be completed during dry season, with no flows present in the creek, seasonally timed restorative open trenching will be completed. This procedure will use minimum trench widths. Trench cut material will be placed outside of the creek bed and outside of 100-year inundated areas. Trench fill will be compacted and replaced to match existing creek bed gradations, and vegetation will be restored. Open trenching restoration will be completed prior to any wet season flows, and will include anti-erosion action plans for any unplanned rainfall during construction. SDG&E shall obtain all required permits prior to completing open trenching through drainages. In any case, flows will be isolated from open trenching by best management practices mandated by the General Construction Permit. Areas of trenching would be restored and/or vegetated at completion of work.

Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-bore procedures to avoid direct impacts and shall be conducted in a manner that does not result in sediment-laden discharge or hazardous materials release to the water body. SDG&E shall develop a Jack-and-Bore/Horizontal Directional Drill (HDD) Contingency Plan for this work in accordance with MM-HYD-8. Additionally, SDG&E shall implement the following measures during horizontal boring (jack-and-bore) operations and shall be included in the HDD Contingency Plan:

- (1) Site preparation shall begin no more than 10 days prior to initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages.
- (2) Trench and/or bore pit spoil shall be stored a minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention).
- (3) Portable pumps and stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10-gallon fuel or oil capacity should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times.

(4) Within 24 hours following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall be left in place until restoration is deemed successful.

SDG&E shall obtain the required permits prior to conducting creek crossing work. Required permits may include ACOE CWA Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. SDG&E shall implement all pre- and post-construction conditions identified in the permits issued.

MM HYD-7 Horizontal Directional Drill Contingency Plan.

If horizontal directional drilling is to be used during construction, SDG&E shall prepare a Horizontal Directional Drill (HDD) Contingency Plan to address procedures for containing an inadvertent release of drilling fluid (frac-out). The plan shall contain specific measures for monitoring frac-outs, for containing drilling mud, and for notifying agency personnel. The plan shall also discuss spoil stockpile management, hazardous materials storage and spill cleanup, site-specific erosion and sediment control, and housekeeping procedures, as described in the Stormwater Pollution Prevention Plan. The Jack-and-Bore HDD Contingency Plan shall be submitted to the CPUC, Forest Service, Bureau of Indian Affairs, and ACOE 60 days prior to construction.

SDG&E shall obtain the required permits prior to conducting work associated with jack-and-bore/horizontal directional drilling activities. Required permits may include U.S. Army Corps of Engineers Clean Water Act Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement Section 1602. The applicant shall implement all pre- and post-construction conditions identified in the permits issued for the jack-and-bore/horizontal directional drilling.

Land Use and Planning

MM LU-1 Prepare Construction Notification Plan.

Forty-five (45) days prior to construction of the first segment, the project applicant shall prepare and submit a Construction Notification Plan to the appropriate land use jurisdiction agency for approval. The plan will be updated with additional information 45 days before construction of each additional segment. The plan shall identify the procedures that will be used to inform private landowners, schools, and agencies with authority over recreational areas/facilities of the location and duration of construction; identify approvals that are needed prior to posting or publication of construction notices; and include text of proposed public notices and advertisements. The plan shall address at a minimum the following components:

Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice shall identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential properties and other sensitive land uses. The notice shall state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. The project applicant shall mail the notice to all residents or

property owners within 1,000 feet of project components and to all land use agencies having jurisdiction over a recreation area/facility located within 1,000 feet of a project component. If construction delays of more than 30 days occur, an additional notice shall be prepared and distributed. To facilitate access to properties obstructed by construction activities, the project applicant shall notify property owners and tenants at least 24 hours in advance of construction activities and shall provide alternative access if required.

Newspaper/website advertisements. Fifteen (15) days prior to construction of any project component, notices shall be placed in local newspapers and bulletins, including Spanish language newspapers and bulletins, and on the relevant websites of jurisdictional agencies. The Forest Supervisor, District Rangers, and Public Affairs Officer of the Cleveland National Forest shall also be notified. The notice shall state when and where construction will occur and provide information about the public liaison person and hotline. If construction is delayed for more than 7 days, an additional round of newspaper notices shall be placed to discuss the status and schedule of construction.

Public venue notices. Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, rest stops, community centers, trailheads, informational kiosks, and other public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose and schedule of construction activities.

Public liaison person and toll-free information hotline. The project applicant shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. The project applicant shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.

MM LU-2

If the Forest Service selects to leave TL626 or C442 in place, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan land use zones and standards.

MM LU-3 Revise project elements to minimize land use conflicts.

At least Ninety (90) days prior to completing final transmission line design for the approved route, the project applicant shall notify landowners of parcels through which the alignment would pass regarding the specific location of the ROW, individual towers, staging areas, access roads, or other facilities associated with the project that would occur on the subject property. The notified parties shall be provided 30 days in which to identify conflicts with any planned

development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner. Property owners whose land may be divided into potentially uneconomic parcels shall be afforded this same opportunity, even if development plans have not been established. The project applicant shall endeavor to accommodate these reroutes to the extent that they are feasible and do not create adverse impacts to resources or to other properties that would be greater in magnitude than impacts that would occur from construction and operation of the alignment as originally planned.

MM LU-4

Prior to construction, for any structure or object that is placed in, under, or over any portion of a county roadway, SDG&E shall obtain, from the San Diego County Director, Department of Public Works (DPW), a written encroachment permit in accordance with Section 71 (Highway and Traffic) of the San Diego County code of Regulatory Ordinances.

Noise

MM NOI-1

In the event noise levels during construction activities are expected to exceed an 8-hour L_{eq} of 75 dBA at the nearest property line or within 190 feet of the existing and proposed project alignment where noise-sensitive areas are located, San Diego Gas & Electric (SDG&E) shall implement noise reduction measures to reduce noise levels to below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or (2) if noise barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents until the impact has been determined to not be adverse.

MM NOI-2

At least 30 days before helicopter use and stringing operations are employed, San Diego Gas & Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the approved project alignment. SDG&E shall notify landowners, residents, schools, livestock facility owners, and CNF offices responsible for managing recreation areas within 590 feet in areas of fly yards and pole locations where helicopters will be used during construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.

MM NOI-3

In the unlikely event that rock blasting is used during construction, SDG&E will prepare a blasting plan, that will include a noise and vibration calculation, and will be submitted to the California Public Utilities Commission and the County of San Diego for review before blasting

at each site. Each blasting plan will be consistent with SDG&E's blasting guidelines to reduce noise and vibration impacts from blasting activities. The blasting contractor will be required to obtain a blasting permit and explosive permit per the San Diego County Regulatory Ordinances, and will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.

MM NOI-4

For any work that cannot occur during the allowable construction hours (between 7 a.m. and 7 p.m. Monday through Saturday), SDG&E will follow its established protocols and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction. SDG&E will also communicate the exception to the CPUC and San Diego County in advance of conducting the work. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.

Public Services and Utilities

MM PSU-1 AT&T Commitments.

Prior to receiving a Notice to Proceed with construction along each of the proposed power line replacement projects, SDG&E shall provide to the CPUC and Forest Service written commitment from AT&T confirming that AT&T facilities that are co-located on the proposed power line replacement projects will be relocated to SDG&E's new facilities. Facilities will be transferred in a manner that avoids interruptions of telecommunications services to the greatest degree possible. The timing of the relocation activities will be reviewed and approved by both the CPUC and Forest Service.

Recreation

MM REC-1 Installation of Gates and Appropriate Signage.

To deter unauthorized access to specially designated or restricted areas via SDG&E access roads authorized by the MSUP, the project applicant shall submit a plan and schedule for gate (or other barriers, such as pipe rails, where appropriate) installation to the Forest Service for approval. Gates will meet Forest Service engineering standards, and designs will be approved by the Forest Service prior to installation. In addition, appropriate deterrence signage approved by the Forest Service shall be installed on gates to SDG&E access roads. Maintenance of gates and signage shall be the responsibility of the project applicant.

MM REC-2 Enforcement of Proper Gate Protocol.

During construction and ongoing operations and maintenance activities, gates on access roads authorized by the MSUP shall be locked immediately after ingress and egress has occurred. Should SDG&E or Forest Service staff observe unlocked gates, SDG&E will be required to review gate protocols with personnel.

Applicant Proposed Measures

SDG&E filed Applicant Proposed Measures (APMs) as part of the Plan of Development that was included in their application to the CPUC and Forest Service. Many of these APMs have been superseded by the required mitigation measures. If there are any conflicts or inconsistency between the APMs and mitigation measures, the mitigation measures will take precedent.

APM No.	Description
<i>General</i>	
APM GEN-01	Native soil not used for backfill will be spread on site, if clean, or hauled off site and disposed of at an approved facility. Construction activities that involve placement of native, clean soil will be managed by employing BMPs that minimize soil erosion and impacts on surrounding vegetation per the SDG&E Water Quality BMP Manual. BMPs such as silt fencing or fiber rolls will be installed where necessary (e.g., in high-velocity flow areas and in areas of steep slope), and soil will be placed and compacted in a manner that sufficiently controls erosion and sediment discharge from the site.
APM GEN-02	Where distribution and power lines are removed, the old conductor will be wound onto wooden spools, placed on flatbed trucks, and recycled at an approved facility.
APM GEN-03	Old poles, associated hardware, and any other debris generated from construction activities will be removed from the site and placed on flatbed trucks for recycling or disposal at an approved facility.
APM GEN-04	The entire existing wooden pole will be removed unless protection of an environmental resource requires the pole to be cut off at the surface and the base left in place.
APM GEN-05	Imported material may be used to backfill the holes as needed; however, as much native material as possible will be used on site. Construction activities that involve placement of native, clean soil will be managed by employing BMPs that minimize soil erosion and impacts on surrounding vegetation per the SDG&E Water Quality BMP Manual. BMPs such as silt fencing or fiber rolls will be installed where necessary (e.g., in high-velocity flow areas and in areas of steep slope), and soil will be placed and compacted in a manner that sufficiently controls erosion and sediment discharge from the site.
APM GEN-06	Prior to initiating construction, SDG&E will make all the appropriate and necessary notifications, including landowner notifications.
APM GEN-07	SDG&E will notify the Underground Service Alert a minimum of 48 hours in advance of excavating or conducting other ground-disturbing activities in order to identify buried utilities. Exploratory excavations (potholing) will also be conducted to verify the locations of existing facilities in the field, if necessary.
APM GEN-08	SDG&E will coordinate with CAISO to obtain all the necessary line clearances prior to beginning new conductor installation.
<i>Visual Resources</i>	
APM VIS-01	When construction has been completed, all temporary work areas will be restored to near pre-construction conditions in accordance with landowner agreements, in order to reduce potential visual contrast with the surrounding landscape setting.
APM VIS-02	Construction activities will be kept as clean and inconspicuous as practical. Where practical, construction storage and staging will be screened from close-range residential views with opaque fencing.
APM VIS-03	Non-specular conductors will be installed for new and replacement conductors along the electric line alignments in order to minimize the reflectivity and general visibility of new electric line facilities.



APM No.	Description
APM VIS-04	New and replacement poles to be installed along the electric line alignments will be reddish-brown, weathered-steel that will appear similar in color to existing wood poles seen in the Proposed Action area and will blend in with the surrounding landscape backdrop.
APM VIS-05	Any required lighting will be limited to individual pole work areas and will not exceed more than two hours per evening.
<i>Air Quality</i>	
APM AIR-01	To the extent feasible, unnecessary construction vehicle and idling time would be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project would apply a “common sense” approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine would be shut off.
APM AIR-02	To control fugitive dust, SDG&E would apply water or non-toxic soil stabilizers on all unpaved access roads, staging areas, and other work areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; cover loads in haul trucks or maintain at least six inches of free-board when traveling on public roads; and apply non-toxic soil stabilizers or water to form and maintain a crust on inactive construction areas (disturbed work areas that are unused for four consecutive days).
APM AIR-03	Traffic speeds on unpaved roads would be limited to 15 miles per hour.
APM AIR-04	SDG&E would maintain construction equipment per manufacturing specifications and use low-emission equipment as follows: all off-road and portable construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower (hp) or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Section 2423(b)(1), unless such an engine is not available for a particular item of equipment. In the event that a Tier 2 engine is not available for any off-road engine larger than 100 hp, that engine shall be equipped with a catalyzed diesel particulate filter (soot filter), unless the engine manufacturer indicates that the use of such devices is not practical for that particular engine type.
APM AIR-05	SDG&E would continue to utilize best management practices (BMPs) to minimize dust and erosion.
<i>Biological Resources</i>	
APM BIO-01	SDG&E will consult with the appropriate resource agencies regarding potential impacts to federally and state-listed species, as appropriate.
APM BIO-02	All work areas will be surveyed for special-status plant and wildlife species by a qualified biologist prior to the commencement of construction in accordance with SDG&E's pre-activity survey report requirements.
APM BIO-03	SDG&E will implement the protocols identified in the POD Appendix A: SDG&E NCCP Protocols (SDG&E 2013a).
APM BIO-04	SDG&E will implement the protocols identified in SDG&E Quino Checkerspot Butterfly (<i>Euphydryas editha quino</i>) Low-Effect Habitat Conservation Plan Sections 3.2 Actions to Minimize Impacts and 3.3 Actions to Mitigate Impacts.
APM BIO-05	Stringing site locations are designed with a preference toward placement within roadways, where possible, to minimize additional potential impacts from grading and vegetation removal that may otherwise be required if these stringing sites were required to be located in vegetated, off-road areas.



APM No.	Description
APM BIO-06	Although Laguna Mountains Skipper is not covered under SDG&E's Natural Community Conservation Plan (NCCP), SDG&E will utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57 in United States (U.S.) Forest Service- (Forest Service-) modeled critical habitat and occupied habitat to minimize any potential impacts to this species. In addition, SDG&E will have a qualified biologist survey any Laguna Mountains Skipper habitat prior to work.
APM BIO-07	If California spotted owls are identified in the vicinity of proposed work areas during the pre-activity survey process, SDG&E will consult with the appropriate resource agencies to avoid impacts to nesting California spotted owl.
APM BIO-08	SDG&E will design and install all new poles to conform to the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee.
APM BIO-09	If active bat roosts are identified during pre-activity surveys, SDG&E will coordinate with the U.S. Fish and Wildlife Service/California Department of Fish and Wildlife as appropriate.
APM BIO-10	SDG&E will eliminate existing access roads that will no longer be used due to removal or relocation of facilities, and will return the land to near pre-construction conditions.
<i>Cultural and Paleontological Resources</i>	
APM CUL-01	Prior to construction, all SDG&E, contractor, and subcontractor personnel will receive training regarding the appropriate work practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural, archaeological, and paleontological resources and how to recognize possible buried resources. This training will include a presentation of the procedures to be followed upon discovery or suspected discovery of cultural and archaeological materials, including Native American remains and their treatment, as well as of paleontological resources.
APM CUL-02	Intensive pedestrian surveys will be conducted prior to construction in those areas within the ROWs for which initial survey access was not granted to determine the potential for impacts to cultural resources in these areas. Where possible, engineering design will be re-evaluated to determine whether facilities can be relocated to avoid any cultural resources identified from these additional surveys. If relocation is not feasible, APM CUL-03 will be implemented to minimize impacts to sensitive cultural resources.
APM CUL-03	All potentially National Register-eligible or archaeologically sensitive sites, as defined in the Cultural Resources Technical Report, that will not be directly affected by construction but are within 50 feet of replacement pole locations will be designated as Environmentally Sensitive Areas (ESAs). Potentially eligible resources include those that are recommended eligible, as well as unevaluated sites. Protective fencing or other markers will be erected and maintained to protect these ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs will not be signed or marked as cultural, historical, or archaeological resources.
APM CUL-04	An archaeological or cultural monitor will be present during construction activities that occur within or adjacent to identified archaeological or cultural resource site boundaries, respectively, as identified in the Cultural Resources Technical Report to ensure conformance with prescribed avoidance measures. The monitor will identify potential archaeological or cultural resources that may be unexpectedly encountered during construction and will have the authority to divert or temporarily halt construction activities in the area of discovery. In the event that archaeological or cultural resources are discovered, the monitor will stop work and notify the Principal Investigator (PI), who will inform SDG&E and the Forest Service Heritage Program Manager (HPM) of the stoppage. The archaeologist, in consultation with the Forest Service HPM and SDG&E's Cultural Resource Specialist, will determine the significance of the discovered resources. The Forest Service HPM and SDG&E's Cultural Resource Specialist and Environmental Project Manager

APM No.	Description
	<p>must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, preservation in-place will be the preferred manner of mitigating for impacts. For resources that cannot be preserved in place, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts in consultation with the Forest Service HPM, the Tribes, and the State Historic Preservation Office (SHPO). No collection of archaeological or cultural resources will occur on Forest Service property without prior Forest Service HPM consent. Daily logs will be kept by all monitors, and a monitoring report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, will be prepared at the conclusion of each phase of monitoring. Any new cultural sites or features encountered will be recorded with the South Coastal Information Center. Monitors will also identify and delineate an approved footpath through the archaeological and cultural resource sites for construction crews, as needed.</p>
APM CUL-05	<p>SDG&E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources Technical Report, such as avoiding access road improvements within culturally sensitive areas unless improvements are required for safety reasons; replacing poles within the previously disturbed area (two to four feet) represented by the existing pole locations, where necessary, to avoid sensitive resources; and cutting existing poles off at grade level, where specified and landowner approval is provided. Same-hole pole placement will also be utilized on a case-by-case basis. No new pole locations will be placed within cultural resource boundaries unless the appropriate consultation (including Section 106) has taken place. No temporary poles will be located within sites unless the appropriate consultation (including Section 106) has taken place.</p>
APM CUL-06	<p>In consultation with the Forest Service HPM, BIA Archaeologist, the Tribes, and the SHPO, SDG&E will develop a Cultural Resources Treatment Plan that includes procedures for protection and avoidance, evaluation and treatment, and the curation of any potentially register-eligible cultural materials. Specific protective measures, including a monitoring program, will be defined in the Cultural Resources Treatment Plan to reduce potential adverse impacts on unknown cultural resources to less-than-significant levels.</p>
APM CUL-07	<p>Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, all operations within 50 feet of an inadvertent discovery during such activities shall cease and the PI will contact the Forest Service HPM and SDG&E's Cultural Resource Specialist. Once a find has been identified, the Forest Service HPM and SDG&E's Cultural Resources Specialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are required treatment. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the Forest Service HPM and after the appropriate consultation has taken place.</p>

APM No.	Description
APM CUL-08	A paleontological monitor will be present for excavation activities conducted at locations with underlying PFYC Class 3 geologic deposits where new steel poles are unable to be installed in the same location as of that of the existing wood pole. In the event that fossils are unexpectedly encountered during construction, a qualified paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow the recovery of fossil remains in a timely fashion. When significant fossils are discovered, the paleontologist will recover them in accordance with professional standards. Fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and curated in a scientific institution with permanent paleontological collections. The paleontological monitor will follow the procedures outlined in the Paleontological Monitoring and Treatment Plan, which will be prepared and will include information regarding pre-construction field surveys, construction personnel training, necessary permits, research design, monitoring methodology, fossil discovery and recovery protocols, fossil preparation and curation procedures, and the preparation of a final monitoring report.
APM CUL-09	SDG&E will flag potentially sensitive archaeological resources identified in the vicinity of access roads for avoidance and prohibit any grading activities in the vicinity as part of construction or operation and maintenance.
<i>Public Health (Fire Hazards)</i>	
APM HAZ-01	SDG&E will implement its existing Electric Standard Practice (ESP) 113-1, which includes requirements for carrying emergency fire suppression equipment, conducting worker-awareness trainings that cover fire prevention and safety, restrictions on smoking and idling vehicles, and construction restrictions during Red Flag Warnings (RFWs).
APM HAZ-02	SDG&E will implement Electric Distribution Operation 3017 to ensure that the proper steps are taken to maintain fire safety while meeting all operational and service requirements.
APM HAZ-03	Prior to starting construction activities, SDG&E will clear dead and decaying vegetation from Proposed Action work areas where personnel are active or where equipment is in use or being stored within ROWs, staging areas, stringing sites, and access roads.
APM HAZ-04	Prescribed fire tools and backpack pumps with water will be kept within 50 feet of work activities to ensure the capability for rapid extinguishment in the event of a fire.
APM HAZ-05	Weather and fire danger will be monitored daily by SDG&E meteorologists and wildland fire specialists in order to provide timely and immediate communication of significant changes which could impact the Proposed Action.
APM HAZ-06	No construction work will occur for areas affected by a RFW or Project Activity Level E designation.
<i>Hydrology and Water Quality</i>	
APM HYD-01	All concrete washouts will be conducted either into excavations where the concrete was poured within designated concrete washout stations, or will be captured using a washout recycling system. Crews will not be allowed to dispose of concrete directly onto the ground.
APM HYD-02	When construction activities are required adjacent to flowing aquatic resources, sediment barriers will be placed between the work area and flowing water.

APM No.	Description
APM HYD-03	<p>In areas where topsoil has not been salvaged, construction activities will be limited when the environmental monitor determines that the soil is too wet to adequately support vehicles and equipment. Where soil conditions are deemed too wet to work, one of the following measures will apply:</p> <ul style="list-style-type: none"> — Access will be limited to the minimum area feasible for construction. Where possible, vehicles and equipment will be routed around wet areas so long as the re-route does not cross into sensitive resource areas. — If wet areas cannot be avoided and soil moisture is too high to strip topsoil, BMPs—including the use of wide-track or low ground pressure equipment or installation of prefabricated equipment pads or timber mats—will be implemented for use in these areas to minimize rutting and off-site sedimentation.
APM HYD-04	Any areas not surveyed for potentially jurisdictional wetlands or waters due to limited access will be surveyed prior to the start of construction activities and potential impacts will be assessed and the appropriate jurisdictional permits will be obtained as needed.
APM HYD-05	SDG&E will prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will identify BMPs based on its Water Quality BMPs Manual for each activity that has the potential to degrade surrounding water quality through erosion, sediment run-off, and other pollutants. These BMPs will then be implemented and monitored by a Qualified SWPPP Practitioner.
APM HYD-06	During any construction activities, SDG&E will flag all hydrological resources occurring within work areas for avoidance, and all construction activities will occur outside of these resources.
APM HYD-07	SDG&E will comply with Forest Service requirements pertaining to hydrology and water quality, as detailed in the Forest Service’s Water Quality Management for National Forest System Lands in California, BMPs.
APM HYD-08	If dewatering is required, dewatering systems—as outlined in SDG&E’s Water Quality BMPs Manual—will be used to dispose of groundwater. Typically, groundwater will be pumped into truck-mounted storage tanks and either discharged to land in accordance with Regional Water Quality Control Board regulations or transported to an authorized discharge location.
APM HYD-09	SDG&E will implement site-specific erosion and sediment control devices and the proper handling of potentially hazardous materials.
APM HYD-10	Following construction, the ROW, work areas, stringing sites, staging areas, and fly yards will be returned to near pre-construction conditions, which include re-establishing drainage patterns and vegetation, where feasible.
APM HYD-11	Existing access roads will be utilized to access the replacement structures where helicopter-only access is not required.
<i>Noise</i>	
APM NOI-01	SDG&E will provide notice of the construction schedule to all property owners within 300 feet of the Proposed Action by mail at least one week prior to the start of construction activities. The announcement will state the construction start date, anticipated completion date, and hours of operation, as well as a telephone number to call with questions or complaints during construction.
APM NOI-02	Operating equipment will be positioned to maximize the distance to residences and to maintain safe and effective operation.
APM NOI-03	All internal combustion engine-driven equipment will be equipped with exhaust mufflers that are in good condition and meet or exceed the manufacturer’s specifications. All equipment will be maintained and tuned according to manufacturer recommendations.
APM NOI-04	When backup alarms have more than one loudness setting, they will be set to the lowest setting that meets Occupational Safety and Health Administration safety requirements.

APM No.	Description
APM NOI-05	When located within 80 feet of residences, a temporary noise barrier with an effective height of approximately three feet will be placed between residences and stationary noise-generating equipment during use. The effective height is that of the barrier above the line-of-sight between the noise source and the noise-sensitive receiver.
APM NOI-06	Helicopters will be required to maintain a height of at least 500 feet when passing over residential areas, except when at temporary construction areas or actively assisting with conductor stringing. All helicopters will be required to maintain a lateral distance of at least 500 feet from all schools. No more than 64 flights per day will be conducted.
APM NOI-07	Residents who experience construction noise levels that exceed the applicable noise thresholds will be temporarily relocated, on an as-needed basis, for the duration of the activities that will impact them.
APM NOI-08	In the event that blasting is required within 325 feet of a residential property line, SDG&E will prepare and provide a blasting plan for the Proposed Projects that is consistent with SDG&E's blasting guidelines to reduce noise and vibration impacts from blasting activities. The blasting contractor will be required to obtain a blasting permit and explosive permit per the San Diego County Regulatory Ordinances.
APM NOI-09	Where appropriate, SDG&E will coordinate with the San Diego County noise control officer regarding helicopter flights between 6:30 a.m. and 7:00 a.m. to avoid any conflicts with the County noise ordinance.
APM NOI-10	If construction occurs outside the hours allowed by San Diego County, SDG&E will follow its established protocols and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction.
<i>Transportation and Traffic</i>	
APM TRANS-01	To minimize traffic impacts, temporary lane closures will occur during off-peak traffic hours, to the extent practical, in order to minimize disruptions and traffic backups.
APM TRANS-02	Caution signs and/or flagmen will be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction.
APM TRANS-03	Emergency vehicles will be provided access even in the event of temporary road or lane closures.
APM TRANS-04	SDG&E will coordinate isolated, temporary road closures with local jurisdictional agencies, as required, to cross these roadways, and perform work according to agency requirements.
APM TRANS-05	SDG&E will develop and implement a Traffic Control Plan during construction.
APM TRANS-06	SDG&E will coordinate flight patterns with local air traffic control and the Federal Aviation Administration prior to construction to prevent any adverse impacts due to increased air traffic.
APM TRANS-07	Where replacement poles will be close to existing pole locations, existing access roads, spur roads, and turnarounds will be used to the extent possible to support construction activities and will continue to be used for future line maintenance.
Source: Final EIR/EIS Table B-13	

ATTACHMENT D
BIA Record of Decision

RECORD OF DECISION
SDG&E POWER LINE REPLACEMENT PROJECT
LA JOLLA, CAMPO AND PAUMA-YUIMA INDIAN RESERVATIONS
SAN DIEGO COUNTY, CALIFORNIA

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS

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1.0 INTRODUCTION

1.1 Background

San Diego Gas & Electric (SDG&E) submitted an initial application to the U. S Forest Service (Forest Service), Cleveland National Forest, to obtain a Master Special Use Permit (MSUP) in 2005. The purpose of the MSUP was to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its electric lines and other existing facilities located within the Cleveland National Forest. As part of the National Environmental Policy Act (NEPA) review process, the Forest Service circulated an Environmental Assessment (EA) for public comment in 2009. In response to public comments received on that EA, the Forest Service determined that additional fire risk reduction measures within the Cleveland National Forest (including fire hardening) and additional undergrounding should be evaluated as part of the MSUP review process and that, as a result, an environmental impact statement (EIS) was required.

After publication of the EA in 2009, SDG&E expanded the scope of the proposed MSUP to include fire hardening, undergrounding, and relocation of improvements both within and outside the Cleveland National Forest. The proposed power line replacement projects will require a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC). The project also crosses other federal jurisdictions, including land managed by the Bureau of Indian Affairs (BIA) and the Bureau of Land Management (BLM). SDG&E also proposed new construction within Cuyamaca Rancho State Park (CSP).

The CPUC and Forest Service agreed to develop a joint Environmental Impact Report / Environmental Impact Statement (EIR/EIS) for the MSUP/PTC Power Line Replacement Projects. The CPUC is the lead agency under California law and the Forest Service is the lead federal agency. The joint EIR/EIS was prepared to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The joint document is called the "SDG&E Master Special Use Permit and Permit to Construct Power Line Replacement Projects EIR/EIS." The BLM and BIA joined the Forest Service as federal cooperating agencies under NEPA, and the CSP is participating as a responsible agency under CEQA. The Final EIR/EIS was issued July 10, 2015.

When taking actions on a Right-of-Way Grant, the BIA must comply with NEPA but can adopt another agency's environmental review to meet those requirements if it has addressed all the environmental issues associated with the trust land action. The Forest Service Final EIR/EIS fully addressed all of the environmental issues for the Proposed Action. The Final EIR/EIS states that it may be used by other state, local and Federal agencies for those that have portions of the project proposed on lands under their jurisdiction. The BIA relies on the Final EIR/EIS for the entire project in making the decisions in this ROD and adopts the Final EIR/EIS and incorporates by reference necessary related documents to address the NEPA requirements for this Proposed Action.

1.2 Forest Service and BLM Decisions

The Forest Service has authorized and BLM is proposing to authorize the MSUP and Power Line Replacement Projects via the Forest Service ROD and a BLM Determination of NEPA Adequacy (DNA) located on lands under their respective jurisdictions. The Forest Service, based on an evaluation of the information provided by the applicant and a review of the analysis disclosed in the Final EIR/EIS, decided to implement the components of the Federal Preferred Alternative that are located on the National Forest System lands. Similarly, BLM is expected to evaluate applicant provided information and review the disclosed analysis in the Final EIR/EIS in reaching its decision to authorize components of the Federal Preferred Alternative that are located on lands managed by the BLM.

1.3 BIA Determination

This BIA ROD applies only to lands held in trust on the La Jolla, Campo and Pauma-Yuima Indian reservations. In issuing this ROD, BIA adopts the relevant mitigation measures identified in the FEIR/EIS. Based on the analysis in the FEIR/EIS and the entirety of the administrative record, BIA has determined that the Federal Preferred Alternative meets the purpose and need of the BIA and respective tribes.

2.0 AGENCY PURPOSE AND NEED

The BIA purpose is to authorize the power lines and associated upgrades needed to continue electric service to a variety of users within and adjacent to the Indian trust lands in a manner that is consistent with tribal land use goals and policies. The action is needed to amend the existing easements to include the proposed fire hardening measures and locations, and to extend their term.

3.0 DESCRIPTION OF THE PROPOSED ACTION

3.1 La Jolla Reservation

The BIA, in consultation with the La Jolla Band of Luiseño Indians, proposes modifications to TL682 and amend existing ROWs where needed on tribal lands as part of the federal proposed action. Under this action, approximately 1,500 feet of TL682 would be placed underground between poles Z118079 to Z118082, through an economic development zone located on the La Jolla Reservation. The transition pole for Z118082 would be moved northeast from its current location. In addition, pole Z118085 would be moved to the south from its current location, and several poles to the west of pole Z118079 would be realigned onto tribal lands to avoid allotted properties on the reservation.

3.2 Campo Reservation

The BIA, in consultation with the Campo Kumeyaay Nation, proposes to amend the existing Right-of-Way (ROW) grants to authorize SDG&E's proposed project for TL629. The project includes fire hardening the line, adding an additional circuit, and relocating an existing distribution circuit to the fire hardened TL629. A section of the transmission line would be constructed underground as it enters the Crestwood Substation. The BIA also proposes to amend the existing ROW grants for TL6931 to authorize the fire hardening of the existing line.

3.3 Pauma-Yuima Reservation

No amendments or relocation of the existing TL682 is proposed by SDG&E. Activities would be limited to a small section of the existing line to replace wooden poles to steel.

4.0 ALTERNATIVES CONSIDERED

The Final EIR/EIS evaluated six other alternatives in detail as described below. A comparison of the alternatives considered in detail can be found in the Final EIR/EIS Section E.

SDG&E's Proposed Project – SDG&E's proposed project would include issuance of a MSUP for the SDG&E system, including 102 miles of electric lines within the SDG&E system totaling approximately 146 miles both on and off the Cleveland National Forest.

Federal Proposed Action – The Federal Proposed Action modifies certain actions proposed by SDG&E on National Forest System lands and the La Jolla Indian Reservation. Under this alternative TL626 would be relocated to the east of the Cedar Creek canyon, and relocated to the east of the Inaja Fire Memorial Overlook. This alternative also requires additional undergrounding for C440 within the Laguna Recreation Area, and also requires a short section of undergrounding for TL682 within the La Jolla Indian Reservation.

No Action Alternative – No MSUP Issued – Under this required alternative the Forest Service would not issue a MSUP and the existing permits would terminate according to their terms. SDG&E would be required to remove all the improvements according to the permit terms.

No Project Alternative – Under this alternative, which is required under CEQA, the existing alignments within the Cleveland National Forest would be maintained as they are currently, under their approximately 70 separate permits and easements. In addition, none of SDG&E's proposed power line replacement projects including proposed fire hardening activities would be authorized.

Partial Removal of Overland Access Roads – This alternative, which is based on the Proposed Project, would remove up to 10.5 miles of regularly maintained access roads that are in general greater than 25% grade and in close proximity to creeks, particularly along TL626 (Boulder Creek) and TL625 (Barber Mountain/Carveacre).

Removal of TL 626 from Service – Under this alternative, TL 626 would be removed from service and replaced by one of two options described in the Final EIR/EIS Section C.4.2. The remaining system components would be treated the same as the Proposed Project.

The Federal Preferred Alternative – As described in the Final EIR/EIS Section E.6, the federal preferred alternative is a composite of three alternatives. The Federal Proposed Action is the basis of the preferred alternative; however the TL626 relocation option has been replaced by the TL626 Removal From Service Alternative Option 1 (the upgrade to TL6931), combined with the off-grid solution for the Boulder Creek substation. The Federal Preferred Alternative adopts Option 2 for the C157 relocation out of the Hauser Wilderness. The Federal Preferred Alternative also analyzed the conversion of TL626 to 12kV to continue service to the Boulder Creek substation if the off-grid solution was not feasible. The Forest Service ROD does not authorize this conversion. The Federal Preferred Alternative would also convert a 6.8 mile section of TL626 that is co-located with C79 to a 12kV fire hardened line to serve local residences along Boulder Creek Road. The Federal Preferred Alternative adopts Option 2 for C157 relocation out of the Hauser Wilderness. The Federal Preferred Alternative also incorporates the portions of the Partial Removal of Overland Access Roads applicable to TL626/C79, TL625, C442 and TL629. This alternative as modified and adopted in the Forest Service ROD best meets the purpose and need for the reasons described in the decision rationale section.

In addition to the alternatives considered in detail, the Final EIR/EIS evaluated fifteen additional alternatives but eliminated them from detailed study as described in the Final EIR/EIS Section C.5. As described in Section C.5, alternatives that were not carried forward for full analysis did not meet project objectives, feasibility or environmental effectiveness criteria.

5.0 MITIGATION AND MONITORING

SDG&E, as the applicant, proposed numerous measures to protect resources as described in the Final EIR/EIS Section B.7.1. The Forest Service and CPUC, as lead agencies, identified additional measures throughout the Final EIR/EIS Section D. Both the applicant proposed measures and the agencies required mitigation measures will be included in the MSUP as permit requirements, and implemented as part of the Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) described in Section H of the Final EIR/EIS. Applicable mitigation measures for implementation on lands held in trust by the BIA can be found Tables 4,5,6,7,8,9,10,11,12, and 16 of the MMCRP.

6.0 PUBLIC INVOLVEMENT

A notice of intent to prepare an EIS was published in the Federal Register on September 23, 2013 (78 FR 58270), and the scoping comment period was open for 45 days. In addition, the proposed action was listed in the Cleveland National Forest Schedule of Proposed Actions and updated periodically during the environmental analysis. People were invited to review and comment through direct distribution of a joint Forest Service and CPUC Notice of Preparation and by legal notices published in local papers. A supplemental scoping period was offered starting on January 17, 2014 and ending on March 7, 2014. Public meetings were held in Alpine and Julian during the first scoping period, and in Alpine during the supplemental scoping period. All project information was maintained on the project webpage

(<http://www.cpuc.ca.gov/environment/info/dudek/CNF/CNF.htm>) hosted by the CPUC.

Issues were identified from scoping comments and were summarized in the Scoping Report dated January 16, 2014, and were updated in March 2014 after the supplemental scoping period. The issues significant to the proposed action are summarized Table A-1 of the Final EIR/EIS.

The Draft EIR/EIS was published for review and comment on September 5, 2014 when the Environmental Protection Agency published the Notice of Availability in the Federal Register (79 FR 53061). Notices were distributed to the project mail list, and copies of the Draft EIR/EIS were available on the web, at local libraries, and provided to those who requested copies. Notice of the opportunity to comment was published in the San Diego Union-Tribune on September 5, 2014. A public meeting was held in Alpine on October 1, 2014. The 60 day comment period closed on November 4, 2014.

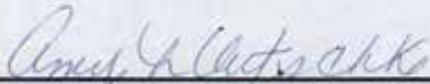
The Forest Service and CPUC received comments on the Draft EIR/EIS from two federal agencies, seven state and local agencies, two Native American tribes, eight community groups, the applicant, and fifteen individuals. The comments and responses are presented in the Final EIR/EIS Volume 2. Summaries of the public participation process are discussed in the Final EIR/EIS Section I.

7.0 DECISION TO IMPLEMENT THE PROPOSED ACTION

The Bureau of Indian Affairs has determined that it will approve the amendments to the subject ROW Grants to SDG&E for the proposed project on TL682 within the La Jolla Reservation and for the proposed project on TL629 and TL6931 within the Campo Reservation and authorize the wood to steel pole replacements on TL682 within the Pauma-Yuima Reservation. The BIA decision is based on it best meets the purpose and need, the analysis of the environmental impacts identified in the FEIR/EIS with corresponding mitigation and supports the mission of BIA and its policy goals and objectives.

8.0 SIGNATURE

By my signature, I indicate my decision to amend the subject ROW Grants to SDG&E within the La Jolla and Campo Indian Reservations and authorize the wood to steel pole replacements on TL682 within the Pauma-Yuima Reservation.



Amy L. Dutschke
Pacific Regional Director

3/30/2016

Date

ATTACHMENT E
Sample Site Inspection Form

**MITIGATION MONITORING
COMPLIANCE AND
REPORTING PROGRAM**



Site Inspection Form

Project:	MSUP/PTC Powerline Replacement Projects (Application A.12-10-009)	Date:	
Owner:	San Diego Gas & Electric (SDG&E)	Project Component:	
Project Manager:	TBD	Report Number:	
Lead Agency:	California Public Utilities Commission	Representative:	Lisa Orsaba

SITE INSPECTION CHECKLIST

Air Quality	Yes	No
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?		
Do vehicles or equipment appear to be idling unnecessarily?		
Biology	Yes	No
Are appropriate measures in place to protect sensitive habitat (i.e., flagging, signage, exclusion fencing, biological monitor)?		
Are all activities being conducted within the approved work limits?		
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		
Cultural and Paleontological Resources	Yes	No
Are known cultural resources clearly marked for exclusion?		
Is a cultural monitor on site if grading is occurring near known cultural sites?		
Is a paleontological monitor on site if grading is occurring (see mitigation measure for specifications)?		
Hazardous Materials	Yes	No
Have all spills been cleaned-up in accordance with the project's Spill Response and Notification Plan and/or the SWPPP?		
Are fuels, oils, lubricants, and other hazardous materials on-site labeled and stored in appropriate containers?		
Water Quality	Yes	No
Have temporary erosion and sediment control measures been installed?		
Are BMPs in good condition and functional?		
Is mud tracked onto roadways cleaned-up in accordance with the project's SWPPP?		

DESCRIPTION OF OBSERVED ACTIVITY

MITIGATION MEASURES VERIFIED

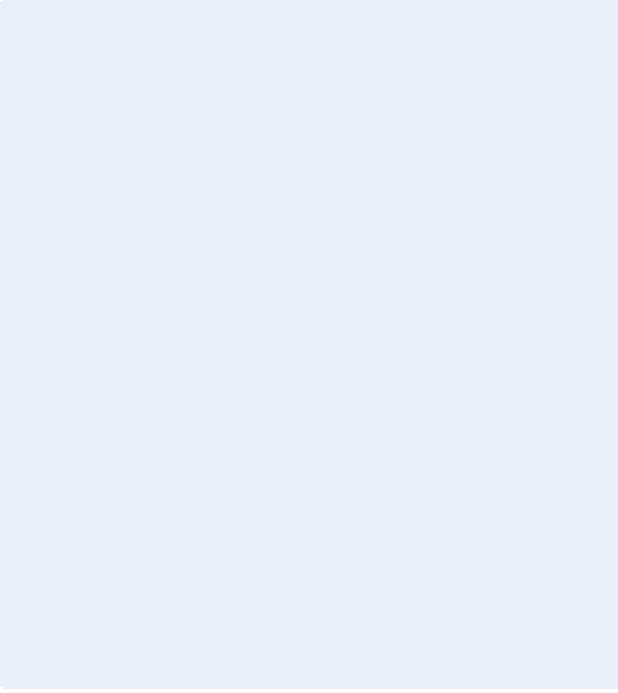
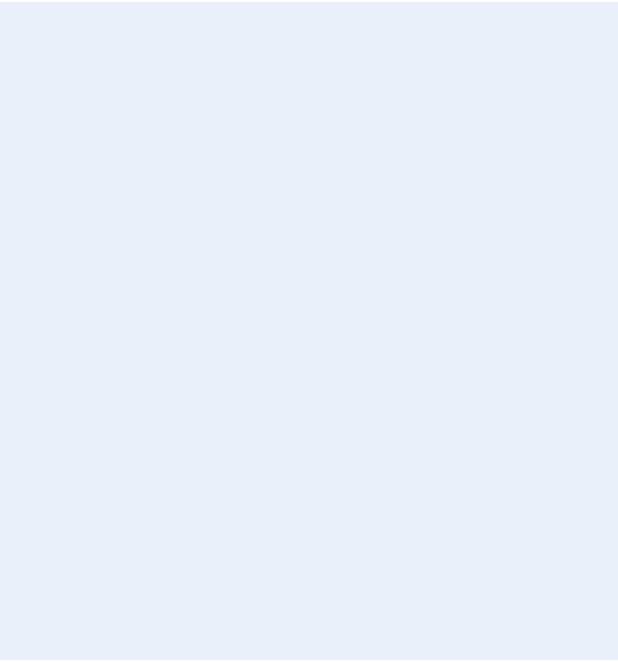
COMPLIANCE

- Project is in compliance with environmental mitigation measures
- Project Memorandum:** (Mitigation Measure not fully implemented, however no eminent resource threat or damage)
- Non-Compliance Report:** (Violates the project’s environmental requirements and places environmental resources at risk or minor incidents are repeated, and show a trend toward placing resources at unnecessary risk)

ISSUES REQUIRING FOLLOW-UP:

Issue Requiring Follow-Up	SDG&E Notification	Corrective Actions Implemented by SDG&E

Photos:

Completed by:

Name: _____
Firm: Dudek
Date: _____

Distribution:

ATTACHMENT F

CPUC Minor Project Refinement Request Form



**CLEVELAND NATIONAL FOREST POWER LINE
REPLACEMENT PROJECTS**



MINOR PROJECT REFINEMENT REQUEST FORM

Date Submitted:		Request #:	
Date Approval Required:		Landowner:	
APN:			
Refinement from (check all that apply):			
<input type="checkbox"/> Mitigation Measure	<input type="checkbox"/> APM	<input type="checkbox"/> Project Description	<input type="checkbox"/> Drawing <input type="checkbox"/> Other
Identify source (mitigation measure, project description, etc.):			
Attachments (check all that apply):			
<input type="checkbox"/> Refinement Request Screening Form (see Error! Reference source not found.)	<input type="checkbox"/> Photos	<input type="checkbox"/> Maps	<input type="checkbox"/> Other
<p>Under Order 2 of the Decision Granting SDG&E Permit to Construct the Cleveland National Forest Power Line Replacement Projects (D.16-05-038), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 2 of the Decision, respond “yes” or “no” to the following questions (a) through (d).</p>			
(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
(b) Will the proposed refinement result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
(d) Does the proposed refinement trigger an additional permit requirement?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Describe refinement being requested (attach drawings and photos as needed):			

Provide need for refinement (attach drawings and photos as needed):

--

Date refinement is expected to be implemented:

--

Resource Agency Coordination

Resource Agency	Name	Action Required	Date	Documentation (see attached if yes)	
				<input type="checkbox"/> Yes	<input type="checkbox"/> No

ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

The requested refinements were evaluated to verify that they will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Diego Gas & Electric Company (SDG&E) Cleveland National Forest Power Line Replacement Projects (Project). The following Final EIR/EIS Consistency Checklist answers the consistency questions for each resource category and includes a description and justification below each resource category, as necessary. The consistency questions were developed using the California Environmental Quality Act (CEQA) Checklist provided in the Final EIR/EIS. Refer to the Final EIR/EIS for the details on the Project impact evaluation.

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Aesthetics (e.g., adversely affect scenic vistas, damage scenic resources within a state scenic highway, degrade the existing visual character of the site and its surroundings, create sources of light or glare, or result in an inconsistency with applicable scenic integrity objectives)?</p> <p><i>Final EIR evaluation:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Aesthetics:			
<p>Air Quality (e.g. produce additional emissions, conflict with applicable local air quality plans, or expose sensitive receptors to additional pollutants)?</p> <p><i>Final EIR evaluation:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Air Quality:			
<p>Biological Resources (e.g., result in temporary or permanent loss of native vegetation, preserve areas, native wildlife and/or their habitats; cause an adverse effect to jurisdictional waters or sensitive or special-status species; result in the introduction of invasive, non-native, or noxious plant species; conflict with local, regional, or state habitat conservation plan; or interfere with the movement of any resident or migratory wildlife)?</p> <p><i>Final EIR evaluation:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Biological Resources:			
<p>Cultural and Paleontological Resources (e.g., cause an adverse change to Traditional Cultural Properties or historical, archeological, or paleontological resources; or disturb any human remains)?</p> <p><i>Final EIR evaluation:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Cultural and Paleontological Resources:			

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Greenhouse Gases (e.g., result in a net increase of greenhouse gas emissions, or conflict with an applicable plan, policy, or regulation that reduces greenhouse gas emissions)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Greenhouses Gases:			
Public Health and Safety (e.g., result in a significant hazard to the public or the environment through the transport, use, or disposal of hazardous materials; emit hazardous waste within one-quarter mile of a school; be located on a hazardous materials site; result in a safety hazard for people residing or working in the Project area; interfere with an adopted emergency plan; or create safety hazards due to structural failure)? <i>Final EIR evaluation:</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Public Health and Safety:			
Fire and Fuels Management (e.g., increase the probability of a wildfire, reduce the effectiveness of firefighting, or introduce non-native plants that would contribute to ignition potential)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Fire and Fuels Management:			
Hydrology and Water Quality (e.g., result in increased levels of turbidity, introduce contaminants, deplete groundwater supplies, or degrade water quality)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Hydrology and Water Quality:			
Land Use (e.g., disturb land uses at or near the Project components, divide an established community, or conflict with a land use plan, policy, or regulation of an agency with jurisdiction over the Project)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Land Use:			

Final EIR/EIS Consistency Checklist			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Noise (e.g., disturb sensitive receptors and violate local rules, standards, and/or ordinances; or cause ground borne vibration)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Noise:			
Public Services and Utilities (e.g., result in construction of new, or expansion of existing, facilities for fire protection, municipal water supplies, telecommunications, and solid waste; or disrupt electric service)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Public Services and Utilities:			
Recreation (e.g., reduce access and visitation to recreation areas, preclude recreational activities, or result in increased, unauthorized access to specially designated or restricted areas)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Recreation:			
Transportation and Traffic (e.g., conflict with an applicable congestion management program or a plan, ordinance, or policy associated with the circulation system or alternative transportation; increase hazards due to a design feature; or result in inadequate emergency access)? <i>Final EIR evaluation:</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Summary of Proposed Minor Project Refinement Impacts on Transportation and Traffic:			

ATTACHMENT G
Applicant Proposed Measures

ATTACHMENT G

Applicant Proposed Measures

APPLICANT PROPOSED MEASURES

Table G-1, Applicant Proposed Measures (APMs) for Each Issue Area, lists APMs that are applicable to each environmental issue area, while Table G-2 lists the APMs included in the FEIR/FEIS in Section B.7.1. APMs that have been superseded by mitigation measures adopted in the CPUC decision have been noted in the tables below.

APMs would be followed during all Project-related construction activities. In addition, all Project personnel are subject to training prior to beginning work on the Project to ensure that the APMs, environmental laws and regulations, and all other agency requirements are understood and followed.

Table G-1
Applicant Proposed Measures for Each Issue Area

Issue Area	Applicable APMs
General	APM GEN-01 through APM GEN-08
Visual Resources	APM VIS-01 through APM VIS-05
Air Quality	APM AIR-01 through APM AIR-05
Biological Resources	APM BIO-01 through APM BIO-10
Cultural and Paleontological Resources	APM CUL-01 through APM CUL-09
Fire Hazards	APM HAZ-01 through APM HAZ-06 (see notes in table below)
Hydrology and Water Quality	APM HYD-01 through APM HYD-11
Noise	APM NOI-01 through APM NOI-10 (see notes in table below)
Transportation and Traffic	APM TRANS-01 through APM TRANS-07 (see notes in table below)

Table G-2
SDG&E Proposed Applicant Proposed Measures

APM No.	Description
<i>General</i>	
APM GEN-01	Native soil not used for backfill will be spread on site, if clean, or hauled off site and disposed of at an approved facility. Construction activities that involve placement of native, clean soil will be managed by employing BMPs that minimize soil erosion and impacts on surrounding vegetation per the SDG&E Water Quality BMP Manual. BMPs such as silt fencing or fiber rolls will be installed where necessary (e.g., in high-velocity flow areas and in areas of steep slope), and soil will be placed and compacted in a manner that sufficiently controls erosion and sediment discharge from the site.
APM GEN-02	Where distribution and power lines are removed, the old conductor will be wound onto wooden spools, placed on flatbed trucks, and recycled at an approved facility.
APM GEN-03	Old poles, associated hardware, and any other debris generated from construction activities will be removed from the site and placed on flatbed trucks for recycling or disposal at an approved facility.
APM GEN-04	The entire existing wooden pole will be removed unless protection of an environmental resource requires the pole to be cut off at the surface and the base left in place.

ATTACHMENT G (Continued)

Table G-2
SDG&E Proposed Applicant Proposed Measures

APM No.	Description
APM GEN-05	Imported material may be used to backfill the holes as needed; however, as much native material as possible will be used on site. Construction activities that involve placement of native, clean soil will be managed by employing BMPs that minimize soil erosion and impacts on surrounding vegetation per the SDG&E Water Quality BMP Manual. BMPs such as silt fencing or fiber rolls will be installed where necessary (e.g., in high-velocity flow areas and in areas of steep slope), and soil will be placed and compacted in a manner that sufficiently controls erosion and sediment discharge from the site.
APM GEN-06	Prior to initiating construction, SDG&E will make all the appropriate and necessary notifications, including landowner notifications.
APM GEN-07	SDG&E will notify the Underground Service Alert a minimum of 48 hours in advance of excavating or conducting other ground-disturbing activities in order to identify buried utilities. Exploratory excavations (potholing) will also be conducted to verify the locations of existing facilities in the field, if necessary.
APM GEN-08	SDG&E will coordinate with CAISO to obtain all the necessary line clearances prior to beginning new conductor installation.
<i>Visual Resources</i>	
APM VIS-01	When construction has been completed, all temporary work areas will be restored to near pre-construction conditions in accordance with landowner agreements, in order to reduce potential visual contrast with the surrounding landscape setting.
APM VIS-02	Construction activities will be kept as clean and inconspicuous as practical. Where practical, construction storage and staging will be screened from close-range residential views with opaque fencing.
APM VIS-03	Non-specular conductors will be installed for new and replacement conductors along the electric line alignments in order to minimize the reflectivity and general visibility of new electric line facilities.
APM VIS-04	New and replacement poles to be installed along the electric line alignments will be reddish-brown, weathered-steel that will appear similar in color to existing wood poles seen in the Proposed Action area and will blend in with the surrounding landscape backdrop.
APM VIS-05	Any required lighting will be limited to individual pole work areas and will not exceed more than two hours per evening.
<i>Air Quality</i>	
APM AIR-01	To the extent feasible, unnecessary construction vehicle and idling time would be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The project would apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine would be shut off.
APM AIR-02	To control fugitive dust, SDG&E would apply water or non-toxic soil stabilizers on all unpaved access roads, staging areas, and other work areas if construction activity causes persistent visible emissions of fugitive dust beyond the work area; cover loads in haul trucks or maintain at least six inches of free-board when traveling on public roads; and apply non-toxic soil stabilizers or water to form and maintain a crust on inactive construction areas (disturbed work areas that are unused for four consecutive days).
APM AIR-03	Traffic speeds on unpaved roads would be limited to 15 miles per hour.

ATTACHMENT G (Continued)

Table G-2
SDG&E Proposed Applicant Proposed Measures

APM No.	Description
APM AIR-04	SDG&E would maintain construction equipment per manufacturing specifications and use low-emission equipment as follows: all off-road and portable construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program, which have a rating of 50 horsepower (hp) or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Section 2423(b)(1), unless such an engine is not available for a particular item of equipment. In the event that a Tier 2 engine is not available for any off-road engine larger than 100 hp, that engine shall be equipped with a catalyzed diesel particulate filter (soot filter), unless the engine manufacturer indicates that the use of such devices is not practical for that particular engine type.
APM AIR-05	SDG&E would continue to utilize best management practices (BMPs) to minimize dust and erosion.
<i>Biological Resources</i>	
APM BIO-01	SDG&E will consult with the appropriate resource agencies regarding potential impacts to federally and state-listed species, as appropriate.
APM BIO-02	All work areas will be surveyed for special-status plant and wildlife species by a qualified biologist prior to the commencement of construction in accordance with SDG&E's pre-activity survey report requirements.
APM BIO-03	SDG&E will implement the protocols identified in the POD Appendix A: SDG&E NCCP Protocols (SDG&E 2013a).
APM BIO-04	SDG&E will implement the protocols identified in SDG&E Quino Checkerspot Butterfly (<i>Euphydryas editha quino</i>) Low-Effect Habitat Conservation Plan Sections 3.2 Actions to Minimize Impacts and 3.3 Actions to Mitigate Impacts.
APM BIO-05	Stringing site locations are designed with a preference toward placement within roadways, where possible, to minimize additional potential impacts from grading and vegetation removal that may otherwise be required if these stringing sites were required to be located in vegetated, off-road areas.
APM BIO-06	Although Laguna Mountains Skipper is not covered under SDG&E's Natural Community Conservation Plan (NCCP), SDG&E will utilize NCCP protocols 1, 2, 3, 5, 7, 8, 10, 11, 13, 14, 17, 24, 25, 29, 34, 35, 41, 44, 48, 54, 55, and 57 in United States (U.S.) Forest Service- (Forest Service-) modeled critical habitat and occupied habitat to minimize any potential impacts to this species. In addition, SDG&E will have a qualified biologist survey any Laguna Mountains Skipper habitat prior to work.
APM BIO-07	If California spotted owls are identified in the vicinity of proposed work areas during the pre-activity survey process, SDG&E will consult with the appropriate resource agencies to avoid impacts to nesting California spotted owl.
APM BIO-08	SDG&E will design and install all new poles to conform to the guidelines in the Suggested Practices for Avian Protection on Power Lines Manual developed by the Avian Power Line Interaction Committee.
APM BIO-09	If active bat roosts are identified during pre-activity surveys, SDG&E will coordinate with the U.S. Fish and Wildlife Service/California Department of Fish and Wildlife as appropriate.
APM BIO-10	SDG&E will eliminate existing access roads that will no longer be used due to removal or relocation of facilities, and will return the land to near pre-construction conditions.
<i>Cultural and Paleontological Resources</i>	
APM CUL-01	Prior to construction, all SDG&E, contractor, and subcontractor personnel will receive training regarding the appropriate work practices necessary to effectively implement the APMs and to comply with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural, archaeological, and paleontological resources and how to recognize possible buried resources. This training will include a presentation of the procedures to be followed upon discovery or suspected discovery of cultural and archaeological materials, including Native American remains and their treatment, as well as of paleontological resources.

ATTACHMENT G (Continued)

Table G-2
SDG&E Proposed Applicant Proposed Measures

APM No.	Description
APM CUL-02	Intensive pedestrian surveys will be conducted prior to construction in those areas within the ROWs for which initial survey access was not granted to determine the potential for impacts to cultural resources in these areas. Where possible, engineering design will be re-evaluated to determine whether facilities can be relocated to avoid any cultural resources identified from these additional surveys. If relocation is not feasible, APM CUL-03 will be implemented to minimize impacts to sensitive cultural resources.
APM CUL-03	All potentially National Register-eligible or archaeologically sensitive sites, as defined in the Cultural Resources Technical Report, that will not be directly affected by construction but are within 50 feet of replacement pole locations will be designated as Environmentally Sensitive Areas (ESAs). Potentially eligible resources include those that are recommended eligible, as well as unevaluated sites. Protective fencing or other markers will be erected and maintained to protect these ESAs from inadvertent trespass for the duration of construction in the vicinity. ESAs will not be signed or marked as cultural, historical, or archaeological resources.
APM CUL-04	An archaeological or cultural monitor will be present during construction activities that occur within or adjacent to identified archaeological or cultural resource site boundaries, respectively, as identified in the Cultural Resources Technical Report to ensure conformance with prescribed avoidance measures. The monitor will identify potential archaeological or cultural resources that may be unexpectedly encountered during construction and will have the authority to divert or temporarily halt construction activities in the area of discovery. In the event that archaeological or cultural resources are discovered, the monitor will stop work and notify the Principal Investigator (PI), who will inform SDG&E and the Forest Service Heritage Program Manager (HPM) of the stoppage. The archaeologist, in consultation with the Forest Service HPM and SDG&E's Cultural Resource Specialist, will determine the significance of the discovered resources. The Forest Service HPM and SDG&E's Cultural Resource Specialist and Environmental Project Manager must concur with the evaluation procedures to be performed before construction activities are allowed to resume. For significant cultural resources, preservation in-place will be the preferred manner of mitigating for impacts. For resources that cannot be preserved in place, a Research Design and Data Recovery Program will be prepared and carried out to mitigate impacts in consultation with the Forest Service HPM, the Tribes, and the State Historic Preservation Office (SHPO). No collection of archaeological or cultural resources will occur on Forest Service property without prior Forest Service HPM consent. Daily logs will be kept by all monitors, and a monitoring report (with appropriate graphics), which describes the results, analyses, and conclusions of the monitoring program, will be prepared at the conclusion of each phase of monitoring. Any new cultural sites or features encountered will be recorded with the South Coastal Information Center. Monitors will also identify and delineate an approved footpath through the archaeological and cultural resource sites for construction crews, as needed.
APM CUL-05	SDG&E will implement all applicable site-specific impact avoidance measures identified and described in the Cultural Resources Technical Report, such as avoiding access road improvements within culturally sensitive areas unless improvements are required for safety reasons; replacing poles within the previously disturbed area (two to four feet) represented by the existing pole locations, where necessary, to avoid sensitive resources; and cutting existing poles off at grade level, where specified and landowner approval is provided. Same-hole pole placement will also be utilized on a case-by-case basis. No new pole locations will be placed within cultural resource boundaries unless the appropriate consultation (including Section 106) has taken place. No temporary poles will be located within sites unless the appropriate consultation (including Section 106) has taken place.
APM CUL-06	In consultation with the Forest Service HPM, BIA Archaeologist, the Tribes, and the SHPO, SDG&E will develop a Cultural Resources Treatment Plan that includes procedures for protection and avoidance, evaluation and treatment, and the curation of any potentially register-eligible cultural materials. Specific protective measures, including a monitoring program, will be defined in the Cultural Resources Treatment Plan to reduce potential adverse impacts on unknown cultural resources to less-than-significant levels.

ATTACHMENT G (Continued)

**Table G-2
SDG&E Proposed Applicant Proposed Measures**

APM No.	Description
APM CUL-07	Should any previously unidentified prehistoric or historic artifacts; indicators or examples of cultural, archaeological, or paleontological resources; or potential human remains or funerary items be discovered during the course of site preparation, grading, excavation, construction, or other activities, all operations within 50 feet of an inadvertent discovery during such activities shall cease and the PI will contact the Forest Service HPM and SDG&E's Cultural Resource Specialist. Once a find has been identified, the Forest Service HPM and SDG&E's Cultural Resources Specialist will determine if additional cultural resources work, including but not limited to a formal evaluation or Proposed Action redesign, are required treatment. Ground-disturbing work in the vicinity of the discovery will not resume without authorization by the Forest Service HPM and after the appropriate consultation has taken place.
APM CUL-08	A paleontological monitor will be present for excavation activities conducted at locations with underlying PFYC Class 3 geologic deposits where new steel poles are unable to be installed in the same location as of that of the existing wood pole. In the event that fossils are unexpectedly encountered during construction, a qualified paleontologist will have the authority to divert or temporarily halt construction activities in the area of discovery to allow the recovery of fossil remains in a timely fashion. When significant fossils are discovered, the paleontologist will recover them in accordance with professional standards. Fossil remains collected during monitoring and salvage will be cleaned, repaired, sorted, cataloged, and curated in a scientific institution with permanent paleontological collections. The paleontological monitor will follow the procedures outlined in the Paleontological Monitoring and Treatment Plan, which will be prepared and will include information regarding pre-construction field surveys, construction personnel training, necessary permits, research design, monitoring methodology, fossil discovery and recovery protocols, fossil preparation and curation procedures, and the preparation of a final monitoring report.
APM CUL-09	SDG&E will flag potentially sensitive archaeological resources identified in the vicinity of access roads for avoidance and prohibit any grading activities in the vicinity as part of construction or operation and maintenance.
<i>Public Health (Fire Hazards)</i>	
APM HAZ-01 ¹	SDG&E will implement its existing Electric Standard Practice (ESP) 113-1, which includes requirements for carrying emergency fire suppression equipment, conducting worker-awareness trainings that cover fire prevention and safety, restrictions on smoking and idling vehicles, and construction restrictions during Red Flag Warnings (RFWs).
APM HAZ-02	SDG&E will implement Electric Distribution Operation 3017 to ensure that the proper steps are taken to maintain fire safety while meeting all operational and service requirements.
APM HAZ-03	Prior to starting construction activities, SDG&E will clear dead and decaying vegetation from Proposed Action work areas where personnel are active or where equipment is in use or being stored within ROWs, staging areas, stringing sites, and access roads.
APM HAZ-04	Prescribed fire tools and backpack pumps with water will be kept within 50 feet of work activities to ensure the capability for rapid extinguishment in the event of a fire.
APM HAZ-05	Weather and fire danger will be monitored daily by SDG&E meteorologists and wildland fire specialists in order to provide timely and immediate communication of significant changes which could impact the Proposed Action.
APM HAZ-06	No construction work will occur for areas affected by a RFW or Project Activity Level E designation.
<i>Hydrology and Water Quality</i>	
APM HYD-01	All concrete washouts will be conducted either into excavations where the concrete was poured within designated concrete washout stations, or will be captured using a washout recycling system. Crews will not be allowed to dispose of concrete directly onto the ground.
APM HYD-02	When construction activities are required adjacent to flowing aquatic resources, sediment barriers will be placed between the work area and flowing water.

ATTACHMENT G (Continued)

Table G-2
SDG&E Proposed Applicant Proposed Measures

APM No.	Description
APM HYD-03	In areas where topsoil has not been salvaged, construction activities will be limited when the environmental monitor determines that the soil is too wet to adequately support vehicles and equipment. Where soil conditions are deemed too wet to work, one of the following measures will apply: Access will be limited to the minimum area feasible for construction. Where possible, vehicles and equipment will be routed around wet areas so long as the re-route does not cross into sensitive resource areas. If wet areas cannot be avoided and soil moisture is too high to strip topsoil, BMPs—including the use of wide-track or low ground pressure equipment or installation of prefabricated equipment pads or timber mats—will be implemented for use in these areas to minimize rutting and off-site sedimentation.
APM HYD-04	Any areas not surveyed for potentially jurisdictional wetlands or waters due to limited access will be surveyed prior to the start of construction activities and potential impacts will be assessed and the appropriate jurisdictional permits will be obtained as needed.
APM HYD-05	SDG&E will prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will identify BMPs based on its Water Quality BMPs Manual for each activity that has the potential to degrade surrounding water quality through erosion, sediment run-off, and other pollutants. These BMPs will then be implemented and monitored by a Qualified SWPPP Practitioner.
APM HYD-06	During any construction activities, SDG&E will flag all hydrological resources occurring within work areas for avoidance, and all construction activities will occur outside of these resources.
APM HYD-07	SDG&E will comply with Forest Service requirements pertaining to hydrology and water quality, as detailed in the Forest Service's Water Quality Management for National Forest System Lands in California, BMPs.
APM HYD-08	If dewatering is required, dewatering systems—as outlined in SDG&E's Water Quality BMPs Manual—will be used to dispose of groundwater. Typically, groundwater will be pumped into truck-mounted storage tanks and either discharged to land in accordance with Regional Water Quality Control Board regulations or transported to an authorized discharge location.
APM HYD-09	SDG&E will implement site-specific erosion and sediment control devices and the proper handling of potentially hazardous materials.
APM HYD-10	Following construction, the ROW, work areas, stringing sites, staging areas, and fly yards will be returned to near pre-construction conditions, which include re-establishing drainage patterns and vegetation, where feasible.
APM HYD-11	Existing access roads will be utilized to access the replacement structures where helicopter-only access is not required.
<i>Noise</i>	
APM NOI-01	SDG&E will provide notice of the construction schedule to all property owners within 300 feet of the Proposed Action by mail at least one week prior to the start of construction activities. The announcement will state the construction start date, anticipated completion date, and hours of operation, as well as a telephone number to call with questions or complaints during construction.
APM NOI-02	Operating equipment will be positioned to maximize the distance to residences and to maintain safe and effective operation.
APM NOI-03	All internal combustion engine-driven equipment will be equipped with exhaust mufflers that are in good condition and meet or exceed the manufacturer's specifications. All equipment will be maintained and tuned according to manufacturer recommendations.
APM NOI-04	When backup alarms have more than one loudness setting, they will be set to the lowest setting that meets Occupational Safety and Health Administration safety requirements.

ATTACHMENT G (Continued)

**Table G-2
SDG&E Proposed Applicant Proposed Measures**

APM No.	Description
APM NOI-05 ²	When located within 80 feet of residences, a temporary noise barrier with an effective height of approximately three feet will be placed between residences and stationary noise-generating equipment during use. The effective height is that of the barrier above the line-of-sight between the noise source and the noise-sensitive receiver.
APM NOI-06	Helicopters will be required to maintain a height of at least 500 feet when passing over residential areas, except when at temporary construction areas or actively assisting with conductor stringing. All helicopters will be required to maintain a lateral distance of at least 500 feet from all schools. No more than 64 flights per day will be conducted.
APM NOI-07 ³	Residents who experience construction noise levels that exceed the applicable noise thresholds will be temporarily relocated, on an as-needed basis, for the duration of the activities that will impact them.
APM NOI-08 ⁴	In the event that blasting is required within 325 feet of a residential property line, SDG&E will prepare and provide a blasting plan for the Proposed Projects that is consistent with SDG&E's blasting guidelines to reduce noise and vibration impacts from blasting activities. The blasting contractor will be required to obtain a blasting permit and explosive permit per the San Diego County Regulatory Ordinances.
APM NOI-09	Where appropriate, SDG&E will coordinate with the San Diego County noise control officer regarding helicopter flights between 6:30 a.m. and 7:00 a.m. to avoid any conflicts with the County noise ordinance.
APM NOI-10 ⁵	If construction occurs outside the hours allowed by San Diego County, SDG&E will follow its established protocols and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction.
<i>Transportation and Traffic</i>	
APM TRANS-01	To minimize traffic impacts, temporary lane closures will occur during off-peak traffic hours, to the extent practical, in order to minimize disruptions and traffic backups.
APM TRANS-02	Caution signs and/or flagmen will be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction.
APM TRANS-03	Emergency vehicles will be provided access even in the event of temporary road or lane closures.
APM TRANS-04	SDG&E will coordinate isolated, temporary road closures with local jurisdictional agencies, as required, to cross these roadways, and perform work according to agency requirements.
APM TRANS-05	SDG&E will develop and implement a Traffic Control Plan during construction.
APM TRANS-06 ⁶	SDG&E will coordinate flight patterns with local air traffic control and the Federal Aviation Administration prior to construction to prevent any adverse impacts due to increased air traffic.
APM TRANS-07	Where replacement poles will be close to existing pole locations, existing access roads, spur roads, and turnarounds will be used to the extent possible to support construction activities and will continue to be used for future line maintenance.

Source: Table B-13, FEIR/EIS, CPUC 2015

Notes: The following APMs have been Superseded by MMs:

- ¹ APM HAZ-01: MM-FF- and FF-2 (Final EIR/EIS, Section D.8-40)
- ² APM NOI-05: MM-NOI-1 (Final EIR/EIS, Section D.11-16)
- ³ APM NOI-07: MM-NOI-1 (Final EIR/EIS, Section D.11-16)
- ⁴ APM NOI-08: MM-NOI-3 (Final EIR/EIS, Section D. 11-19, D.11-21)
- ⁵ APM NOI-10: MM NOI-4 (Final EIR/EIS, Section D.11-19)
- ⁶ APM-TRANS-06: PHS-5 (Final EIR/EIS, Section D.7-20)

ATTACHMENT G (Continued)

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ATTACHMENT H
Mitigation Measures

ATTACHMENT H

Mitigation Measures

MITIGATION MEASURES

Table H-1, Mitigation Measures (MMs) for Each Issue Area, lists MMs that are applicable to each environmental issue area, while Tables D.2-13 through D.13-11 list the mitigation measures included in the FEIR/FEIS, as adopted by the CPUC decision (D. 16-05-038, May 26, 2016).

All project-related construction activity is subject to the mitigation measures. In addition, all project personnel are subject to training prior to beginning work on the project to ensure that the mitigation measures, environmental laws and regulations, and all other agency requirements are understood and followed.

Table H-1
Mitigation Measures for Each Issue Area

Mitigation Monitoring, Compliance, and Reporting Tables (Table numbering from Final EIR/EIS (June 2015))	Mitigation Measures
Table D.2-13 - Visual Resources	MM VIS-1 and MM VIS-2
Table D.4-16 - Biological Resources	MM BIO-1 through MM BIO-33
Table D.5-15 - Cultural and Paleontological Resources	MM CUL-1 through MM CUL-3
Table D.7-2 - Public Health and Safety	MM PHS-1 through PHS-8
Table D.8-2 - Fire and Fuels Management	MM FF-1 and FF-2
Table D.9-11 - Hydrology and Water Quality	MM HYD-1 through MM HYD-7
Table D.10-10 - Land Use	LU-1 through LU-4
Table D.11-9 - Noise	MM NOI-1 through MM NOI-4
Table D.12-3 - Public Services and Utilities	MM PSU-1
Table D.13-11 - Recreation	MM REC-1 and REC-2

Table D.2-13
Mitigation Monitoring, Compliance, and Reporting – Visual Resources

Mitigation Measure	MM VIS-1 Prepare and Implement a Scenery Conservation Plan. SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. Each 69 kV power line or 12 kV distribution line segment will be covered under an individual section of the plan, and each section will be reviewed and approved by the appropriate agencies prior to any ground-disturbing activities for the specific segment. The purpose of this plan is to identify and implement specific actions that will minimize the project's visual disturbance to the naturally established scenery. Specific actions shall also be identified and implemented for individual poles to protect existing views from established scenic vistas and roadways located outside of the CNF. Power and distribution line support towers shall be designed to minimize their visual prominence and contrast to the natural landscape. Individual poles anticipated to create adverse effects to scenic vistas and/or particularly noticeable visual contrast in existing views shall be designed,
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ATTACHMENT H (Continued)

**Table D.2-13
Mitigation Monitoring, Compliance, and Reporting – Visual Resources**

	located, shaped, textured, and/or screened as necessary to minimize their visual contrast, blend and complement the adjacent forest and community character. Methods such as limiting the number of climbing pegs and identifying less visually intrusive pole markings for high voltage lines, consistent with CPUC requirements, shall be considered. SDG&E shall also be required to provide photorealistic visual simulations of typical proposed designs that include design features that may be incorporated into poles identified for visual treatment to demonstrate the effectiveness of such features in reducing visual contrast and prominence as viewed from sensitive viewsheds.
<i>Location</i>	<p><u><i>SDG&E's Proposed Project:</i></u> TL625 (Z213002, Z212998, Z212997, Z212996, Z212995, Z212993, Z212992, Z212991, Z212990, Z212989, Z212980, Z212972, Z212971, Z212970, Z212969, Z212960, Z212934, Z239692, Z212922, Z212901, Z212886, Z212885, Z212870); TL626 (Z213734, Z213735, Z213736, Z213737, Z213738, Z213739); TL629 (along River Drive, Viejas Boulevard and SR-79 through Descanso, Z812701, Z173133, Z173134, Z173135, Z173136, Z173137, Z173138, Z173139, P373878, Z173141, Z173142); TL682 (Z118035, Z118036, Z111236, Z118037, Z118038, and Z118144); C440 (P-304, P-60, P-303, P-305, P-306, P40368, P109956, P40370)</p> <p><u><i>Project Alternatives:</i></u> USFS proposed actions (TL626 Options 1–5; C157 Options 1 and 2; undergrounding C440); BIA proposed action (TL682) and Removal of TL626 from Service (TL625 and TL6931)</p>
<i>Compliance Documentation(a) and Consultation</i>	<p>a. Provide final design for review (appropriate design considerations are identified and implemented for poles along the TL625, TL626, TL629, TL682 and C440 alignments)</p> <p>b. CPUC/USFS Monitor: Line item in compliance monitoring report (individual treatment for replacement poles identified in "Location" is consistent with the plan)</p>
<i>Timing</i>	<p>a. Prior to project final design for each power line replacement project</p> <p>b. Final monitoring report for each power line replacement project</p>
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM VIS-2 If the Forest Service selects to fire harden TL626, TL629, TL6923 or C157 or relocate TL626 (Options 1,2,3a,3b,4 and 5, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives. SDG&E would be required to compensate the Forest Service for the loss in scenic quality associated with the negative scenery effects that are inconsistent with the LMP scenic integrity objectives. Compensation shall be accomplished through agency approved scenery restoration activities, fee-payment for scenery restoration projects, or preservation of comparable lands.</p>
<i>Location</i>	Existing High SIO lands traversed by TL626, TL629, TL6923 as viewed from KOP 4, 13, and 15 and Very High SIO lands traversed by C157 and TL626 (for SDG&E's proposed project and USFS proposed action TL626 Options 1, 2, 3a, 3b, 4, and 5).

ATTACHMENT H (Continued)

Table D.2-13
Mitigation Monitoring, Compliance, and Reporting – Visual Resources

<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. USFS amends the Land Management Plan contemporaneously with the authorization of the MSUP and approval to rebuild, operate, and maintain TL626, TL629, TL6923, C157, and TL626 (Options 1, 2, 3a, 3b, 4, and 5). b. The Land Management Plan Amendment is described in any project ROD authorizing TL626, TL629, TL6923, C157, and TL626 (Options 1, 2, 3a, 3b, 4, and 5) as proposed.
<i>Timing</i>	a. Contemporaneously with the ROD.
<i>Responsible Agency</i>	USFS

Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources

Mitigation Measure	MM BIO-1 Confine all construction and construction-related activities to the minimum necessary area. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified in Section B, Project Description, Table B-7. The limits of approved work spaces (not including existing access roads) shall be delineated with stakes and/or flagging prior to beginning work in any area. In areas where SDG&E will not work within exclusive-use easements, SDG&E will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H).
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Delineate approved work limits on final engineering plans b. Provide maps showing phased work areas and proposed locations for temporary restricted access signs c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to construction of segments as phased in final project schedule and maps b. At least one week prior to construction activities as phased in final project schedule and maps c. Prior to and during construction
<i>Responsible Agency</i>	<u>SDG&E's Proposed Project:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u>Forest Service Proposed Actions:</u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u>BIA Proposed Action:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682) <u>Partial Removal of Overland Access Roads:</u> USFS <u>Removal of TL626 from Service:</u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

Mitigation Measure	MM BIO-2 Conduct contractor training for all construction staff. Prior to construction, all developer, contractor, and subcontractor personnel shall receive training regarding the appropriate work practices necessary to implement the mitigation measures and comply with environmental regulations, including plant and wildlife species avoidance, impact minimization, and best management practices. Sign-in sheets and hard hat decals shall be provided that document contractor training has been completed for construction personnel.
<i>Location</i>	All areas disturbed by construction activities for <u>SDG&E's</u> proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Conduct contractor training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets and hard hat decals) of project personnel training c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. b. and c. Prior to and during construction
<i>Responsible Agency</i>	<u>SDG&E's Proposed Project</u> : CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u>Forest Service Proposed Actions</u> : CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u>BIA Proposed Action</u> : CPUC and USFS, BIA and La Jolla Indian Tribe (TL682) <u>Partial Removal of Overland Access Roads</u> : USFS <u>Removal of TL626 from Service</u> : CPUC and USFS, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM BIO-3 Conduct biological construction monitoring. An authorized biological monitor must be present at the construction sites during all initial ground-disturbing and vegetation-removal activities in undeveloped areas (i.e., not roads or existing developed areas). The monitor shall survey the construction project footprint and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.
<i>Location</i>	All areas disturbed by construction activities for <u>SDG&E's</u> proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Brief report weekly/monthly (identify issues/solutions through regular monitoring and reporting) c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. Prior to the authorized biological monitor performing work associated with ground-disturbing and vegetation removal activities. b. Weekly during ground disturbance and vegetation removal activities/monthly for remaining construction duration c. During construction
<i>Responsible Agency</i>	<u>SDG&E's Proposed Project</u> : CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u>Forest Service Proposed Actions</u> : CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u>BIA Proposed Action</u> : CPUC and USFS, BIA and La Jolla Indian Tribe (TL682) <u>Partial Removal of Overland Access Roads</u> : USFS <u>Removal of TL626 from Service</u> : CPUC and USFS, BIA and Campo Indian Tribe (TL6931)

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

Mitigation Measure	<p>MM BIO-4 Restore all temporary construction areas pursuant to a Habitat Restoration Plan (HRP). All previously undisturbed temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. Restoration techniques may include the following: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process for use in the restoration of sites requiring restoration. Wherever possible, vegetation will be left in place or mowed, and not grubbed, per the NCCP, to avoid excessive root damage and allow for natural regrowth following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas does not meet success criteria per the HRP, the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-5).</p> <p>Specifically, the HRP will include the following sections:</p> <p>Introduction Mitigation Measure Summary Plan Objectives Plan Implementation</p> <ul style="list-style-type: none"> • Pre-Construction Documentation • Clearing and Grading • Cleanup • Seeding • Other Planting Methods <p>Schedule</p> <ul style="list-style-type: none"> • Restoration • Seeding and Planting <p>Restoration Monitoring</p> <ul style="list-style-type: none"> • Monitoring Success Criteria, and Remedial Measures • Reporting • Completion of Restoration Program <p>References</p> <p>The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and USFS) who will oversee implementation of the HRP. The HRP shall be submitted to the CPUC and the USFS for review and approval prior to implementation.</p>
<i>Location</i>	All areas disturbed by construction activities for <u>SDG&E's</u> proposed project and all alternatives.

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Habitat restoration specialist qualifications (resumes; approved by CPUC and USFS) b. Prepare habitat restoration plan c. Final review and approval of plan d. Implementation of plan e. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Permitting agency approval of the habitat restoration specialist prior to development of the HRP. b. At least 90 days prior to ground disturbance activities c. Prior to notice to proceed d. Restoration initiated in accordance with schedule provided in the HRP. e. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-5 Provide habitat compensation or restoration for permanent impacts to native vegetation communities. Permanent impacts to all native vegetation communities shall be mitigated by either on- or off-site restoration of suitable but degraded habitat, or by the procurement and protection of off-site habitat as compensation for permanent impacts. Permanent impacts shall be compensated at a minimum of a 1:1 ratio and in accordance with SDG&E NCCP 7.4 Mitigation Credits or as required by the permitting agencies. Where discrepancies occur, the higher of the two ratios will be applied, but these ratios are not additive (i.e., ratios of 1:1 and 2:1 do not equal 3:1. Mitigation would be applied at the 2:1 ratio only). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland. "Disturbed" habitat is to be mitigated per ratio for the surrounding vegetation. Forest Service requirements related to MM BIO-5 will only apply to National Forest System lands.</p> <p>Habitat compensation shall be accomplished through agency-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the proposed power line replacement projects. Land preservation or mitigation fee payment for habitat compensation must be completed within 36 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on private lands shall include long-term management and legal protection assurances.</p>
<i>Location</i>	On the project/alternative site or to-be-identified mitigation parcels

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Documentation that habitat compensation and/or habitat restoration has been identified b. Documentation of long-term management of restored habitat, if applicable c. Documentation of consultation with permitting agencies d. Compliance will be documented internally with the applicable responsible agency.
<i>Timing</i>	<ul style="list-style-type: none"> a. Habitat Compensation: Within 1 year of the initiation of project construction (habitat mitigation lands shall be identified and approved); Habitat Restoration: in accordance with timing identified in MM-BIO-4. b. No later than 36 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) c. Within 2 weeks of completion of coordination with permitting agencies d. Post-construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM BIO-6 Implement fire prevention best management practices during construction and operation activities. Fire prevention best management practices shall be implemented during construction and operation of the project as specified by the Construction Fire Prevention/Protection Plan (to be developed as required under MM FF-1 and MM FF-2). The PALS system will be followed for any work on National Forest System lands.
<i>Location</i>	All areas disturbed by construction activities for <u><i>SDG&E's</i></u> proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	See fire plan requirements under MM FF-1 and MM FF-2 <ul style="list-style-type: none"> a. Implement fire prevention best management practices b. Provide evidence of coordination with applicable fire authorities c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. b. and c. Prior to and during project construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM BIO-7 Prepare and implement a Stormwater Pollution Prevention Plan. Prepare a Stormwater Pollution Prevention Plan pursuant to the specifications described in APM HYD-05 and MM HYD-1.
<i>Location</i>	All areas disturbed by construction activities for <u><i>SDG&E's</i></u> proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	See SWPPP requirements under APM HYD-05 and MM HYD-1 <ul style="list-style-type: none"> a. Implement SWPPP as outlined b. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. and b. Prior to and during project construction

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-8 Procedural requirements for herbicide applications. Herbicide applications shall follow measures as described in MM HYD-5 and MM BIO-23. In addition, herbicides shall only be applied to the minimum area necessary to achieve fire safety objectives and not used in excess or inadvertently be applied to special-status plant species in the vicinity. Special-status plant species of concern are listed below under Impact BIO-6 (a total of 48 species, of which 46 are further described in Table D.4-11). If the professional is unfamiliar with the identification of special-status plant species, an SDG&E biologist shall provide additional supplemental training prior to the application of herbicides along the project as described in MM BIO-23. This training will be administered by an SDG&E biologist and shall include an overview of special-status species along the ROW, identification features, and avoidance measures.</p>
<i>Location</i>	All areas disturbed by construction activities for <u>SDG&E's</u> proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Verification that professional is familiar with special-status plant species b. Documentation of herbicide application approach c. Map of special-status plant species and locations of herbicide applications d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. b. and c. At least 2 weeks prior to application d. Prior to and during construction
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-9 SDG&E shall identify all proposed replacement pole locations within the vicinity of RCAs to identify those poles and associated access roads that can be reasonably relocated outside these areas and consult with the Forest Service for authorization of their relocation and proposed placement. These Forest Service requirements will only apply to National Forest System lands.</p>
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Implement measure as defined b. Map of pole and access road locations in the vicinity of RCAs c. Final approval by USFS of relocation outside of RCAs d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. b. and c. Prior to notice to proceed d. Prior to and during construction
<i>Responsible Agency</i>	SDG&E's Proposed Project and all Alternatives: USFS

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

Mitigation Measure	<p>MM BIO-10 Limit temporary and permanent impacts to jurisdictional features to the minimum necessary. Formal jurisdictional delineation and permits are required prior to construction for all work areas located within or adjacent to jurisdictional wetlands and waters. The applicant shall obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit from the ACOE, a Clean Water Act Section 401 water quality certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement with the California Department of Fish and Wildlife for impacts to jurisdictional features prior to project construction. These permits are anticipated to be approved under the MSUP. The terms and conditions of these authorizations shall be implemented.</p> <p>In addition, prior to conducting work or establishing the final design of a selected transmission line alignment, a planning-level assessment of aquatic resources will be conducted to identify the environmentally preferred alternative. The assessment will include review of the National Hydrography Dataset, National Wetland Inventory, U.S. Geological Survey topographic maps, high-resolution digital photography, and necessary field checking. Once the environmentally preferred alternative is identified, a jurisdictional delineation will be conducted of the selected transmission line to ensure the final design is the Least Environmentally Damaging Practicable Alternative (LEDPA) and is in compliance with the Clean Water Act (CWA) Section 404(b)(1) Guidelines. The CWA Section 404 permit authorization will be obtained for any discharges into waters of the United States and the widths of access roads and construction of bridges over waters of the United States will be minimized to the extent feasible.</p>
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Documentation of all permits obtained b. Maps showing delineated work areas and proposed flagging or fencing areas c. Documentation of implementation of permit terms and conditions d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. b. and c. Prior to notice to proceed d. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-11 Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands. Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e., establishment), enhancement, preservation, and/or and restoration at a minimum</p>

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

	<p>of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage (as discussed in SDG&E NCCP 7.2 Habitat Enhancement Measures). Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly. All habitat creation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.</p>
<i>Location</i>	Identified habitat creation and/or restoration areas in the project/alternative site or at off-site mitigation parcel(s)
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Implement measure as defined b. Documentation of no net loss of jurisdictional waters and wetlands (Habitat Restoration Plan) c. Documentation of consultation with permitting agencies d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to and during construction b. Prior to notice to proceed c. Within 2 weeks of completion of coordination with permitting agencies d. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM BIO-12 Where drainage crossings are unavoidable, construct access roads at right angles to drainages. Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.
<i>Location</i>	All drainage crossing in the project area or alternative site areas.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Incorporate measure in final engineering design b. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to issuance of notice to proceed b. Prior to and during construction

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-13 Conduct preconstruction surveys for special status plants in areas not accessible during previous rare plant surveys. Prior to construction, San Diego Gas & Electric (SDG&E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) and Forest Service to conduct a focused rare plant survey on site during the time period when the previously described special-status plant species are detectable.</p> <p>Table D.4-12 in EIR/EIS describes the 40 blooming plant species that shall be surveyed, months they shall be surveyed (i.e., blooming periods), and the TL/circuits on which they occur. Cuyamaca cypress and tecate cypress can be surveyed anytime of the year. Surveys shall be conducted in areas not included during rare plant surveys (see Chambers Group Inc. 2012b, Table 2).</p> <p>Of the 40 species described, there is some potential for 8 of these species to occur in vernal pools, including California Orcutt grass*, Cuyamaca larkspur, long-spined spineflower, Orcutt's brodiaea*, San Diego goldenstar*, San Diego thornmint*, Santa Lucia dwarf rush, and variegated dudleya*. These 8 species are also included in Table D.4-12. These species will also be protected through implementation of, the SDG&E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands (MM BIO-10 through MM BIO-12).</p> <p>Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing.</p> <p>Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a Covered Species within the SDG&E NCCP, mitigation consistent with measures established in the NCCP shall be provided.</p> <p>The results of the focused plant surveys and measures outlined above that will be implemented by SDG&E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC and Forest Service. CPUC and Forest Service will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.</p>
<i>Location</i>	<p>All areas not previously surveyed for special status plants for SDG&E's proposed project (Chambers Group 2012b see Table 2) and all alternatives. SDG&E will coordinate with USFS to refine prospective survey locations before implementing this measure.</p>

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Survey report c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 2 weeks prior to surveys b. Prior to issuance of a notice to proceed c. Prior to and during construction
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-14 Install fencing or flagging around identified special-status plant species populations in the construction areas. Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities.</p> <p>Cutting down or damaging coniferous trees that occur along C79 within California Department of Parks and Recreation lands is prohibited. Equipment within staging areas will be situated to avoid damage to coniferous trees. If avoidance to coniferous trees along C79 within California Department of Parks and Recreation lands is not feasible, the applicant will work closely with the California Department of Parks and Recreation to determine alternative staging location(s). In addition, all areas along C79 associated with the Cuyamaca Rancho State Park Reforestation Project will be avoided, including disturbance to these areas and the temporary establishment of staging and stringing sites. This reforestation project is registered with the Climate Action Reserve (www.climateactionreserve.org), where more details can be found.</p>
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Notification of planned special-status plant species surveys c. Results of survey d. Map of special-status plant species (GPSed) and location of construction flagging/fencing e. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 2 weeks prior to conducting surveys b. At least 1 week prior to surveys and per survey windows timing c. Within 2 weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area e. Prior to and during construction

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project</i></u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions</i></u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action</i></u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads</i></u>: USFS</p> <p><u><i>Removal of TL626 from Service</i></u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-15 Implement special-status plant species compensation. Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the Forest Service. Land preservation must be completed within 36 months of initiation of construction. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required. Forest Service requirements will only apply to National Forest System lands.</p>
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Documentation of off-site land preservation and/or plant salvage and relocation b. Documentation of agency consultation and plan approval c. Documentation of long-term management of restored habitat, if applicable d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. and b. Prior to construction c. No later than 36 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) d. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project</i></u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions</i></u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action</i></u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads</i></u>: USFS</p> <p><u><i>Removal of TL626 from Service</i></u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-16 Install fencing or flagging around identified special-status butterfly host species populations in the construction areas and road maintenance. Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for larvae or adult (nectar sources or egg laying sources) plant for the following species: Hermes copper butterfly, Laguna</p>

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Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources

	Mountains skipper, or Quino checkerspot butterfly. These host plants include Cleveland's horkelia, western plantain, bird's beak, owl's clover, California buckwheat, and spiny redberry. Similar protective measures for special-status plants (identified in MM BIO-13 and MM BIO-14) shall be implemented. Occupied or suitable habitat for these species shall be avoided to the greatest extent feasible. In addition to the implementation of SDG&E NCCP Operational Protocols, site visits will be conducted prior to construction and road maintenance. Prior to site visits, a digital database of known host plant populations will be reviewed. Site visits will verify the known locations of host plant populations in the area and, if present, avoid those locations.
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Botanist qualifications (resumes; approved by CPUC and USFS) b. Notification of planned special-status plant species surveys c. Results of survey d. Maps showing the proposed flagging or fencing areas e. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 2 weeks prior to conducting surveys b. At least 1 week prior to surveys and per survey windows timing c. Within 2 weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area e. Prior to and during construction
<i>Responsible Agency</i>	<p>SDG&E's <u>Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-17 Conduct protocol surveys for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterflies within 1 year prior to project construction activities in occupied habitat. The project proponent shall conduct preconstruction protocol surveys for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that SDG&E's low-effect habitat conservation plan (HCP) for Quino (SDG&E 2007) adequately protects the species, historical surveys are adequate, or as superseded by consultation with the USFWS and Forest Service) in any project construction area known to support the species.</p> <p>Surveys shall be conducted by a qualified biologist¹ in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be reported to USFWS and the CDFW South Coast</p>

¹ A qualified biologist is defined as a biologist (permitted or not) who has a demonstrated background in butterfly survey techniques and identification

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Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources

	Regional Office within 45 days of the completion of the survey. Surveys for Hermes copper butterfly shall follow County of San Diego Guidelines. ² A qualified biologist shall survey all potential habitat for Hermes copper which includes any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. If California buckwheat is within 15 feet of a mature spiny redberry shrub, additional vegetation within 15 feet should also be considered potential habitat for Hermes copper. All butterfly protocol survey data shall be provided to the CDFW South Coast Regional Office.
<i>Location</i>	Suitable habitat for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly of project/alternatives area
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Notification of planned surveys c. Survey Report d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 2 weeks prior to surveys b. Within 1 year of planned project construction in occupied habitat. c. Within 45 days after surveys are completed and at least 2 weeks prior to construction d. Prior to and during construction
<i>Responsible Agency</i>	<p>SDG&E's <u>Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-18 Provide compensation for temporary and permanent impacts to Occupied or Critical Habitat for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat through conservation and/or restoration. Temporary and permanent impacts to Quino checkerspot butterfly and Laguna Mountains skipper shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for occupied non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Forest-related impacts will be mitigated at the ratios provided above on Forest Service lands and in coordination with the Forest Service. Habitat compensation shall be accomplished through U.S. Fish and Wildlife Service-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly or Laguna Mountains skipper as appropriate. Mitigation for Hermes copper butterfly shall consist of 1:1 replacement of temporary impacts to occupied habitat, where host plants are impacted, and at a 2:1 ratio where permanent impacts occur. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall</p>

² County of San Diego (2010) Attachment C of the Report Format and Content Requirements – Biological Resources.

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**Table D.4-16
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	be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.
<i>Location</i>	On the project/alternative site or on to-be-identified mitigation parcels
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Documentation that habitat preservation and/or habitat restoration has been identified and implemented (Habitat Restoration Plan). b. Documentation of long-term management of restored habitat, if applicable c. Documentation of consultation with USFWS d. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Within 1 year of the initiation of project construction (habitat mitigation lands shall be identified and approved) b. No later than 18 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) c. Within 2 weeks of coordination with USFWS d. During construction
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions:</u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> USFS</p> <p><u>Removal of TL626 from Service:</u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM BIO-19 Final design of power and distribution line and access roads through Quino checkerspot and Laguna Mountains skipper critical habitat and Hermes copper occupied habitat shall maximally avoid host plants for these species. The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by these species based on safety and other superseding regulatory requirements. The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications to minimize impacts to host plants in critical habitat for these species, and it shall obtain agency approval of the final design through this area. If impacts are not avoided, compensatory mitigation, as described per MM BIO-18, will be required. This measure shall apply to all locations that have been designated as critical or occupied habitat for these species.
<i>Location</i>	Occupied Quino checkerspot, Laguna Mountains skipper, or Hermes copper butterfly habitat along the project/alternatives area
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Final design review and approval (design maximizes avoidance of critical habitat) b. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. and b. Prior to notice to proceed
<i>Responsible Agency</i>	<u>SDG&E's Proposed Project:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)

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**Table D.4-16
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	<p><u>Forest Service Proposed Actions:</u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> USFS</p> <p><u>Removal of TL626 from Service:</u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-20 Obtain and implement the terms of agency permit(s) with jurisdiction federal or state-listed species. In addition to the obligation of the Forest Service consulting with the USFWS on the project, if federally listed wildlife species not already covered by SDG&E's NCCP (including any species that may be listed prior to issuance of the PTC and MSUP) may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species not already covered by SDG&E's NCCP may be impacted by the project, SDG&E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). In addition, take authorization for golden eagles will require coordination with the USFWS and CDFW. SDG&E shall implement and/or adhere to all USFWS recommendations stipulated by the Forest Service in the Special Use Permit; SDG&E shall implement and/or adhere to all requirements in CDFW permit. SDG&E will not need a Section 2081 permit if the potentially impacted species or action is covered by SDG&E's NCCP. The Forest Service is required to consult with the USFWS for their federal action (approving the MSUP) as identified in Section A, Table A-3.</p> <p>When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&E shall implement all applicable protocols to avoid and minimize impacts to this species defined in the SDG&E Low-Effect Habitat Conservation Plan for Quino. Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&E shall implement all impact minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which includes:</p> <ol style="list-style-type: none"> 1. Prior to project work, a qualified biologist shall identify all LMS habitat (to include host plant and nectar sources) within 10 meters of the proposed project(s) ROW. SDG&E facilities that are within designated critical habitat for Laguna Mountains skipper are shown on USFWS Critical Habitat maps (71 FR 74592–74615). During any maintenance activities, a qualified biologist will be present to monitor work and ensure that Laguna Mountains skipper habitat is not affected. 2. Chipping of vegetation shall not be allowed in known or potential Laguna Mountains skipper habitat. This includes the ROW within or adjacent to (within 10 meters) known or potential Laguna Mountains skipper habitat. Potential habitat shall be identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW work. 3. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to Laguna Mountains skipper habitat. Prior to operation of vehicles on existing roads or trails, a qualified biologist will ensure that the road or trail itself does not contain host plants or nectar sources.

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	<p>4. Any project that may adversely affect the Laguna Mountains skipper shall require consultation with the U.S. Fish and Wildlife Service.</p> <p>If the NCCP is not used, then formal consultation with the USFWS and CDFW will need to occur to determine the need for take permits.</p>
<i>Location</i>	Terms and conditions of permits may apply anywhere within the project/alternative site or on off-site mitigation parcels, but would mostly relate to the occupied Quino checkerspot, Laguna Mountains skipper, or Hermes copper butterfly habitat areas and the designated critical habitat for Quino checkerspot butterfly and Laguna Mountains skipper.
<i>Compliance Documentation^(a) and Consultation</i>	<p>a. Documentation of permit compliance</p> <p>b. CPUC/USFS monitor: Line item in compliance monitoring reports</p>
<i>Timing</i>	<p>a. Prior to notice to proceed</p> <p>b. Prior to and during construction</p>
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-21 If construction occurs in occupied and/or suitable habitat for sensitive butterfly species, SDG&E will implement the following:</p> <p>Quino checkerspot: SDG&E will comply with the avoidance and minimization measures outlined in the existing Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly.</p> <p>Hermes copper: Because this species is not state- or federally listed, the following will only be required for activities: While performing construction activities within the flight season, a qualified biological monitor will be on-site for all project activities to assure that both impacts to host plants and direct take of Hermes copper butterflies are avoided to the greatest extent feasible. The biological monitor may temporarily stop work in the event a Hermes copper butterfly is observed within the immediate construction area (i.e., the flagged work areas currently being used for construction activities.)</p> <p>Laguna Mountains skipper butterfly: Construction will occur outside of the flight season OR at least 10 meters (33 feet) away from all host plant locations. If there is a known or newly discovered occurrence during the flight season, construction shall be prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service determines construction activities may commence. The Laguna Mountains skipper flight season occurs from April to July.</p>
<i>Location</i>	Occupied and/or suitable Quino checkerspot or Laguna Mountains skipper habitat along the project/alternatives area. Also in immediate construction areas where Hermes copper butterfly are observed.
<i>Compliance Documentation^(a) and Consultation</i>	<p>a. Biologist qualifications (resumes; approved by CPUC and USFS)</p> <p>b. Maps showing occupied/suitable habitat</p> <p>c. Provide construction schedule in occupied/suitable habitat areas</p>

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	<p>d. Documentation of coordination with USFWS or field verification (construction occurs outside of 1 kilometer (0.6 miles of known or newly discovered occurrences))</p> <p>e. CPUC/USFS monitor: Line item in compliance monitoring reports</p>
<i>Timing</i>	<p>a. b. and c. At least 2 weeks prior to construction and per survey windows timing</p> <p>d. Prior to and during construction</p> <p>e. Prior to and during construction</p>
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
<i>Mitigation Measure</i>	<p>MM BIO-22 Biologists will monitor construction activities. San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site monitoring, and documentation of violations and compliance. Monitors shall also delineate pre-determined access routes using markers or signs and ensure the maintenance of markers or signs on a regular basis.</p> <p>SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report shall, at a minimum, include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns, and general wildlife observations.</p>
<i>Location</i>	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<p>a. Biologist qualifications (resumes; approved by CPUC and USFS)</p> <p>b. Conduct field monitoring</p> <p>c. Weekly summary report of monitoring activities as defined in measure d and e. CPUC/USFS monitor: Line item in compliance monitoring reports</p>
<i>Timing</i>	<p>a. At least 2 weeks prior to construction</p> <p>b. and c. During construction</p>
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
<i>Mitigation Measure</i>	<p>MM BIO-23 Biologists will inspect open holes at the end of each workday. At the end of each workday, any open holes (including large/steep excavations) shall be inspected by the on-site biologist and subsequently fully covered with steel plates,</p>

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	plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.
<i>Location</i>	All construction areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Implement open hole covering procedures b. Documentation that covering requirements in BIO-23 have been incorporated into construction contracts c. Documentation that notification and handling procedures are utilized for wildlife found in open holes d. CPUC monitor: Line item in monitoring report.
<i>Timing</i>	a – d. During construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
<i>Mitigation Measure</i>	MM BIO-24 Enforce speed limits in and around all construction areas. Vehicles shall not exceed 15 miles per hour on unpaved roads (as stated in SDG&E NCCP 7.1 Operational Protocols) and the right-of-way accessing the construction site or 10 miles per hour during the night.
<i>Location</i>	All construction areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Documentation and verification of enforcement mechanisms b. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to and during construction b. During construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
<i>Mitigation Measure</i>	MM BIO-25 Minimize night construction lighting adjacent to native habitats. Lighting of construction areas at night shall be the minimum necessary for personnel safety and shall be low illumination, selectively placed, shielded and directed away from adjacent native habitats.

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<i>Location</i>	All construction areas adjacent to native vegetation for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Documentation of night lighting specifications b. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. Prior to night time construction activities b. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> USFS <u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)
<i>Mitigation Measure</i>	MM BIO-26 Prohibit littering and remove trash from construction areas daily. Littering shall not be allowed by the project personnel. All food-related trash and garbage shall be removed from the construction sites on a daily basis.
<i>Location</i>	All construction areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Documentation that measures included in the contractor specifications and in environmental training. b. Documentation of compliance throughout construction c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. Prior to construction b. and c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> USFS <u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)
<i>Mitigation Measure</i>	MM BIO-27 Prohibit the harm, harassment, collection of, or feeding of wildlife. Project personnel shall not harm, harass, collect, or feed wildlife. No pets shall be allowed in the construction areas.
<i>Location</i>	All construction areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Documentation that measures included in the contractor specifications and in environmental training. b. Documentation of compliance throughout construction c. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. Prior to construction b. and c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) <u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)

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	<p><u>BIA Proposed Action:</u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> USFS</p> <p><u>Removal of TL626 from Service:</u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-28 Implement Bird Protection Measures.</p> <p>A. Construction activities, including but not limited to tree trimming, road maintenance (i.e., re-establishing of existing access roads), grading, or site disturbance (i.e., re-establishing of existing access roads), grading, or site disturbance, may occur during the avian bird breeding season that runs between March 1 and September 1, for non-listed birds, and other seasons as defined below for special-status species, in compliance with the procedures and provisions of this mitigation measure. To avoid avian disturbance by construction activities, an Avian Protection Plan, including a Nesting Bird Management Plan, shall be developed in coordination with the Wildlife Agencies prior to project onset to develop measures based on site specific conditions to protect birds. This Avian Protection Plan shall be implemented by SDG&E and their biological monitors with oversight by the CPUC and the Forest Service. The Plan shall include procedures to allow the Wildlife Agencies open communication with the biological monitor(s) and access to scientific data collected that will be electronically stored in a database approved by the CPUC, the Forest Service, and the Wildlife Agencies. Between February and September during project construction, SDG&E shall provide a monthly summary of nesting bird monitoring activities and at the completion of each nesting season shall provide an evaluation of the data collected to date as specified in the Nesting Bird Management Plan.</p> <p>B. The Project's transmission pole and line design may have an impact on certain raptor species. Consequently, in addition to the construction activities, the Plan shall address avian mortality related to line strikes through the use of adaptive management (i.e., measures to make the lines more visible to the suite of species affected), in response to reported mortalities.</p> <p>C. The Avian Protection Plan shall include the following measures:</p> <ol style="list-style-type: none"> a. Compliance with the Migratory Bird Treaty Act b. Compliance with Fish and Game Code Sections 3503, 3503.5, and 3511 c. Activities shall be prohibited within: <ol style="list-style-type: none"> i. Approximately 0.25 mile of California spotted owl active nest sites (or activity centers) during the breeding season (February 1 through August 15) unless surveys confirm that California spotted owls are not nesting within the 0.25-mile radius; ii. 500 feet of raptor and owl active nests; iii. 500 feet of federally and/or state-listed birds active nests; iv. 250 feet of occupied burrowing owl burrows from February 1 to August 31 or within 160 feet from September 1 through January 31; and v. 150 feet of non-listed birds and as specified in the avian protection plan for other bird species of concern. <p>If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue through coordination with the CDFW and monitoring. If it appears that the burrowing owls may be directly impacted, then</p>

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	<p>a relocation plan will be developed for the specific burrowing owl(s). This plan would include the methods to relocate, location of the relocation, and post-relocation monitoring. Active relocation and banding of birds is not required. Similar buffers will be utilized for non-Forest Service lands as specified in the Avian Protection Plan and Nesting Bird Management Plan. "Nest" is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.</p> <p>d. Apply APLIC Measures. Specific APLIC measures to be applied must, at a minimum, must allow the circuits to meet National Electric Safety Code (NESC) requirements and should provide general information on specialized construction designs to meet APLIC standards. In particular, conductor separation between the energized and grounded hardware should meet the current state of the art requirements to protect species up to California condor. If appropriate separation is not feasible, then the energized parts and hardware should be covered. As appropriate, bird diverters should be deployed as well.</p> <p>D. The database shall include special features to accommodate additional variables (covariate) information requested by the Wildlife Agencies designed for this Project that will provide data which will contribute to the scientific standards of effective avian avoidance measures. In order to help evaluate buffer effectiveness, nests shall be monitored on a daily basis by a qualified biologist during disturbance and-related activities (i.e., brushing, tree trimming, ground-disturbing activities, mechanized or manual construction/removal/installation, and restoration activities) and every 4 days following disturbance until nest fates have been determined for entry into the database. Daily nest monitoring will be conducted by a qualified biologist, from as far away as possible while still being able to observe activity. The biologist need not observe the actual contents of the nest, but may extrapolate status based on adult behaviors. Actual surveys of the nest contents must not occur more than weekly (i.e., allow at least 7 days between nest visits) and visits should be very brief, paths should go by the nest without stopping if possible, the biologist should not touch leaves or branches, and should take a new route each time they pass by the nest. If brown-headed cowbirds or potential nest predators (e.g., scrub jays, crows, ravens) are in the area, then the visit should be postponed until they are gone.</p> <p>At a minimum, the plan(s) shall include the following sections:</p> <p>Plan Objectives Applicable Mitigation Measures Environmental Awareness Program Existing Avian Resources</p>
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	<p>Construction Process and Timing (related to avian resource protection)</p> <p>Specific APLIC measures to be Applied</p> <p>Nest Survey and Monitoring Methods</p> <ul style="list-style-type: none"> • Surveyor Experience and Training • Nesting Bird Survey Protocol • Standard Buffer Distances as determined in consultation with Wildlife Agencies • Protections of Listed Species, Raptors, and Eagles • Nest Monitoring • Data Collection <p>Avian Reporting System</p> <ul style="list-style-type: none"> • Nest Monitoring Log to include fates of all nests monitored • Reporting including update of database accessible to Wildlife Agencies <p>Nest Management</p> <ul style="list-style-type: none"> • Nesting Habitat Reduction • Nesting Deterrents • Nest Removal <p>Risk Assessment and Mortality Reduction</p> <p>Quality Control and Effectiveness</p> <p>Avian Enhancement</p> <p>Key Resources</p> <p>Prior to the start of construction and implementation, SDG&E shall submit the plan to the U.S. Fish and Wildlife Service, CDFW, CPUC, and Forest Service for review and approval.</p> <p>E. In order to identify locations of current bald eagle (<i>Haliaeetus leucocephalus</i>), golden eagle (<i>Aquila chrysaetos</i>), California spotted owl (<i>Strix occidentalis</i>), American peregrine falcon (<i>Falco peregrinus anatum</i>), or federally and/or state-listed or fully protected bird nests, the monitoring biologists will coordinate with the U.S. Forest Service (Forest Service), U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife (CDFW) to ensure that the most up to date information is made available to monitoring biologists. If work will be conducted within a 1 mile buffer of historic and currently known nests during the bald or golden eagle breeding season (December 15 through July 31), SDG&E will survey the historic and currently known nests sites to determine if they are active. If nests are determined to be active, then work within 1 mile of active nests shall be rescheduled until after the completion of nesting activity at those nests. Alternatively, SDG&E may plan work activities to occur outside of the 1 mile buffers during the breeding season.</p>
<i>Location</i>	<p>In and around any construction activity in the project/alternative area, with the exception of existing access roads. Standard buffer distances will be determined in consultation with Wildlife Agencies.</p>

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<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Prepare an Avian Protection Plan, including a Nesting Bird Management Plan c. Final review and approval of plan d. Implementation of plan e. CPUC/USFS monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to construction b. At least 90 days prior to ground disturbance activities c. Prior to notice to proceed d. Avian protection implemented in accordance with approved plan e. Prior to or during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> USFS</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-29 Rock blasting. In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC.</p> <p>If the CPUC-approved biologist observes an active nest (as defined in MM BIO-28) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric shall postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions.</p>
<i>Location</i>	In project/alternative areas considered for blasting
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. See blasting requirements under MM PSU-3. b. Site-specific nesting bird survey (as part of Plan) and communicate results to CPUC/USFS c. Biologist qualifications (resumes; approved by CPUC and USFS) d. Documentation of postponing construction activities with respect to active nests (if applicable) e. CPUC monitor: Line item in compliance monitoring report
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to blasting activities b. Prior to blasting activities/Prior to construction c. Prior to construction d. During construction

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Mitigation Monitoring, Compliance, and Reporting – Biological Resources

<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and USFS, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and USFS, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: USFS</p> <p><u>Removal of TL626 from Service</u>: CPUC and USFS, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM BIO-30 Prior to work being conducted, measures will be employed to protect (a) Townsend's bat and (b) bats in general.</p> <p>A. Townsend's bat protection measures</p> <p>Prior to work being conducted, qualified biologists will conduct a literature search for potential roost sites and follow-up surveys for Townsend's big-eared bat maternity roosts within 500 feet of project lines during the breeding/pupping season (April–mid-September). Typical Townsend's big-eared bat roosts occur in mines, caves, buildings, long and dark culverts, and older bridges (pre-1960) (Pierson and Rainey 1994). If any potential structures or features for Townsend's big-eared bat are present within the project area they shall be surveyed.</p> <p>Inspections of potential roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Where active roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number present at the time of visit (count or estimate); 3) the location, amount, distribution, and age of all droppings shall be described and pinpointed on a map; and 4) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance.</p> <p>If non-maternity roosts are identified, the CDFW will be notified and consulted. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 500 feet of the roost location until the end of the pupping season or until the roost is determined to be unoccupied by Townsend's big-eared bat. For the protection of young (i.e., unable to fly) and hibernating adults all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.</p> <p>B. General bat protection measures for other bat species</p> <p>Prior to work being conducted, qualified biologists will conduct a literature search for known general bat roost sites and follow-up surveys within 100 feet of project lines during the breeding/pupping season (April–mid-September). In general, bat species may roost in rock outcrop, dense tree canopies, flaking tree bark, snags, bridges, mine, caves, flumes, and buildings. If any known sites for bats in general are present within the project</p>

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**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

	<p>area they shall be surveyed.</p> <p>Inspections of known roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Bats shall be identified to the most specific taxonomic level possible. Where active bat roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the specific was identified); 4) the location, amount, distribution, and age of all bat droppings shall be described and pinpointed on a map; and 5) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance.</p> <p>If potential roosts are determined to be present then the roosts must be analyzed further to determine if Townsend's big-eared bats are present and if maternity roosts are present. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 100 feet of the roost location until the end of the pupping. For the protection of young (i.e., unable to fly) and hibernating adults, all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.</p>
<i>Location</i>	In historically occupied sites and current suitable habitat within 500 feet of all project lines, not including access roads.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and USFS) b. Conduct surveys c. Provide CDFW South Coast Regional Office survey results d. CDFW notification if species maternity roosts present e. Apply Townsend's big-eared bat avoidance measures to known bat roost locations within a 100-foot buffer. f. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to construction b. Prior to ground disturbance activities c. Minimum 7 days prior to ground disturbance activities d. Minimum 7 days prior to ground disturbance activities e. During construction f. Prior to and during construction
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: Forest Service</p> <p><u>Removal of TL626 from Service</u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

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**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

Mitigation Measure	<p>MM BIO-31 Biologists will conduct surveys for Stephens' kangaroo rat. In locations where Stephens' kangaroo rat habitat assessments were not accessible during the 2010 surveys (including the extensive parcels of land westward of Santa Ysabel owned by a single landowner – Map Pages MS-016-025 [Chambers Group Inc. and SJM Biological Consultants 2012; Appendix A] and the large parcel immediately south of Old Highway 80 and southward of southern end of Kitchen Creek Road [Map Page MS-069 [Chambers Group Inc. and SJM Biological Consultants 2012]; Appendix A]), a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC)-approved biologist to assess the potential areas for Stephens' kangaroo rat to occur within SDG&E's proposed project area.</p> <p>Any burrows, utilized habitat, or signs of Stephens' kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephens' kangaroo rat occupied habitat. If Stephens' kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephens' kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to the project work area for complete avoidance of Stephens' kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.</p>
Location	In areas previously not accessible to SKR surveys for proposed project and all alternatives.
Compliance Documentation ^(a) and Consultation	<ul style="list-style-type: none"> a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Pedestrian preconstruction survey for potentially occupied suitable habitat (and follow-up trapping) in areas where survey was not conducted in 2010 c. Documentation that burrows, utilized habitat, and sign have been flagged for avoidance/provide map d. Biologist recommendations to minimize areas that cannot be avoided submitted to CPUC e. Prepare report and submit to CPUC f. CPUC monitor: Line item in compliance monitoring report
Timing	<ul style="list-style-type: none"> a. At least 2 weeks prior to construction b. At least 2 weeks prior to construction c. Prior to construction d. Prior to construction e. Prior to construction f. During construction
Responsible Agency	<p><u>SDG&E's Proposed Project:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</p> <p><u>Forest Service Proposed Actions:</u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> Forest Service</p> <p><u>Removal of TL626 from Service:</u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

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**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

Mitigation Measure	MM BIO-32 Procedural requirements for pesticide applications. Herbicide application shall occur under the direction of a professional applicator with an Agricultural Pest Control Adviser License. If the professional has only obtained a Qualified Applicator License, an SDG&E biologist shall provide additional supplemental training prior to the application of pesticides along the project right-of-way. This training will be administered by an SDG&E biologist and shall include topics, such as pertinent laws and regulations (California Department of Fish and Game Code, Migratory Bird Treaty Act, and Endangered Species Act), that may impact special-status wildlife species.
<i>Location</i>	All operation and maintenance areas for SDG&E's proposed project, alternatives, and lines not part of the power line replacement projects to be covered under the MSUP.
<i>Compliance Documentation^(a) and Consultation</i>	Also see procedural requirements for pesticide and herbicide applications under MM HYD-5 a. Documentation of professional applicator training of special-status wildlife species
<i>Timing</i>	a. Prior to pesticide application
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)</i></u> <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service <u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM BIO-33 Focused surveys for arroyo toad shall be conducted. Prior to initiating construction, all riverbed areas within 1,000 feet of construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31) ³ for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed. If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring plan that includes the following measures, in consultation with the USFWS: 1. The applicant shall retain a qualified biologist with demonstrated expertise with arroyo toads to monitor all construction activities in potential arroyo toad habitat and assist the project applicant in the implementation of the monitoring program. This person will be approved by the CPUC and Forest Service prior to the onset of ground-disturbing activities. This biologist will be referred to as the "authorized biologist" hereafter. The authorized biologist will be present during all activities immediately adjacent to or within habitat that supports populations of arroyo toad. 2. Prior to the onset of construction activities, the authorized biologist shall provide all personnel who will be present on work areas within or adjacent to the project site with the following information: a. A detailed description of the arroyo toad, including color photographs;

³ Since at higher elevations breeding season may occur between February 1 and July 31, on Forest Service land breeding season limited operating period will be set with a project-specific consultation with the Forest Service.

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Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources

	<ul style="list-style-type: none">b. A description of the protection the arroyo toad receives under the Endangered Species Act (ESA) and possible legal action that may be incurred for violation of the act;c. The protective measures being implemented to conserve the arroyo toad and other species during construction activities associated with the proposed project; andd. A point of contact if arroyo toads are observed. <ul style="list-style-type: none">3. All trash that may attract predators of the arroyo toad will be removed from work sites or completely secured at the end of each workday.4. Prior to the onset of any construction activities, the project applicant shall meet on site with staff from the USFWS and the authorized biologist. The applicant shall provide information on the general location of construction activities within habitat of the arroyo toad and the actions taken to reduce impacts to this species. Because arroyo toads may occur in various locations during different seasons of the year, the project applicant, USFWS, and authorized biologists will, at this preliminary meeting, determine the seasons when specific construction activities would have the least adverse effect on arroyo toads. The goal of this effort is to avoid mortality of arroyo toads during construction.5. Where construction can occur in habitat where arroyo toads are widely distributed, work areas will be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat. The authorized biologist⁴ will assist in determining the boundaries of the area to be fenced in consultation with the USFWS. All workers will be advised that equipment and vehicles must remain within the fenced work areas.6. The authorized biologist will direct the installation of the fence and conduct a minimum of three nocturnal surveys to move any arroyo toads from within the fenced area to suitable habitat outside of the fence. If arroyo toads are observed on the final survey or during subsequent checks, the authorized biologist will conduct additional nocturnal surveys if he or she determines that they are necessary in concurrence with the USFWS.7. Fencing to exclude arroyo toads will be at least 24 inches in height.8. The type of fencing must be approved by the authorized biologist and the USFWS.9. Construction activities that may occur immediately adjacent to breeding pools or other areas where large numbers of arroyo toads may congregate will be conducted during times of the year (fall/winter) when individuals have dispersed from these areas. The authorized biologist will assist the project applicant in scheduling its work activities accordingly.10. If arroyo toads are found within an area that has been fenced to exclude arroyo toads, activities will cease until the authorized biologist moves the arroyo toads.11. If arroyo toads are found in a construction area where fencing was deemed unnecessary, work will cease until the authorized biologist moves the arroyo toads. The authorized biologist, in consultation with USFWS, will then determine whether additional surveys or fencing are needed. Work may
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⁴ Authorized biologist is a biologist whose resume has been reviewed and approved by the Forest Service and CPUC.

ATTACHMENT H (Continued)

Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources

	<p>resume while this determination is being made, if deemed appropriate by the authorized biologist and USFWS.</p> <ol style="list-style-type: none"> 12. Any arroyo toads found during clearance surveys or otherwise removed from work areas will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. Clearance surveys shall occur on a daily basis in the work area. 13. The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed. 14. Staging areas for all construction activities will be located on previously disturbed upland areas designated for this purpose. All staging areas will be fenced within potential toad habitat. 15. To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force (DAPTF 2009) will be followed at all times. 16. Drift fence/pitfall trap surveys will be implemented in toad sensitive areas prior to construction in an effort to reduce potential mortality to this species. Prior to any construction activities in the project site, silt fence shall be installed completely around the proposed work area and a qualified biologist should conduct a preconstruction/clearance survey of the work area for arroyo toads. Any toads found in the work area should be relocated to suitable habitat. The silt fence shall be maintained for the duration of the work activity. <p>On Forest Service lands, occupied arroyo toad breeding habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo toad habitat (or designated critical habitat) will be mitigated at 2:1⁵. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined.</p> <p>The applicant shall restrict work to daylight hours, except during an emergency⁶, in order to avoid nighttime activities when arroyo toads may be present on the access road. Traffic speed should be maintained at 15 mph or less in the work area.</p>
<i>Location</i>	Arroyo toad designated critical habitat area along Forest Service Proposed Action C157 Options 1 and 2.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Implement measure as defined b. Biologist qualifications (resumes; approved by CPUC and Forest Service) c. Survey summary report d. Documentation of monitoring plan and consultation with the USFWS, if required e. Maps showing the proposed flagging or fencing areas f. Brief report of monitoring activities g. CPUC monitor: Line item in compliance monitoring report

⁵ Per Robert Hawkins (pers. comm. 2014)

⁶ Emergencies are described in SDG&E 1995 (Section 2.2) and SDG&E 2013a (Attachment C).

ATTACHMENT H (Continued)

**Table D.4-16
Mitigation Monitoring, Compliance, and Reporting – Biological Resources**

<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to and during construction b. At least 2 weeks prior to construction c. d. and e. Prior to construction f. and g. During construction
<i>Responsible Agency</i>	<u>Forest Service Proposed Action C157 Options 1 and 2</u> ; CPUC and Forest Service, City of San Diego

**Table D.5-15
Mitigation Monitoring, Compliance, and
Reporting – Cultural and Paleontological Resources**

<i>Mitigation Measure</i>	<p>MM CUL-1 In order to avoid adverse effects to historic properties, SDG&E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements:</p> <ul style="list-style-type: none"> 1a. – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE). Prior to any ground disturbing activities, SDG&E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall supplement surveys done for the EIR/EIS and will satisfy Section 106 requirements. 1b. – Avoid and protect potentially significant resources. Where feasible, complete avoidance of impacts shall be the preferred strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a Historic Properties Management Plan (HPMP), as described below. 1c. – Develop and Implement Historic Properties Treatment Plan. After completing the inventory and avoidance phase of site design, SDG&E will prepare and submit for approval an HPMP to avoid or mitigate identified potential impacts. 1d. – Conduct data recovery to reduce adverse effects. If eligible resources, as determined by the federal agencies and the SHPO, cannot be protected from direct impacts of the project or alternatives, data-recovery investigations shall be conducted by SDG&E to reduce adverse effects to the characteristics of each property that contribute to its eligibility, using procedures described in the HPMP. 1e. – Monitor construction activities. Incorporate monitoring as described in APM CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify the Principal Investigator, who will notify the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.
<i>Location</i>	SDG&E's proposed project and all alternatives
<i>Compliance Documentation^(a) and</i>	<ul style="list-style-type: none"> a. Approval of Final APE surveys b. Approval of final designs documenting avoidance.

ATTACHMENT H (Continued)

**Table D.5-15
Mitigation Monitoring, Compliance, and
Reporting –Cultural and Paleontological Resources**

<i>Consultation</i>	<ul style="list-style-type: none"> c. Approval of HPMP d. Approval of recovery plans e. Monitor construction activities and data recovery
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to construction b. and c. Prior to issuance of notice to proceed e. During construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC ,Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM, California State Parks (C79)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM CUL-2 In order to reduce adverse effects and significant impacts to historic resources along C79, C440, and C442 as identified in Table D.5-12 of the EIR/EIS, the original exterior materials on the cabins shall not be removed, modified, or covered. If equipment attached to the cabins must be replaced, the equipment shall retain its original appearance in terms of materials and size. If this cannot be met, then a cultural monitor is required to be present during the replacement of the lines to minimize modifications to the cabin exteriors.</p>
<i>Location</i>	C79, C440, and C442 for SDG&E's proposed project and all alternatives with identified historic resources
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Letter of conformance b. Map of locations of cabins where requirement cannot be met c. CPUC/Forest Service monitor: Conduct in-field inspections of historic structures d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. and b. Prior to issuance of notice to proceed c. During construction d. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC, Forest Service, and California State Parks</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM CUL-3 During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. Further, when on City-owned land (portions of C157, T625, and C449), the City's Land Development Manual – Historical Resource Guidelines per the San Diego Municipal Code, Chapter 14, Article 3, Division 2, Section 14.0201, shall be followed (http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division02.pdf).</p>

ATTACHMENT H (Continued)

**Table D.5-15
Mitigation Monitoring, Compliance, and
Reporting –Cultural and Paleontological Resources**

<i>Location</i>	TL625, TL626, TL629, TL682, TL6923, C78, C79, C157, C440, C442, C449
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Documentation indicating completion of all measures provided in the cultural resources report prepared by ASM for each power and distribution line. b. Map identifying all environmentally sensitive areas to be flagged and avoided during construction c. Archaeologist qualifications d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to and during construction b. Prior to issuance of notice to proceed c. At least 1 week prior to construction d. Prior to and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629, TL625, and TL6923), CSP (C79)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

**Table D.7-2
Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety**

Mitigation Measure	MM PHS-1 San Diego Gas & Electric (SDG&E) shall provide written documentation that all staff, including contractor, and subcontractor project personnel, have received training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternative locations.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Conduct training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets) of project personnel training to the CPUC and Forest Service. c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	a. b. and c. Prior to notice to proceed and throughout construction.
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM PHS-2 San Diego Gas & Electric (SDG&E) shall implement best management practices (BMPs) to prevent impacts from release of hazardous materials during construction, operation, and maintenance activities. Typical BMPs could include, but would not be limited to, practices such as the use of absorbent pads for spill containment, specified

ATTACHMENT H (Continued)

**Table D.7-2
Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety**

	locations for vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible. No hazardous material, as defined by 40 CFR 355, shall be stored on site above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355. All vehicle maintenance activities shall be conducted at designated locations within approved staging areas or other locations specified for this activity. In the event emergency maintenance is required on site, or removal of the equipment to an off-site repair facility is determined by SDG&E to be infeasible, SDG&E will use BMPs to prevent the release of hazardous materials during these emergency maintenance activities. SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternative locations.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Prepare a Spill Response and Notification Plan b. Implement measures as defined and as further defined in the project SWPPP. c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	<ol style="list-style-type: none"> a. Prior to construction b. During construction, operation, and maintenance activities c. During construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service</p> <p><u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM PHS-3 In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions:</p> <ul style="list-style-type: none"> • The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas & Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan. • The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the <i>Blasting Guidance Manual</i> of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. • The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting

ATTACHMENT H (Continued)

**Table D.7-2
Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety**

	techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternative locations.
<i>Compliance Documentation^(a) and Consultation</i>	a. Prepare a program-level blasting plan followed by specific blasting plans during construction b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. and b. Prior to and during construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project</i></u> : CPUC, Forest Service and County, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions</i></u> : CPUC and Forest Service and County, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action</i></u> : CPUC and Forest Service and County, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads</i></u> : Forest Service <u><i>Removal of TL626 from Service</i></u> : CPUC and Forest Service and County, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM PHS-4 Prior to construction, all San Diego Gas & Electric (SDG&E), contractor, and subcontractor project personnel anticipated to work between poles Z173105 and Z173109 shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid any ground disturbance in the area.
<i>Location</i>	Along TL629 between poles Z173105 and Z173109.
<i>Compliance Documentation^(a) and Consultation</i>	a. Conduct training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets) of project personnel training to the CPUC.
<i>Timing</i>	a. Prior to notice to proceed for TL629 b. Prior to and during construction
<i>Responsible Agency</i>	CPUC
Mitigation Measure	MM PHS-5 Prior to flight operations for helicopter use during construction as well as operations, San Diego Gas & Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration (FAA) regulations regarding helicopter use to prevent conflicts with air traffic generated by local airstrips. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction and operations and maintenance activities. SDG&E shall prepare an Aviation Safety Plan for Forest Service approval prior to any use of helicopters in support of activities on the Cleveland National Forest. The Aviation Safety Plan will outline the procedures used to ensure safe transportation of external loads, and will identify coordination requirements with Forest Service aviation resources operating in the area.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternative locations.
<i>Compliance Documentation^(a) and Consultation</i>	a. Prepare an Aviation Safety Plan as defined in measure b. Documentation showing coordination with Forest Service aviation resources as defined in plan, local air traffic control, and compliance with all applicable FAA regulations. c. CPUC/Forest Service Monitor: Line item in compliance monitoring report

ATTACHMENT H (Continued)

**Table D.7-2
Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety**

<i>Timing</i>	a and b. Prior to use of helicopters for construction activities c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service <u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM PHS-6 If, during construction activities, it is anticipated or planned that helicopters will be used for external load operations, including carrying structures, San Diego Gas & Electric (SDG&E) will prepare a Helicopter Lift Plan. This plan will be prepared in accordance with and comply with all relevant FAA regulations, as well as SDG&E's Aviation Operations Manual. Prior to initiation of construction activities for each alignment, if determined that helicopters would be used, the Helicopter Lift Plan will be provided to the California Public Utilities Commission.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternative locations.
<i>Compliance Documentation^(a) and Consultation</i>	a. Helicopter Lift Plan b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a.. Prior to construction-related flight operations b. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service <u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM PHS-7 Conduct geotechnical investigations. The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction measures that meet California Building Code (CBC), CPUC General Order 95, and Electric Power Research Institute (EPRI) Moment Foundation Analysis and Design parameters shall be incorporated into the project designs.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Geotechnical investigations for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards for approved project facilities. b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. Prior to construction b. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)

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**Table D.7-2
Mitigation Monitoring, Compliance, and Reporting – Public Health and Safety**

	<p><u>BIA Proposed Action:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> Forest Service</p> <p><u>Removal of TL626 from Service:</u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM PHS-8 Facilities inspections conducted following major seismic event. If large levels of ground shaking (such as Modified Mercalli Intensity VI or greater) are experienced or a major earthquake (magnitude 6.0 and above) occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer employed or contracted by SDG&E shall perform facilities inspections as quickly as possible. Careful examination shall be conducted of all project facilities within the identified area of effect. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation ^(a) and Consultation	<p>a. Professional investigation of all approved project facilities following a major seismic event</p> <p>b. Submittal of report (indicates required repairs or needed improvements, actions taken to repair facilities, if needed, and timing of repair work)</p>
Timing	<p>a. Following a major seismic event</p> <p>b. During construction and operation</p>
Responsible Agency	<p><u>SDG&E's Proposed Project:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u>Forest Service Proposed Actions:</u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> Forest Service</p> <p><u>Removal of TL626 from Service:</u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

**Table D.8-2
Mitigation Monitoring, Compliance, and Reporting – Fire and Fuels Management**

Mitigation Measure	<p>MM FF-1 Develop and Implement a Construction Fire Prevention/Protection Plan. SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service, Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of lead agencies. SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&E. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition <ul style="list-style-type: none"> ○ Vegetation clearing ○ Fuel treatment area establishment ○ Parking requirements ○ Smoking restrictions ○ Hot work restrictions
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ATTACHMENT H (Continued)

**Table D.8-2
Mitigation Monitoring, Compliance, and Reporting – Fire and Fuels Management**

	<ul style="list-style-type: none"> • Red Flag Warning restrictions • Fire coordinator role and responsibility • Fire suppression equipment on site at all times work is occurring • Requirements of Title 14 of the California Code of Regulations, 918 "Fire Protection" for the private land portions • Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice 113-1 (July 2012) • Emergency response and reporting procedures • Emergency contact information • Worker education materials; kick-off and tailgate meeting schedules • Other information as provided by responsible and commenting agencies (as appropriate for each project). <p>Additional restrictions will include the following:</p> <ul style="list-style-type: none"> • During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily construction and hotwork. • Fire Suppression Resource Inventory – In addition to 14 CCR 918.1(a), (b), and (c), the applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE. • During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest Service Project Activity Level (PAL) is "E" on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under a Hot Work Procedure. The Hot Work Procedure will be in compliance with the applicable sections in NFPA 51-B "Fire prevention during welding, cutting, or other hot work" and CFC Chapter 26 "Welding and other Hot Work." <ul style="list-style-type: none"> ○ The applicant and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF. ○ All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area as soon as the fire is identified/discovered. ○ Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect. ○ Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent
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ATTACHMENT H (Continued)

**Table D.8-2
Mitigation Monitoring, Compliance, and Reporting – Fire and Fuels Management**

	<p>them from growing into more serious threats. Each crew member shall at all times be within 50 feet of fire suppression equipment, as outlined in ESP 113.1.</p> <p>SDG&E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The final plan will be approved by the responsible lead agencies with input from the fire and permitting agencies, as desired, prior to the initiation of construction activities and provided to SDG&E for implementation during all construction prior to the initiation of construction activities. All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.</p>
<i>Location</i>	All access roads and work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Prepare Construction Fire Prevention/Protection Plan b. Approval and implementation of Construction Fire Prevention/Protection Plan c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. Draft Plan: At least 90 days prior to scheduled start of construction. b. Final Plan: At least 30 days prior to scheduled start of construction (plan in effect throughout construction). c. During construction
<i>Responsible Agency</i>	<p>CAL FIRE, SDRFPD, SDCFA for proposed project and all alternatives</p> <p><u>SDG&E's Proposed Project</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: Forest Service</p> <p><u>Removal of TL626 from Service</u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM FF-2 Develop and Implement an Operations and Maintenance Fire Prevention/Protection Plan. The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) within the Cleveland National Forest (CNF), and <u>other project facilities off the CNF</u>, and will be implemented during all operational maintenance work associated with the project for the life of the project. This plan will satisfy the requirements of the SDG&E Project Specific Fire Plan, as identified in SDG&E's Electric Standard Practice 113-1. Important fire safety concepts that shall be included in the plan and make it an essential overall mitigation measure are the following:</p> <ul style="list-style-type: none"> • Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans) • Fuel treatment area maintenance • When vegetation work will occur (prior to any other work activity) • Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread • Coordination procedures with fire authority • Integration of the project's Construction Fire Prevention/Protection Plan content • Personnel training and fire suppression equipment • Red Flag Warning restrictions for operation and maintenance work

ATTACHMENT H (Continued)

**Table D.8-2
Mitigation Monitoring, Compliance, and Reporting – Fire and Fuels Management**

	<ul style="list-style-type: none"> • Fire safety coordinator role as manager of fire prevention and protection procedures, coordinate with fire authority and educator • Communication protocols • Incorporation of responsible agency review and approved Response Plan mapping and assessment. • Other information as provided by responsible and commenting agencies, as applicable. <p>SDG&E will provide a draft copy of the Operations and Maintenance Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the completion of the first project segment. The final plan will be approved by the CPUC and Forest Service prior the first construction segment being deemed complete and the final plan will be provided to SDG&E for implementation during all operations and maintenance activities.</p>
<i>Location</i>	All access roads and work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Prepare draft Operations and Maintenance Fire Prevention/Protection Plan b. Approval and implementation of plan (no operations and maintenance work during Red Flag Warnings and Very High PAL) c. Ongoing coordination with Fire Authority d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. Draft Plan: At least 90 days prior to completion of the first project segment b. Final Plan: At least 30 days prior to completion of the first project segment (revision every 5 years thereafter) c. and d. During construction ^b, operations and maintenance
<i>Responsible Agency</i>	<p>CAL FIRE, SDRFPD, SDCFA for proposed project and all alternatives</p> <p><u>SDG&E's Proposed Project</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u>BIA Proposed Action</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads</u>: Forest Service</p> <p><u>Removal of TL626 from Service</u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

Mitigation Measure	<p>MM HYD-1 Erosion Control Plan / Stormwater Pollution Prevention Plan. SDG&E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gullyng . The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization) and incorporate Construction General Permit SWPPP requirements for each construction segment as the SWPPP(s) for that segment are completed. Additionally, the ECP shall complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4.</p>
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ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

	<p>The ECP shall be updated for each construction segment and provided to the CPUC and the federal agencies for review and approval prior to each agency's Notice to Proceed issuance for that construction segment.</p> <p>As required by the Construction General Permit, SDG&E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project or for individual construction segments, as required, to reduce soil erosion during construction. The SWPPP(s) and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance for the respective construction segment. SDG&E shall provide the CPUC and Forest Service with subsequent amendments to the SWPPP as part of SDG&E's weekly compliance reports. In weekly construction compliance reports, SDG&E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water Multiple Application and Report Tracking System (SMARTS) following storm events.</p>
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Prepare Draft Erosion Control Plan / Stormwater Pollution Prevention Plan and submit to agencies b. Submit Final approved Erosion Control Plan / Stormwater Pollution Prevention Plan (SWPPP) c. CPUC/Forest Service monitor: Line item in compliance monitoring reports d. Implement post-construction maintenance activities and note in compliance monitoring reports
<i>Timing</i>	<ol style="list-style-type: none"> a. Prior to notice to proceed b. Prior to and during construction c. During construction d. Post construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u><i>Forest Service Proposed Actions</i></u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)</p> <p><u><i>BIA Proposed Action</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads</i></u>: Forest Service</p> <p><u><i>Removal of TL626 from Service</i></u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

Mitigation Measure	MM HYD-2a Documentation of purchased water source(s). For water that is to be purchased from one or more public or private water/utility district(s), private landowners, or from tribes, SDG&E shall provide to the CPUC written documentation from such district(s) and/or landowners indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The documentation shall also indicate the type of water (potable or reclaimed) and the specific source of the water (groundwater well or surface diversions). The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC prior to notice to proceed for each project component.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Submit Water Supply Plan including copies of "will serve" letters providing verification that water quantities are available to meet project needs.
<i>Timing</i>	a. Prior to notice to proceed for each project component.
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project and all Alternatives</i></u> ; CPUC and Forest Service
Mitigation Measure	MM HYD-2b Groundwater Evaluations of Off-Site Water Import Sources. For identified water sources that derive their water supply from groundwater, SDG&E shall commission a groundwater study by a registered/certified hydrogeologist, as reviewed and approved by CPUC, to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner's permission) in the vicinity of proposed well location/water sources and to verify that the proposed source is capable of supplying the amount of water needed. The groundwater study shall evaluate whether the volume and duration of the proposed groundwater use would exceed County of San Diego thresholds for impacts with respect to groundwater supply and well interference. If the evaluation indicates the potential for significant impacts, the registered/certified hydrogeologist shall recommend feasible mitigation measures (e.g., a groundwater monitoring program) to avoid exceeding applicable thresholds. The groundwater evaluation shall be provided along with the documentation of purchased water sources, and the CPUC shall not authorize construction of the project unless such documentation have been provided by SDG&E and approved by CPUC. If the evaluation finds that impacts cannot be avoided given the volume and duration of the proposed groundwater use, the CPUC will not authorize use of the water source and shall require SDG&E to seek other viable sources of water. Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project. SDG&E shall submit monthly water logs documenting compliance with the water supply plan and groundwater thresholds.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Copy of water study with verified groundwater quantities and will serve letters providing verification that water adds up to equal estimated project construction needs b. Provide monthly water logs documenting compliance with the water supply plan and groundwater thresholds

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

<i>Timing</i>	<p>a. At least 30 days prior to noticed to proceed for each project component.</p> <p>b. During construction</p>
<i>Responsible Agency</i>	<u>SDG&E's Proposed Project and all Alternatives</u> : CPUC and Forest Service
Mitigation Measure	<p>MM HYD-3 Access Road Decommissioning Plan. SDG&E shall prepare an Access Road Decommissioning Plan for review and approval by the CPUC and Forest Service within 1 year of project approval or permit issuance. The plan will be prepared by qualified professionals (e.g., PG, PE, or CEG contracted by SDG&E) whose qualifications are reviewed and approved by the CPUC and the Forest Service. The plan will include a schedule for decommissioning activities.</p> <p>Under the plan, SDG&E shall be responsible for the prevention and control of soil erosion and gulying in areas proposed for access road removal and shall implement the following activities::</p> <ul style="list-style-type: none"> • Remove any flagging, signs, or other markings within or around sensitive resource areas after road removal, except where such signs are necessary for long-term access control and interpretation purposes. • Remove temporary fill and structures to the extent practical. • Provide appropriate access control for temporary work areas, such as fencing posts, and/or signage, and ensure gates are locked in accordance with MM-REC-1 to minimize unauthorized traffic and/or access road circumvention during construction • Ensure that the road surface is in stable condition when the road is closed. Seed and fertilize disturbed surfaces as necessary. • To facilitate regeneration, back blade or otherwise scarify road beds where appropriate. Use native grass or forb mixes if available. • All earthwork shall be confined to the road corridor and no soil shall be sidecast onto adjacent areas; if necessary, excess soil material shall be incorporated into restoration activities or hauled off site to an approved disposal facility. • Activities will complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4.
<i>Location</i>	Road removal locations for SDG&E's proposed projects and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<p>a. Implement access road decommissioning best practices (MSUP permit condition for Forest Service)</p> <p>b. Monitor success of passive restoration, prevention of unauthorized use/access</p> <p>c. CPUC/Forest Service Monitor: Line item in compliance monitoring report</p>
<i>Timing</i>	<p>a. and b. During construction and operation</p> <p>c. During construction</p>
<i>Responsible Agency</i>	<p><u>SDG&E's Proposed Project</u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79)</p> <p><u>Forest Service Proposed Actions</u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p>

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

	<p><u>BIA Proposed Action:</u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u>Partial Removal of Overland Access Roads:</u> Forest Service</p> <p><u>Removal of TL626 from Service:</u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	<p>MM HYD-4 Access Road Condition Evaluation and Repair Design Report. Planned grading and repair activities along SDG&E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within RCAs, or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, or CEG contracted by SDG&E and reviewed and approved by the CPUC and the Forest Service) prior to initiating construction on the associated segment, who will identify areas experiencing chronic erosion and drainage issues. At a minimum, segments shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ● TL626 south of Eagle Creek Road and north of Boulder Creek Road ● TL625 in the Vicinity of Barber Mountain Road ● TL625 north of Lyons Valley Road and south of Carveacre Road ● C442 east of Oak Valley and south of I-8, on the western flanks of Long Peak ● Short segments of TL629 on either side of Cameron Valley and east of Pine Valley <p>The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues prior to beginning work on those facilities associated with the problematic access road. The designed solution(s) shall be included into the approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments.</p> <p>Examples of such solutions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> ● Crowning road sections with gentle slopes to prevent standing water on the road ● Outsloping roads at 3%-5% wherever possible ● Where required for proper maneuvering and safety, insloping roads at 3-5% into properly designed ditches ● Installing rolling dips, ditch relief culverts, and/or water bars at intervals appropriate for the road-grade and the soil erosivity ● Minimizing the number of water crossings, and maintaining crossings as close to a 90-degree angle as possible to the streambed. ● Constructing perennial and seasonal/ephemeral stream crossings so as not to change the cross-sectional area of the stream channel or impede fish migration.

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

	<ul style="list-style-type: none"> • Constructing perennial and seasonal/ephemeral stream crossings with materials that will not degrade water quality (e.g., concrete, coarse rock, riprap and/or gabions) • Surfacing roads with erosion-resistant materials such as rock or asphalt concrete. <p>The Access Road Condition Evaluation and Repair Design Report shall identify locations, if any, where no feasible and/or effective solutions can be implemented to adequately handle runoff or comply with Forest Service soil and water quality management standards as contained in Forest Service Handbook 2509.22 (Section 12.2). The report will be updated for each construction segment according to SDG&E's final construction schedule.</p> <p>In these locations, the qualified professional shall recommend options for access road removal (i.e., requiring access by helicopter) or realignment (e.g., to achieve a lower slope) that would still achieve project objectives.</p> <p>Construction of each segment shall not proceed until the report section pertaining to that segment has been reviewed and approved by CPUC and Forest Service. In the event there are disputes regarding specific problem locations, CPUC and Forest Service will allow construction to proceed on those portions of the construction segment not impacted by access roads requiring evaluation under this measure; however, SDG&E shall not work in areas under dispute until resolution is achieved.</p>
<i>Location</i>	SDG&E exclusive use access roads for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ol style="list-style-type: none"> a. Prepare Access Road Condition Evaluation and Repair Design Report b. Final review and approval of report c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	<ol style="list-style-type: none"> a. and b. Prior to start of construction for each individual replacement project. c. Prior to final design d. Prior to notice to proceed and during construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923))</p> <p><u><i>Forest Service Proposed Actions</i></u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)</p> <p><u><i>BIA Proposed Action</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads</i></u>: Forest Service</p> <p><u><i>Removal of TL626 from Service</i></u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM HYD-5 Procedural Requirements for Pesticide and Herbicide Applications. Pesticide and herbicide application shall occur under the direction of a professional pesticide applicator with either a Qualified Applicator License (QAL) or an Agricultural Pest Control Adviser License in the State of California (see MM-BIO-32 for additional biological training requirements for applicators with a QAL). Label instructions and all applicable laws and regulations shall be strictly followed in the application of pesticides and herbicides and disposal of excess materials and containers. Only those materials registered by the EPA for the specific purpose planned shall be authorized for use.

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

	<p>Before applying any pesticides or herbicides on National Forest System land, SDG&E shall receive approval from the Forest Service for all pesticides and herbicides proposed for use on National Forest System land prior to their application on these lands. For portions of the project crossing BLM lands, SDG&E shall obtain a BLM Pesticide Use Permit as well. Additionally, prior to any pesticide or herbicide use, SDG&E shall submit an anticipated schedule to the Forest Service for planned use within the CNF on an annual basis, or more frequently as needed, and will work with the Forest Service to determine the appropriate pesticide and herbicide per location.</p>
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Pesticide applicator qualifications b. Implement in accordance with EPA requirements c. Provide pesticide application schedule
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 2 weeks prior to first pesticide application b. Post-construction during routine operation and maintenance c. Submit on annual basis (or more frequently as needed)
<i>Responsible Agency</i>	Forest Service
Mitigation Measure	<p>MM HYD-6 Implementation of Creek-Crossing Procedures. Where creek crossings can be completed during dry season, with no flows present in the creek, seasonally timed restorative open trenching will be completed. This procedure will use minimum trench widths. Trench cut material will be placed outside of the creek bed and outside of 100-year inundated areas. Trench fill will be compacted and replaced to match existing creek bed gradations, and vegetation will be restored. Open trenching restoration will be completed prior to any wet season flows, and will include anti-erosion action plans for any unplanned rainfall during construction. SDG&E shall obtain all required permits prior to completing open trenching through drainages. In any case, flows will be isolated from open trenching by best management practices mandated by the General Construction Permit. Areas of trenching would be restored and/or vegetated at completion of work.</p> <p>Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-bore procedures to avoid direct impacts and shall be conducted in a manner that does not result in sediment-laden discharge or hazardous materials release to the water body. SDG&E shall develop a Jack-and-Bore/Horizontal Directional Drill (HDD) Contingency Plan for this work in accordance with MM-HYD-8. Additionally, SDG&E shall implement the following measures during horizontal boring (jack-and-bore) operations and shall be included in the HDD Contingency Plan:</p> <ul style="list-style-type: none"> 1 Site preparation shall begin no more than 10 days prior to initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages. 2 Trench and/or bore pit spoil shall be stored a minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention).

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

	<p>3 Portable pumps and stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10-gallon fuel or oil capacity should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times.</p> <p>4 Within 24 hours following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall be left in place until restoration is deemed successful.</p> <p>SDG&E shall obtain the required permits prior to conducting creek crossing work. Required permits may include ACOE CWA Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. SDG&E shall implement all pre- and post-construction conditions identified in the permits issued.</p>
<i>Location</i>	TL626 alternative alignment (Option 3 underground in Boulder Creek Road)
<i>Compliance Documentation^(a) and Consultation</i>	<p>a. Implement Creek Crossing Procedures during the dry season</p> <p>b. Prepare a Jack-and-Bore HDD Contingency Plan with associated SWPPP in accordance with the requirements and timing in MM-HYD-8</p> <p>c. Conduct directional drilling rather than trenching, where/when applicable</p> <p>d. CPUC/Forest Service Monitor: Line item for standard trenching (Creek Crossing Procedures) in compliance monitoring report</p>
<i>Timing</i>	<p>a. During creek-crossing construction activities</p> <p>b. At least 60 days prior to construction</p> <p>c. Prior to and during construction</p> <p>d. During construction</p>
Mitigation Measure	<p>MM HYD-7 Horizontal Directional Drill Contingency Plan. If horizontal directional drilling is to be used during construction, SDG&E shall prepare a Horizontal Directional Drill (HDD) Contingency Plan to address procedures for containing an inadvertent release of drilling fluid (frac-out). The plan shall contain specific measures for monitoring frac-outs, for containing drilling mud, and for notifying agency personnel. The plan shall also discuss spoil stockpile management, hazardous materials storage and spill cleanup, site-specific erosion and sediment control, and housekeeping procedures, as described in the Stormwater Pollution Prevention Plan. The Jack-and-Bore HDD Contingency Plan shall be submitted to the CPUC, Forest Service, Bureau of Indian Affairs, and ACOE 60 days prior to construction.</p> <p>SDG&E shall obtain the required permits prior to conducting work associated with jack-and-bore/horizontal directional drilling activities. Required permits may include U.S. Army Corps of Engineers Clean Water Act Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement Section 1602. The applicant shall implement all pre- and post-construction conditions identified in the permits issued for the jack-and-bore/horizontal directional drilling.</p>

ATTACHMENT H (Continued)

**Table D.9-11
Mitigation Monitoring, Compliance, and Reporting – Hydrology and Water Quality**

<i>Location</i>	TL626 alternative alignment (Option 3 underground in Boulder Creek Road)
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Prepare Jack-and-Bore HDD Contingency Plan with associated SWPPP and obtain required permits b. Approval and implementation of Jack-and-Bore HDD Contingency Plan, if necessary d. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	<ul style="list-style-type: none"> a. Prior to creek-crossing construction activities b. Prior to and during construction, if applicable c. During construction
<i>Responsible Agency</i>	<u>Forest Service Proposed Action – Option 3</u> : CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), ACOE

**Table D.10-10
Mitigation Monitoring, Compliance, and Reporting – Land Use**

Mitigation Measure	<p>MM LU-1 Prepare Construction Notification Plan. Forty-five (45) days prior to construction of the first segment, the project applicant shall prepare and submit a Construction Notification Plan to the appropriate land use jurisdiction agency for approval. The plan will be updated with additional information 45 days before construction of each additional segment. The plan shall identify the procedures that will be used to inform private landowners, schools, and agencies with authority over recreational areas/facilities of the location and duration of construction; identify approvals that are needed prior to posting or publication of construction notices; and include text of proposed public notices and advertisements. The plan shall address at a minimum the following components:</p> <p>Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice shall identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential properties and other sensitive land uses. The notice shall state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. The project applicant shall mail the notice to all residents or property owners within 1,000 feet of project components and to all land use agencies having jurisdiction over a recreation area/facility located within 1,000 feet of a project component. If construction delays of more than 30 days occur, an additional notice shall be prepared and distributed. To facilitate access to properties obstructed by construction activities, the project applicant shall notify property owners and tenants at least 24 hours in advance of construction activities and shall provide alternative access if required.</p> <p>Newspaper/website advertisements. Fifteen (15) days prior to construction of any project component, notices shall be placed in local newspapers and bulletins, including Spanish language newspapers and bulletins, and on the relevant websites of jurisdictional agencies. The Forest Supervisor, District Rangers, and Public Affairs Officer of the Cleveland National Forest shall also be notified. The notice shall state when and where construction will occur and provide information about the public liaison person and hotline. If construction is delayed for more than 7 days, an additional round of newspaper notices shall be placed to discuss the status and schedule of construction.</p>
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ATTACHMENT H (Continued)

**Table D.10-10
Mitigation Monitoring, Compliance, and Reporting – Land Use**

	<p>Public venue notices. Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, rest stops, community centers, trailheads, informational kiosks, and other public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose and schedule of construction activities.</p> <p>Public liaison person and toll-free information hotline. The project applicant shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. The project applicant shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.</p>
<i>Location</i>	Any project component where residences are located within 1,000 feet of SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Prepare construction notification plan as defined. b. Provide construction notices for review and approval c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 45 days prior to construction as defined b. Prior to construction as defined c. During construction
<i>Responsible Agency</i>	<p><u><i>SDG&E's Proposed Project</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79),</p> <p><u><i>Forest Service Proposed Actions</i></u>: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157)</p> <p><u><i>BIA Proposed Action</i></u>: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)</p> <p><u><i>Partial Removal of Overland Access Roads</i></u>: Forest Service</p> <p><u><i>Removal of TL626 from Service</i></u>: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)</p>
Mitigation Measure	MM LU-2 If the Forest Service selects to leave TL626 or C442 in place, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan land use zones and standards.
Location	TL626, C442, TL626 Forest Service Alternative (Options 1,2, and 5)
Compliance Documentation ^(a) and Consultation	<ul style="list-style-type: none"> a. Forest Service amends the LMP contemporaneously with the authorization of the MSUP and approval to rebuild, operate, and maintain TL626, C442, and TL626 Forest Service Alternative (Options 1, 2, and 5) as proposed or modify the land use zones b. The LMP Amendment is described in any project ROD authorizing TL626, C442, and TL62 Forest Service Alternative (Options 1, 2, and 5) as proposed
Timing	a. and b. Contemporaneously with the ROD
Responsible Agency	Forest Service

ATTACHMENT H (Continued)

**Table D.10-10
Mitigation Monitoring, Compliance, and Reporting – Land Use**

Mitigation Measure	MM LU-3 Revise project elements to minimize land use conflicts. At least Ninety (90) days prior to completing final transmission line design for the approved route, the project applicant shall notify landowners of parcels through which the alignment would pass regarding the specific location of the ROW, individual towers, staging areas, access roads, or other facilities associated with the project that would occur on the subject property. The notified parties shall be provided 30 days in which to identify conflicts with any planned development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner. Property owners whose land may be divided into potentially uneconomic parcels shall be afforded this same opportunity, even if development plans have not been established. The project applicant shall endeavor to accommodate these reroutes to the extent that they are feasible and do not create adverse impacts to resources or to other properties that would be greater in magnitude than impacts that would occur from construction and operation of the alignment as originally planned.
<i>Location</i>	TL626 alternative alignment (Option 1, 2, and 4) where new ROW across private lands would be required
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Provide verification of property owner notification. b. Identified by property owners provide potential conflicts to SDG&E c. SDG&E provides potential conflicts to the Forest Service and CPUC for review d. SDG&E shall provide written responses to each submitted conflict/comment. e. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	<ul style="list-style-type: none"> a. At least 90 prior to final transmission line design b. At least 30 prior to final transmission line design c. Reasonable and feasible reroutes reviewed by CPUC, Forest Service, BIA and Inaja and Cosmit Tribe to minimize land use conflicts. Reduced land use conflicts to be reviewed against potential increased impacts to other resource areas. d. Prior to final transmission line design e. Prior to notice to proceed
<i>Responsible Agency</i>	CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)
Mitigation Measure	MM LU-4 Prior to construction, for any structure or object that is placed in, under, or over any portion of a county roadway, SDG&E shall obtain, from the San Diego County Director, Department of Public Works (DPW), a written encroachment permit in accordance with Section 71 (Highway and Traffic) of the San Diego County code of Regulatory Ordinances.
<i>Location</i>	TL626 alternative alignment (Option 3 and 4 in and along Boulder Creek Road), C440 Additional Undergrounding Alternative (County-maintained roads in Laguna Mountain Recreation Area)
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. Provide verification of Encroachment Permit(s) obtained from the San Diego County Department of Public Works b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. and b. Prior to construction
<i>Responsible Agency</i>	CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)

ATTACHMENT H (Continued)

**Table D.11-9
Mitigation Monitoring, Compliance, and Reporting – Noise**

Mitigation Measure	MM NOI-1 In the event noise levels during construction activities are expected to exceed an 8-hour L_{eq} of 75 dBA at the nearest property line or within 190 feet of the existing and proposed project alignment where noise-sensitive areas are located, San Diego Gas & Electric (SDG&E) shall implement noise reduction measures to reduce noise levels to below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or (2) if noise barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents until the impact has been determined to not be adverse.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Monitor noise where noise sensitive areas are located b. Documentation of noise levels c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a, b, and c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project</i></u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions</i></u> : CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action</i></u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads</i></u> : Forest Service <u><i>Removal of TL626 from Service</i></u> : CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM NOI-2 At least 30 days before helicopter use and stringing operations are employed, San Diego Gas & Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the approved project alignment. SDG&E shall notify landowners, residents, schools, livestock facility owners, and CNF offices responsible for managing recreation areas within 590 feet in areas of fly yards and pole locations where helicopters will be used during construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Provide public notice mailer as defined in mitigation measure to CPUC. b. Mail notice to public c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. At least 30 days before helicopter use and stringing operations b. At least 7 days prior to helicopter use and stringing operation c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project</i></u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions</i></u> : CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action</i></u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads</i></u> : Forest Service <u><i>Removal of TL626 from Service</i></u> : CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

ATTACHMENT H (Continued)

**Table D.11-9
Mitigation Monitoring, Compliance, and Reporting – Noise**

Mitigation Measure	MM NOI-3 In the unlikely event that rock blasting is used during construction, SDG&E will prepare a blasting plan, that will include a noise and vibration calculation, and will be submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. Each blasting plan will be consistent with SDG&E's blasting guidelines to reduce noise and vibration impacts from blasting activities. The blasting contractor will be required to obtain a blasting permit and explosive permit per the San Diego County Regulatory Ordinances, and will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Prepare noise and vibration calculation for rock blasting activities b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. Prior to rock blasting activities b. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service <u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	MM NOI-4 For any work that cannot occur during the allowable construction hours (between 7 a.m. and 7 p.m. Monday through Saturday), SDG&E will follow its established protocols and will provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement will state the construction start date, anticipated completion date, and hours of construction. SDG&E will also communicate the exception to the CPUC and San Diego County in advance of conducting the work. If necessary, SDG&E will temporarily relocate residents occupying properties located less than 220 feet from construction activities on an as-needed basis for the duration of construction activities that would affect them.
<i>Location</i>	All construction work areas for SDG&E's proposed project and all alternatives.
<i>Compliance Documentation^(a) and Consultation</i>	a. Provide public notice mailer as defined b. Provide verification of relocation of residents, if needed. c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. At least 15 days prior to work occurring outside allowable construction hours b. At least 7 days prior to relocation of residents. c. During construction
<i>Responsible Agency</i>	<u><i>SDG&E's Proposed Project:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u><i>Forest Service Proposed Actions:</i></u> CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u><i>BIA Proposed Action:</i></u> CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u><i>Partial Removal of Overland Access Roads:</i></u> Forest Service <u><i>Removal of TL626 from Service:</i></u> CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

ATTACHMENT H (Continued)

**Table D.2-3
Mitigation Monitoring, Compliance, and Reporting – Public Services and Utilities**

Mitigation Measure	MM PSU-1: AT&T Commitments. Prior to receiving a Notice to Proceed with construction along each of the proposed power line replacement projects, and it required by the CPUC or Forest service, SDG&E shall work in good faith to obtain and provide to the CPUC and Forest Service written commitment from AT&T confirming that AT&T facilities that are co-located on the proposed power line replacement projects will be relocated to SDG&E's new facilities. Facilities will be transferred in a manner that avoids interruptions of telecommunications services to the greatest degree possible. The timing of the relocation activities will be reviewed and approved by both the CPUC and Forest Service.
<i>Location</i>	Along electric lines with co-located AT&T facilities.
<i>Compliance Documentation^(a) and Consultation</i>	a. Record of written verification from AT&T that telecommunication facilities will be relocated on new poles and the timing of the relocation of facilities. b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. and b. Prior to notice to proceed
<i>Responsible Agency</i>	SDG&E's <u>Proposed Project</u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) <u>Forest Service Proposed Actions</u> : CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) <u>BIA Proposed Action</u> : CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) <u>Partial Removal of Overland Access Roads</u> : Forest Service <u>Removal of TL626 from Service</u> : CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

**Table D.13-11
Mitigation Monitoring, Compliance, and Reporting – Recreation**

Mitigation Measure	MM REC-1 Installation of Gates and Appropriate Signage. To deter unauthorized access to specially designated or restricted areas via SDG&E access roads authorized by the MSUP, the project applicant shall submit a plan and schedule for gate (or other barriers, such as pipe rails, where appropriate) installation to the Forest Service for approval. Gates will meet Forest Service engineering standards, and designs will be approved by the Forest Service prior to installation. In addition, appropriate deterrence signage approved by the Forest Service shall be installed on gates to SDG&E access roads. Maintenance of gates and signage shall be the responsibility of the project applicant.
<i>Location</i>	Where determined necessary by Forest Service
<i>Compliance Documentation^(a) and Consultation</i>	a. SDG&E to install gates and appropriate signage as identified by the Forest Service to deter unauthorized access along SDG&E access roads authorized by the MSUP). b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
<i>Timing</i>	a. Prior to initiation of construction activities. b. Maintained during construction, operations and maintenance.
<i>Responsible Agency</i>	Forest Service

ATTACHMENT H (Continued)

**Table D.13-11
Mitigation Monitoring, Compliance, and Reporting – Recreation**

Mitigation Measure	MM REC-2 Enforcement of Proper Gate Protocol. During construction and ongoing operations and maintenance activities, gates on access roads authorized by the MSUP shall be locked immediately after ingress and egress has occurred. Should SDG&E or Forest Service staff observe unlocked gates, SDG&E will be required to review gate protocols with personnel.
<i>Location</i>	Along all exclusive use access roads with existing and new gates on Forest Service managed-lands.
<i>Compliance Documentation^(a) and Consultation</i>	<ul style="list-style-type: none"> a. SDG&E will provide access and gate monitoring throughout construction, maintenance, and operations. SDG&E will notify the Forest Service of roadway damage or off-site disturbance suspected to be caused by unauthorized access and will provide the Forest Service with proposed restoration activities for damaged areas. The Forest Service may request additional restoration efforts specific to the damaged/disturbed area caused by unauthorized access if determined necessary. b. SDG&E will provide documentation of all pre- and post-restoration activities (with respect to this measure) to the Forest Service upon completion. c. Prior to operations, SDG&E will provide the Forest Service with a maintenance schedule in order to ensure gates and locks are kept in good working order/condition.
<i>Timing</i>	a. b. and c. Throughout construction, operations, and maintenance activities
<i>Responsible Agency</i>	Forest Service

Source: Decision Granting Permit to Construct The Cleveland National Forest Power Line Replacement Projects, CPUC 2016.

ATTACHMENT H (Continued)

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