

Melinda A. Kimble Project Manager San Diego Gas & Electric Company (M) 760-315-3288

September 8, 2021

Trevor Pratt
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Revised Notice to Proceed Request No. 1 to Construct the San Marcos to Escondido Tie Line 6975 Project (D.20-09-034).

Mr. Pratt:

On September 24, 2020, the California Public Utilities Commission (CPUC) voted to grant San Diego Gas & Electric Company (SDG&E) a Permit to Construct (PTC) for the San Marcos to Escondido Tie Line (TL) 6975 69 kilovolt (kV) Project (Project or TL6975 Project) (Decision 20-09-034) contingent upon implementation of the Mitigation Monitoring, Reporting and Compliance Program (MMRCP). SDG&E requests approval of this Notice to Proceed Request No. 1 (NTPR-1) for construction of the Project activities which include rebuilding an existing 69 kV power line west of San Marcos Substation, constructing a new 69kV power line from Melrose Tap to Meadowlark Junction and reconductoring an existing line from Meadowlark Junction to Escondido Substation as shown in Attachment A, NTPR-1 Mapbook (Mapbook). Staging areas will be required for this Project; and two staging vards and two auxiliary vards are included with this NTPR-1. More detailed descriptions of these activities are included below. NTPR-1 activities will take place primarily within the cities of San Marcos and Escondido and unincorporated areas in northern San Diego County, California<sup>1</sup>. Project components identified herein are described in the Final Initial Study / Mitigated Negative Declaration (IS/MND) dated January 10, 2020 (State Clearinghouse No. 2019049009) and shown in the Mapbook. NTPR-1 has been revised based on comments provided by the CPUC during a meeting on August 25, 2021.

#### 1.0 Description of Work and Comparison to Final IS/MND

The Project components described herein are consistent with the descriptions contained within the IS/MND and Final Decision. As discussed in the IS/MND Section 2.0, the Project activities will be similar to what is in the IS/MND but some details may vary based on final engineering and constructability review.

See below for a description of the NTPR-1 work components. The TL6975 Project will add a second 69kV power line that connects the existing San Marcos Substation to the existing

<sup>1</sup> Small portions of the Project will also occur within the cities of Carlsbad and Vista.



Escondido Substation. The Project will be a combination of installing new overhead single circuit power line structures, the rebuild of existing structures, and reconductoring and re-energizing of existing conductors.

The Project also includes installation and operation of an alternating current (AC) interference Mitigation System, including the installation of five deep wells and three coupon test stations<sup>2</sup>. The Project includes four main components, broken out by segments, which are discussed further below.

#### Segment 1 Rebuild (San Marcos Substation-Melrose Tap)

Rebuilding approximately 1.8 miles of an existing 69kV power line from San Marcos Substation to Melrose Tap.

The proposed rebuild of the existing 69kV power line will result in a double circuit line supporting both the existing TL680C and the proposed TL6975. All wood structures will be replaced with dulled, galvanized steel poles; all porcelain insulators will be replaced with polymer; and new conductor will be strung on for both lines. Segment 1 will require approximately 1.2 acres of new right-of-way (ROW), where the existing ROW will be widened (refer to the *Mapbook*). Improvements at the San Marcos Substation will include the addition of a 69 kV sulfur hexafluoride (SF<sub>6</sub>) gas-insulated circuit breaker, as well as two 69kV 2,000-amp disconnects. Additional minor construction within the San Marcos Substation may also be required during NTPR-1 construction. There will be 37 pole replacements and 10 poles removed from service as part of Segment 1 activities, including power line, distribution line, and stub poles. Pole-top only work will occur at an additional 6 structures. The existing distribution lines will be transferred to the new power line structures in an underbuild position.

The portion of Segment 1 in the vicinity of intersection of Discovery Street and West San Marcos Boulevard (refer to Page 1 of the *Mapbook*) is not included within NTPR-1. This work will be covered under a separate NTP request because it is subject to Cultural Resources mitigation (MM CUL-4) before construction activities can begin. Specifically, the following elements of this Segment will be included in a future NTP request (i.e., NTPR-3):

Structure 8Structure 10Structure 11Structure 12

Guard Structure at 11
 Guard Structure at 8

Underground distribution line at Structure 11

#### Segment 2 New Build (Melrose Tap-Meadowlark Junction)

Addition of approximately 2.8 miles of a new single circuit 69kV overhead power line from the end of Segment 1 to the existing Meadowlark Junction.

The Proposed Project will result in the addition of a new single circuit 69kV overhead power line segment approximately 2.8 miles long to be constructed on new steel poles adjacent to the existing TL13811/13825 power lines within the existing 150-foot utility corridor. This new build portion of the Project is entirely within the existing SDG&E easement. There will be 16 new steel poles

<sup>&</sup>lt;sup>2</sup> Construction of the AC Interference Mitigation System is covered under NTPR-2.



installed as part of Segment 2 activities and pole-top only work will occur at one structure location (Structure 71). In order to create pads for structure installation and maintenance, grading activities will occur at 11 structure sites, and three sites (Structures 55, 60, and 61) will include installation of retaining walls (refer to the *Mapbook*).

## Segment 3 Reconductoring/Re-energizing (Meadowlark Junction-Harmony Grove Rd to Escondido Substation)

Reconductoring approximately 7.4 miles of a de-energized power line (TL13811/13825) from Meadowlark Junction to the existing Escondido Substation. Minor work at the existing Escondido Substation to accommodate this new circuit.

Segment 3 of the Project consists of reconductoring a portion of an existing deenergized double circuit power line. This segment runs approximately 7.4 miles along existing lattice towers. The copper conductor and porcelain insulators on the north side of the towers will be removed and replaced with polymer insulators and 636 aluminum conductor steel supported/AW Core (ACSS/AW) conductor. Minor work on the existing Escondido Substation is also anticipated to take place to accommodate connection to the new TL6975 power line. There will be one new steel pole installed, four wood poles replaced with steel poles (for a total of 5 new structures), and nine poles removed from service as part of Segment 3 activities. An additional five structures will be re-energized as is (no work required). A majority of Segment 3 work will take place on existing poles and towers to complete the reconductoring (refer to the *Mapbook*).

#### AC Mitigation System

Install and operate alternating current mitigation system, potentially including five deep well locations and three coupon test stations.

SDG&E requested NTP for the AC Mitigation System under NTPR-2.

#### 2.0 Description of Activities for Project Components

SDG&E contractors will complete power line work activities as described below. Please note that the activities described below illustrate the more substantial activities to occur during construction but are not comprehensive of every activity that must be performed to construct power lines, including those activities associated with construction mitigation and compliance.

#### Grading, Retaining Walls, and Access Road Improvements

Equipment and vehicles will use existing access roads and public roadways shown on the *Mapbook* to reach the existing and new structure sites whenever possible. Vegetation clearing, along the sides of the existing roads to allow safe access and reduce wildfire potential will take place as necessary. Vegetation clearing will typically extend one foot beyond the established graded section (windrow) on both sides. Branches of trees that obstruct access roads will be trimmed; however, trees will not be removed as part of access road improvements unless they pose a safety hazard or impede access. Widening of existing roads may be required but will generally be limited to road segments that overlap with permanent maintenance pads. Improvements to existing access roads such as reestablishing or regrading will take place as necessary.



Four new spur roads are anticipated to be required for access to Structures 68, 70, 77, and 78, totaling approximately 225 linear feet of new spur road. The four new spur roads will be approximately 14 feet wide. A new access road will also be constructed to access Pole 36. It will be approximately 88 feet long and 14 feet wide.

#### Overhead Power Line Construction and Removal

The steel power poles will be delivered in sections and assembled within the temporary work areas as shown in the *Mapbook*. A crane or helicopter<sup>3</sup> will be used to lift and install the poles. The poles will be installed on concrete foundations or direct buried into auger holes. One new structure site, Location 60, will have a micropile foundation based on geotechnical recommendations. Aerial bucket trucks or similar equipment will be used to access structure arms to install attachments and perform reconductoring work. Stringing equipment will be used to string conductor from structure to structure using controlled tension to keep the conductor elevated and away from obstacles. Helicopters may also be used during stringing activities. Where necessary, guard structures will be installed temporarily to protect roadways and utility corridors (refer to the *Mapbook*). Traffic control may also be used for roadway crossings, in compliance with approved traffic control plans provided by each local public agency with jurisdiction (see Table 1 in Section 9.0 below). Existing pole components (e.g., poles, cross arms, hardware, conductor insulators) will be removed and properly recycled or disposed of in accordance with applicable laws and regulations. Pole foundations will be removed to approximately two feet below final-grade and direct bury poles will be removed completely. In some cases, existing poles may be cut at ground level, and the remainder of the pole will be left in place to avoid impacts on sensitive resources. The holes will be backfilled with clean fill, soils from the pole replacement, or clean decomposed granite.

#### 3.0 Staging, Storage Yards and Laydown Areas

The NTPR-1 access roads adjacent to pole sites and approved work areas will be used as laydown areas where pole components and materials may temporarily be situated for assembly. NTPR-1 work areas will also be used for installation of temporary construction components such as support structures and guy wires. In addition, three staging yards and two auxiliary yards are included within this NTPR-1, as follows and as shown on the *Mapbook*:

- San Elijo Recycling Plant
- Rock Springs Road
- Kearny (auxiliary yard)
- Icon 3PL Materials Yard (auxiliary yard)

#### 4.0 Location of Project Component

NTPR-1 work activities will primarily take place within the cities of San Marcos and Escondido and unincorporated areas in northern San Diego County, California. However, small portions of work along Segment 1 will occur within the cities of Vista and Carlsbad. Please refer to the *Mapbook*, to view the NTPR-1 components and work areas.

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<sup>&</sup>lt;sup>3</sup> Helicopters may be used to support structure installation at locations 52 through 55 and 61 through 65.



#### 5.0 Estimated Area of Land Disturbance

NTPR-1 will result in approximately 2.22 acres of permanent disturbance and approximately 7.38 acres of temporary disturbance (not including staging yards). In accordance with the Construction General Permit (2009-0009-DWQ) effective soil cover such as hydromulch or another effective soil stabilization technique will be applied on disturbed, inactive areas in order to control erosion and fugitive dust in compliance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Temporary work areas will be restored following completion of their use as close as possible to their original grade and landscape condition consistent with fire break requirements, or as otherwise agreed to with the property owner, local jurisdictional agency, and in accordance with the Project IS/MND and PTC.

#### 6.0 Construction Schedule, Duration, and Sequencing

#### **Overall Construction Schedule**

Construction associated with NTPR-1 activities is anticipated to begin in September 2021 and conclude in approximately July 2022<sup>4</sup> for a duration of approximately 11 months.

#### Construction Sequencing

The general sequencing of construction activities is as follows:

| <b>Project Segment or Component</b>      | <b>Approximate Start Date</b> | Applicable NTP |
|--|-------------------------------|----------------|
| Staging Yard Set-up and Use              | September 2021                | NTP-1          |
| Power Line Segment 3 (Reconductor)       | September 2021                | NTP-1          |
| Power Line Segment 2 (New structures)    | September/ October 2021       | NTP-1          |
| Substation Upgrades                      | October 2021                  | NTP-1          |
| AC Mitigation System                     | Q1 2022 <sup>5</sup>          | NTP-2          |
| Power Line Segment 1 (Pole replacements) | Q1 or Q2 2022                 | NTP-1 & NTP-3  |
| Segment 1 components covered by MM CUL-4 | Q1 or Q2 2022                 | NTP-3          |

#### **Construction Times and Durations**

As described in Applicant Proposed Measure (APM) NOI-1, daily construction equipment operation will typically take place during the times established by local ordinances. When work must occur on Sundays or during nighttime hours to meet outage and/or permit requirements, SDG&E will obtain approval from the local jurisdictional agency or will otherwise meet and confer with the applicable jurisdiction to discuss temporarily deviating from the requirements of the noise ordinance.

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<sup>&</sup>lt;sup>4</sup> Due to identified RAS locations the accelerated in-service date is required to mitigate two measures for generation deliverability. SDG&E must energize the new TL6975 by the end of June 2022. However, construction activities will continue past the date of energization, including cleanup, restoration, repairs, and final inspections, and other miscellaneous close-out activities.

<sup>&</sup>lt;sup>5</sup> Construction of the AC Mitigation System is dependent upon final design and issuance of local permits.



#### 7.0 Construction Personnel

Approximately 35-55 construction personnel will typically be onsite at one time for the work included in NTPR-1. The peak number of construction personnel, including SDG&E management, engineering, and environmental compliance personnel onsite at one time for NTPR-1 activities will be approximately 85 personnel. Please see *Attachment B*, *MMRCP Requirements Tracking Table for NTPR-1* for further details on applicable monitoring requirements.

## 8.0 Preconstruction Requirements, Status and Mitigation Measures/Applicant Proposed Measures

During construction of the components described herein, SDG&E will implement all applicable APMs and Mitigation Measures (MMs) as identified in the Project's MMRCP. The applicability and status of all APMs and MMs included within the Project's MMRCP is provided in *Attachment B, MMRCP Requirements Tracking Table for NTPR-1*. The table is color coded for easy reference by applicability, timing and the status (if the measure contains a preconstruction requirement and/or approval). The following pre-construction actions have will be completed prior to issuance of the NTP-1:

- *MM CUL-6: Pre-Construction Surveys*: Pre-construction surveys of the four archaeological sites bisected by existing access roads were completed on September 2, 2021. SDG&E has included a verification Memorandum of the completion of these survey as Attachment C of this NTPR No. 1.
- *MM WIL-1: Construction Fire Prevention Plan*: At the direction of CPUC, SDG&E has reached out of the local Fire Protection Agencies (refer to Attachment D). SDG&E will submit copies of any responses or input received from these agencies.

In addition, prior to construction, SDG&E will communicate the environmental concerns and appropriate work practices to all SDG&E crews and contractors through Worker Environmental Awareness Program (WEAP) training. The WEAP will include, but is not limited to, a review of archaeological and paleontological resources, biological resources, hazardous waste and spill prevention, stormwater control, construction fire control and emergency response measures, and noise control measures.

#### 9.0 Permits and Approvals

Construction activities included in NTPR-1 are anticipated to require the local, state, and federal agency permits listed in *Table 1* below. SDG&E will obtain all necessary permits/approvals prior to initiating the specific Project activities triggering each requirement. In accordance with the Project MMRCP, all permits acquired by the Project will be submitted to the CPUC for their records prior to commencing the activity for which the permits and approvals were obtained.



**Table 1. NTPR-1 Potentially Required Permits** 

| Agency                                 | Permit  | Applicability to Project<br>Component  | Ministerial /<br>Discretionary |
|--|---|--|--------------------------------|
| City of San Marcos                     | Grading Permit  | Grading permits will be acquired from the City when required   | Ministerial                    |
|  | Wall Permit   | Wall permits will be acquired as part of the grading permit process. Wall permits are required for the two retaining wall locations within the City of San Marcos. | Ministerial                    |
|  | Transportation Permit                                   | May be required for trucks exceeding the CVC legal load limits   | Ministerial                    |
| City of Vista                          | Haul Route Permit                                       | Required for transportation of excavated or fill material  | Ministerial                    |
| County of San Diego                    | Construction Permit                                     | Construction within County<br>ROW  | Ministerial                    |
| All Locations                          | Encroachment Permit and<br>Traffic Control              | Permits will be acquired as necessary for work within the City ROWs  | Ministerial                    |
|  | Noise Variance  | Construction outside of designated construction hours  | Discretionary                  |
|  | Oversize Load Permit                                    | Required for transportation of oversize or overweight loads  | Ministerial                    |
| Federal Aviation<br>Administration     | Congested Area Plan                                     | Use of helicopters within populated areas  | N/A                            |
| State Water Resources<br>Control Board | Construction General Permit<br>Coverage (develop SWPPP) | NTPR-1 work areas will be covered by the Project SWPPP   | N/A                            |

#### 10.0 Request for Approval

SDG&E respectfully requests authorization of NTPR-1 to begin the work described herein as conditioned on any pending preconstruction requirements by September 13, 2021. Should you have any questions or need additional information, please do not hesitate to contact me at (760) 315-3288 or by email at MKimble1@sdge.com; or William (Bill) Yee at (619) 857-8922 or by email at WYee@sdge.com.

Sincerely,

Melinda A. Kimble Project Manager San Diego Gas & Electric Company William R. Yee Environmental Project Manager San Diego Gas & Electric Company



Attachment A: NTPR-1 Mapbook

Attachment B: MMRCP Requirements Tracking Table For NTPR-1

Attachment C: CUL-6 Survey Verification Memorandum

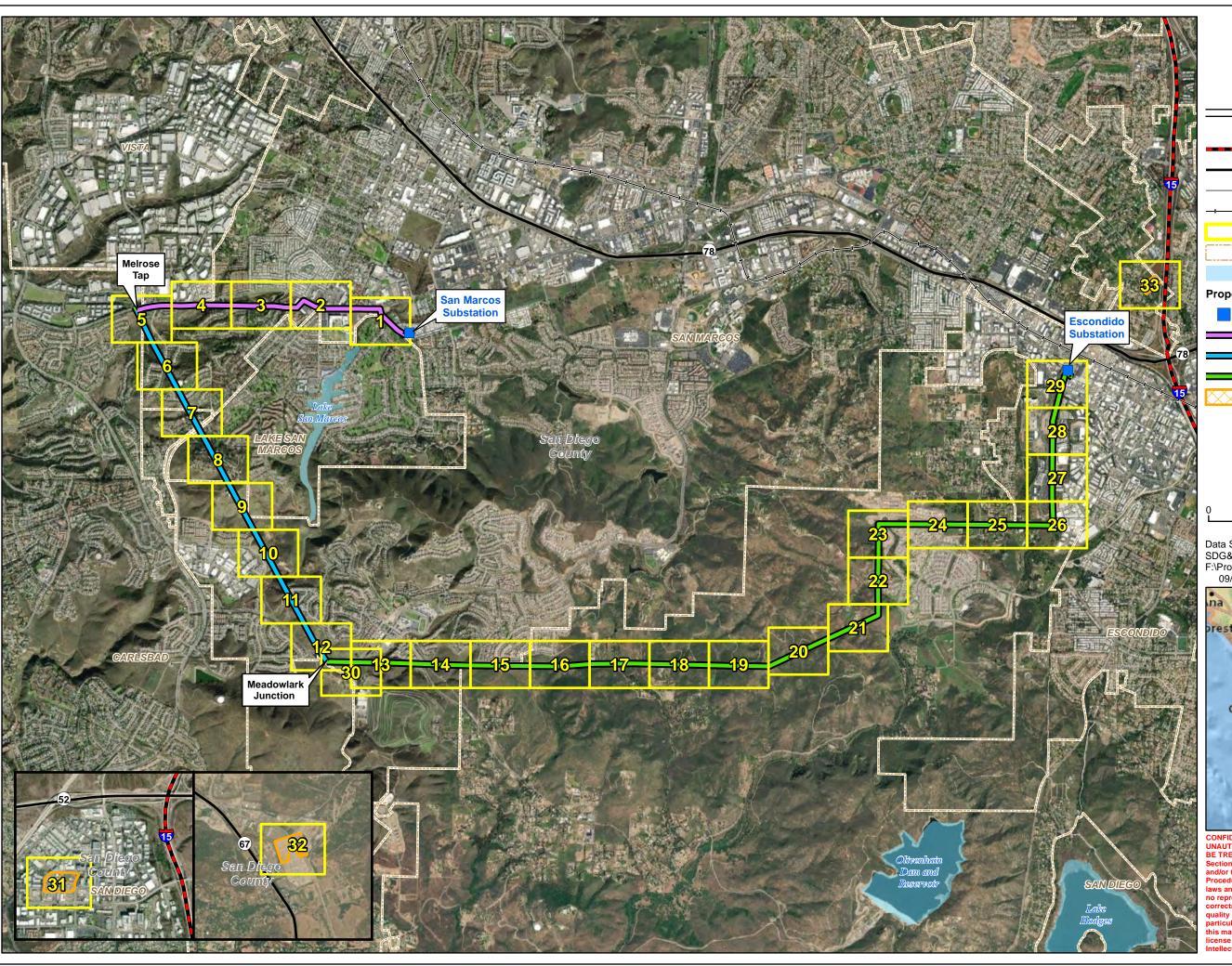
Attachment D: Follow-up Coordination with Local Fire Protection Agencies

cc: Dave Davis, Ecology and Environment, Inc.

Dustin Joseph, KP Environmental



# ATTACHMENT A NTPR-1 Mapbook



### NTP-1 Mapbook

PROJECT OVERVIEW San Diego County, CA

#### **LEGEND**

State Highway

Major Road

Railroad

Mapbook Page

Municipal Boundary

Waterbody

#### **Proposed Project**

**Existing Substation** 

Segment 1 - Rebuild

Segment 2 - New Build

Segment 3 - Reconductor / Re-energize

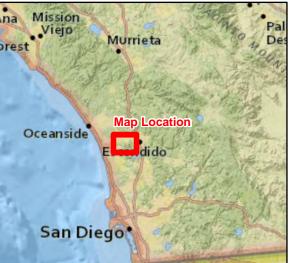


Staging Yard

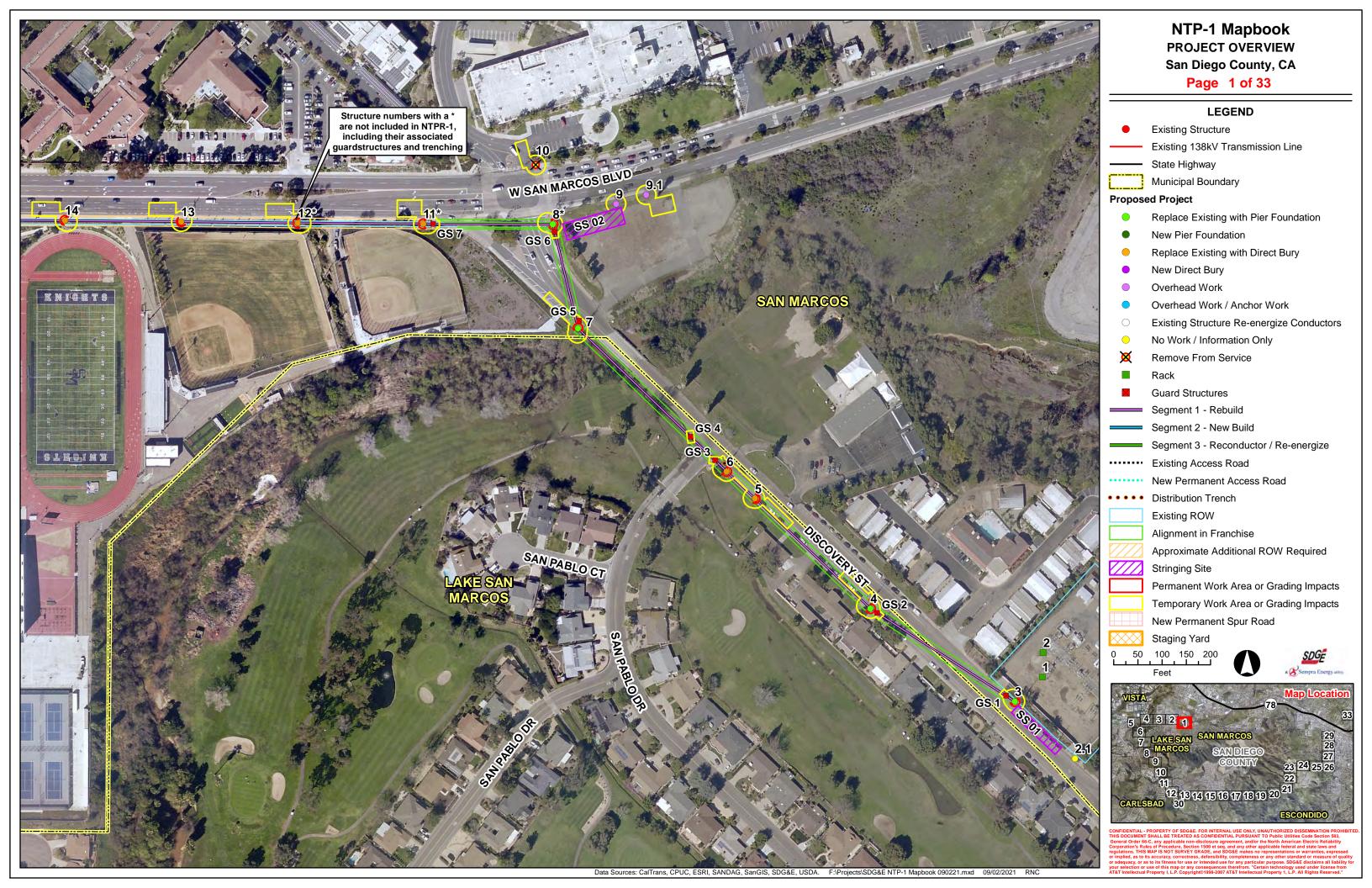




Data Sources: CalTrans, CPUC, ESRI, SANDAG, SanGIS, SDG&E, USDA.
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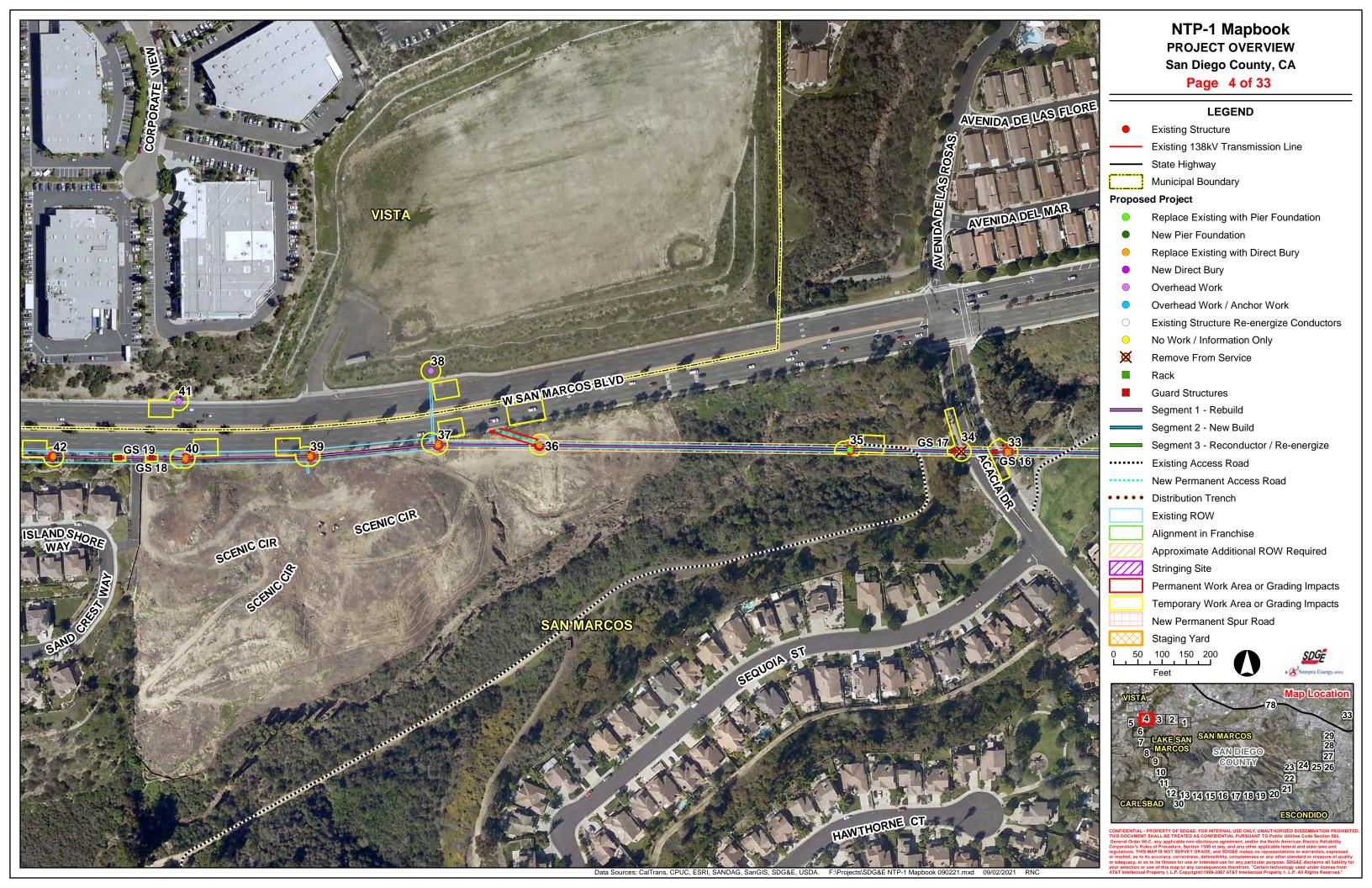


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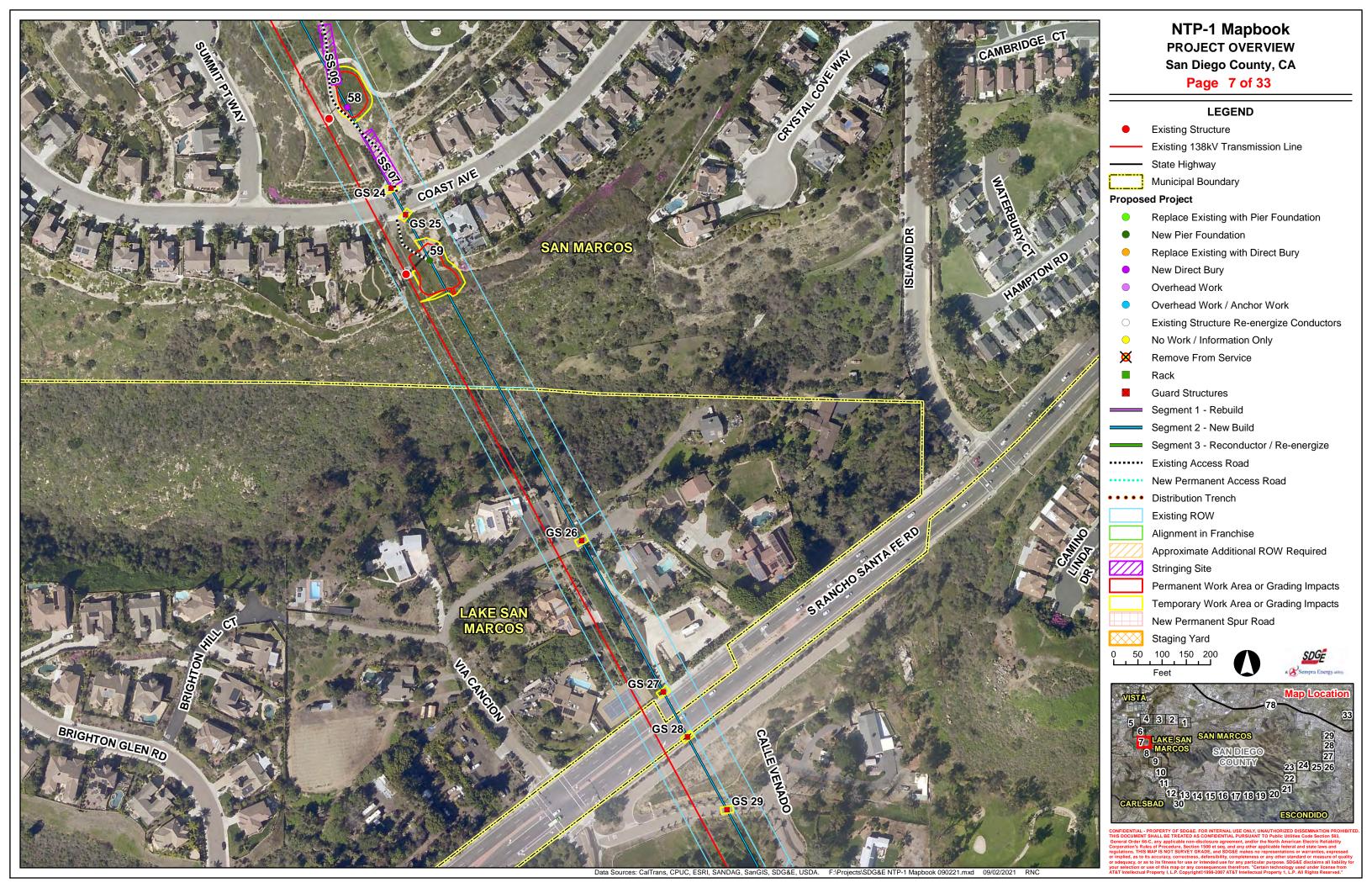




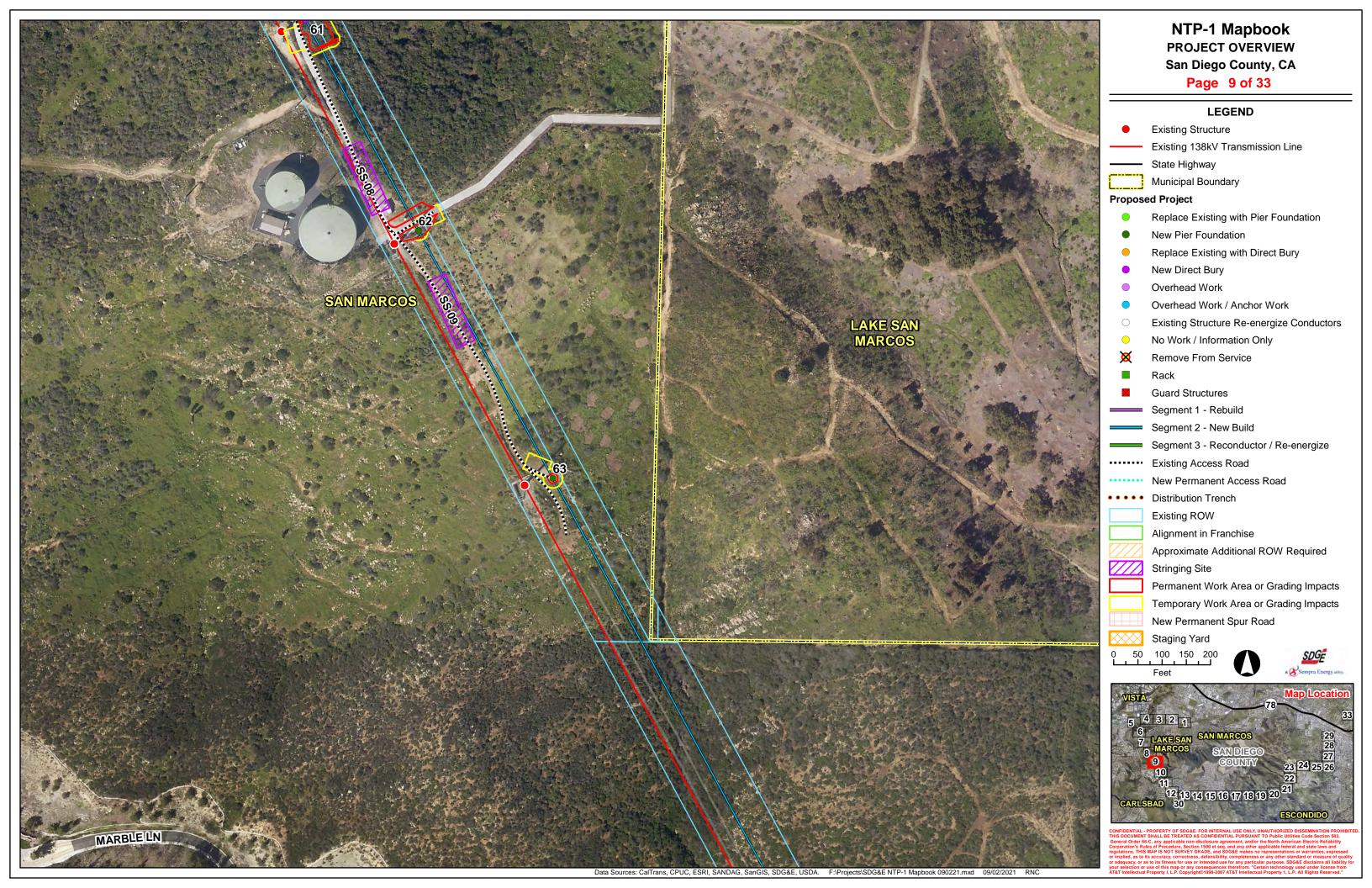


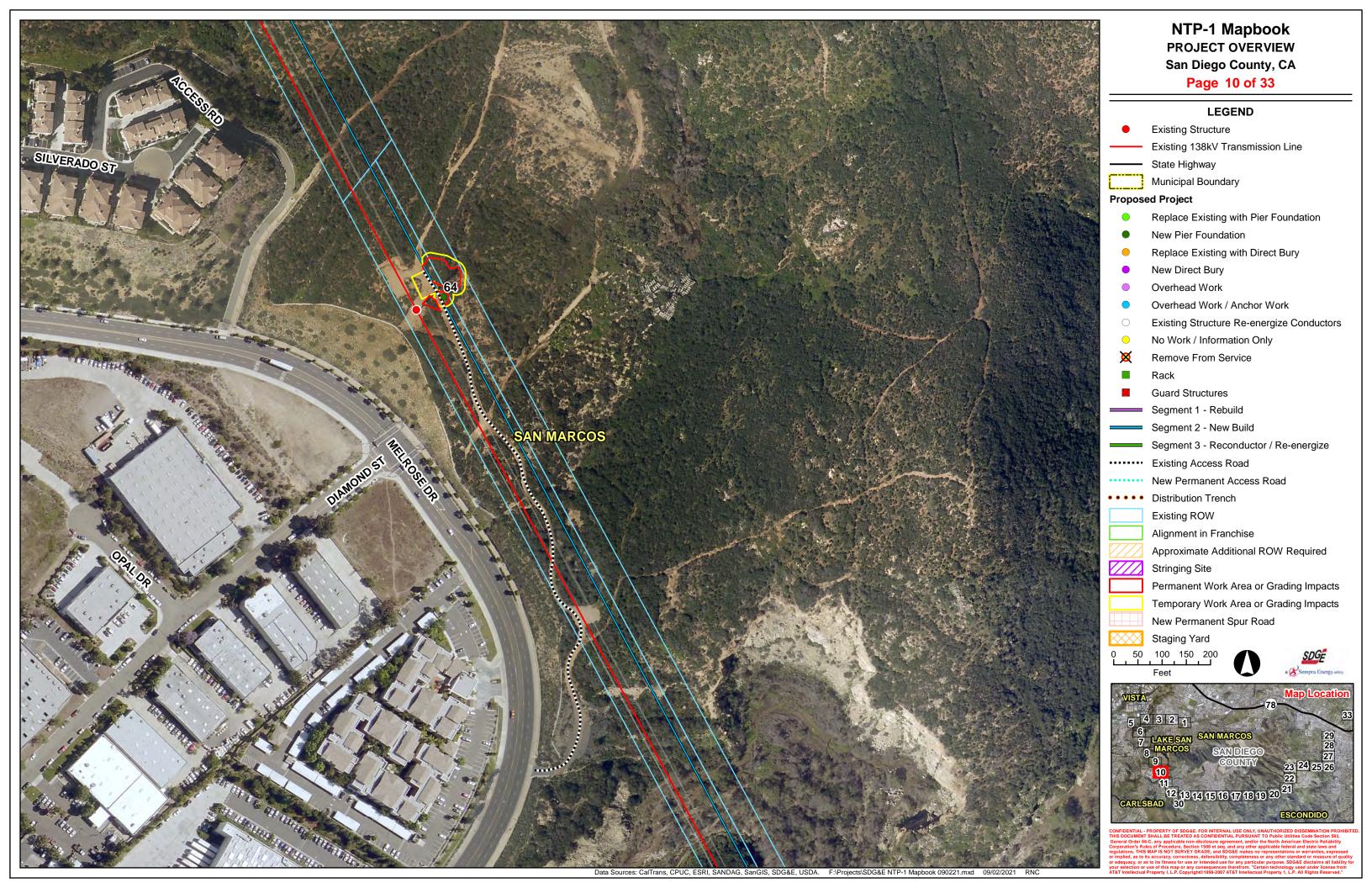


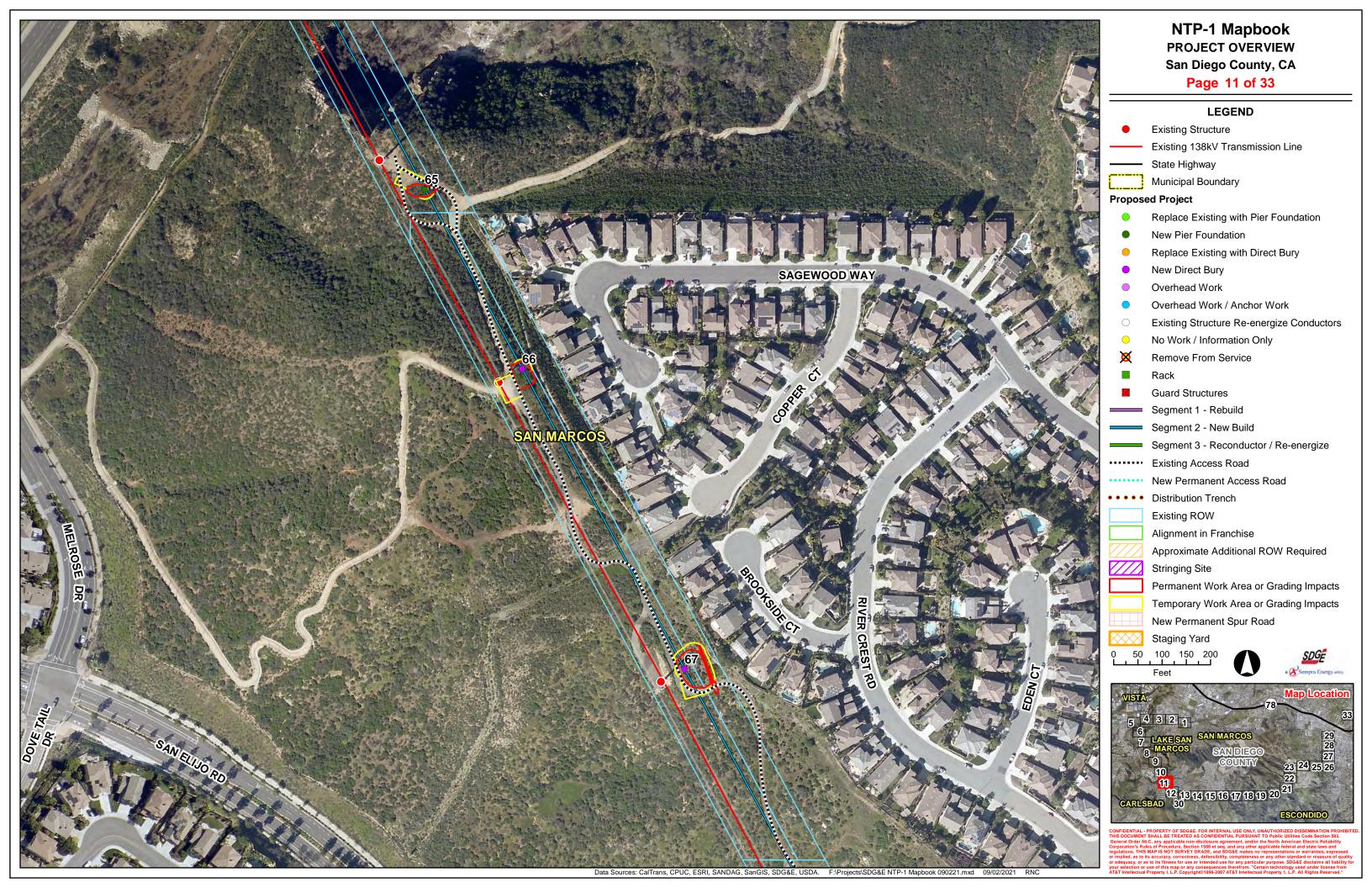


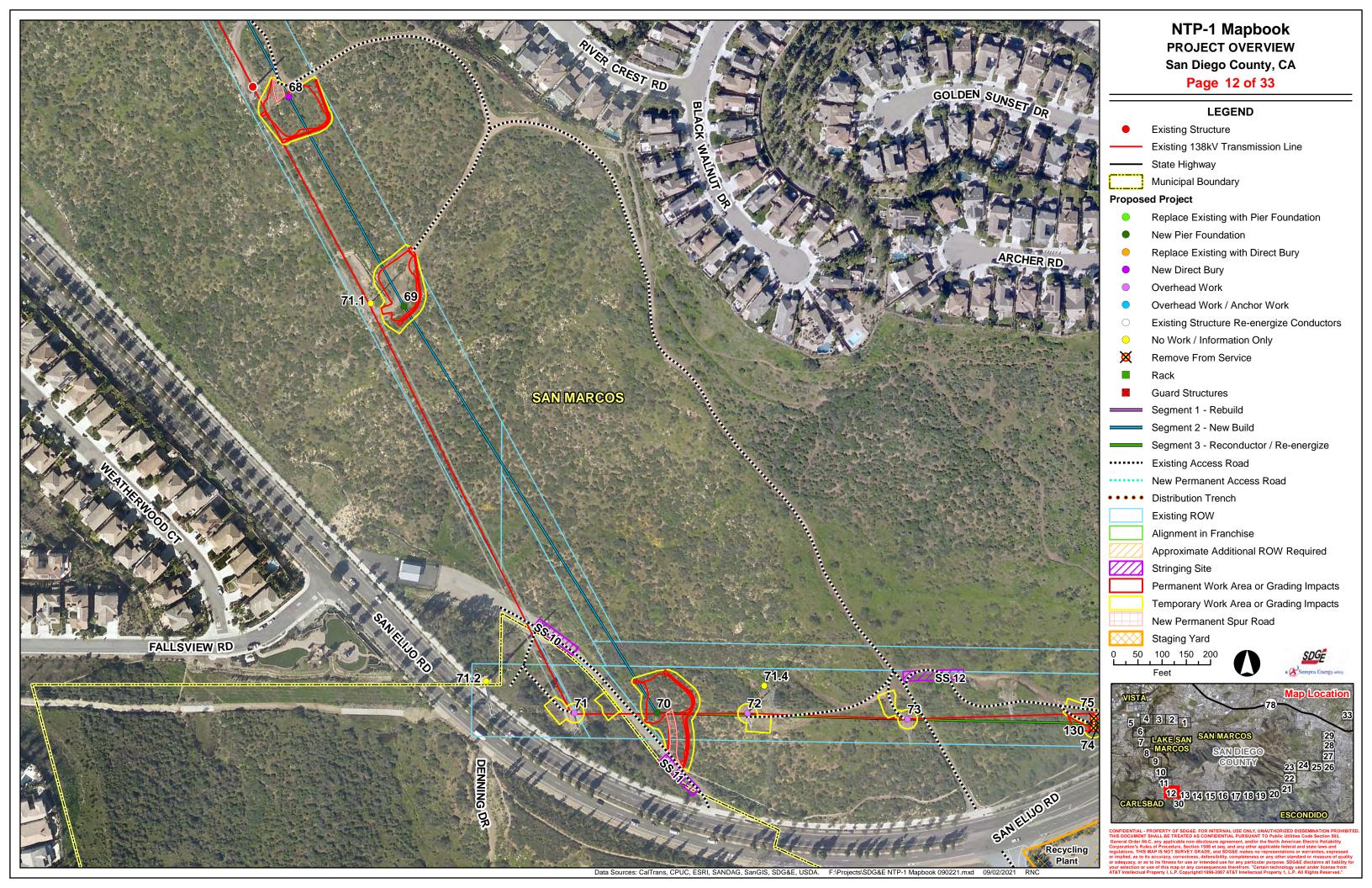


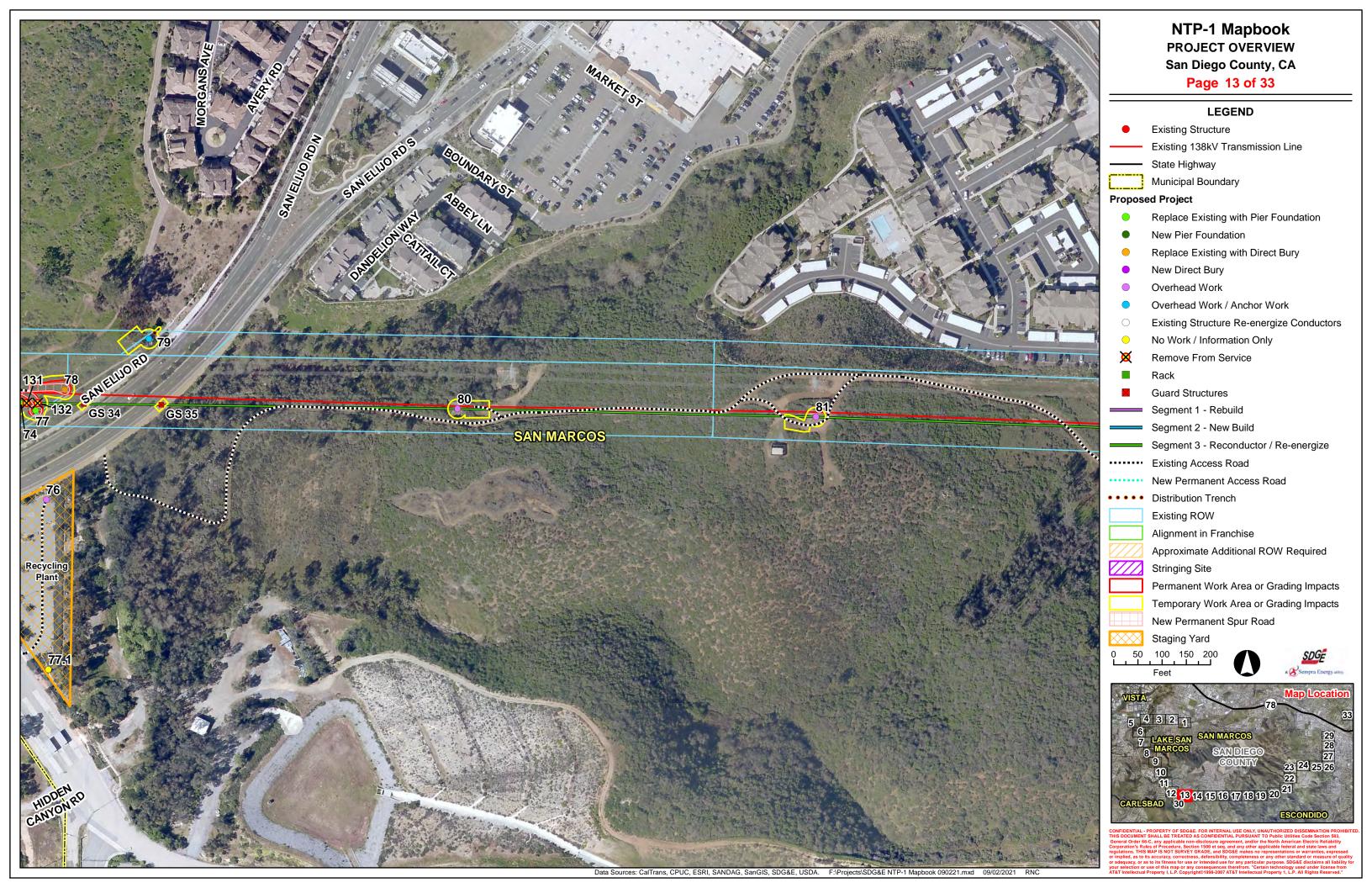


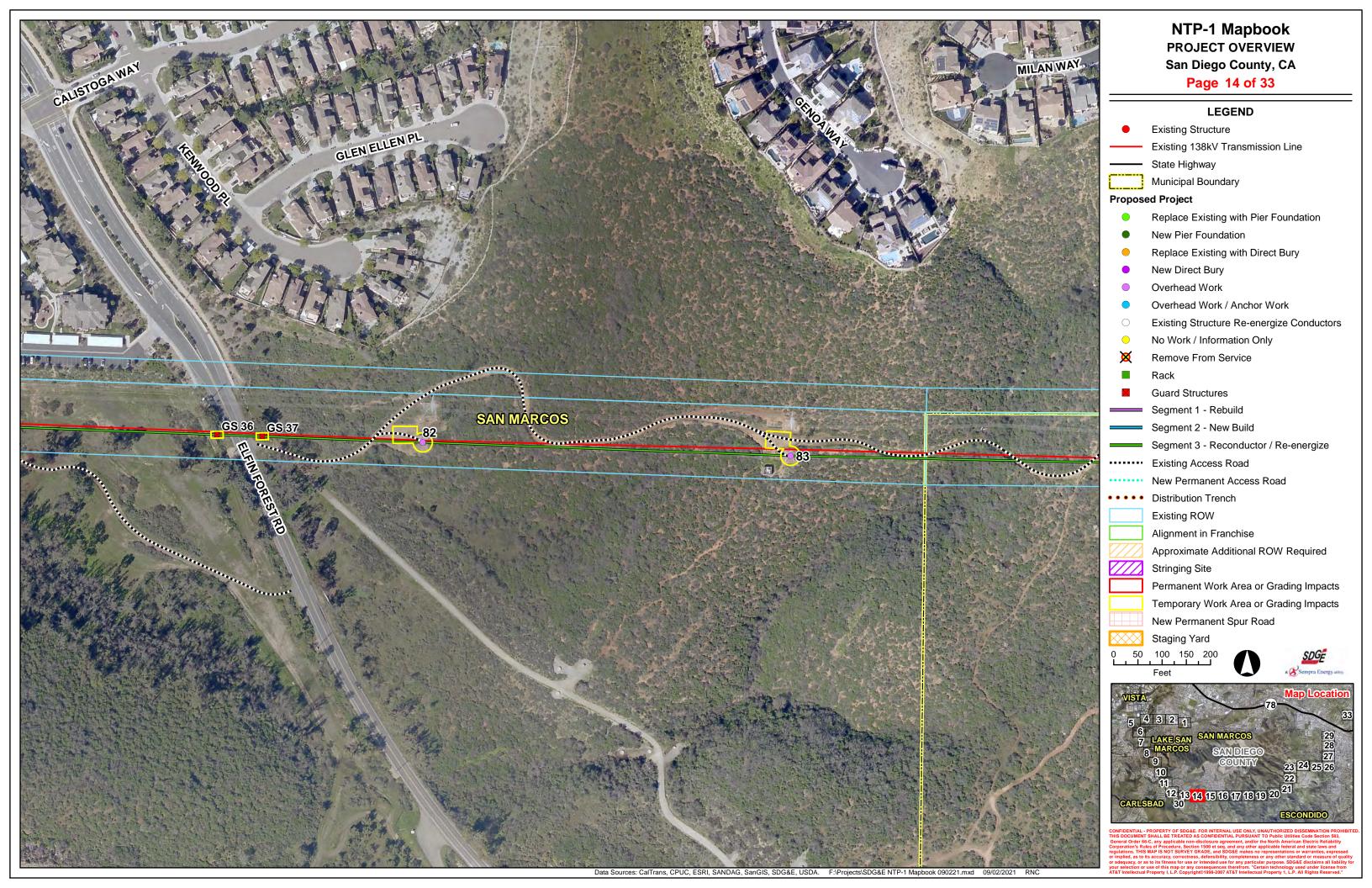




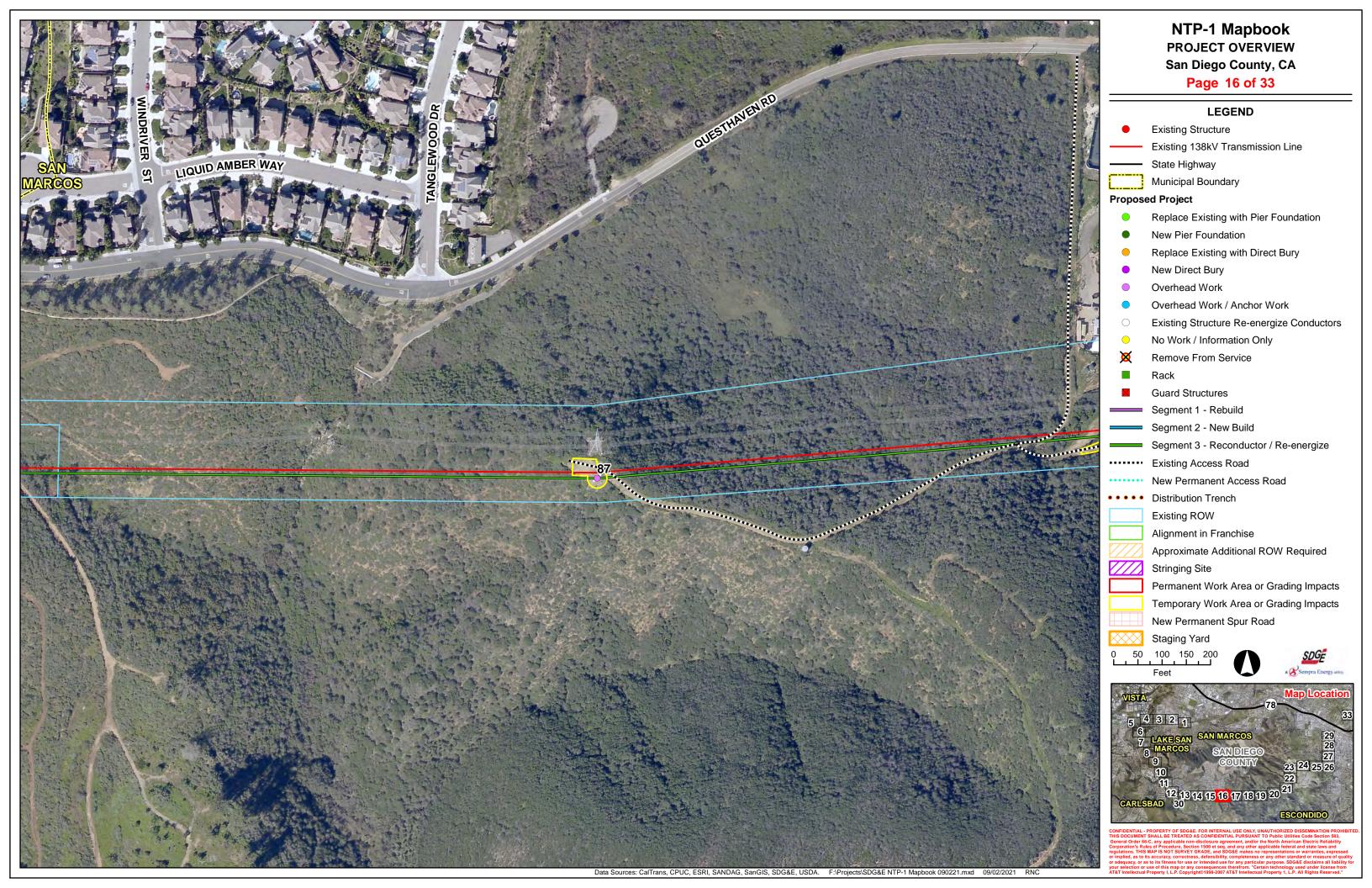


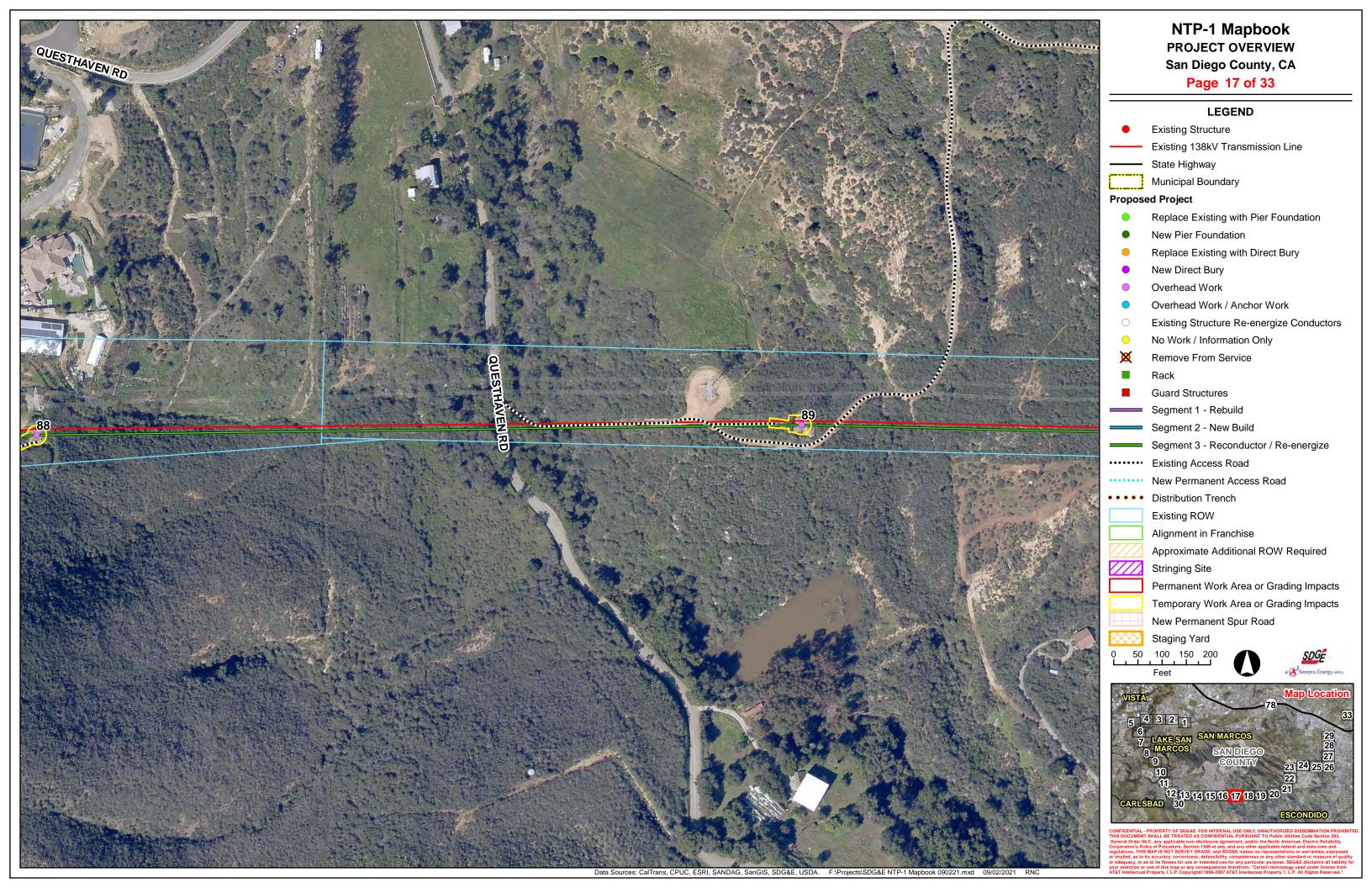


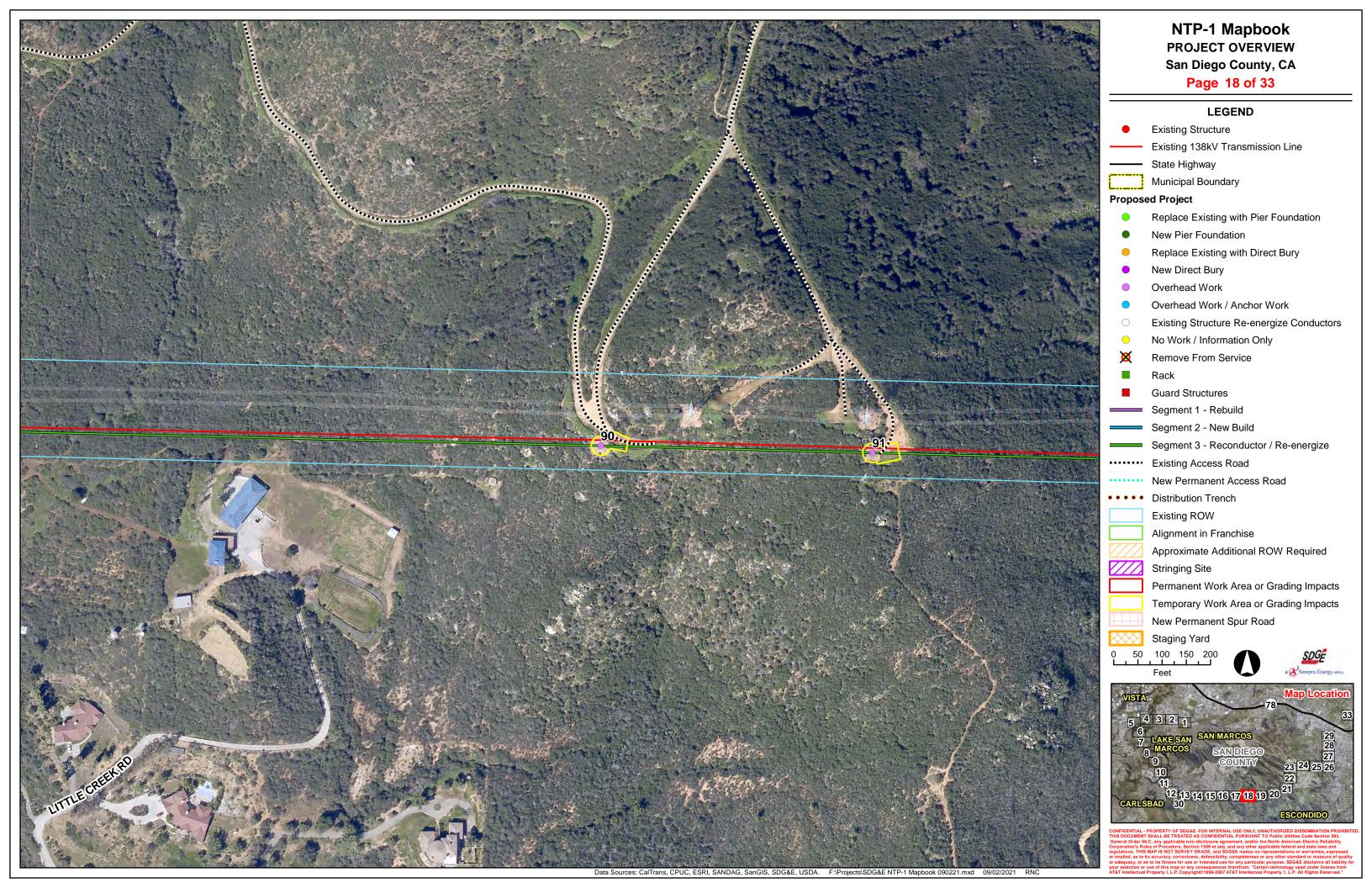


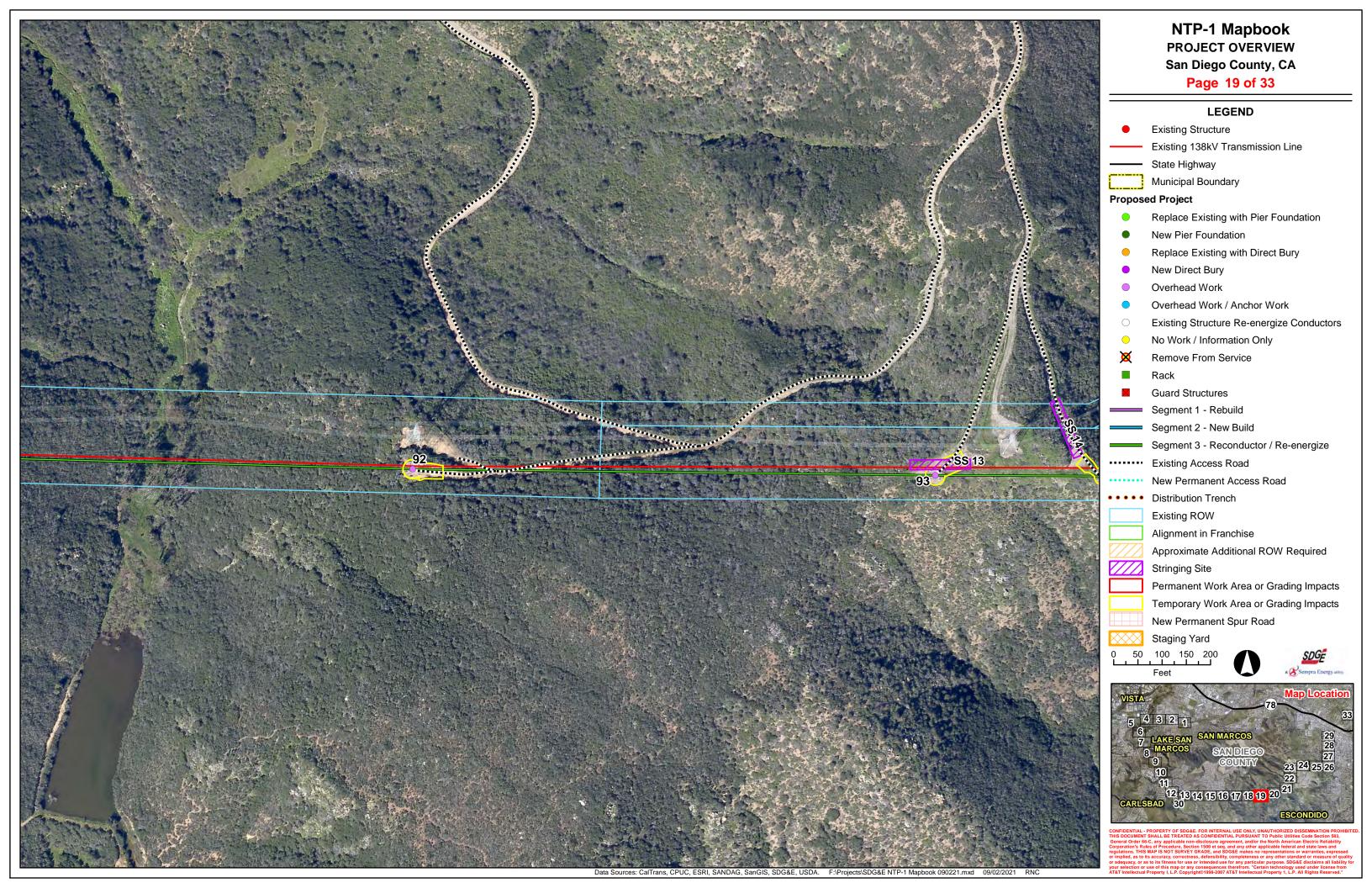


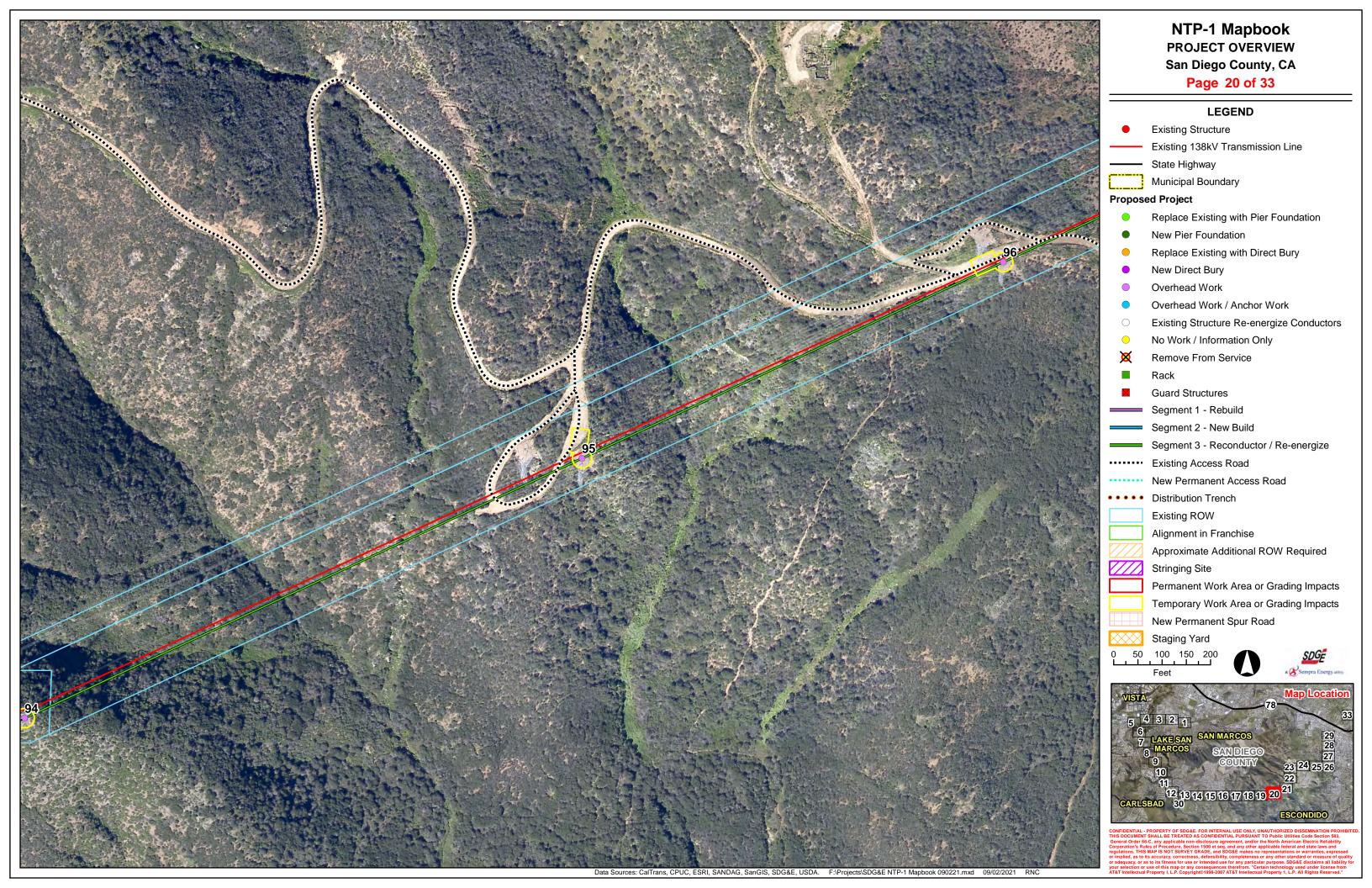


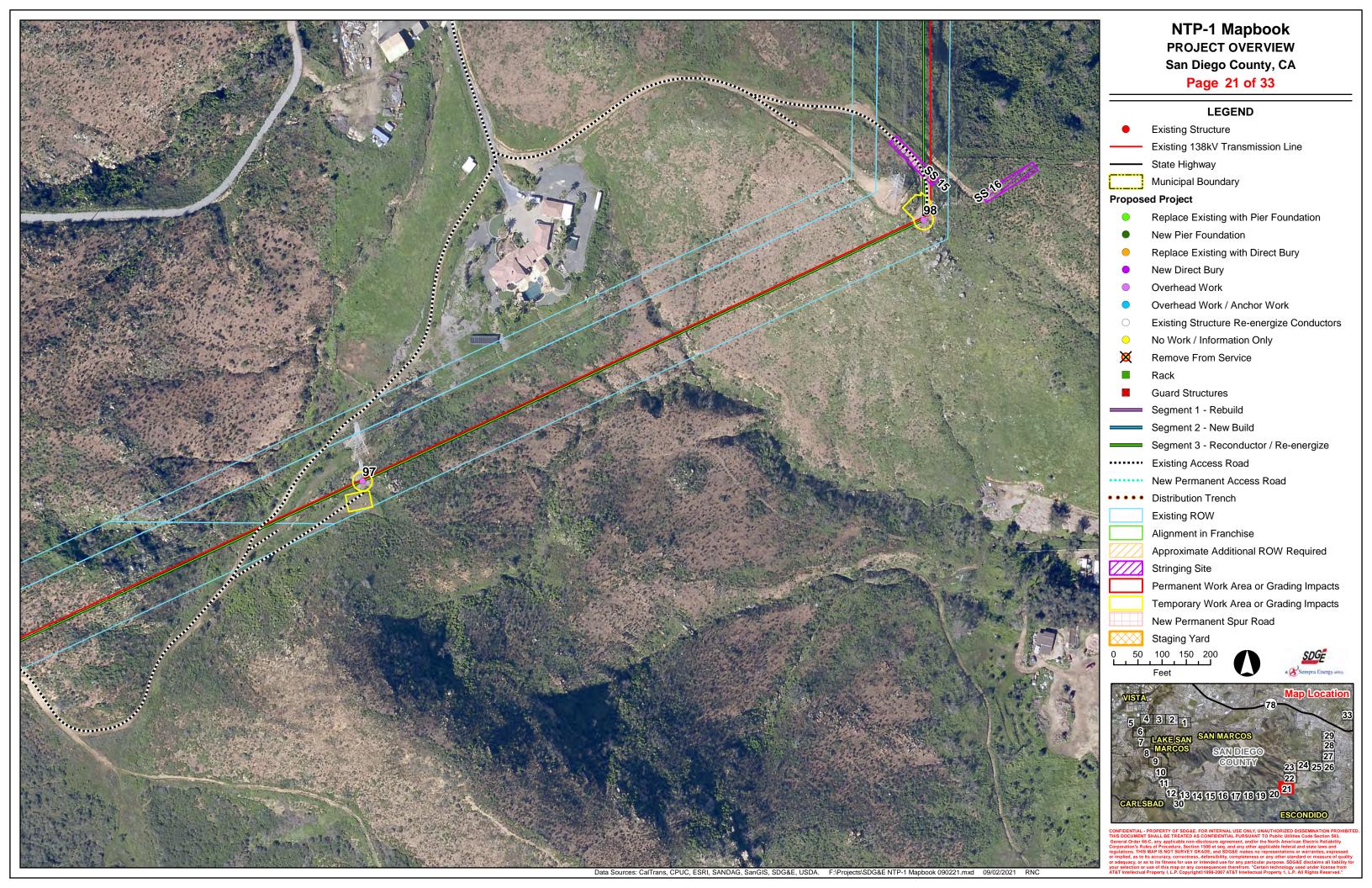


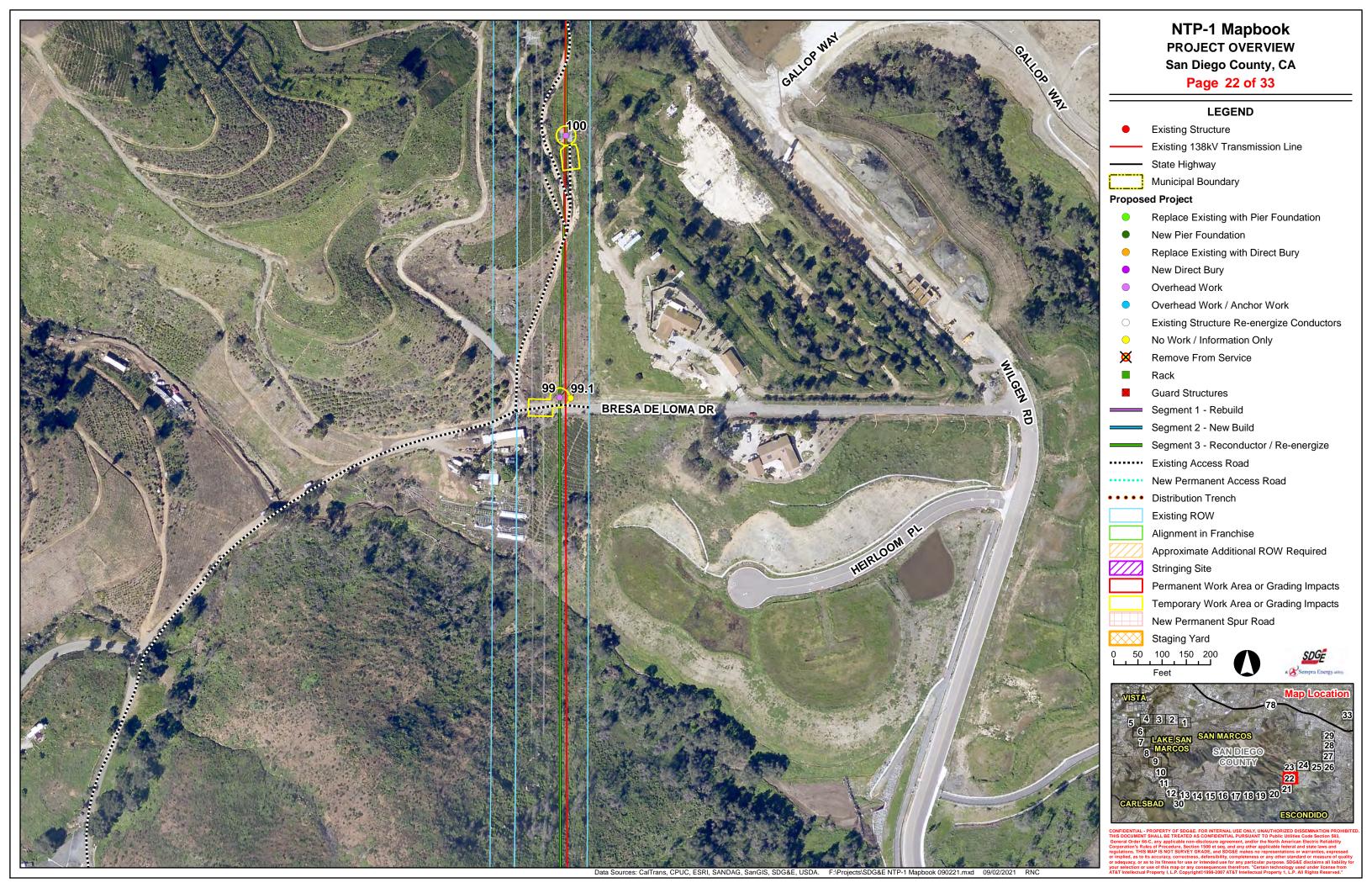


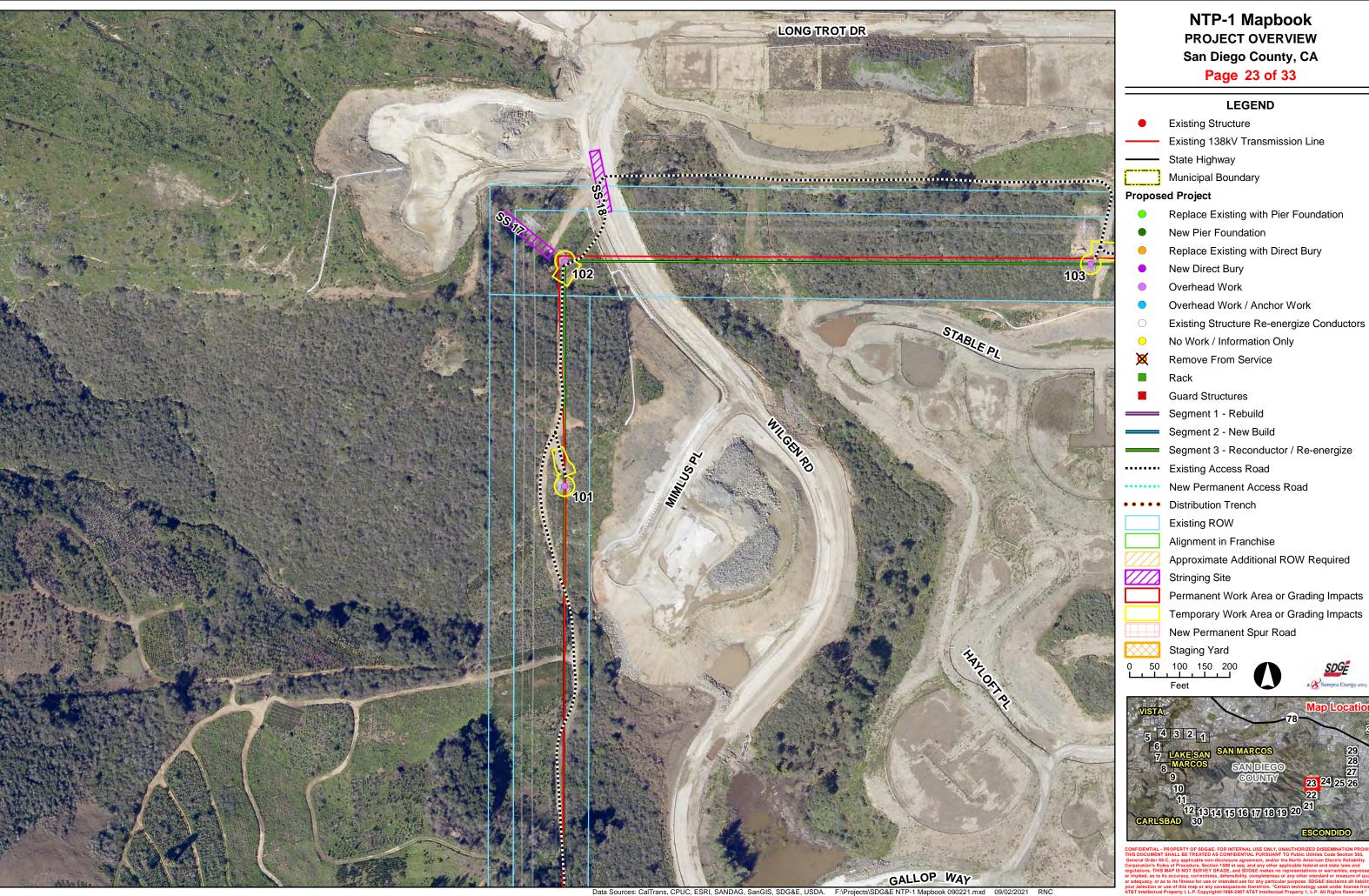








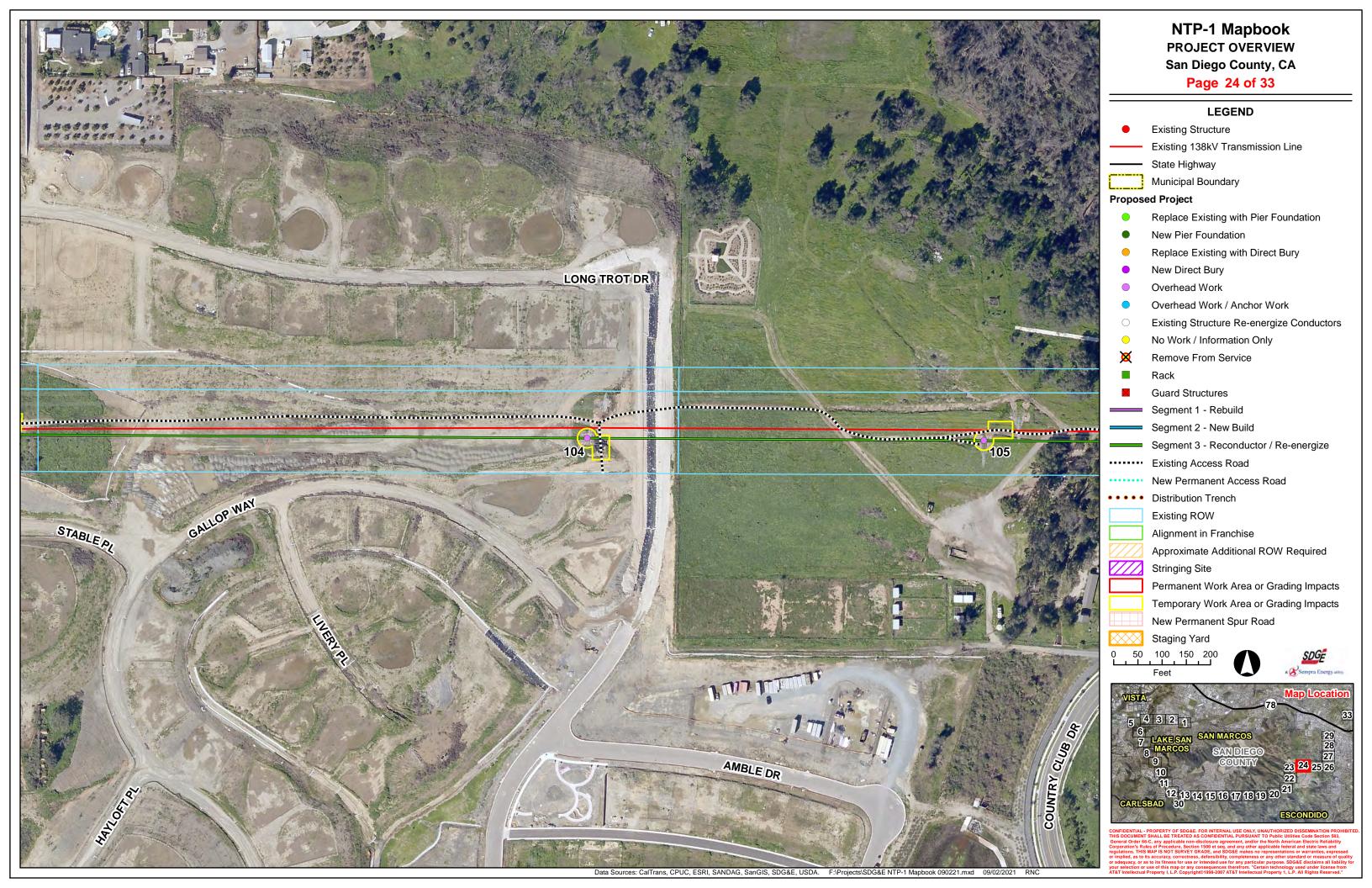


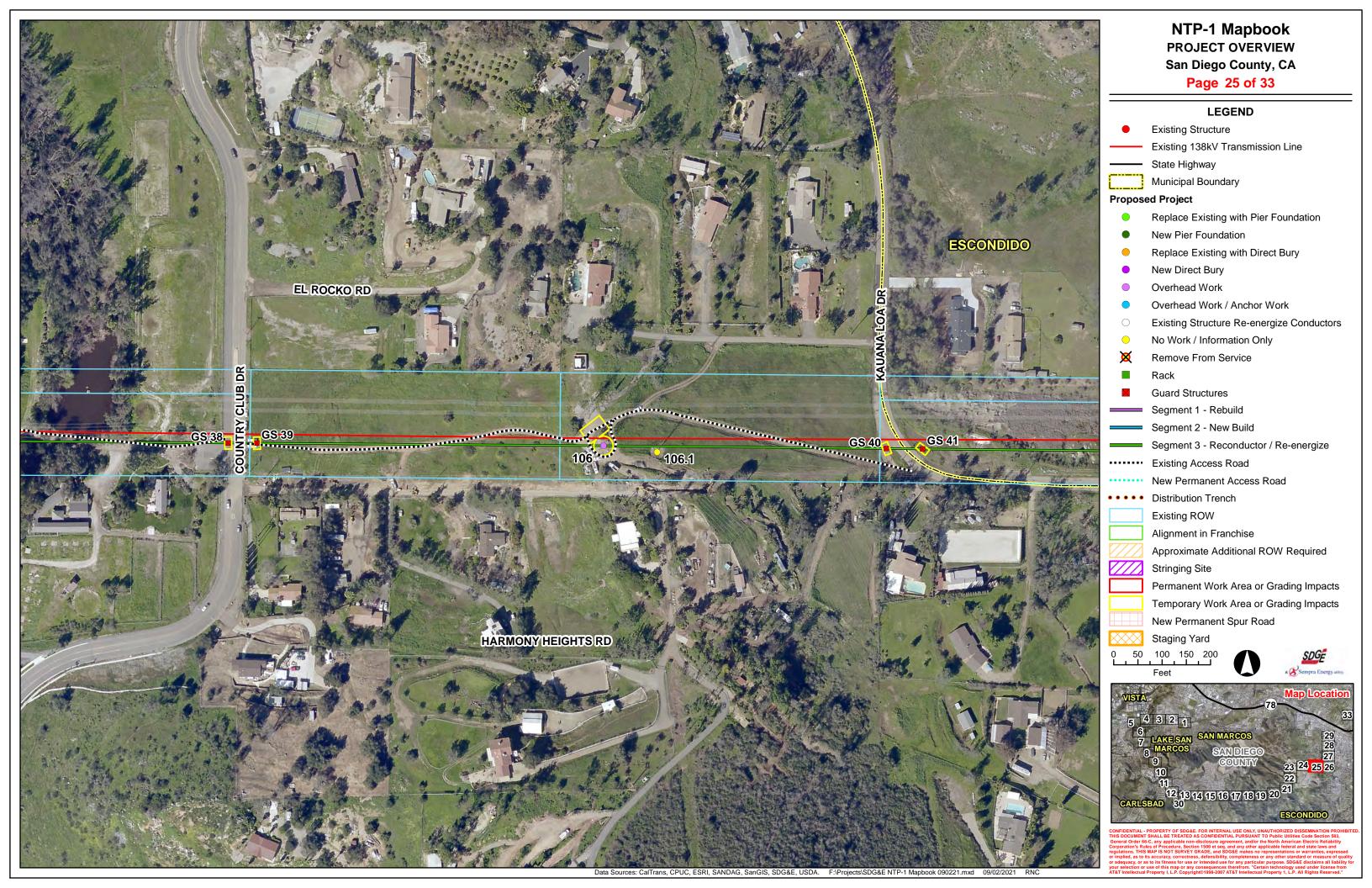


**PROJECT OVERVIEW** San Diego County, CA

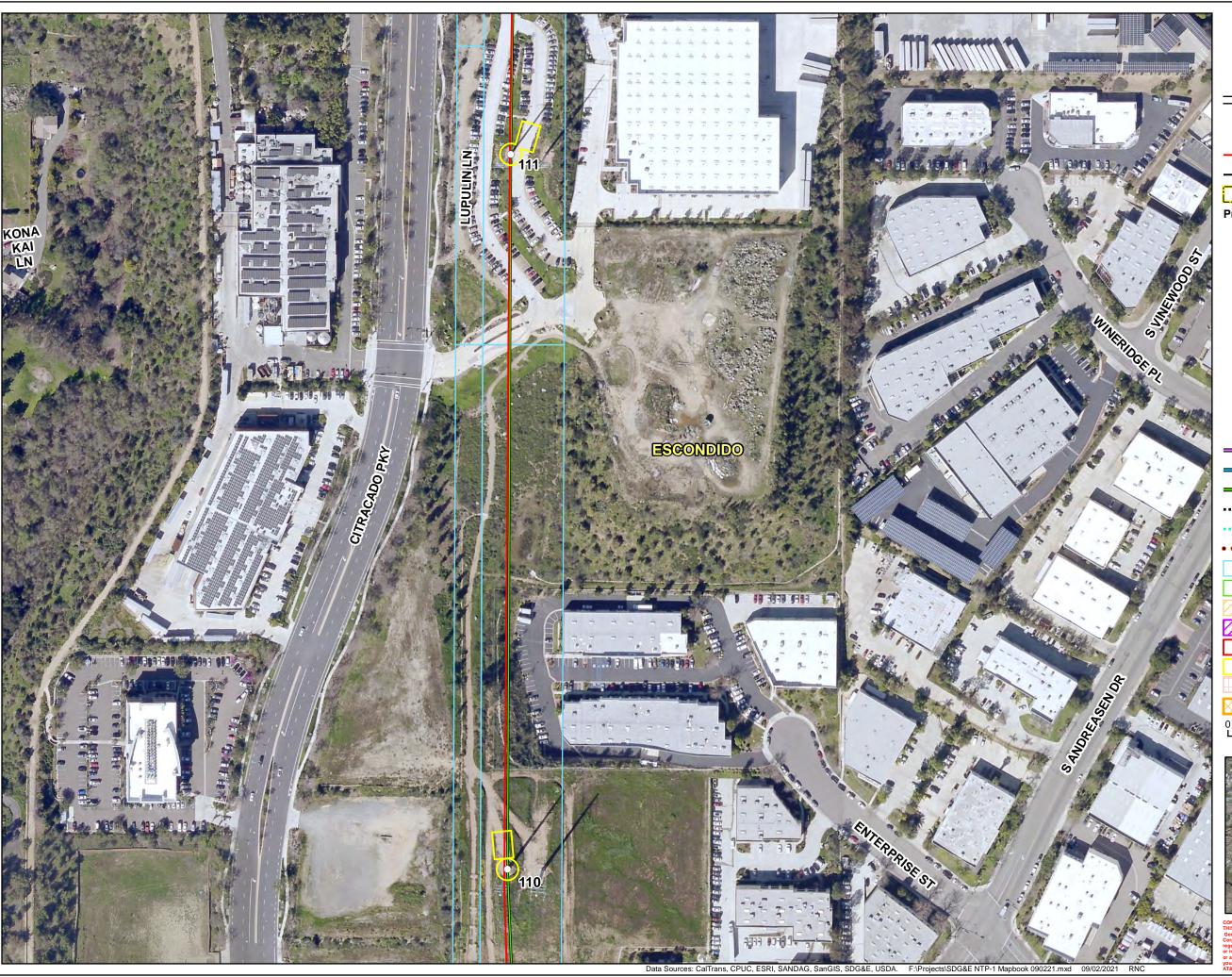












## NTP-1 Mapbook PROJECT OVERVIEW San Diego County, CA

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#### **LEGEND**

Existing Structure

Existing 138kV Transmission Line

State Highway

Municipal Boundary

#### **Proposed Project**

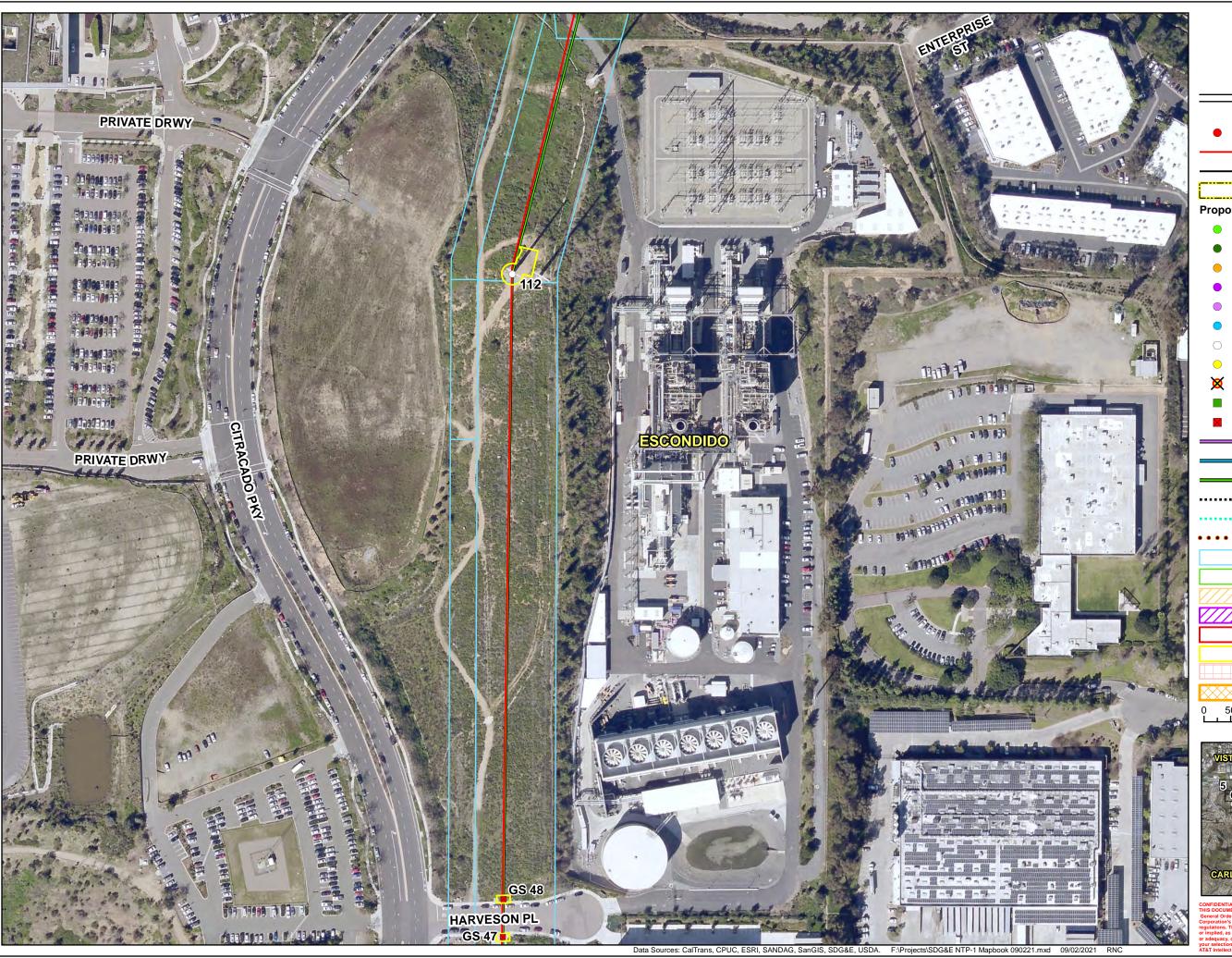
- Replace Existing with Pier Foundation
- New Pier Foundation
- Replace Existing with Direct Bury
- New Direct Bury
- Overhead Work
- Overhead Work / Anchor Work
- Existing Structure Re-energize Conductors
- No Work / Information Only
- X Remove From Service
- Rack
- Guard Structures
  - = Segment 1 Rebuild
- Segment 2 New Build
- Segment 3 Reconductor / Re-energize
- Existing Access Road
- New Permanent Access Road
- • Distribution Trench
  - Existing ROW
- \_\_\_\_\_\_
- Alignment in Franchise
  - Approximate Additional ROW Required
- Stringing Site
  - Permanent Work Area or Grading Impacts
- Temporary Work Area or Grading Impacts
- New Permanent Spur Road
- Staging Yard
- 50 100 150 200 Feet







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# NTP-1 Mapbook PROJECT OVERVIEW San Diego County, CA

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#### **LEGEND**

Existing Structure

Existing 138kV Transmission Line

State Highway

Municipal Boundary

#### **Proposed Project**

- Replace Existing with Pier Foundation
- New Pier Foundation
- Replace Existing with Direct Bury
- New Direct Bury
- Overhead Work
- Overhead Work / Anchor Work
- Existing Structure Re-energize Conductors
- No Work / Information Only
- X Remove From Service
- Rack
- Guard Structures
- Segment 1 Rebuild
- Segment 2 New Build
- Segment 3 Reconductor / Re-energize
- **Existing Access Road**
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- Temporary Work Area or Grading Impacts
- New Permanent Spur Road
- Staging Yard
- 50 100 150 20

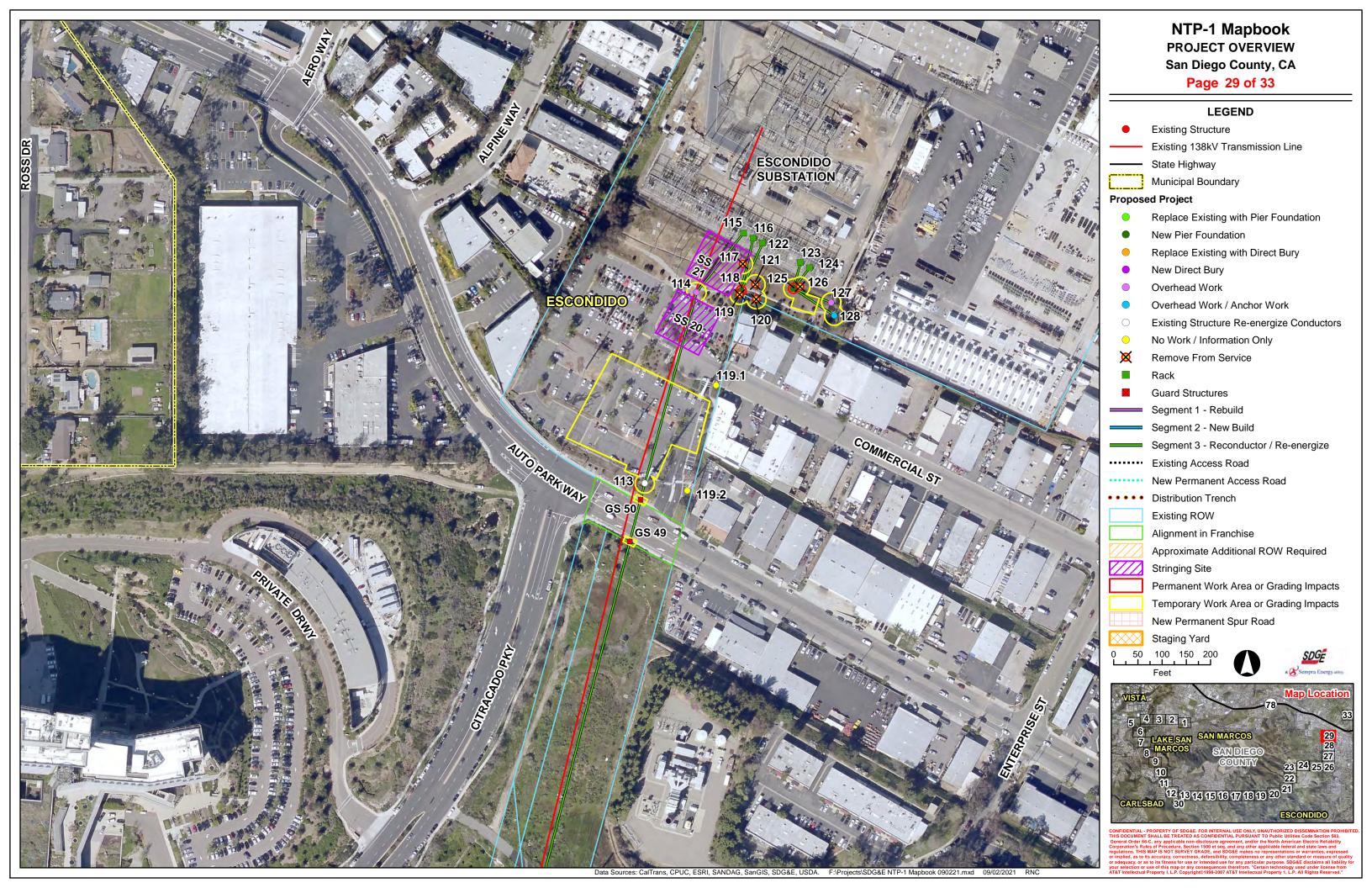


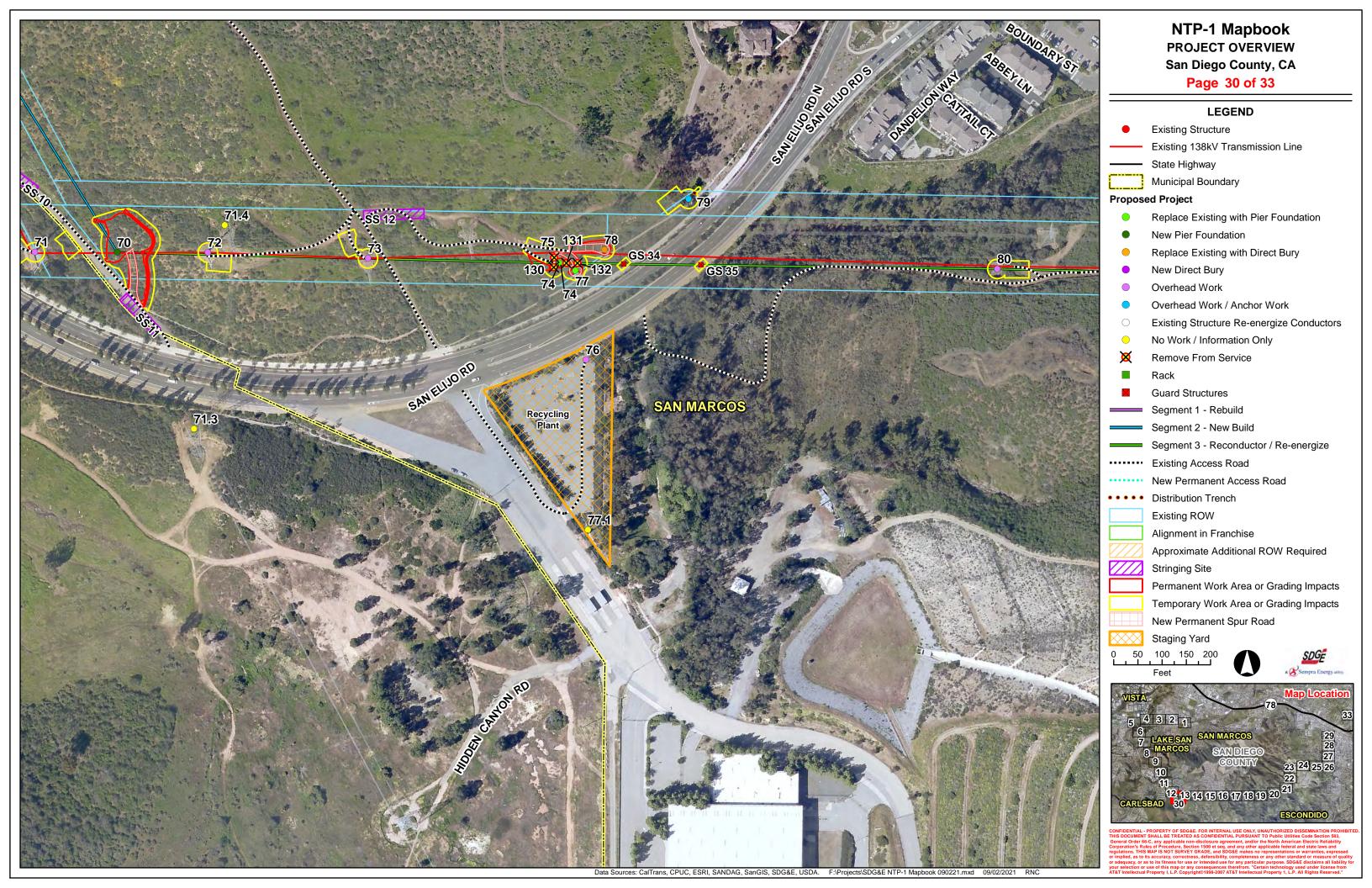




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**PROJECT OVERVIEW** San Diego County, CA











### ATTACHMENT B MMRCP Requirements Tracking Table For NTPR-1

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)   | TIMING  | APPLICABILITY<br>TO NTPR-1 | STATUS  |
|---|---|----------------------------|---|
| BIOLOGICAL RESOURCES  |   |                            |   |
| APM BIO-1: SDG&E will conduct all construction and operation and maintenance activities in accordance with NCCP Operational Protocols to avoid and minimize impacts on biological resources.  | Pre-<br>construction,<br>during<br>Construction,<br>and Operation | Applicable                 | There will be some temporary and permanent impacts within sensitive habitat associated with NTPR-1. Work in these areas will be subject to mitigation requirements and draw down of credits as described in SDG&E's Subregional Natural Communities Conservation Plan (NCCP) and the 5-Year Low-Effect Habitat Conservation Plan (LEHCP). A pre-activity survey report (PSR) will be completed for the Project. |
| APM BIO-2: All earth-moving equipment will be free of mud and vegetative material before being mobilized onto work areas associated with the Project.   | During<br>Construction  | Applicable                 | APM BIO-2 will be implemented for NTPR-1 activities and earth-moving equipment will be inspected for cleanliness prior to mobilizing to work areas.   |
| <b>APM BIO-3:</b> Except when not feasible due to physical or safety constraints, all Project construction vehicle movement will be restricted to the Project work areas, existing roads, and access roads constructed as a part of the Project and mapped by SDG&E in advance of construction. Approval from a biological monitor will be obtained prior to vehicle travel off of existing access roads.   | During<br>Construction  | Applicable                 | SDG&E will implement APM BIO-3 during NTPR-1 construction. Approval will be received from a biological monitor prior to any off-road vehicle travel.  |
| APM BIO-4: Civil and land survey personnel will keep survey vehicles on existing roads. During Project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat prior approval will be required from the Project's biological monitor. Hiking off roads or paths for survey data collection will be allowed year-round as long as all of the other applicable APMs are met. | Pre-<br>construction<br>and during<br>Construction                | Applicable                 | Approval will be received from the biological monitor prior to any off-road survey activities in accordance with APM BIO-4.   |

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| APM BIO-5: Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist. The flagging and/or fencing will be maintained in place for the duration of construction. Flagged and fenced areas will be avoided to the extent practicable during construction activities in that area. If impacts on sensitive plant species are unavoidable, SDG&E will perform soil and plant salvage activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of the NCCP. These include the stockpiling of native soil in the area where Nuttall's scrub oak and wart-stemmed Ceanothus occur and top soil replacement after construction. Quality assurances and success criteria milestones for the restoration area as a whole will conform to the standards provided in Enhancement Section 7.2.1 of the NCCP.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | A Qualified Biologist will delineate boundaries of sensitive plant populations that require protection with flagging or fencing for NTPR-1 activities prior to work occurring in each applicable area. If impacts to special-status plants occur, the soil and plant salvage activities described in APM BIO-5 will be implemented.   |
| APM BIO-6: Coastal California Gnatcatcher. Prior to construction, SDG&E shall retain a qualified biologist to conduct surveys for the coastal California gnatcatcher in suitable habitat, to determine if any active nests are within or in the immediate vicinity of proposed construction activities. If feasible, SDG&E will avoid construction during the peak breeding season (February 15 – August 31) for coastal California gnatcatcher and migratory birds. When it is not feasible to avoid trimming or removal of vegetation or during the peak breeding season, SDG&E will perform a site survey in the area where the work is to occur. Trimming or removal of vegetation during the peak breeding season will require a preconstruction survey by a qualified biologist to confirm that active nests will not be affected. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest. If the nesting and/or breeding activities are being conducted by a federal or state-listed species, SDG&E will consult with the USFWS and CDFW as necessary. Monitoring of the nest will continue until the birds have fledged or construction is no longer occurring on site.  Migratory Birds. Trimming or removal of vegetation during the peak breeding season (February 15 to August 31) will require a pre-construction survey by a qualified biologist to confirm that active nests will not be affected. If an active nest is detected within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a | Pre-construction and during Construction           | Applicable                 | A Qualified Biologist will conduct a pre-construction survey for coastal California gnatcatcher in suitable habitat for NTPR-1 activities. Trimming or vegetation removal activities during the peak breeding season will require a preconstruction survey by a Qualified Biologist to determine presence or absence of nesting birds, and no-work buffers will be implemented if necessary in accordance with APM BIO-6. |

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| not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest.   |  |                            |   |
| APM BIO-7: If a raptor nest is observed during preconstruction surveys, a qualified biologist would determine if it is active. If the nest is determined to be active, the biological monitor would monitor the nest to ensure nesting activities and/or breeding activities are not substantially adversely affected. If the biological monitor determines that Project activities are disturbing or disrupting nesting and/or breeding activities, the monitor will make recommendations to reduce the noise and/or disturbance in the vicinity of the nest.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | APM BIO-7 will be implemented for NTPR-1 activities.  |
| <b>APM BIO-8:</b> A biological monitor will be present during all ground-disturbing and vegetation removal activities. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the biological monitor will survey the site to ensure that no special-status species will be impacted.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | APM BIO-8 will be implemented for NTPR-1 activities.  |
| <b>APM BIO-9:</b> Wherever possible, vegetation will be left in place or mowed, instead of grubbed, to avoid excessive root damage and to allow for regrowth and to minimize soil erosion.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | APM BIO-9 will be implemented for NTPR-1 activities.  |
| Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts. Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).  If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal | Pre-<br>construction                               | Applicable                 | Complete. SDG&E has provided written mitigation commitment with proof of sufficient mitigation/take credits to the CPUC as part of the NTPR-1 package on March 3, 2021. |

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| and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.  |  |                            |   |
| Mitigation Measure BIO-2: Establishment of Cylindrical Construction Buffers. The biological monitor shall establish a three-dimensional cylinder-shaped buffer around active nests that have the potential to be affected by helicopter use or ground-based activities associated with helicopter use. A vertical buffer shall extend at least 300 feet vertically above the location of the nest and at least 300 feet horizontally for passerines (or 500 feet vertically and horizontally for raptors and 500 feet vertically and 0.5 mile horizontally for white-tailed kite). The biological monitor and SDG&E project manager shall monitor the helicopter tracks (i.e., flight patterns, durations) daily to ensure compliance with these established buffers. This buffer assumes the helicopter activities are temporary or infrequent in nature (no longer than one minute [e.g., pass-by] or visit the site once in a day) If helicopter work occurs in the vicinity of an active nest for an extended period of time, the biological monitor may determine, based on the nature of the work and nest monitoring observations, that the buffer is insufficient for the nest and adjust the buffer distance appropriately. | During<br>Construction                             | Applicable                 | Mitigation Measure BIO-2 will be implemented during any helicopter activities that take place as part of NTPR-1.  |
| Mitigation Measure BIO-3: Avoid Jurisdictional Resources. To avoid impacts on jurisdictional areas, SDG&E and its contractor shall flag work area limits and work shall be restricted to the flagged limits. Additionally, when clearing or grading occurs within 25 feet of a jurisdictional feature, silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated run-off or sedimentation. A qualified biologist shall verify that silt fencing and construction work is properly installed and are located outside of jurisdictional areas to confirm their avoidance. Monitoring shall take place during rain events to confirm the integrity of silt fencing and verify runoff does not enter jurisdictional areas.  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | A Qualified Biologist will verify that work limits are flagged as necessary, and silt fencing is installed properly and maintained in accordance with Mitigation Measure BIO-3. |
| CULTURAL RESOURCES   |  |                            |   |
| Mitigation Measure CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&E. The Qualified  | Pre-<br>construction,<br>during<br>Construction    | Applicable                 | Complete and Ongoing. The CPUC-<br>approved Qualified Archaeologist<br>and/or Archaeological Monitor shall<br>implement all APMs and cultural                                   |

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| Archaeologist, or a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall carry out all APMs and mitigation measures related to archaeological resources.  | and<br>Restoration                                 |                            | resource mitigation measures for NTPR-1 activities. SDG&E identified the proposed Qualified Archaeologist in the CRMP, which was approval by the CPUC.   |
| Mitigation Measure CUL-2: Pre-Construction Cultural Resources Sensitivity Training. Prior to the start of any ground-disturbing activity, the Qualified Archaeologist shall prepare cultural resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the Qualified Archaeologist. The Qualified Archaeologist shall determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training shall be conducted for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. SDG&E shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Pending. A Worker Environmental Awareness Program (WEAP) will be developed in coordination with the Qualified Archaeologist to include cultural resources sensitivity training. WEAP sign-in sheets will be kept as part of the Project record. Initial WEAP training will occur on September 13, 2021. Additional trainings will be held for all new workers as needed throughout construction. |
| Mitigation Measure CUL-3: Development and Implementation of Cultural Resources Monitoring Plan. Prior to the start of any Project-related ground disturbing activities the Qualified Archaeologist shall prepare a Cultural Resources Monitoring Plan (CRMP). The CRMP shall stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground disturbing activities within 250 feet of P-37-032160 and within 100 feet of the remaining 10 archaeological resources (P-37-004495, -004499, -005501, -007306, -010551, -010550,-011442, -012209, -034831, and TL6975-S-5) that have the potential to contain or are known to contain subsurface archaeological deposits, as well as all ground disturbing activities within Segment 3 and the easternmost 500 feet of Segment 2. The CRMP shall include monitoring protocols to be carried out during Project construction. The CRMP shall stipulate that a Native American monitor associated with one or more of the Native American groups that have expressed interest in the Project (i.e., San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the lipay Nation) be retained to monitor all Project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring shall be consulted regarding the | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. The CRMP was submitted to CPUC for review and approval on January 21, 2021 with multiple revisions as needed. The Final CRMP was approved by the CPUC in August 2021.  |

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS   |
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| scheduling of monitors. A Native American monitoring schedule shall be incorporated into the CRMP.  The CRMP shall contain an allowance that the Qualified Archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and SDG&E, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural resources during Project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery shall cease until a treatment plan is developed by the Qualified Archaeologist in coordination with SDG&E and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the Project if avoidance of a significant resource is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan shall also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories. The CRMP shall be submitted to SDG&E and CPUC for review and approval prior to the start of Project-related ground disturbance, as well as to the Native American groups that have expressed interest in the Project (i.e. San Luis Rey Ban |  |                            |  |
| Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160. Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design  | Pre-<br>construction<br>and during<br>Construction | Not Applicable             | Ongoing. SDG&E submitted the research design to the CPUC for review and approval on February 18, 2021.  Data recovery activities will be completed prior to commencement of construction activities within 250 feet of Site P-37-032160. |

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| shall be submitted to SDG&E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&E, and submitted to the San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center.  |  |                            | Construction activities included within the Data Recovery Plan are not included as part of NTP-1.  |
| Mitigation Measure CUL-5: Exclusionary Fencing. Prior to Project-related ground disturbing activities, exclusionary fencing shall be installed to ensure that the five previously recorded archaeological sites within or immediately adjacent to the Project alignment that have surface manifestations (P-37-004495, -004499, -007306, -012209, and TL6975-S-5) are not inadvertently impacted during Project implementation. The exclusionary fencing shall encompass the mapped site boundaries plus a 25-foot radius to ensure an appropriate buffer is maintained between the sites and Project-related ground disturbing activities. For the four archaeological resources bisected by Project access roads (P-37-004495, -004499, -007306, and TL6975-S-5), the exclusionary fencing shall be established along the shoulder of the existing roads. To ensure avoidance, the exclusionary fencing shall be marked with signs indicating that staff associated with the Project are not to go beyond the limits of the fencing. The exclusionary fencing shall not identify the protected areas as demarcating archaeological resources in order to discourage unauthorized disturbance, vandalism, or collection of artifacts. | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Pending and Ongoing. Mitigation Measure CUL-5 will be implemented for applicable NTPR-1 activities prior to ground disturbing activities.  |
| Mitigation Measure CUL-6: Pre-Construction Surveys. Prior to the start of Project-related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5) shall be conducted to map and collect all artifacts located within the road beds. Artifact mapping shall be conducted using a hand held GPS unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. Pre-construction surveys of the four sites described in Mitigation Measure CUL-6 were complete on September 2, 2021. A verification Memo has been included as Attachment C of the NTPR-1. Disposition of the artifacts shall be in coordination with the San Luis Rey Band of Mission Indians. |
| Mitigation Measure CUL-7: Road Maintenance within Archaeological Sites. During Project implementation, routine road maintenance, including but not limited to grading and blading, shall be avoided within the four archaeological sites bisected by existing access roads (P-37-004495, - 004499, -007306, and TL6975-S-5). Should  | During<br>Construction                             | Applicable                 | Mitigation Measure CUL-7 will be implemented by SDG&E as necessary for NTPR-1 activities.  |

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| maintenance activities such as drainage or culvert repairs be required to stabilize the access road, all ground disturbing activities within 100 feet of the four archaeological sites shall be monitored as stipulated in the CRMP.  |  |                            |  |
| Mitigation Measure CUL-8: Inadvertent Discovery of Human Remains. If human remains are uncovered during Project construction, all work within 100 feet of the find shall be immediately halted, and the San Diego County coroner shall be contacted to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the County Coroner shall contact the California Native America Heritage Commission (NAHC), in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98 (as amended by AB 2641). The NAHC shall then identify a Most Likely Descendant (MLD) of the deceased Native American, who shall then help determine what course of action should be taken in the disposition of the remains.  Per Public Resources Code Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. | During<br>Construction                             | Applicable                 | Mitigation Measure CUL-8 will be implemented by SDG&E in the event human remains are discovered during NTPR-1 activities.  |
| GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES   |  |                            |  |
| Mitigation Measure GEO-1: Geotechnical Report. The structural requirements of the California Building Code (CBC) are applicable to certain structural components of the Project, including retaining walls, screen walls, fences, and control shelters. SDG&E and/or its contractors shall design such structures to comply with such CBC standards and shall adhere to and implement all design recommendations and parameters established in the Project's Geotechnical Investigation Report by GEOCON Inc. and the AC Interference Analysis & Mitigation System Design by ARK Engineering & Technical Services. In addition, SDG&E shall retain a California registered professional engineer(s) to prepare a supplemental geotechnical report. This report shall address specific geotechnical hazards that were not addressed in the Geotechnical Investigation Report, and provide recommendations for mitigating such hazards. The analysis in that report shall include, but not be limited to, the following:  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. SDG&E submitted the supplemental geotechnical report to the CPUC Project Manager for review and approval on February 26, 2021. CPUC approved the Geotechnical report on May 18 2021. |

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| -recommendations to address the liquefaction risk within the Quaternary alluvium along Segment 1 and 3, if any; -recommendations to address the corrosive soils that are present along Segments 1 and 2, if any, which pose a risk to the concrete pier foundations and direct bury poles; -recommendations to address the landslide potential along Segment 2, if any, where planned ground disturbing activities could trigger landslides; and, -evaluation of the site-specific conditions and recommendations specific to micropiles where proposed, if final design includes the use of micropiles.  The recommendations shall ensure that when incorporated, the Project shall not increase the potential for ground failure, slope instability, and/or landslides, and shall be resistant to damage from ground shaking, ground failure, corrosive soils, unstable slopes, and landslides. SDG&E shall submit the supplemental geotechnical report to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction.   |  |                            |  |
| Mitigation Measure PALEO-1: Project Paleontologist. SDG&E or its contractor shall retain a qualified professional paleontologist (qualified paleontologist) meeting the Society of Vertebrate Paleontology (SVP) standards as set forth in the "Definitions" section of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) prior to the approval of demolition or grading permits. The qualified paleontologist shall attend the Project kick-off meeting and Project progress meetings on a regular basis, shall report to the site in the event potential paleontological resources are encountered, and shall implement the duties outlined in Mitigation Measures PALEO-2 through PALEO-4.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete and Ongoing. A Qualified Paleontologist shall implement all paleontological resource mitigation measures for NTPR-1 activities.   |
| Mitigation Measure PALEO-2: Worker Training. Prior to the start of any ground disturbing activity (including vegetation removal, pavement removal, etc.), the qualified paleontologist shall prepare paleontological resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The paleontological resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the qualified paleontologist. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found, as outlined in the approved Paleontological Resources Monitoring and Mitigation Plan in Mitigation Measure PALEO-3. SDG&E and/or its contractor shall retain documentation demonstrating that all construction | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Pending. A WEAP will be developed in coordination with the Qualified Paleontologist to include paleontological resources sensitivity training. WEAP sign-in sheets will be kept as part of the Project record and will be provided to the CPUC upon request.  Initial WEAP training will occur on September 13, 2021. Additional trainings will be held for all new workers as needed throughout construction. |

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| personnel attended the training prior to the start of work on the site, and shall provide the documentation to the CPUC Project Manager upon request.   |  |                            |  |
| Mitigation Measure PALEO-3: Paleontological Monitoring. The qualified paleontologist shall prepare, and SDG&E and/or its contractors shall implement, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). SDG&E shall submit the plan to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction. This plan shall address specifics of monitoring and mitigation and comply with the recommendations of the SVP (2010), as follows.  The qualified paleontologist shall identify, and SDG&E or it contractor(s) shall retain, qualified paleontologist resource monitors (qualified monitors) meeting the SVP standards (2010).  The qualified paleontologist and/or the qualified monitors under the direction of the qualified paleontologist shall conduct full-time paleontological resources monitoring for all ground-disturbing activities in previously undisturbed sediments in the Project site that have high paleontological sensitivity. This includes any depth of excavation into the Santiago Formation, as well as excavations that exceed 10 feet in depth in areas mapped as young alluvial floodplain deposits that overlie the Santiago Formation. The PRMMP shall clearly map these portions of the Project based on final design provided by SDG&E and/or its contractor(s).  If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location will need to be individually monitored.  Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to evaluate and recover the fossil specimens, establishing a 50-foot buffer.  If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location and regardless of whether the site is being monitored, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment.  The qualified | Pre-Construction and during construction | Applicable                 | Complete. The PRMMP was submitted to the CPUC on December 14, 2020 and revised and resubmitted on January 15, 2021. The PRMMP was approved by the CPUC on July 27, 2021. |

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| request, and shall provide the final report to the CPUC Project Manager upon completion.   |  |                            |  |
| Mitigation Measure PALEO-4: Significant Fossil Treatment. If any find is deemed significant, as defined in the SVP standards (2010) and following the process outlined in Mitigation Measure PALEO-3, the qualified paleontologist shall salvage and prepare the fossil for permanent curation with a certified repository with retrievable storage following the SVP standards.   | During<br>Construction                             | Applicable                 | Mitigation Measure PALEO-4 will be implemented if any paleontological finds are deemed significant as part of NTPR-1 activities.   |
| HAZARDS AND HAZARDOUS MATERIALS  |  |                            |  |
| APM HAZ-1: A Health and Safety Plan will be prepared and implemented during construction. The Health and Safety Plan will describe the anticipated hazards that construction workers may encounter while working on the Project, the safety measures that must be taken to address those hazards, and the necessary training requirements for personnel working on the Project. Safety hazards and applicable federal and state occupational standards will be identified in conjunction with the development of appropriate response actions, as well as a protocol for accident reporting. The Health and Safety Plan will also identify security and safety requirements for staging areas, storage yards, excavation areas, and any other areas of the Project where hazards may exist during construction activities. In addition, information regarding medical kits, safety equipment, and evacuation procedures will be outlined in the Health and Safety Plan. A qualified safety field representative will be present on site to observe and document adherence to the Health and Safety Plan as needed. The Health and Safety Plan will be prepared by the SDG&E construction contractor and will be available immediately prior to construction. | Pre-<br>construction                               | Applicable                 | Complete. The Health and Safety Plan was submitted to the CPUC on December 6, 2020 and will be adhered to during NTPR-1 activities.  |
| APMs TRA-1 and TRA-2, described below.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | APMs TRA-1 and TRA-2 will be implemented as necessary by SDG&E during NTPR-1 activities.   |
| Mitigation Measure HAZ-1: Soil and Dewatering Management Plan. SDG&E and the contractor conducting soil excavation and (if needed) dewatering shall develop and implement a Soil and Dewatering Management Plan (SDMP) that describes the procedures for managing excavated soil and groundwater generated from dewatering activities. The SDMP shall include procedures for monitoring soil for possible contamination, identifying the specific stockpiling locations and measures to contain the  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. The Soil and Dewatering Management Plan was submitted to the CPUC for review and approval on January 22, 2021. The Plan was approved by the CPUC on February 18, 2021. |

TL 6975 San Marcos to Escondido NTPR-1 September 2021 Page **11** of **21**  Not applicable to NTPR-1

Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)   | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS   |
|---|--|----------------------------|--|
| stockpiled soil to prevent run on and run off, and materials disposal specifying how the construction contractor(s) will remove, handle, transport, and dispose of all excavated materials in a safe, appropriate, and lawful manner. The SDMP shall specify the contractor will segregate and dispose of soil with chemical concentrations above regulatory standards. Soil with chemical concentrations below regulatory standards may be reused or recycled. Soil with chemical concentrations above regulatory standards shall be disposed of in accordance with the applicable provisions of Cal. Code Regs. Title 22, Chapter 11, Article 3, Section 66261 (i.e., Class III (non-hazardous waste), Class II (non-hazardous and "designated" waste), or Class I (non-hazardous and hazardous waste)). The SDMP must identify protocols for soil testing and disposal, identify the approved disposal sites, and include written documentation that the disposal site can accept the waste. The contractor shall include procedures for the safe and legal disposal of groundwater generated from dewatering, if any. The procedures shall include water sampling and testing procedures to quantify chemical concentrations in the water, and dispose of the water in a safe and legal manner. Note that the disposal of groundwater generated from dewatering may be disposed of under the State's VOC and Fuel General Permit, depending on chemical concentrations and local sanitary sewer acceptance criteria. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in soil and groundwater. This SDMP shall be submitted to CPUC for review and approval prior to commencement of construction. |  |                            |  |
| HYDROLOGY AND WATER QUALITY   |  |                            |  |
| Mitigation Measure HAZ-1: Soil and Dewatering Management Plan, described above.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. The Soil and Dewatering Management Plan was submitted to the CPUC for review and approval on January 22, 2021. The Plan was approved by the CPUC on February 18, 2021.             |
| NOISE   |  |                            |  |
| <b>APM NOI-1:</b> Construction activities will occur during the times established by the local ordinances, with the exception of certain activities where nighttime and weekend construction activities are necessary, including, but not limited to, construction work timeframes mandated by permit, pouring of foundations, and pulling of the conductor, which require continuous operation or must be conducted during off-peak hours per  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | In the event that nighttime or weekend construction is required for NTPR-1 activities, SDG&E will follow the noise variance process of the applicable jurisdiction as required by APM NOI-1. |

TL 6975 San Marcos to Escondido NTPR-1 September 2021 Page **12** of **21**  Not applicable to NTPR-1

Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS   |
|--|--|----------------------------|--|
| agency requirements. SDG&E will meet and confer with the applicable jurisdiction to discuss temporarily deviating from the requirements of the noise ordinance, as described in the noise variance process.  |  |                            |  |
| <b>APM NOI-2:</b> SDG&E will provide notice of the construction plans to all property owners within 300 feet of the Project by mail at least one week prior to the start of construction activities. The announcement will state the anticipated construction start window, anticipated completion window, and hours of operation, as well as provide a telephone contact number for receiving questions or complaints during construction. SDG&E will maintain functional mufflers and/or silencers on all equipment to minimize noise levels as well as evaluate the potential use of portable noise barriers.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. Pre-construction notifications were sent out to property owners within 300 feet of the Project the week of August 23, 2021 for a potential start of construction no sooner than September 13, 2021.                                    |
| Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan. To reduce noise impacts due to Project construction near sensitive receptors, SDG&E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval. The Plan shall include a requirement for SDG&E to administer a noise monitoring program when construction activities are conducted within 100 feet of sensitive receptor locations to ensure that the provisions of the Plan, including those identified below, are effective in reducing construction noise levels at sensitive receptor locations to 75 dBA Leq or less. The Plan shall present specific measures that identify how the construction noise limit of 75 dBA as an hourly Leq at nearby sensitive receptor locations will be adhered to, how potential exceedances will be documented and corrected, and how impacts on sensitive receptors from exceedances that cannot be corrected or avoided will be mitigated, including but not limited to the following measures:  **Noise Reduction**  Impact tools (e.g., jack hammers, pavement breakers, and rock drills) shall be hydraulically or electrically powered where feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dB. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dB. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible. | Pre-construction and during Construction           | Applicable                 | Complete. The Construction Noise Reduction and Mitigation Plan was submitted to the CPUC for review and approval on February 17, 2021 with multiple revisions submitted as needed. The Final Plan was approved by the CPUC on September 1, 2021. |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

Applicable to NTPR-1 – Pre-Construction Status Pending/Ongoing

Applicable to NTPR-1 – Pre-Construction Status Complete/Approved

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING | APPLICABILITY<br>TO NTPR-1 | STATUS |
|--|--------|----------------------------|--------|
| <ul> <li>□ When construction activities that could potentially exceed 75 dBA are conducted, construction equipment and trucks shall be equipped with enhanced noise control measures (where feasible and reasonably available). Enhanced noise control measures shall be identified in the Plan and could include, but are not limited to, improved exhaust mufflers and intake silencers, engine enclosures, noise shields or shrouds, etc.</li> <li>□ When construction activities that could potentially exceed 75 dBA are conducted, noise barriers such as noise shields, barriers, blankets, or enclosures shall be used, where feasible, adjacent to or around noisy construction equipment. Noise control shields/barriers/blankets shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise shield/barrier/blanket. The noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source.</li> <li>□ Stationary construction noise sources shall be located as far from adjacent receptors as possible. They shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent this does not interfere with construction.</li> </ul> |        |                            |        |
| Notification and Correction  |        |                            |        |
| □ Distribute to the potentially affected residences within 100 feet of Project construction an informational pamphlet, and post signs at conspicuous publicly accessible places at each construction site, that indicate the hours of construction work and applicable noise level limits and provide a "hotline" telephone number, which shall be attended during active construction working hours and record messages outside of working hours, for use by the public to register complaints. SDG&E shall identify whether posted hours and/or the 75 dBA L <sub>eq</sub> threshold have been exceeded, take action to keep to posted hours and/or reduce noise levels below 75 dBA, and notify CPUC within 24 hours. With regard to any noise complaints received citing project construction, SDG&E shall ensure that all complaints received during or outside of working hours shall be logged noting date, time, complainant's name, nature of complaint, and any corrective action taken, and shall submit such information to the CPUC Project Manager within 48 hours of receiving the complaint.  □ For construction activities that involve a helicopter (e.g., sock line installation, movement of materials), at least one week prior to the start of such activity, additional notice shall be issued or delivered [by a means which provides proof of delivery] by                                  |        |                            |        |
| SDG&E and/or its contractor to sensitive receptors within 300 feet of planned helicopter activity. This notice shall include the estimated date and time of the proposed work, as  |        |                            |        |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS   |
|--|--|----------------------------|--|
| well as the estimated duration of the work, both in terms of overall duration per segment and duration per pole location.  |  |                            |  |
| Relocation   |  |                            |  |
| ☐ The Plan shall provide for temporary relocation of residents in the event that the Plan or the noise monitoring program identifies the potential for construction noise to exceed 75 dBA Leq within 100 feet of such receptors.  |  |                            |  |
| Mitigation Measure NOI-2: Blasting Plan. Prior to conducting any blasting activities, SDG&E shall develop a Blasting Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor. The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval to ensure that all components of this measure have been included and all required reviews, signatures, and permits obtained. The plan shall include a current/valid copy of the Explosives Permit issued by the San Diego County Sheriff's Office, as well as documentation that all local blasting requirements have been adhered to. The Blasting Plan shall include at a minimum the following measures:    Methods of matting or covering of blast area to prevent excessive air blast pressure.   Description of air blast monitoring program.   If necessary, SDG&E and/or its contractors shall use portable noise barriers between the source and affected occupied properties to reduce excessive noise impacts.   Blasting shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. daily.   Blasting notification procedures, lead times, and list of those notified. Public notification to potentially affected sensitive receptors describing the expected extent and duration of the blasting.   Verification that explosives are not being proposed for use within 300 feet of the boundary of any occupied parcels zoned for residential. In the event that blasting activities are proposed within this distance, SDG&E will provide verification to the CPUC that residences affected by noise are notified of the date and time of blasting and offered temporary relocation assistance. | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Pending. Although blasting is not anticipated, if needed, the Blasting Plan will be submitted by SDG&E to the CPUC for review and approval at least 14 days prior to the commencement of any NTPR-1 blasting activities. |
| Mitigation Measure NOI-3: Vibration Reduction Plan. Prior to any blasting construction, the applicant shall develop a Vibration Reduction Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor, and submit  | Pre-<br>construction                               | Applicable                 | Pending. Although blasting is not anticipated, if needed, the Vibration Reduction Plan will be submitted by  |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

Applicable to NTPR-1 – Pre-Construction Status Pending/Ongoing

Applicable to NTPR-1 – Pre-Construction Status Complete/Approved

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)   | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS  |
|---|--|----------------------------|---|
| the Plan to the CPUC for approval at least 14 days prior to any proposed blasting. The Vibration Reduction Plan shall include vibration reduction measures to ensure that surrounding buildings will be exposed to less than 0.2 PPV to prevent building damage. At a minimum, the plan shall consider the following measures:    Evidence of licensing, experience, and qualifications of blasting contractors.     The Plan shall establish a vibration limit of 0.2 PPV at nearby structures in order to protect structures from blasting activities and identify specific locations for monitoring. A pre-blast survey shall be conducted of any potentially affected structures.     The Plan shall identify the appropriate size of the explosive charge to ensure that a vibration level of 0.2 PPV is not exceeded at nearby structures.     Impacted property owners shall be notified at least 48 hours prior to the visual inspections.     Post-construction inspection of structures shall be performed to identify (and repair if necessary) any damage from blasting vibrations. Any damage shall be documented by photograph, video, etc. This documentation shall be reviewed with the individual property owners and SDG&E shall arrange and fund any needed repairs.     Documentation of these efforts shall be provided to the CPUC. | and during<br>Construction                         |                            | SDG&E to the CPUC for review and approval at least 14 days prior to the commencement of any NTPR-1 blasting activities. |
| PUBLIC SERVICES   |  |                            |   |
| Mitigation Measure WIL-1: Fire Safety, described in Wildfire below.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | NTPR-1 construction activities will take place in accordance with Mitigation Measure WIL-1.                             |
| RECREATION  |  |                            |   |
| <b>APM PS-1:</b> SDG&E will provide the public with advance notification of construction activities. Concerns related to dust, noise, and access restrictions with construction activities will be addressed within this notification.  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | Complete. SDG&E will provide advance notification of NTPR-1 construction activities as necessary (also see APM NOI-2).  |
| <b>APM PS-2:</b> All construction activities will be coordinated with the property owner or authorized agent for each affected park, trail, or recreational facility prior to construction in these areas.  | Pre-<br>construction<br>and during<br>Construction | Applicable                 | SDG&E will implement APM PS-2 during NTPR-1 construction activities.  |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS  |
|--|--|----------------------------|---|
| <b>APM PS-3:</b> As needed, signs will be posted directing vehicles to alternative park access and parking, if available, in the event construction temporarily affects parking near trailheads.   | Pre-<br>construction<br>and during<br>Construction | Applicable                 | SDG&E will implement APM PS-3 during NTPR-1 construction activities.  |
| APM PS-4: All parks, trails, and recreational facilities that are physically impacted during construction activities and are not directly associated with the new permanent facilities, will be returned to an approximate pre-construction state, while still allowing for SDG&E to safely operate and maintain the facilities, following the completion of the Project. SDG&E will replace or repair any damaged or removed public equipment, facilities, and infrastructure in a timely manner.   | During<br>Construction<br>and<br>Restoration       | Applicable                 | SDG&E will restore all recreational or facilities to pre-construction conditions following completion of NTPR-1 construction. Any damage to public equipment, facilities, and infrastructure will be repaired in a timely manner. |
| TRANSPORTATION AND TRAFFIC   |  |                            |   |
| <b>APM TRA-1:</b> If construction requires lane closures, traffic delays, or other encroachment of construction activities within public travelways, the Applicant will adhere to local traffic control regulations and establish a traffic control plan as needed to comply with local ordinances. Traffic control plans will describe signage, flaggers, or other controls to be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction.  | During<br>Construction                             | Applicable                 | SDG&E will comply with all permits and traffic control plans for NTPR-1 activities.   |
| APM TRA-2: The Applicant will coordinate with local emergency response agencies during construction within existing public roadways to allow safe passage and access by emergency vehicles and equipment.  | During<br>Construction                             | Applicable                 | SDG&E will coordinate with local emergency response agencies throughout NTPR-1 construction within existing public roadways.  |
| Mitigation Measure TRA-1: Coordination with North County Transit District (NCTD). SDG&E and its contractor shall:  Minimize interruptions to transit services and facilities. In the event that a temporary removal or relocation of a bus stop is necessary, coordination with NCTD shall occur to ensure that any such action is consistent with the transit operator's needs.  The applicant shall coordinate with NCTD at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations. | During<br>Construction<br>and<br>Restoration       | Applicable                 | SDG&E will coordinate with NCTD during NTPR-1 construction activities as necessary.   |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)      | TIMING  | APPLICABILITY<br>TO NTPR-1 | STATUS   |
|--|---|----------------------------|--|
| TRIBAL CULTURAL RESOURCES  |   |                            |  |
| Mitigation Measure CUL-1: Described in Cultural Resources above. | Pre-<br>construction,<br>during<br>Construction<br>and<br>Restoration | Applicable                 | Complete and Ongoing. The CPUC-<br>approved Qualified Archaeologist<br>and/or Archaeological Monitor shall<br>implement all APMs and cultural<br>resource mitigation measures for<br>NTPR-1 activities. SDG&E identified<br>the proposed Qualified Archaeologist<br>in the CRMP, which was approval by<br>the CPUC.  |
| Mitigation Measure CUL-2: Described in Cultural Resources above. | Pre-<br>construction<br>and during<br>Construction                    | Applicable                 | Pending. A Worker Environmental Awareness Program (WEAP) will be developed in coordination with the Qualified Archaeologist to include cultural resources sensitivity training. WEAP sign-in sheets will be kept as part of the Project record. Initial WEAP training will occur on September 13, 2021. Additional trainings will be held for all new workers as needed throughout construction. |
| Mitigation Measure CUL-3: Described in Cultural Resources above. | Pre-<br>construction<br>and during<br>Construction                    | Applicable                 | Complete. The CRMP was submitted to CPUC for review and approval on January 21, 2021 with multiple revisions as needed. The Final CRMP was approved by the CPUC in August 2021.  |
| Mitigation Measure CUL-4: Described in Cultural Resources above. | Pre-<br>construction<br>and during<br>Construction                    | Not Applicable             | Ongoing. SDG&E submitted the research design to the CPUC for review and approval on February 18, 2021.  Data recovery activities will be completed prior to commencement of construction activities within 250 feet of Site P-37-032160.   |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

Applicable to NTPR-1 – Pre-Construction Status Pending/Ongoing

Applicable to NTPR-1 – Pre-Construction Status Complete/Approved

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING   | APPLICABILITY<br>TO NTPR-1 | STATUS  |
|--|--|----------------------------|---|
|  |  |                            | Construction activities included within the Data Recovery Plan are not included as part of NTP-1.   |
| UTILITIES AND SERVICE SYSTEMS  |  |                            |   |
| Mitigation Measure US-1: Construction and Demolition Debris Recycling Ordinances. SDG&E and its contractors shall recycle and/or reuse 90 percent of inert materials and 70 percent of all other materials, as well as 100 percent of trees, stumps, rocks, and other vegetation. In order to document and track such diversions, the applicant shall provide the following:  Prior to construction, the Applicant shall provide a preliminary Construction and Demolition Debris Register (Preliminary Debris Register) that lists all anticipated construction and demolition solid waste streams (by weight) along with how the project will dispose/divert each waste. The Preliminary Debris Register shall also list the anticipated destination(s) (i.e., location or facility) for each waste stream. The Preliminary Register shall document how the project shall achieve the minimum waste diversion percentages.  During construction activities, the Applicant shall keep records (e.g., a log) on site documenting the disposal and/or diversion of all construction and demolition debris that leaves the project site. The Applicant shall also keep copies of all corresponding receipts or similar documentation from solid waste facility, recycling center, green waste facility, or other permitted facility.  During construction activities, the Applicant shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports required by the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP).  Following the completion of construction activities, the Applicant shall provide a Final Debris Register that documents the final construction and demolition debris totals, destinations, and diversion percentages. The Final Debris Register shall document the Project's final compliance with the minimum diversion percentages. | During<br>Construction                             | Applicable                 | Complete and Ongoing. SDG&E provided the preliminary Construction and Demolition Debris Register (Register) to the CPUC as part of the NTPR-1 package. If needed, SDG&E will update and resubmit the Register once the construction contractor is identified. SDG&E will implement Mitigation Measure US-1 during all applicable NTPR-1 construction activities. SDG&E shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports. |
| WILDFIRE   |  |                            |   |
| <b>Mitigation Measure WIL-1: Fire Safety.</b> SDG&E and/or its contractors shall prepare and implement a Final Project-specific Construction Fire Prevention Plan (CFPP) to ensure the health and safety of construction workers and the public from fire-related hazards. The Final Project-Specific Construction Fire Prevention Plan shall include the provisions in the TL 6975 Construction Fire Prevention Plan provided in Appendix 4.8-B of the Proponent's Environmental Assessment (SDG&E, 2017b), as well as the  | Pre-<br>Construction<br>and During<br>Construction | Applicable                 | Complete. SDG&E submitted the CFPP for CPUC review and approval on November 13, 2020 and submitted a revised version on January 9, 2021. CPUC issued its approval of the CFPP on February 18, 2021. Copy of the   |

TL 6975 San Marcos to Escondido NTPR-1 September 2021 Page **19** of **21**  Not applicable to NTPR-1

Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)  | TIMING | APPLICABILITY<br>TO NTPR-1 | STATUS  |
|--|--------|----------------------------|---|
| requirements listed below. Prior to construction, SDG&E shall contact and consult with the San Diego Unit of CAL FIRE, the San Diego County Fire Authority, and the fire departments of the cities of Carlsbad, Escondido, San Marcos, and Vista to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate prevention measures to be taken. SDG&E shall submit verification of its consultation with the appropriate fire departments to the CPUC Project Manager.  SDG&E shall submit the CFPP to the CPUC Project Manager for approval 60 days prior to commencement of construction activities and shall make the approved Final CFPP available to all construction crew members prior to construction of the Project. The Final CFPP shall list fire safety measures including fire prevention and extinguishment procedures, as well as specific emergency response and evacuation measures that would be followed during emergency situations; examples are listed below. The Final CFPP also shall provide fire-related rules for smoking, storage and parking areas, usage of spark arrestors on construction equipment, and fire-suppression tools and equipment. The Final CFPP shall include or require, but not be limited to, the following:  SDG&E and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available in the study area for fire protection.  All construction vehicles shall have fire suppression equipment.  SDG&E shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire.  As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.  SDG&E shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dr |        |                            | coordination with local fire protection agencies has been provided with the NTPR-1 package.  SDG&E has initiated follow-up correspondence with the local fire protection agencies (refer to Attachment C). SDG&E will provide copies of any correspondence received from any of the fire protection agencies. |

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Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

Applicable to NTPR-1 – Pre-Construction Status Pending/Ongoing

Applicable to NTPR-1 – Pre-Construction Status Complete/Approved

| APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)   | TIMING | APPLICABILITY<br>TO NTPR-1 | STATUS |
|---|--------|----------------------------|--------|
| authorities which documented and submitted to the CPUC for final approval. Additionally, successful implementation of Mitigation Measure WIL-1 would require that SDG&E and its contractor comply with all components of the Final CFPP, that ignition from project construction activities is promptly reported to the fire department(s) with jurisdiction, and that when it is safe to do so, any project-caused ignition is suppressed immediately. |        |                            |        |

TL 6975 San Marcos to Escondido NTPR-1 September 2021 Page **21** of **21**  Not applicable to NTPR-1

Applicable to NTPR-1 – Measure to be Implemented During Construction/Restoration/Operation

Applicable to NTPR-1 – Pre-Construction Status Pending/Ongoing

Applicable to NTPR-1 – Pre-Construction Status Complete/Approved



### ATTACHMENT C CUL-6 Survey Verification Memorandum



September 8, 2021

Cheryl Bowden-Renna SDG&E Environmental Services 8315 Century Park Court, CP21E San Diego, CA 92123

Memorandum: TL 6975 69kV Project Mitigation Measure CUL-6 compliance survey

Dear Ms. Bowden-Renna:

This memorandum prepared by ICF under contract to kp Environmental documents the results of cultural resources survey and collection in compliance with Mitigation Measure CUL-6 of the Cultural Resources Monitoring Plan and Final Initial Study/Mitigated Negative Declaration for the San Marcos to Escondido Tie-Line TL 6975 69kV Project (TL6975 Project).

#### **Project Description**

The TL6975 Project would replace wood poles, reconductor, rebuild and install a new 69kV line to upgrade existing facilities along existing lines in unincorporated San Diego County and within the cities of San Marcos and Escondido.

#### **Project Personnel**

Patrick McGinnis, MA, RPA served as principal investigator, survey crew and authored this memo. Rachel Droessler, MA, RPA, provided technical review, participated in the survey, and provided GIS support. Native American monitoring was conducted by La Jolla Band of Luiseno Indians tribal member Shelly Nelson of Saving Sacred Sites (San Luis Rey Band of Mission Indians cultural resources monitoring firm).

**Mitigation Measure CUL-6: Pre-Construction Surveys.** Prior to the start of Project related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5 [[P-37-034832/CA-SDI-21675]) shall be conducted to map and collect all artifacts located within the road beds. Artifact mapping shall be conducted using a handheld GPS

Cheryl Bowden-Renna September 8, 2021 Page 2 of 2

unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians.

#### **Pre-Construction Survey Results and Recommendations**

ICF completed the access road pre-construction surveys for the TL6975 Project on September 2, 2021, to comply with MM CUL-6. All locations were accessible and surveyed. For the access roads at the former San Marcos Landfill that went through sites CA-SDI-4495 and CA-SDI-4499 the survey was negative. The access roads were paved either fully paved with either poured asphalt or hot patch asphalt on top of rock base. The second road surveyed was a well-maintained dirt road through site CA-SDI-7306. No artifacts were identified in the road, which was consistent with previous surveys although, there are artifacts present in the surrounding area outside of the road. The last area surveyed was the access road and tower pad off Questhaven Road in San Marcos within site P-37-034832/CA-SDI-21675. At this location numerous flakes (20+), a small number of tools (5+) and a complete mano were identified and collected. The collected artifacts were in the existing disturbed road bed or existing pad. The road and pad area appear to have been refreshed since the original recording in 2015, however the pad and road disturbance is all within the same footprint from that time. Not all artifacts listed in the original site form were re-identified and other previously unidentified artifacts were found. Portions of the site outside the disturbed area within dense vegetation had limited visibility and appear unchanged since 2015. When the artifacts were collected a submeter GPS was used to record locations. The artifacts will be temporarily curated at ICF's laboratory in San Diego. Final disposition of the collected artifacts will be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians per MM CUL-6. California Office of Historic Preservation (OHP) Department of Parks and Recreation (DPR) forms will be updated to reflect the changes to disposition of artifacts from the site, site boundaries, and information regarding the survey will also be provided in the final construction monitoring report for the project.

Sincerely,

Patrick McGinnis

Archaeologist

patrick.mcginnis@icf.com

Patrick Midinin

Cc: CPUC; Michael Vader, ESA; Monica Strauss, ESA



### ATTACHMENT C Follow-up Coordination with Local Fire Protection Agencies

From: Veihl, Richard K
To: Fred W. Cox

Cc: Pina, Daryll H; Kimble, Melinda A

**Subject:** RE: SDG&E TL6975

Date:Wednesday, September 1, 2021 9:21:01 AMAttachments:TL6975 20210218 CFPP REV02 FINAL.pdf

Pages from SDGE TL6975 69kV DraftIS-MND Wildfire Map.pdf

#### Good Morning Chief Cox

Due to the time that has passed since we last reached out about the TL6975 Project, we have been asked by the CPUC to reconnect with the Fire Agencies with jurisdiction that the project right of way crosses. The plans and map that are attached are unchanged from the last time they were sent and I have included the original message below for convenience. One change that has occurred within our team is that Daryll Pina is now the primary POC from Fire Coordination supporting this project but I will be supporting him to ensure a smooth transition. Construction activities are likely to begin within the next 30 days and we wanted to provide the opportunity for any changes to our Construction Fire Prevention Plan. As always, SDG&E's goal is to prevent ignitions and keep the communities we serve safe. We also will strive to avoid any obstacles to emergency response throughout the life of the project.

If you could please let us know if there are any questions or concerns it would be greatly appreciated, thank you.

Thank you

Richie Veihl Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation Cell: 858 248-0847 rveihl@sdge.com

----Original Message----

From: Fred W. Cox <cox@RSF-Fire.org> Sent: Tuesday, November 10, 2020 7:26 PM To: Veihl, Richard K <RVeihl@sdge.com> Cc: Pina, Daryll H <DPina@sdge.com> Subject: [EXTERNAL] RE: SDG&E TL6975

\*\*\* EXTERNAL EMAIL - Be cautious of attachments, web links, and requests for information \*\*\*

Thank you Richie! You are always so good in keeping us informed.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Veihl, Richard K" <RVeihl@sdge.com>

Date: 11/9/20 1:20 PM (GMT-08:00)

To: "Fred W. Cox" <cox@RSF-Fire.org> Cc: "Pina, Daryll H" <DPina@sdge.com>

Subject: SDG&E TL6975

Chief Cox,

I'm reaching out because SDG&E is planning another project that I believe runs through your jurisdiction. I've attached a map and our draft Construction Fire Prevention Plan to provide more context but my main objective in reaching out is to provide Rancho Santa Fe Fire Department the ability to collaborate or add to the plan (please forward as needed). I don't know if RSF has been kept in the loop as much because the project originally began planning in 2009 and I believe the area was still Elfin Forest until a couple years ago. The CPUC is not requiring approval of the plan from the local jurisdictions but I'm more than happy to address concerns. I will also be the main point of contact that you are welcome to use throughout the project for questions or concerns with Daryll Pina serving as a secondary POC. The primary object of the plan is to prevent ignitions from occurring during the construction phase of the project and to give guidance to construction crews about emergency response and fire reporting. I'm happy to meet, talk on the phone, or utilize email for communication but regardless my goal will be to keep you in the loop with any project information.

There is a much more detailed summary of the project in the plan but in short the project is scheduled to kick off construction in August of 2021 and last for about 12 months. The project will replace wooden poles along the route with steel poles and install new conductor along the entire alignment. The project work should not impede emergency response in the area and my intent will be to keep you informed throughout the process.

Please let me know if there are questions about the plan or the project. I'm also happy to be pointed in the right direction if you'd prefer me work with a different member of the department.

Richie Veihl

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation Cell: 858 248-0847

rveihl@sdge.com<mailto:rveihl@sdge.com>

This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

From: <u>Veihl, Richard K</u>

To: <a href="mailto:nvanderpol@ci.vista.ca.us">nvanderpol@ci.vista.ca.us</a>; <a href="cusher@ci.vista.ca.us">cusher@ci.vista.ca.us</a>

Cc: Pina, Daryll H; Kimble, Melinda A

**Subject:** RE: SDG&E"s TL6975

 Date:
 Wednesday, September 1, 2021 9:13:23 AM

 Attachments:
 TL6975 20210218 CFPP REV02 FINAL.pdf

Pages from SDGE TL6975 69kV DraftIS-MND Wildfire Map.pdf

Good Morning Chief Vander Pol and Chief Usher,

Due to the time that has passed since we last reached out about the TL6975 Project, we have been asked by the CPUC to reconnect with the Fire Agencies with jurisdiction that the project right of way crosses. The plans and map that are attached are unchanged from the last time they were sent and I have included the original message below for convenience. One change that has occurred within our team is that Daryll Pina is now the primary POC from Fire Coordination supporting this project but I will be supporting him to ensure a smooth transition. Construction activities are likely to begin within the next 30 days and we wanted to provide the opportunity for any changes to our Construction Fire Prevention Plan. As always, SDG&E's goal is to prevent ignitions and keep the communities we serve safe. We also will strive to avoid any obstacles to emergency response throughout the life of the project.

If you could please let us know if there are any questions or concerns it would be greatly appreciated, thank you.

Thank you

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com

From: Veihl, Richard K

Sent: Monday, November 9, 2020 1:00 PM

To: 'nvanderpol@ci.vista.ca.us' <nvanderpol@ci.vista.ca.us>; 'cusher@ci.vista.ca.us'

<cusher@ci.vista.ca.us>

Cc: Pina, Daryll H < DPina@sdge.com>

**Subject:** SDG&E's TL6975

Chief Vander Pol and Chief Usher,

I'm reaching out because SDG&E is planning a project that has portions in your and neighboring jurisdictions. I've attached a map and our draft Construction Fire Prevention Plan to provide more context but my main objective in reaching out is to provide Vista Fire Department the ability to

collaborate or add to the plan (please forward as needed). The CPUC is not requiring approval of the plan from the local jurisdictions but I'm more than happy to address concerns. I will also be a point of contact that you are welcome to use throughout the project for questions or concerns with Daryll Pina serving as a secondary POC. The primary object of the plan is to prevent ignitions from occurring during the construction phase of the project and to give guidance to construction crews about emergency response and fire reporting. I'm happy to meet, talk on the phone, or utilize email for communication but regardless my goal will be to keep you in the loop with any project information.

There is a much more detailed summary of the project in the plan but in short the project is scheduled to kick off construction in August of 2021 and last for about 12 months. The project will replace wooden poles along the route with steel poles and install new conductor along the entire alignment. The project work should not impede emergency response in the area and my intent will be to keep you informed throughout the process.

Please let me know if there are questions about the plan or the project. I'm also happy to be pointed in the right direction if you'd prefer me work with a different member of the department.

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com

From: <u>Veihl, Richard K</u>

To: <a href="mike.calderwood@carlsbadca.gov">mike.calderwood@carlsbadca.gov</a>
Cc: <a href="mike.calderwood@carlsbadca.gov">Pina, Daryll H; Kimble, Melinda A</a>

Subject: RE: TL6975

 Date:
 Wednesday, September 1, 2021 9:17:25 AM

 Attachments:
 TL6975 20210218 CFPP REV02 FINAL.pdf

Pages from SDGE TL6975 69kV DraftIS-MND Wildfire Map.pdf

#### Good Morning Chief Calderwood

Due to the time that has passed since we last reached out about the TL6975 Project, we have been asked by the CPUC to reconnect with the Fire Agencies with jurisdiction that the project right of way crosses. The plans and map that are attached are unchanged from the last time they were sent and I have included the original message below for convenience. One change that has occurred within our team is that Daryll Pina is now the primary POC from Fire Coordination supporting this project but I will be supporting him to ensure a smooth transition. Construction activities are likely to begin within the next 30 days and we wanted to provide the opportunity for any changes to our Construction Fire Prevention Plan. As always, SDG&E's goal is to prevent ignitions and keep the communities we serve safe. We also will strive to avoid any obstacles to emergency response throughout the life of the project.

If you could please let us know if there are any questions or concerns it would be greatly appreciated, thank you.

Thank You

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: 858 248-0847 rveihl@sdge.com

From: Veihl, Richard K <RVeihl@sdge.com>
Sent: Monday, November 9, 2020 12:54 PM
To: mike.calderwood@carlsbadca.gov
Cc: Pina, Daryll H <DPina@sdge.com>

Subject: TL6975

Chief Calderwood,

I'm reaching out because SDG&E is planning a project that has portions in your and neighboring jurisdictions. I've attached a map and our draft Construction Fire Prevention Plan to provide more context but my main objective in reaching out is to provide Carlsbad Fire Department the ability to collaborate or add to the plan (please forward as needed). The CPUC is not requiring approval of the

plan from the local jurisdictions but I'm more than happy to address concerns. I will also be a point of contact that you are welcome to use throughout the project for questions or concerns with Daryll Pina serving as a secondary POC. The primary object of the plan is to prevent ignitions from occurring during the construction phase of the project and to give guidance to construction crews about emergency response and fire reporting. I'm happy to meet, talk on the phone, or utilize email for communication but regardless my goal will be to keep you in the loop with any project information.

There is a much more detailed summary of the project in the plan but in short the project is scheduled to kick off construction in August of 2021 and last for about 12 months. The project will replace wooden poles along the route with steel poles and install new conductor along the entire alignment. The project work should not impede emergency response in the area and my intent will be to keep you informed throughout the process.

Please let me know if there are questions about the plan or the project. I'm also happy to be pointed in the right direction if you'd prefer me work with a different member of the department.

#### Richie Veihl

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com From: Veihl, Richard K
To: jnailon@san-marcos.net

Cc: Pina, Daryll H; Kimble, Melinda A; Dan Barron

Subject: RE: TL6975

Date: Wednesday, September 1, 2021 9:35:07 AM
Attachments: TL6975 20210218 CFPP REV02 FINAL.pdf

Pages from SDGE TL6975 69kV DraftIS-MND Wildfire Map.pdf

#### Good Morning Chief Nailon,

Due to the time that has passed since we last reached out about the TL6975 Project, we have been asked by the CPUC to reconnect with the Fire Agencies with jurisdiction that the project right of way crosses. The plans and map that are attached are unchanged from the last time they were sent and I have included the original message below for convenience. One change that has occurred within our team is that Daryll Pina is now the primary POC from Fire Coordination supporting this project but I will be supporting him to ensure a smooth transition. Construction activities are likely to begin within the next 30 days and we wanted to provide the opportunity for any changes to our Construction Fire Prevention Plan. As always, SDG&E's goal is to prevent ignitions and keep the communities we serve safe. We also will strive to avoid any obstacles to emergency response throughout the life of the project.

I believe you are currently assigned to the Dixie Fire so please take your time in responding. Upon your return, if you could please let us know if there are any questions or concerns it would be greatly appreciated. Additionally, if throughout the life of the project other questions come up please don't hesitate to reach out to myself or Daryll.

#### Thank you

#### Richie Veihl

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com

From: Veihl, Richard K

Sent: Friday, November 6, 2020 10:16 AM

**To:** jnailon@san-marcos.net

Cc: Pina, Daryll H < DPina@sdge.com>

Subject: TL6975

Chief Nailon,

I'm reaching out because SDG&E is planning a project that has portions in your and neighboring

jurisdictions. I've attached a map and our draft Construction Fire Prevention Plan to provide more context but my main objective in reaching out is to provide San Marcos Fire Department the ability to collaborate or add to the plan (please forward as needed). The CPUC is not requiring approval of the plan from the local jurisdictions but I'm more than happy to address concerns. I will also be a point of contact that you are welcome to use throughout the project for questions or concerns with Daryll Pina serving as a secondary POC. The primary object of the plan is to prevent ignitions from occurring during the construction phase of the project and to give guidance to construction crews about emergency response and fire reporting. I'm happy to meet, talk on the phone, or utilize email for communication but regardless my goal will be to keep you in the loop with any project information.

There is a much more detailed summary of the project in the plan but in short the project is schedule to kick off construction in August of 2021 and last for about 12 months. The project will replace wooden poles along the route with steel poles and install new conductor along the entire alignment. The project work should not impede emergency response in the area and my intent will be to keep you informed throughout the process.

Please let me know if there are question about the plan or the project.

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: 858 248-0847 rveihl@sdge.com

From: <u>Veihl, Richard K</u>

To: <u>Dave Nissen (Dave.nissen@fire.ca.gov)</u>
Cc: <u>Pina, Daryll H; Kimble, Melinda A</u>

**Subject:** SDG&E"s TL6975

 Date:
 Wednesday, September 1, 2021 8:59:53 AM

 Attachments:
 TL6975 20210218 CFPP REV02 FINAL.pdf

Pages from SDGE TL6975 69kV DraftIS-MND Wildfire Map.pdf

#### Good Morning Chief Nissen,

Due to the time that has passed since we last reached out about the TL6975 Project, we have been asked by the CPUC to reconnect with the Fire Agencies with jurisdiction that the project right of way crosses. The plans and map that are attached are unchanged from the last time they were sent and I have included the original message below for convenience. One change that has occurred within our team is that Daryll Pina is now the primary POC from Fire Coordination supporting this project but I will be supporting him to ensure a smooth transition. Construction activities are likely to begin within the next 30 days and we wanted to provide the opportunity for any changes to our Construction Fire Prevention Plan. As always, SDG&E's goal is to prevent ignitions and keep the communities we serve safe. We also will strive to avoid any obstacles to emergency response throughout the life of the project.

If you could please let us know if there are any questions or concerns it would be greatly appreciated, thank you.

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com

From: Veihl. Richard K

Sent: Monday, November 9, 2020 1:14 PM

To: Dave Nissen (Dave.nissen@fire.ca.gov) < Dave.nissen@fire.ca.gov>

Cc: Pina, Daryll H < DPina@sdge.com>

Subject: SDG&E's TL6975

Chief Nissen,

I'm reaching out because SDG&E is planning a project that has portions in small parts that I believe are still under SDFCA and/or CALFIRE's jurisdiction. I've attached a map and our draft Construction Fire Prevention Plan to provide more context but my main objective in reaching out is to provide CALFIRE and SDCFA the ability to collaborate or add to the plan (please forward as needed). The CPUC is not requiring approval of the plan from the local jurisdictions but I'm more than happy to address concerns. I will also be a point of contact that you are welcome to use throughout the

project for questions or concerns with Daryll Pina serving as a secondary POC. The primary object of the plan is to prevent ignitions from occurring during the construction phase of the project and to give guidance to construction crews about emergency response and fire reporting. I'm happy to meet, talk on the phone, or utilize email for communication but regardless my goal will be to keep you in the loop with any project information.

There is a much more detailed summary of the project in the plan but in short the project is scheduled to kick off construction in August of 2021 and last for about 12 months. The project will replace wooden poles along the route with steel poles and install new conductor along the entire alignment. The project work should not impede emergency response in the area and my intent will be to keep you informed throughout the process.

Please let me know if there are questions about the plan or the project. I'm also happy to be pointed in the right direction if you'd prefer me work with a different member of the department.

#### **Richie Veihl**

Fire Science and Coordination Program Manager SDG&E Fire Science and Climate Adaptation

Cell: *858 248-0847* rveihl@sdge.com