

## **6.0 MITIGATION IMPLEMENTATION AND MONITORING PLAN**

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San Diego Gas & Electric (SDG&E) proposes to construct and operate the Tie-Line (TL) 637 Wood-to-Steel Replacement Project (proposed project). An Initial Study was prepared to assess the proposed project's potential environmental effects. The Initial Study was prepared based on information in the Proponent's Environmental Assessment (PEA), project site visits, and supplemental research. The majority of the Proposed Project's impacts would occur during project construction. Within SDG&E's application, Applicant Proposed Measures (APMs) proposed by SDG&E as project design features, were proposed to reduce potentially significant adverse impacts related to project construction and operation.

The purpose of this Mitigation Monitoring Plan (MMP) is to ensure effective implementation of each APM, as well as the mitigation measures identified by the Initial Study and imposed by the CPUC as part of project approval. Table 6-1, along with the full text of the mitigation measures themselves, will form the basis for implementation of the mitigation monitoring program. Table 6-1 has been updated in the Final IS/MND to clarify compliance documentation and consultation, the responsible party, and location of project component for implementation of each mitigation measure.

This Mitigation Monitoring Plan shown in Table 6-1 includes:

- The APMs and mitigation measures that SDG&E must implement as part of the proposed project;
- The actions-compliance documentation and consultation required to implement these measures;
- ~~The monitoring requirements and effectiveness criteria; and~~
- The timing of implementation for each measure; and
- The responsible party and location of project component for implementation of each measure.

The CPUC will use this MMP as the framework for a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). The MMCRP will be created by the CPUC to formalize protocols to be followed prior to and during construction by CPUC third-party environmental monitors (CPUC EMs) and SDG&E project staff. The MMCRP will include, but will not be limited to, the following topics:

- Agency Jurisdiction
- Roles/Responsibilities
- Communication
- Compliance Verification and Reporting
- Project Changes

A CPUC-designated environmental monitor will carry out all construction field monitoring to ensure full implementation of all measures. In all instances where non-compliance occurs, the CPUC's designated environmental monitor will issue a warning to the construction foreman and SDG&E's project manager. Continued non-compliance shall be reported to the CPUC's designated project manager. Any decisions to halt work due to non-compliance will be made by

the CPUC. The CPUC's designated environmental monitor will keep a record of any incidents of non-compliance with mitigation measures, APM, or other conditions of project approval. Copies of these documents shall be supplied to SDG&E and the CPUC.

Final language of the MMCRP will be made in consultation with SDG&E. Drafted language for minor project changes and dispute resolution protocols are provided below.

## **6.1 MINOR PROJECT CHANGES**

The Commission's Energy Division may approve requests by SDG&E for minor project refinements which meet the fixed criteria described below and that may be necessary to complete the project due to final engineering or other reasons. Minor project refinements cannot create a new significant impact or a substantial increase in the severity of a previously identified significant impact, based on the thresholds used in the environmental document. Minor project refinements cannot require new conditions for approval, without which the proposed refinements would result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. Minor project refinements cannot conflict with any mitigation measure or applicable law or policy or trigger an additional permit requirement. Specifically, minor project refinements must not change mitigation measures. Minor project refinements must be located within the geographic boundary of the study area of this Initial Study/Mitigated Negative Declaration. If approved, SDG&E The CPUC Project Manager along with the CPUC Monitoring Team will ensure that any process to consider minor project changes that may be necessary due to final engineering or deviations from the procedures identified under the monitoring program are consistent with CEQA requirements. No minor project changes will be approved by the CPUC if they are located outside of the geographic boundary of the project study area or create new or substantially more severe significant impacts. A minor project change is one that is strictly limited to those that do not trigger other permit requirements unless the appropriate agency has approved the change, that does not increase the severity of an impact or create a new impact without appropriate agency approval, and that clearly and strictly complies with the intent of the mitigation measure or applicable law or policy. SDG&E shall seek any other project refinements by a petition to modify the decision.

A proposed project change that has the potential for creating significant environmental effects will be evaluated to determine whether a petition to modify and/or supplemental California Environmental Quality Act (CEQA) review is required. Any proposed deviation from the approved project, adopted mitigation measures, APMs, and correction of such deviation, will be reported immediately to the CPUC Project Manager for his or her review. The CPUC Monitoring Team will review the minor project change request to ensure that all of the information required to process the minor project change is included, and then forward the request to the CPUC Project Manager for review and approval. The CPUC Project Manager may request a site visit from the CPUC EM, or may need additional information to process the minor project change. In some cases, project refinements may also require approval by jurisdictional agencies. In general, a minor project change request must include the information listed below.

- Detailed description of the location, including maps, photos, and/or other supporting documents;
- How the minor project change request deviates from a project requirement;
- Biological resource surveys or verification that no biological resources would be significantly impacted;

- Cultural resource surveys or verification that no cultural resources would be significantly impacted; and
- Agency approval (if necessary).

## **6.2 DISPUTE RESOLUTION**

It is expected that the Mitigation Monitoring Plan will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur.

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

- **Step 1.** Disputes unresolved in the field and complaints (including those from the public) should be directed to the CPUC Project Manager for resolution. The Project Manager will attempt to resolve the dispute informally. Should this informal process fail, the CPUC Project Manager will inform SDG&E prior to initiating Step 2.
- **Step 2.** Should this informal process in the field fail, the CPUC Project Manager may issue a formal letter requiring corrective actions to address the unresolved or persistent deviations from the Proposed Project or adopted MMP.
- **Step 3.** If a dispute or complaint regarding implementation or evaluation of the Program or mitigation measures cannot be resolved informally or through a letter request, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants to resolve the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it to the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

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

**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in air quality and noise impacts due to project construction overlap.		APM-GEN-1	<b>Construction scheduling.</b> SDG&E will coordinate construction of the proposed project such that construction activities will typically not overlap with other SDG&E construction projects in the immediate vicinity of the proposed project.	<ul style="list-style-type: none"> <li>a. Documentation verifying construction schedules for SDG&amp;E projects do not overlap in the immediate vicinity</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  * Applicable to all project components during construction
Construction of the proposed project could result in noise impacts due to helicopter use.		APM-GEN-2	<b>Helicopter use.</b> Helicopter takeoffs and landings conducted at the Warnock and Santa Ysabel Staging Yards will be restricted to the approximate center of the staging area. Helicopter usage will conform to acceptable hours for construction activities, as outlined within the San Diego County Noise Code.	<ul style="list-style-type: none"> <li>a. Identify the takeoff and landing locations at the Warnock and Santa Ysabel Yards.</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  * Applicable at the Warnock and Santa Ysabel Yards
<b>Aesthetics</b>						
Construction of the proposed project could result in short-term visual impacts.		APM-AES-1	<b>Visual screening of staging yards.</b> The Warnock and Santa Ysabel Staging Yards will have opaque mesh installed along the fence that will soften the view of the staging yard from public vantage points such as roads, residences, and public vantage points.	<ul style="list-style-type: none"> <li>a. Documentation verifying color of screening materials used at Warnock and Santa Ysabel staging yards</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  * Applicable at the Warnock and Santa Ysabel Yards
Operation of the proposed project could result in long-term visual impacts.		APM-AES-2	<b>Restoring appearance of temporarily disturbed areas.</b> When proposed project construction has been completed, all temporarily disturbed terrain will be restored, as needed and as appropriate, to approximate pre-construction conditions.	<ul style="list-style-type: none"> <li>a. Documentation of pre-construction conditions.</li> <li>b. Documentation demonstrating that disturbed areas have been restored in</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. During construction</li> <li>c. During construction</li> </ul>	SDG&E and CPUC  * Applicable to all project components during construction

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			Revegetation would be used, where appropriate (revegetation in certain areas is not possible due to vegetation management requirements related to fire safety) to reestablish a natural-appearing landscape and reduce potential visual contrast between disturbed areas and the surrounding landscape.	accordance with the guidelines provided in section 7.2, "Habitat Enhancement Measures," of the NCCP.  c. CPUC monitor: Line item in compliance monitoring report		
<b>Biological Resources</b>						
Construction of the proposed project could result in temporary and/or permanent loss of native vegetation, direct or indirect loss of listed/ sensitive plants or habitat for sensitive plants, and direct or indirect loss of listed/sensitive wildlife or habitat of sensitive wildlife.		APM-BIO-1	<b>SDG&amp;E Subregional NCCP.</b> The proposed project will avoid and minimize impacts to biological resources through implementation of the SDG&E Subregional NCCP. The SDG&E Subregional NCCP establishes a mechanism for addressing biological resource impacts incidental to the development, maintenance, and repair of SDG&E facilities within the SDG&E Subregional NCCP coverage area. The proposed project is located within the SDG&E Subregional NCCP coverage area. The SDG&E Subregional NCCP includes a Federal Endangered Species Act (ESA) Section 10(A) permit and a California ESA Section 2081 memorandum of understanding (for incidental take) with an Implementation Agreement with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW – formerly the California Department of Fish and Game), respectively, for the management and conservation of multiple species and their associated habitats, as established	a. A Implement NCCP Protocols as defined  b. CPUC monitor: Line item in compliance monitoring report	a. During construction and operations  b. During construction	SDG&E and CPUC  * Applicable to all project components during construction

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			<p>according to the Federal and State ESAs and California's NCCP Act. The NCCP's Implementing Agreement confirms that the mitigation, compensation, and enhancement obligations contained in the Agreement and the SDG&amp;E Subregional NCCP meet all relevant standards and requirements of the California ESA, the Federal ESA, the NCCP Act, and the Native Plant Protection Act with regard to SDG&amp;E's activities in the Subregional Plan Area.</p> <p>Pursuant to the SDG&amp;E Subregional NCCP, SDG&amp;E conducted pre-construction studies for all activities occurring off of existing access roads in natural areas. An independent biological consulting firm surveyed all proposed project impact areas and prepared a Preactivity Study Report (PSR) outlining all anticipated impacts related to the proposed project. The proposed project will include monitoring for all project components, as recommended by the PSR and outlined in the SDG&amp;E Subregional NCCP, as well as other avoidance and minimization measures outlined in the NCCP's Operational Protocols. The PSR was submitted to the CDFW and USFWS, and no comments were received. Prior to the commencement of construction, a verification survey will be conducted of the proposed project disturbance areas, as required by the SDG&amp;E Subregional NCCP.</p> <p>Biological monitors will be present during construction to assure implementation of the avoidance and minimization measures.</p>			

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			<p>If the previously delineated work areas must be expanded or modified during construction, the monitors will survey the additional impact area to determine if any sensitive resources will be impacted by the proposed activities, to identify avoidance and minimization measures, and to document any additional impacts. Any additional impacts are included in a Post-Construction Report (PCR) for purposes of calculating the appropriate mitigation, which generally includes site enhancement or credit withdrawal from the SDG&amp;E mitigation bank. When construction is complete, the biological monitor will conduct a survey of the entire line to determine actual impacts from construction. The PCR will determine how much site enhancement and credit withdrawal from the SDG&amp;E mitigation bank will be required to address impacts from project-related activities. These impact and mitigation credit calculations are submitted to the USFWS and the CDFW as part of the NCCP Annual Report pursuant to requirements of the NCCP and the NCCP Implementing Agreement.</p> <p>Specific operating restrictions that are incorporated into the proposed project design to comply with the SDG&amp;E Subregional NCCP include the following:</p> <ul style="list-style-type: none"> <li>• Vehicles would be kept on access roads and limited to 15 miles per hour (Section 7.1.1, 1).</li> <li>• No wildlife, including rattlesnakes, may be harmed, except to protect life</li> </ul>			

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			<p>and limb (Section 7.1.1, 2).</p> <ul style="list-style-type: none"> <li>• Feeding of wildlife is not allowed (Section 7.1.1, 4).</li> <li>• No pets are allowed within the ROW (Section 7.1.1, 5).</li> <li>• Plant or wildlife species may not be collected for pets or any other reason (Section 7.1.1, 7).</li> <li>• Littering is not allowed, and no food or waste would be left on the ROW or adjacent properties (Section 7.1.1, 8).</li> <li>• Measures to prevent or minimize wild fires would be implemented, including exercising care when driving and not parking vehicles where catalytic converters can ignite dry vegetation (Section 7.1.1, 9).</li> <li>• Field crews shall refer all environmental issues, including wildlife relocation, dead or sick wildlife, or questions regarding environmental impacts to the Environmental Surveyor. Biologists or experts in wildlife handling may be necessary to assist with wildlife relocations (Section 7.1.1, 10).</li> <li>• All SDG&amp;E personnel would participate in an environmental training program conducted by SDG&amp;E, with annual updates (Section 7.1.2, 11).</li> <li>• The Environmental Surveyor shall conduct preactivity studies for all activities occurring in natural areas,</li> </ul>			

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			<p>and will complete a preactivity study form including recommendations for review by a biologist and construction monitoring, if appropriate. The form will be provided to CDFW and USFWS but does not require their approval (Section 7.1.3, 13).</p> <ul style="list-style-type: none"> <li>• The Environmental Surveyor shall flag boundaries of habitats to be avoided and, if necessary, the construction work boundaries (Section 7.1.3, 14).</li> <li>• The Environmental Surveyor must approve of activity prior to working in sensitive areas where disturbance to habitat may be unavoidable (Section 7.1.4, 25).</li> <li>• In the event SDG&amp;E identifies a covered species (listed as threatened or endangered by the federal or state) of plant within the temporary work area (10-foot radius) surrounding a power pole, SDG&amp;E would notify the USFWS (for Federal ESA listed plants) and CDFW (for California ESA listed plants) (Section 7.1.4, 28).</li> <li>• The Environmental Surveyor shall conduct monitoring as recommended in the preactivity study form (Section 7.1.4, 35.).</li> <li>• Supplies, equipment, or construction excavations where wildlife could hide (e.g., pipes, culverts, pole holes, trenches) shall be inspected prior to moving or working on/in them (Section 7.1.4, 37 and 38). Fugitive dust will be</li> </ul>			

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<p>controlled by regular watering and speed limits (Section 7.1.4, 39).</p> <ul style="list-style-type: none"> <li>• During the nesting season, the presence or absence of nesting species (including raptors) shall be determined by a biologist who would recommend appropriate avoidance and minimization measures (Section 7.1.6, 50).</li> <li>• Maintenance or construction vehicle access through shallow creeks or streams is allowed. However, no filling for access purposes in waterways is allowed (Section 7.1.7, 52).</li> <li>• Staging/storage areas for equipment and materials shall be located outside of riparian areas (Section 7.1.7, 53).</li> </ul>			
Construction activities could impact rare plants species.	BIO-1		<p>Prior to construction, San Diego Gas &amp; Electric (SDG&amp;E) shall retain a qualified biologist approved by the California Public Utilities Commission (CPUC) to conduct a focused rare plant survey during the time period when the following special-status plant species are detectable: San Diego gumplant (July – October; east of Del Amo Road (P65 east to Santa Ysabel Substation) in the following habitat types: chaparral, grassland, oak woodland, riparian forest, disturbed wetland, and in agricultural land east of Oak Hollow Road (P75 east to Santa Ysabel Substation)), and Coulter's saltbush (March – October; within proposed project impact areas within the project area in the following habitat types: agricultural land, coastal sage scrub,</p>	<ul style="list-style-type: none"> <li>a. Biologist (including botanist) qualifications</li> <li>b. Focused surveys for species listed in measure</li> <li>c. Implement special procedures for pole activity in confined areas (where little mousetail is assumed present)</li> <li>d. Provide survey report and map of identified and inventoried SSP locations</li> <li>e. Monitor in vicinity of identified SSP (qualified</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. Timing is Plant-Specific</li> <li>c. During construction/ during hand removal of poles between P103 through P107</li> <li>d. Prior to construction/CPUC to review and approve and make additional recommendations for avoidance prior to issuance of NTP</li> </ul>	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<p>grassland, oak woodland, and disturbed wetlands).</p> <p>There is some potential for little mouselail to occur within vernal pool and wetland areas; these areas will be protected through implementation of MM BIO 7, the SDG&amp;E Natural Community Conservation Plan (NCCP), and through avoidance of impacts to wetlands. However, there is a confined area (P103 through P107), where poles are situated within a wet meadow and will be cut down and removed by hand. Therefore, in this confined area, presence is assumed and SDG&amp;E shall do the following: using pin flags, narrowly define footpaths for hand crews to and from the poles; crews will hand-cut the pole; and the cut poles will be removed by hand or by helicopter only.</p> <p>Locations of special-status plants shall be identified and inventoried. The qualified biologist shall supervise construction activities within the vicinity of areas identified as having special-status plant species. Impacts to special-status plant species shall be avoided to the maximum extent possible by installing fencing or flagging, marking areas to be avoided in construction areas, and limiting work in areas identified as having special-status plant species to periods of time when the plants have set seed and are no longer growing.</p> <p>Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-</p>	<p>biologist) if needed use fencing, markers or flagging</p> <p>f. Implement avoidance measures, if needed</p> <p>g. CPUC monitor: Line item in monitoring report</p>	<p>e. During construction</p> <p>f. During construction</p> <p>g. During construction</p>	

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<p>site land preservation and /or plant salvage and relocation as determined by the qualified biologist and approved by the CPUC. Alternatively, if the special-status plant species in question is a covered species within the SDG&amp;E NCCP, mitigation consistent with measures established in the NCCP shall be provided.</p> <p>The results of the focused plant surveys and measures outlined above that will be implemented by SDG&amp;E in the event special-status plant species are identified within the biological survey area shall be provided to CPUC. CPUC will review and approve the rare plant survey report and recommended avoidance or mitigation approaches prior to issuance of a notice to proceed.</p>			
Construction activities could impact sensitive wildlife species.	BIO-2		<p>San Diego Gas &amp; Electric (SDG&amp;E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&amp;E's Natural Community Conservation Plan, on-site monitoring and documentation of violations and compliance.</p>	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. CPUC monitor: line item in compliance monitoring report</li> <li>c. Weekly monitoring report summarizing biological monitoring activities (include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations)</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> <li>c. Weekly during construction</li> <li>d. Within 60 days of completing ground-disturbing activities</li> </ul>	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report at a minimum shall include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns and general wildlife observations.	d. CPUC monitor: Line item in compliance monitoring report		
Construction of the proposed project could impact sensitive wildlife species.	BIO-3		At the end of each workday, any open holes shall be fully covered, after they have been inspected by the on-site biologist, with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted or approved to handle a specific species) shall remove the animal before resumption of work in that immediate area. San Diego Gas & Electric shall specify the requirement to cover all open holes, create ramps, or install exclusion fencing around open holes in its agreements with all construction contractors.	<ul style="list-style-type: none"> <li>a. Implement open hole covering procedures</li> <li>b. Documentation that covering requirements in BIO-3 have been incorporated into construction contracts</li> <li>c. Documentation that notification and handling procedures are utilized for wildlife found in open holes</li> <li>d. CPUC monitor: Line item in monitoring report.</li> </ul>	<ul style="list-style-type: none"> <li>a. During construction</li> <li>b. During construction</li> <li>c. During construction</li> <li>d. During construction</li> </ul>	<p>SGE&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in the potential impacts to nesting birds.	BIO-4		<p>If construction activities including but not limited to tree trimming, road maintenance (i.e., re-establishing existing access roads), grading, or site disturbance are to occur between March 1 and September 1, a nesting bird survey shall be conducted by a qualified biologist to determine the presence of nests or nesting birds within 100 feet of the construction activities. The nesting bird surveys shall be completed no more than 72 hours prior to any construction activities. The survey will focus on special-status species known to use the area as well as other nesting birds that are protected under the Migratory Bird Treaty Act. If an active nest (defined below) is identified grading or site disturbance within a 100-foot buffer of the nest shall be monitored on a daily basis by a qualified biologist until project activities are no longer occurring within 100 feet of the nest or until fledglings become independent of the nest. "Nest" is defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.</p> <p>The monitoring biologist may increase the buffer radius if he or she determines it is</p>	<ul style="list-style-type: none"> <li>a. Biologist Qualifications</li> <li>b. Conduct nesting bird survey</li> <li>c. Document survey efforts in daily log and report to CPUC at the end of each week.</li> <li>d. Documentation of monitoring active nests on daily basis within buffer areas (within 100 feet of construction activities or as increased by the biologist)</li> <li>e. CPUC to review and approve/deny decreases in buffer space</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. Survey no more than 72 hours prior to construction</li> <li>c. Prior to construction</li> <li>d. During construction</li> <li>e. Prior to or during construction</li> </ul>	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<p>necessary. The monitoring biologist may decrease the buffer radius upon receiving approval from California Public Utilities Commission (CPUC), if he or she determines that the construction activities are not disturbing the nesting activities and a smaller buffer is more appropriate. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing the nesting activities. The monitor shall make practicable recommendations to reduce the noise or disturbance in the vicinity of the nest. This may include recommendations such as: (1) turning off vehicle engines and other equipment whenever possible to reduce noise, (2) working in other areas until the young have fledged, or (3) placing noise barriers to maintain the noise at the nest to 60 dBA Leq hourly or less or to the preconstruction ambient noise level if that exceeds 60 dBA Leq hourly. The on-site biologist will review and verify compliance with these nesting boundaries and will verify that the nesting effort has finished. Unrestricted construction activities can resume when no other active nests are found. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC with the weekly report as identified in MM BIO-2.</p> <p>A nesting bird report, at a minimum, shall include the date, starting and ending time, general weather conditions (cloud cover, temperature, wind), name of biologist with</p>			

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			affiliation, area surveyed including map, survey results (species, nest GPS location, nest stage [number of eggs, number of nestlings]), recommended compliance (e.g., 100-foot buffer recommended, buffer increased with explanation, recommended noise reduction, noise dBA Leq levels at nest), and compliance issues/concerns. The report shall also include the date and nesting outcome (e.g., depredated, nestling fledged, nest abandoned).			
Construction of the proposed project could result in the potential impacts to nesting birds.	BIO-5		In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC. If the CPUC-approved biologist observes an active nest (see definition below) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric would postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions. "Nest" is	See blasting requirements under HAZ-3. a. Site-specific nesting bird survey (as part of Plan) and communicate results to CPUC b. Biologist qualifications c. Documentation of postponing construction activities with respect to active nests (if applicable) d. CPUC monitor: Line item in compliance monitoring report	a. Prior to blasting activities b. Prior to blasting activities/Prior to construction c. Prior to construction d. During construction	SDG&E and CPUC  * Applicable to all project components during construction

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			defined as: a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as: once birds begin constructing, preparing or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest.			
Construction of the proposed project could impact Stephen's kangaroo rat habitat.	BIO-6		In locations where Stephen's kangaroo rat habitat assessments were not conducted during the 2010 field survey, a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC) approved biologist to assess the potential areas for Stephen's kangaroo rat to occur within the proposed project area. Any burrows, utilized habitat, or signs of Stephen's kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephen's kangaroo rat occupied habitat. If Stephen's kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal	<ul style="list-style-type: none"> <li>a. Biologist qualifications</li> <li>b. Pedestrian preconstruction survey for potentially occupied suitable habitat (and follow-up trapping) in areas where survey was not conducted in 2010</li> <li>c. Documentation that burrows, utilized habitat, and sign have been flagged for avoidance/provide map</li> <li>d. Biologist recommendations to minimize areas that cannot be avoided submitted to CPUC</li> <li>e. Prepare report and submit to CPUC</li> </ul>	<ul style="list-style-type: none"> <li>a. At least two weeks prior to construction</li> <li>b. At least two weeks prior to construction</li> <li>c. Prior to construction</li> <li>d. Prior to construction</li> <li>e. Prior to construction</li> <li>f. During construction</li> </ul>	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			impacts to the existing Stephen's kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to project work area for complete avoidance of Stephen's kangaroo rat occupied habitat; or (2) placement of dirt piles or sediment to avoid occupied burrows. Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to the CPUC.	f. CPUC monitor: Line item in compliance monitoring report		
Construction of the proposed project could impact vernal pools.	BIO-7		<p>Prior to construction, qualified biologists approved by the California Public Utilities Commission shall flag all vernal pools (marginal or otherwise) and associated existing connectivity within the project footprint (water entering area during rain events) for avoidance during the proposed construction activities. Rain events are defined as "a precipitation event of 0.5 inch or greater."</p> <p>If work is conducted during the rainy season (October 1 through May 1), before scheduling project activity in areas flagged as vernal pools, the weather forecast will be monitored. Work will not be scheduled in these areas if a greater than 40% chance of a rain event (as defined above) is forecasted during the time needed to complete project activities. If a rain event unexpectedly occurs during project activity, the site will be secured with appropriate best management practices as identified in APM HYD-1. Construction travel along public access roads where the road rut</p>	<p>a. Biologist qualifications</p> <p>b. Documentation identifying the survey methods, locations of vernal pools, and construction footprint</p> <p>c. Documentation of flagged vernal pools for avoidance</p> <p>d. Documentation of weather monitoring prior to flagging vernal pools</p> <p>e. Documentation of work schedule that correlates with weather conditions in vernal pool areas</p> <p>f. Documentation of BMP implementation during rain events during project activity</p>	<p>a. At least two prior to construction</p> <p>b. Prior to construction</p> <p>c. Prior to construction</p> <p>d. During construction</p> <p>e. During construction</p> <p>f. During construction</p> <p>g. During construction</p>	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components during construction</p>

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			vernal pools have been identified will be flagged or otherwise marked prior to construction for minimal impact to these locations. Project related traffic in these areas will be kept to the minimum required to implement the project.	g. CPUC monitor: Line items in compliance monitoring report		
<b>Cultural Resources</b>						
Construction of the proposed project could affect known cultural resources.		APM-CUL-1	SDG&E's practices are in accordance with Federal, State, and local laws to protect and avoid cultural resources, including: Archaeological Resources Protection Act of 1979, as amended, National Historic Preservation Act of 1966, as amended (NHPA), California Penal Code 622 ½, PRC 5097.1 through 5097.6, PRC 5097.98, and CEQA. An independent Cultural Resource Management firm conducted pre-construction surveys under contract with SDG&E, prepared an inventory of cultural resources within the proposed project's Area of Potential Effect, and provided recommendations for avoidance and minimization to assist SDG&E in its compliance with CEQA requirements. SDG&E's Principal Cultural Resources Specialist worked closely with SDG&E design and engineering to move several of the poles during the design phase of the proposed project to avoid impacts to known cultural resources. Known cultural resources will be spanned or otherwise avoided through project design and through routing during construction activities to the extent feasible. In addition, the micropile pole type will be	<ul style="list-style-type: none"> <li>a. Provide documentation verifying commitments have been incorporated into the construction contracts.</li> <li>b. Implementation of avoidance measures through spanning and use of micropile techniques</li> <li>c. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> <li>c. Prior to and during construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			used at many locations during construction to minimize ground disturbance and decrease potential impacts to unknown buried deposits.			
Construction of the proposed project could affect cultural resources.		APM-CUL-2	<b>Cultural resources sensitivity training.</b> Prior to construction or ground-disturbing activities, all SDG&E, contractor, and subcontractor project personnel will receive training regarding the appropriate work practices necessary to effectively implement the project design features and ordinary construction restrictions relating to cultural resources, including the potential for exposing subsurface cultural resources and paleontological resources. This training will include presentation of the procedures to be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains, as well as of paleontological resources. Known archaeological sites would be demarcated by a qualified archaeologist as Environmentally Sensitive Areas prior to the start of construction. Construction crews would be instructed to avoid disturbance of these areas.	<ul style="list-style-type: none"> <li>a. Develop a cultural and paleontological resources sensitivity training program for all personnel working on project site</li> <li>b. Provide cultural and paleontological resources sensitive training material for review and approval.</li> <li>c. Provided weekly record of trained personnel and training session log maintained and kept on site with construction lead.</li> <li>d. Provide a map identifying all environmentally sensitive areas that will be flagged in the field and avoided during construction</li> <li>e. CPUC monitors. Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction.</li> <li>b. Prior to issuance of an NTP</li> <li>c. During construction.</li> <li>d. Prior to issuance of an NTP</li> <li>e. Prior to and during construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components.
Construction of the proposed project could		APM-CUL-3	<b>Archaeological monitoring.</b> A qualified archaeologist will attend preconstruction meetings, as needed, and a qualified	<ul style="list-style-type: none"> <li>a. Archaeologist qualifications</li> </ul>	<ul style="list-style-type: none"> <li>a. At least two prior to construction</li> </ul>	SDG&E and CPUC  *Applicable to all

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
affect archaeological resources.			archaeological monitor will monitor activities in the vicinity of all known cultural resources within the proposed project area. The requirements for archaeological monitoring will be noted on the construction plans. The archaeologist's duties will include monitoring, evaluation of any finds, analysis of materials, and preparation of a monitoring results report conforming to Archaeological Resource Management Reports guidelines.	<ul style="list-style-type: none"> <li>b. Record of trained personnel and training session log</li> <li>c. Report of monitoring activities, recorded daily</li> <li>d. Prepare report conforming to Archaeological Resource Management Reports guidelines.</li> <li>e. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>b. Prior to and during construction</li> <li>c. During construction</li> <li>d. During construction</li> <li>e. Prior to and during construction</li> </ul>	project components
Construction of the proposed project could affect undiscovered human remains.		APM-CUL-5	<b>Unanticipated discovery of human remains.</b> If human remains are encountered during construction, SDG&E will comply with California State law (Health and Safety Code Section 7050.5; PRC Sections 5097.94, 5097.98 and 5097.99). This law specifies that work will stop immediately in any areas where human remains or suspected human remains are encountered. The appropriate agency and SDG&E will be notified of any such discovery. SDG&E will contact the Office of the Medical Examiner. The Medical Examiner has two working days to examine the remains after being notified by SDG&E. Under some circumstances, a determination may be made without direct input from the Medical Examiner. When the remains are determined to be Native American, the Medical Examiner has 24 hours to notify the Native American	<ul style="list-style-type: none"> <li>a. Notification to CPUC of potential discovery and stop work (email)</li> <li>b. Documentation of notification of Medical Examiner within 24 hours of discovery (email)</li> <li>c. Documentation of the Medical Examiner's examination (email)</li> <li>d. If remains determined to be Native American, documentation of notification of Native American Heritage Commission (NAHC)</li> <li>e. NAHC to notify most likely decedent (MLD) within 24 hours -</li> </ul>	<ul style="list-style-type: none"> <li>a. Within 1 hour of potential discovery</li> <li>b. Immediately upon notification</li> <li>c. Immediately upon receipt of findings from Medical Examiner</li> <li>d. <i>(d through f)</i> - Immediately upon notification</li> <li>g. During construction</li> </ul>	SDG&E, CPUC, Medical Examiner, MLD, and NAHC  *Applicable to all project components during construction

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			Heritage Commission (NAHC). The NAHC will immediately notify the identified most likely descendant (MLD) and the MLD has 24 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the remains and grave goods. If the MLD does not make recommendations within 24 hours, the area of the property must be secured from further disturbance. If there are disputes between the landowner and the nearest likely descendants, the NAHC will mediate the dispute to attempt to find a resolution. If mediation fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall re-inter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.	<ul style="list-style-type: none"> <li>notification provided to CPUC (email)</li> <li>f. Notification of MLD recommendation (made within 24 hours) for treatment of remains and grave goods.</li> <li>g. CPUC monitor: Line item in compliance monitoring report</li> </ul>		
Construction of the proposed project could affect paleontological resources.		APM-CUL-6	<b>Paleontological monitoring.</b> A paleontological monitor will work under the direction of a qualified project paleontologist and will be on site to observe excavation operations that involve the original cutting of previously undisturbed deposits for the eight poles located within paleontologically sensitive formations (i.e., Pomerado Conglomerate, Late Pleistocene to Holocene-age channel deposits). A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.	<ul style="list-style-type: none"> <li>a. Paleontologist qualifications</li> <li>b. Provide map indicating where paleontological monitoring will be required.</li> <li>c. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least two weeks prior to construction</li> <li>b. At least one week prior to issuance of NTP</li> <li>c. During construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components during construction

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could affect undiscovered paleontological resources and fossils.		APM-CUL-7	<b>Unanticipated discovery of fossils.</b> In the event that fossils are encountered, the paleontological monitor would have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely fashion. The paleontologist would contact SDG&E's Cultural Resource Specialist and Environmental Project Manager at the time of discovery. The paleontologist, in consultation with SDG&E's Cultural Resource Specialist, would determine the significance of the discovered resources. SDG&E's Cultural Resource Specialist and Environmental Project Manager would have to concur with the evaluation procedures to be performed before construction activities would be allowed to resume. Because of the potential for recovery of small fossil remains, it may be necessary to set up a screen-washing operation on site. If fossils are discovered, the paleontologist (or paleontological monitor) would recover them along with pertinent stratigraphic data. In most cases, this fossil salvage can be completed in a short period of time. Because of the potential for recovery of small fossil remains, such as isolated mammal teeth, recovery of bulk sedimentary-matrix samples for off-site wet screening from specific strata may be necessary, as determined in the field. Fossil remains collected during monitoring and salvage would be cleaned, repaired, sorted,	<ul style="list-style-type: none"> <li>a. Paleontologist qualifications</li> <li>b. Notification provided that identifies the process that will be implemented to address the unanticipated discovery.</li> <li>c. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least two weeks prior to construction</li> <li>b. Within 24 hours of an unanticipated discovery</li> <li>c. During construction</li> </ul>	<p>SDG&amp;E and CPUC</p> <p>*Applicable to all project components during construction</p>

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			cataloged, and deposited in a scientific institution with permanent paleontological collections, and a paleontological monitoring report would be written.			
Construction of the proposed project could affect undiscovered cultural resources.	CUL-1		During construction of the proposed project, all Avoidance Measures as identified in Table 4 of the project-specific cultural resources report conducted by ASM (ASM 2012) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission. Avoidance Measures as listed in Table 4 of the report include retention of a cultural resources monitor during pole relocation work; establishment of Environmentally Sensitive Areas (ESAs) where sensitive resources are present in the vicinity of work sites; and avoiding sensitive bedrock, historical features, or other identified features within established ESAs.	<ul style="list-style-type: none"> <li>a. Documentation indicating completion of all measures listed on Table 4 of the cultural resources report prepared by ASM.</li> <li>b. Provide map identifying all environmentally sensitive areas to be flagged and avoided during construction</li> <li>c. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. Prior to issuance of an NTP</li> <li>c. Prior to and during construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components during construction
Construction of the proposed project could affect undiscovered cultural resources.	CUL-2		Prior to commencement of construction associated with the Santa Ysabel Staging Yard, an Environmentally Sensitive Area (ESA) shall be established around the existing resource by the retained cultural monitor. Fencing shall be erected to demarcate the ESA to minimize the potential for impacts during construction.	<ul style="list-style-type: none"> <li>a. Documentation indicating fencing has been erected and is being maintained to demarcate the ESA.</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to commencement and during construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  *Applicable to Santa Ysabel Staging Yard during construction
Construction of the proposed project could affect undiscovered cultural	CUL-3		Where access roads traverse or are located near cultural resource sites as identified in the cultural resources report conducted by ASM (ASM 2012), vehicles shall be required to remain within existing access roads. No road grading shall be	<ul style="list-style-type: none"> <li>a. Provide map indicating sensitive areas identified in ASM cultural report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  *Applicable to all access roads that traverse or are near

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
resources.			allowed within identified cultural resource site boundaries.	b. CPUC monitor: Line item in compliance monitoring reports		cultural resources sites during construction
Construction of the proposed project could affect undiscovered cultural resources.	CUL-4		<p>In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or human bones, all work within 50 feet of the resources shall be halted, and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of San Diego Gas &amp; Electric (SDG&amp;E), California Public Utilities Commission (CPUC), and the qualified archaeologist shall confer to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curation, as necessary; and a report prepared by a specialist according to current professional standards.</p> <p>In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to historical resources or unique archaeological resources, the CPUC and SDG&amp;E shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures</p>	<p>a. Stop work upon discovery to ensure avoidance of significant resources</p> <p>b. Notification to CPUC of stop work (email)</p> <p>c. Record of evaluation, determination of significance, avoidance measures or other appropriate mitigation</p> <p>d. CPUC monitor: Line item in compliance monitoring report</p>	<p>a. Immediately within 50 feet of the resources</p> <p>b. Immediately upon discovery</p> <p>c. Within 3 weeks of find</p> <p>d. During construction</p>	<p>SDG&amp;E and CPUC</p> <p>*Applicable to all project components during construction</p>

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<p>(e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out. If the CPUC, in consultation with the qualified archaeologist, determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, SDG&amp;E will:</p> <ul style="list-style-type: none"> <li>a. Attempt to redesign the project to avoid any adverse effect on the significant archaeological resources.</li> <li>b. If the circumstances warrant an Archaeological Data Recovery Program (ADRP), such a program shall be conducted. The project archaeologist and the CPUC shall confer and consult to determine the scope of the ADRP. The archaeologist shall prepare a draft ADRP that shall be submitted to the CPUC for review and approval. The ADRP shall identify how the proposed ADRP would preserve the significant information the archaeological resource is expected to contain. That is, the ADRP shall identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to portions of the archaeological resource that</li> </ul>			

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			could be adversely affected by the proposed project. Destructive analytical methods shall not be applied to cultural materials if nondestructive methods are practical.			
<b>Geology and Soils</b>						
Construction of the proposed project could expose people or structures to potential substantial adverse seismic effects and the proposed project would be located on unstable and expansive soils.		APM-GEO-1	<b>Project plans and specifications take into account the potential for mass wasting and liquefaction.</b> A geotechnical study was conducted by VO Engineering Inc. in 2011 to evaluate the pole locations along the proposed project power line route for the presence of geologic hazards. The geotechnical study indicated the presence of geologic conditions potentially susceptible to mass wasting or liquefaction at the locations of proposed Pole Nos. P103, R107, P110, P114, P129, P22, P23, P48, P49, and P51. The final project plans and specifications prepared by the responsible engineer have taken into account the geologic hazard conditions present at these locations and include appropriate engineering design and construction measures to minimize the potential for damage to proposed project structures in the event that there is an occurrence of these hazards.	<ul style="list-style-type: none"> <li>a. Geotechnical investigation reports</li> <li>b. CPUC monitor: Line item in compliance monitoring reports</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. Prior to construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components (as identified by the geotechnical study)
Construction of the proposed project could result in erosion impacts.		APM-GEO-2	<b>Soil stabilization.</b> Once temporary surface disturbances are complete, areas that would not be subject to additional disturbance will be stabilized to control soil erosion.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC  *Applicable to all project components during construction

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<b>Table 6-1: Mitigation Monitoring Program Table</b>						
Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
<b>Hazards and Hazardous Materials</b>						
Construction of the proposed project could result in wildland fire impacts.		APM-HAZ-1	<b>Steel structures.</b> New structures are designed utilizing steel to avoid potential adverse effects relating to fire and fire damage.	a. Provide designs illustrating pole structures	a. Prior to construction	SDG&E and CPUC  *Applicable to all project components
Construction of the proposed project could result in wildland fire impacts.		APM-HAZ-2	<b>TL 637 Project Fire Plan.</b> The purpose of the proposed project is to improve the reliability of the power lines in fire-prone (very high to extreme fire threat areas) and wind-prone areas and minimize the risks associated with future wildfires. The proposed project is located within the Very High fire threat designation, as indicated on SDG&E's 2012 Fire Threat Zone Map. The proposed project design includes fire-hardening techniques, including replacing wood poles with steel poles, increasing conductor spacing to maximize line clearances, installing steel poles designed to withstand an extreme wind-loading case and known local conditions, and installing longer polymer insulators. These design components of the proposed project minimize fire risk through enhanced safety and reliability of the power line system during extreme weather conditions. In addition to these design features, the proposed project will implement the TL 637 Project Fire Plan. The TL 637 Project Fire Plan exceeds fire prevention measures as stated in California Forestry Practice Rules, PRC 4:6. Avoidance and minimization	a. Fire Plan (includes training, oversight, work controls, suppression methods, personnel)  b. CPUC monitor: Line item in compliance monitoring report	a. Prior to construction  b. During construction	SDG&E and CPUC  *Applicable to all project components during construction

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			measures to prevent wildland fires include training, oversight, and work controls in all phases of preparation and implementation of the proposed project. Training and briefings in fire prevention and suppression methods are key components of reducing the threat of a wildland fire on the proposed project. Additionally, suppression in the event of a fire starting will be facilitated by locating water tanks within two minutes of a work site, requiring firefighting equipment within 50 feet of any work/equipment site, and avoidance of construction activities during periods of declared Red Flag Warnings or other severe fire weather conditions as identified by SDG&E. Other avoidance and minimization measures may be employed, such as standby firefighters and fire engines. In addition, portions of the proposed project occurring within the Cleveland National Forest must abide by the Cleveland National Forest Fire Plan. The plan describes the project activity level (PAL) work restriction measures to employ while working on forest lands. Therefore, the proposed project design and construction avoidance and minimization measures will avoid and minimize fire risks as outlined in the TL 637 Project Fire Plan and the Cleveland National Forest Fire Plan.			
Construction of the proposed project could result in		APM-HAZ-3	<b>Electric Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety.</b> The proposed project will be constructed consistent with Electric	a. Project design and documentation that project design meets Electric Standard	a. Prior to construction b. During construction	SDG&E and CPUC  *Applicable to all

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
wildland fire impacts.			Standard Practice 113.1 – Wildland Fire Prevention and Fire Safety. Electric Standard Practice 113.1 outlines practices and procedures for SDG&E activities occurring within areas of potential wildland fire threat within SDG&E's service territory. The proposed project design includes replacement of wood poles with steel poles, increased conductor spacing to maximize line clearances, installation of steel poles to withstand an extreme wind-loading case and known local conditions, and undergrounding of a portion of the power line. These design components of the proposed project minimize the fire risk through enhanced safety and reliability of the power line system, particularly during extreme weather conditions. The standard practices in Electrical Standard Practice 113.1 include avoidance and minimization measures to comply with state and local fire ordinances.	Practice 113.1  b. CPUC monitor: Line item in compliance monitoring report		project components
Construction of the proposed project could result in safety hazards to recreational trail users.		APM-HAZ-4	<b>Coordination and measures within parks and preserves.</b> Appropriate safety measures will be implemented where trails and construction areas are near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ to provide a safety buffer between recreational users and construction areas. Construction schedule and activities will be coordinated with the authorized officer for the recreation area.	a. Documentation of coordination with authorized officer for the recreation area regarding construction schedule and activities.  b. Implement safety buffers and measures  c. CPUC monitor: Line item in compliance monitoring report	a. Prior to and during construction b. During construction c. During construction	SDG&E, CPUC, and authorized officer of recreation area  *Applicable to components of the project where trails and construction areas are near each other within the Simon Preserve, Mt. Gower Preserve, and the Mt. Gower HLZ

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through accident conditions involving the release of hazardous material.	HAZ-1		Prior to construction, all San Diego Gas & Electric, contractor, and subcontractor project personnel would receive training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures. A sign-in sheet of contractor and subcontractor project personnel who have received training shall be provided to California Public Utilities Commission on a weekly basis as indicated in MM BIO-2.	<ul style="list-style-type: none"> <li>a. Conduct training program including content in mitigation measure</li> <li>b. Provide documentation (sign-in sheet) of contractor and subcontractor training to the CPUC</li> </ul>	<ul style="list-style-type: none"> <li>a. During construction</li> <li>b. Prior to construction; weekly during construction</li> </ul>	SDG&E  *Applicable to all project components
Construction of the proposed project could result in hazardous substance spills during transport, use or disposal, and construction could create a significant hazard to the public through	HAZ-2		During construction, construction best management practices (BMPs) shall be implemented to prevent impacts from release of hazardous materials during construction activities. Typical BMPs could include, but would not be limited to, construction practices such as the use of absorbent pads for spill containment, specified locations for construction vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible.	<ul style="list-style-type: none"> <li>a. Implement BMPs as defined in mitigation measure and as further defined in the Storm Water Pollution Prevention Plan (SWPPP)</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. During construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  *Applicable to all project components

<sup>(a)</sup> All compliance documentation and consultation records to be available for CPUC staff review upon request.

**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
accident conditions involving the release of hazardous material.						
Construction of the proposed project could result in hazard impacts during blasting activities.	HAZ-3		<p>In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions:</p> <ul style="list-style-type: none"> <li>The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas &amp; Electric (SDG&amp;E) or SDG&amp;E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.</li> </ul>	<ol style="list-style-type: none"> <li>a. Prepare and provide a noise and vibration calculation for CPUC and County of San Diego review if rock blasting is used during construction</li> <li>b. Pre-blast survey</li> <li>c. CPUC and County to review calculations/pre-blast survey</li> <li>d. Documentation that measures have been incorporated into construction contractor scope</li> <li>e. Final blasting plan that meets conditions in the mitigation measure</li> <li>f. CPUC and County to review final blasting plan</li> <li>g. CPUC monitor: Line item in compliance monitoring report</li> </ol>	<ol style="list-style-type: none"> <li>a. Prior to blasting activities</li> <li>b. Prior to blasting activities</li> <li>c. Prior to blasting activities</li> <li>d. Prior to blasting activities</li> <li>e. Prior to blasting activities</li> <li>f. Prior to blasting activities during construction</li> <li>g. Prior to blasting activities during construction</li> </ol>	<p>SDG&amp;E, CPUC, and County of San Diego</p> <p>*Applicable to all project components</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			<ul style="list-style-type: none"> <li>The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</li> <li>The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.</li> </ul>			
Construction of the proposed project could result in a safety hazard near an airport.	HAZ-4		Prior to flight operations for helicopter use during construction, San Diego Gas & Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration regulations regarding helicopter use to prevent conflict with air traffic generated by the Ramona	a. Documentation showing coordination with local air traffic control and compliance with all applicable FAA regulations	a. Prior to use of helicopters for construction activities b. During construction	SDG&E, CPUC, local air traffic control  *Applicable to all project components

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			Airport. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction activities.	b. CPUC Monitor: Line item in compliance monitoring report		
Construction of the proposed project could result in a safety hazard near an airport.	HAZ-5		Prior to flight operations for helicopter use during construction, a Helicopter Lift Plan shall be prepared if required pursuant to Federal Aviation Administration regulations. The Helicopter Lift Plan shall be submitted to the California Public Utilities Commission for review and approval.	a. Helicopter Lift Plan b. CPUC to review and approve Helicopter Lift Plan c. CPUC Monitor: Line item in compliance monitoring report	a. Prior to construction-related flight operations b. Prior to construction-related flight operations c. During construction	SDG&E and CPUC
<b>Hydrology and Water Quality</b>						
		APM-HYD-1	<b>SDG&amp;E Water Quality Construction BMPs Manual.</b> SDG&E's Water Quality Construction BMPs Manual (BMP Manual) was created to organize SDG&E's standard water quality protection procedures for various specific actions that routinely occur as part of SDG&E's ongoing construction, operations, and maintenance activities. The primary focus of most BMPs is the reduction and/or elimination of water quality impacts during construction of linear projects such as the proposed project. The BMPs described within the BMP Manual were derived from several sources, including the State of California guidelines as well as the Caltrans Water Quality BMPs.  The BMP Manual will be utilized during construction (by way of preparation and implementation of the SWPPP), operation, and maintenance of the proposed project to	a. Implement measure as defined and incorporate commitments into construction contracts	a. Prior to and during construction	SDG&E, CPUC  *Applicable to grading activities at all project components during construction

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**Table 6-1: Mitigation Monitoring Program Table**

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
			ensure compliance with all relevant SDG&E and government-mandated water quality standards.			
Construction of the proposed project could cause erosion impacts resulting in a violation of water quality standards or waste discharge requirements.	HYD-1		<p>During routine operation and maintenance activities, if erosion is discovered along the proposed project alignment that would affect a surface water feature, including but not limited to a wet meadow, stream, channel or any other surface water body, San Diego Gas &amp; Electric shall implement erosion control measures including but not limited to:</p> <ul style="list-style-type: none"> <li>• Periodic inspection and maintenance, including cleaning dips and cross-drains, repairing non-jurisdictional ditches, marking culvert inlets to aid in location, and clearing debris from culverts.</li> <li>• Avoid using roads during wet periods if such use would damage road drainage features.</li> <li>• Grade road surfaces only as often as necessary to maintain a stable running surface and to retain the original surface drainage.</li> <li>• Place all excess material removed by maintenance operations in safe disposal sites and stabilize these sites to prevent erosion. Avoid locations where erosion will carry materials into a stream.</li> </ul>	Commitments to be incorporated into operational and maintenance contracts	Prior to operations	<p>SDG&amp;E and CPUC</p> <p>* Applicable to all project components</p>

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements due to herbicide application.	HYD-2		Herbicides shall not be applied within 100 feet of a surface water feature, including but not limited to a wet meadow, stream, channel, or any other surface water body.	<ul style="list-style-type: none"> <li>a. Commitments to be incorporated into construction and operational and maintenance contracts</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. During construction and operation</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  * Applicable to all project components
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.	HYD-3		During pole repair work, mowing or trimming of vegetation shall be conducted to ensure that ground disturbance is minimized. Vegetation clearing shall be avoided where feasible. In the unlikely event that vegetation clearing or minor grading is required during operation and maintenance activities, San Diego Gas & Electric shall establish a temporary work site where work is to be conducted. Any topsoil or vegetation removed during this process shall be stored, and redistributed over the temporary work site when maintenance activities are completed, unless clearance is required around the poles.	Commitments to be incorporated into operational and maintenance contracts	Prior to operations	SDG&E and CPUC  * Applicable to all project components

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<b>Table 6-1: Mitigation Monitoring Program Table</b>						
<b>Impact</b>	<b>MM</b>	<b>APM No.</b>	<b>Mitigation Measure/ Applicant Proposed Measure</b>	<b>Compliance Documentation<sup>(a)</sup> and Consultation</b>	<b>Timing</b>	<b>Responsible Party and Project Components</b>
Construction of the proposed project could result in a violation of water quality standards or waste discharge requirements.	HYD-4		San Diego Gas & Electric shall implement the terms and conditions as specified in the Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Certification (Certification No. 11C-114; May 16, 2012), which identifies the poles to remain in place and those to be relocated outside jurisdictional areas.	<ul style="list-style-type: none"> <li>a. Provide a list of poles to remain in place and those to be relocated outside of jurisdictional areas</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to construction</li> <li>b. During construction</li> </ul>	SDG&E and CPUC  * Applicable to all project components
<b>Noise</b>						
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.		APM-NOI-1	<b>Generators.</b> Generator use will be limited to less than 50 horsepower (HP) at all staging yards. Any generators used at the staging yards will be located away from noise sensitive areas, and positioned on the property to comply with the San Diego County noise ordinance.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC  * Applicable to all project components
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.		APM-NOI-2	<b>Mufflers.</b> Functioning mufflers will be maintained on all equipment.	CPUC monitor: Line item in compliance monitoring report	During construction	SDG&E and CPUC  * Applicable to all project components

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.		APM-NOI-3	<b>Resident notification.</b> Residents within 50 feet will receive notification of the start of construction at least one week prior to the start of construction activities within that area.	<ul style="list-style-type: none"> <li>a. Record of property owner notification</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least 1 week prior to construction</li> <li>b. Prior and/or during construction</li> </ul>	SDG&E and CPUC  * Applicable to property owners within 50 feet of all project components
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.	NOI-1		At least 30 days before helicopter use and stringing operations are employed San Diego Gas & Electric (SDG&E) shall prepare and submit a public notice mailer to the California Public Utilities Commission for approval. The public notice mailer shall be prepared and mailed no less than 7 days prior to helicopter use and stringing operations along the proposed project alignment, SDG&E shall notify landowners, livestock facility owners, and residents within 50 feet of construction to provide adequate notice of potential helicopter and/or stringing activity within the project vicinity. If construction is delayed for more than 7 days, an additional notice shall be mailed to discuss the status and schedule of helicopter use and stringing operations.	<ul style="list-style-type: none"> <li>a. Provide public notice mailer</li> <li>b. Mail notice to public</li> <li>c. CPUC monitor: Line in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. At least 30 days prior to helicopter use and stringing operations</li> <li>b. At least 7 days prior to helicopter use and stringing operations</li> <li>c. During construction</li> </ul>	SDG&E and CPUC  * Applicable to all property owners within 50 feet of construction.
Construction of the proposed project could generate noise levels in excess	NOI-2		In the event noise levels during construction activities are expected to exceed an 8- hour Leq of 75 dBA at the nearest property line or within 50 feet of the existing and proposed project alignment	<ul style="list-style-type: none"> <li>a. Monitor noise where noise sensitive areas are located</li> <li>b. Documentation of noise levels</li> </ul>	<ul style="list-style-type: none"> <li>a. During construction</li> <li>b. During construction</li> <li>c. During construction</li> </ul>	SDG&E and CPUC  * Applicable to noise sensitive areas within 50 feet of

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of established standards and/or temporary or periodic increases in noise levels.			where noise sensitive areas are located, San Diego Gas & Electric (SDG&E) shall implement noise reduction measures to reduce noise levels below 75 dBA. Measures to be implemented could include: (1) portable noise barriers erected temporarily to reduce noise impacts at specific locations; or 2) if noise barriers would not reduce levels to below 75 dBA, depending on the location of residences and the level of construction noise, SDG&E shall offer to relocate affected residents.	c. CPUC monitor: Line item in compliance monitoring report		construction.
Construction of the proposed project could generate noise levels in excess of established standards and/or temporary or periodic increases in noise levels.	NOI-3		In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities.	a. Prepare noise and vibration calculation for rock blasting activities b. CPUC monitor: Line item in compliance monitoring report	a. Prior to rock blasting activities and in effect throughout construction b. During construction	SDG&E and CPUC  * Applicable to all project components
<b>Recreation</b>						
Construction of the proposed project could result in temporary impacts to recreational trails.		APM-REC-1	<b>Temporary trail detours.</b> Where feasible, temporary detours will be provided for trail users. Signs will be provided to direct trail users to the temporary trail detours.	a. Signage for temporary detours b. CPUC monitor: Line item in compliance monitoring report	a. During construction b. During construction	SDG&E and CPUC  * Applicable to all project components

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Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Compliance Documentation <sup>(a)</sup> and Consultation	Timing	Responsible Party and Project Components
<b>Transportation/Traffic</b>						
Project implementation could result in a conflict with an applicable traffic plan, ordinance, or policy.		APM-TRA-1	<b>Standard Traffic Control Procedures.</b> SDG&E will implement a traffic control plan to address potential disruption of traffic circulation during construction activities and address any safety issues. The traffic control plan will be prepared by the project engineer or contractor and subject to approval by the County.	<ul style="list-style-type: none"> <li>a. Traffic control plan</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. Prior to and during construction</li> </ul>	SDG&E and CPUC .  * Applicable to all project components
Project implementation could result in a conflict with an applicable traffic plan, ordinance, or policy.		APM-TRA-2	<b>Encroachment permits.</b> SDG&E will obtain the required encroachment permits from Caltrans for work near Highways 78 and 79, and will ensure that proper safety measures are in place while construction work is occurring near public roadways. These safety measures include flagging, proper signage, and orange cones to alert the public to construction activities near the roadway.	<ul style="list-style-type: none"> <li>a. Documentation of coordination with the Caltrans and encroachment permit issuance</li> <li>b. CPUC monitor: Line item in compliance monitoring report</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to and during construction</li> <li>b. Prior to and during construction</li> </ul>	SDG&E and CPUC  * Applicable to project components near Highways 78 and 79

MM = Agency Mitigation Measure

APM = Applicant Proposed Measure

Note that SDG&E APMs-CUL-4, NOI-4 and NOI-5 were superseded by agency mitigation measures

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