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PROPOSED DECISION

Agenda ID #14847 (Rev. 1)
Ratesetting
5/26/2016 Item 13

Decision **PROPOSED DECISION OF ALJ YACKNIN** (Mailed 4/26/2016)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In The Matter of the Application of San Diego Gas & Electric Company (U902E) for a Permit to Construct Electrical Facilities: Cleveland National Forest Power Line Replacement Projects.	Application 12-10-009 (Filed October 17, 2012)

DECISION GRANTING PERMIT TO CONSTRUCT THE CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

Table of Contents

Title **Page**

DECISION GRANTING PERMIT TO CONSTRUCT THE CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS 1
Summary 2
1. Proposed Project – Description and Purpose 3
2. Permitting and Environmental Review Background 5
3. Procedural Background 7
4. Scope of Issues 9
5. Project Alternatives 13
6. Environmental Impacts 14
6.1. Proposed Project 15
6.2. Removal of TL626 from Service Alternative 15
6.3. Relocation of TL626 Alternatives 16
6.4. C157 Relocation Alternatives 16
6.5. C440 Partial Undergrounding Alternative 17
6.6. TL682 Partial Undergrounding Alternative 17
6.7. Partial Removal of Overland Access Roads Alternative 17
6.8. No Project Alternative 18
6.9. No Action Alternative 18
7. Environmentally Superior Alternative 18
8. Federal Preferred Alternative 19
9. Federal Records of Decision 21
10. Certification of the EIR 22
10.1. POC's Challenges to the EIR/EIS 23
10.1.1. Alleged Failure to Conduct Independent Analysis 23
10.1.2. Exclusion of Evidence 23
10.1.3. Substantial Evidence 24
10.2. CNFF/Backcountry's Challenges to the EIR/EIS 26
10.2.1. Rejection of Increased Vegetation Management Alternative 26
10.2.2. Rejection of No-Wire and Distributed Generation Alternatives 28
10.2.3. Rejection of Complete Undergrounding Alternative 28
10.2.4. Failure to Specifically Respond to Comment Regarding the Impact of Wildfire Temperatures on Steel Poles 29

Table of Contents
(Cont'd)

Title **Page**

10.2.5. Lack of Alternative That Would Avoid or Lessen Air Quality Impacts 29
11. Infeasibility of Environmentally Superior Alternative 30
12. Overriding Considerations 31
13. Electric and Magnetic Field 33
14. Comments on Proposed Decision 34
15. Assignment of Proceeding 35
Findings of Fact 35
Conclusions of Law 37
ORDER 38

ATTACHMENT - Mitigation Monitoring, Compliance, and Reporting Program

DECISION GRANTING PERMIT TO CONSTRUCT THE CLEVELAND NATIONAL FOREST POWER LINE REPLACEMENT PROJECTS

Summary

This decision grants San Diego Gas & Electric Company a permit to construct the Cleveland National Forest Power Line Replacement Projects, configured as San Diego Gas & Electric Company's proposed project with respect to TL625, TL629, TL6923, C79, C78, C442, and C449;[1] with the relocation of distribution line C157 out of wilderness (City of San Diego Modified Alignment); with additional undergrounding of C440 and TL682; with the removal of TL626 and its replacement with reconstruction of TL6931 and conversion of 13.3 miles of TL626 to 12 kilovolt; with the partial removal of overland access roads; and with the mitigation identified in the Mitigation Monitoring, Compliance, and Reporting Program attached to this order.[2] We find and certify that the Environmental Impact Report prepared for the project meets the requirements of the California Environmental Quality Act and that the project benefits of reducing the risk of wildfires and power outages caused by powerline failure and allowing San Diego Gas & Electric Company to obtain a Master Special Use Permit to continue operating its electric facilities within the Cleveland National Forest outweigh the project's significant and unavoidable effects on air quality during project construction.

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[1] "TL" denotes a transmission line, and "C" denotes a distribution line.

[2] The attached Mitigation Monitoring, Compliance and Reporting Program consolidates the individual programs with respect to each environmental impact contained in the Environmental Impact Report/Environmental Impact Statement.

1. Proposed Project – Description and Purpose

San Diego Gas & Electric Company (SDG&E) has applied to the U.S. Forest Service (Forest Service) for a Master Special Use Permit (MSUP) for electric facilities and certain ancillary and appurtenant facilities within the Cleveland National Forest. Currently, SDG&E is operating these facilities under temporary, one-year authorizations from the Forest Service. As part of the National Environmental Policy Act (NEPA) review process, the Forest Service determined that the MSUP review process should include the evaluation of additional fire risk reduction measures and additional undergrounding. Accordingly, SDG&E proposes the Cleveland National Forest Power Line Replacement Projects to replace or rebuild five 69 kilovolt (kV) power lines and six 12 kV distribution lines that are subject to the temporary permits and would be subject to the MSUP. The lines are located both within and outside the Cleveland National Forest and the various agencies involved in the review process have authority over different aspects or segments of the proposed project.

SDG&E seeks a Permit to Construct (PTC) from this Commission for reconstruction of the following 69 kV transmission lines:

- TL625 – approximately 22.5 miles, total (about 6.3 miles located within the Cleveland National Forest boundary and about 16.2 miles outside it); runs from Loveland Substation east to Barrett Tap, from Barrett Tap east to Descanso Substation, and from Barrett Tap south to Barrett Substation.
- TL626 – approximately 18.8 miles, total (about 7.9 miles located within the Cleveland National Forest boundary and about 10.9 miles outside it); runs from Santa Ysabel Substation south to Descanso Substation.
- TL629 – approximately 29.8 miles, total (about 9.1 miles located within the Cleveland National Forest boundary and about 20.7 miles located outside it); runs from Descanso

Substation east to Glencliff Substation, from Glencliff Substation southeast to Cameron Tap, from Cameron Tap south to Cameron Substation, and from Cameron Tap east to Crestwood Substation.

- TL682 – approximately 20.2 miles, total (about 1.3 miles located within the Cleveland National Forest boundary and about 18.9 miles outside it); runs from Rincon Substation east to Warners Substation.
- TL6923 – approximately 13.4 miles, total (about 2.4 miles located within the Cleveland National Forest boundary and about 11 miles outside it); runs from Barrett Substation east to Cameron Substation.

SDG&E lists four objectives of the 69 kV transmission line reconstruction: (1) increasing fire safety ("fire hardening") and service reliability; (2) obtaining the Commission approvals the Forest Service will require before issuing an MSUP; (3) ensuring the continued safe, reliable and cost-effective operations of electrical facilities through the Cleveland National Forest; and (4) minimizing potential environmental impacts by locating facilities within previously disturbed areas, where feasible.[3]

Service reliability improvements include electric infrastructure replacements to convert some single-circuit segments to double-circuit, as well as the fire hardening measures. Fire hardening largely consists of replacing existing wood poles with weathered-steel poles, typically on a one-to-one ratio. Approximately 1,392 wooden poles have been identified for replacement. Except where sensitive resources require a different siting, SDG&E proposes to place

[3] The Commission's environmental review identified the reduction of fire risk by fire-hardening electric facilities and the improvement of reliability of power delivery as the appropriate project objectives for the purposes of screening and assessing potential alternatives to SDG&E's proposed project. Both of these project objectives have safety implications for residents and visitors to the Cleveland National Forest and adjacent lands.

steel poles in line with conductors and within eight feet of existing wood poles. In addition, SDG&E proposes to underground approximately one-tenth mile of TL629E and to remove the corresponding poles at that location. The construction project also would include maintenance of approximately 31 miles of existing access roads and ancillary facilities required to operate and maintain the five 69 kV power lines. SDG&E estimates the cost of the proposed project to be approximately $418.5 million ($2012), based on preliminary engineering. (SDG&E Application, Appendix I.)

2. Permitting and Environmental Review Background

Pursuant to General Order (GO) 131-D, SDG&E may not proceed with construction of electric power line facilities which are designed for operation at voltage between 50 kV and 200 kV without the Commission having issued a permit to construct, which shall be granted upon the Commission's determination that the project complies with the California Environmental Quality Act (CEQA)[4] and with the Commission's policies requiring the use of low-cost and no-cost measures to mitigate electric and magnetic field (EMF) effects.

CEQA requires the lead agency (the Commission in this case) to conduct a review to identify the environmental impacts of the project, and ways to avoid or reduce environmental damage, for consideration in the determination of whether to approve the project, a project alternative, or no project. If (as is the case here) the initial study determines that the proposed project will have potentially significant effects, the lead agency shall prepare an Environmental Impact Report

[4] CEQA is codified at Public Res. Code § 21000, *et seq.*

(EIR) that identifies the environmental impacts of the proposed project and alternatives, designs a recommended mitigation program to reduce any significant impacts, and identifies, from an environmental perspective, the preferred project alternative. If the agency approves the project, it must require the environmentally superior alternative and identified mitigation measures, unless they are found to be infeasible. The lead agency may not approve a project that has significant and unavoidable environmental impacts unless it determines that there are overriding considerations that merit project approval despite its environmental impacts.

SDG&E also seeks authority to construct within the independent jurisdiction of several state and federal agencies. The Forest Service, the federal Bureau of Indian Affairs (BIA), the federal Bureau of Land Management (BLM), and California State Parks[5] have independent authority to approve segments of the project within their areas of jurisdiction. Federal approval is subject to environmental review pursuant to the NEPA. Similar to CEQA, NEPA requires the lead agency to prepare (in this instance) an environmental impact statement (EIS). The Forest Service is the lead agency under NEPA, and BIA and BLM are federal cooperating agencies under NEPA.

The Commission and the Forest Service, the two lead agencies, executed a memorandum of understanding to undertake joint environmental review and jointly prepare the EIR required by CEQA and the EIS required by NEPA.

[5] California State Parks is a responsible agency under CEQA.

3. Procedural Background

SDG&E filed the application and supporting documents on October 17, 2012. The Division of Ratepayer Advocates, now known as the Office of Ratepayer Advocates, timely filed a protest on November 26, 2012 and the SDG&E filed a reply on December 6, 2012.

On June 26, 2013, as instructed by the Commission, SDG&E filed the amended plan of development required by the Forest Service to study alternative routings for TL626.[6] SDG&E completed the revised plan of development in April 2013 and subsequently filed it in June 2013, together with the amendment to application. On August 7, 2013, the Commission's Energy Division deemed the application complete for purposes of proceeding with its environmental review.

Protect Our Communities Foundation (POC) timely filed a protest on July 26, 2013 and SDG&E filed a reply on August 8, 2013. At the February 10, 2014, prehearing conference (PHC), the Administrative Law Judge (ALJ) granted the oral motions for party status by Utility Consumers' Action Network (UCAN) and Cleveland National Forest Foundation (CNFF). Thereafter, the assigned

[6] One segment of TL626 within the Cleveland National Forest crosses the Inventoried Roadless Area in the vicinity of a proposed recommended Wilderness Land Use Zone. The Forest Service wants to relocate that segment and has required the development of potential, alternative routings. As directed by the Forest Service, the revised plan of development, which is part of SDG&E's Amendment to Application, includes a 3,000-foot preliminary study corridor for consideration of potential alternative routes for TL626. Another reason for the revised plan of development (and Amendment to Application) is that elsewhere in the Cleveland National Forest, the Forest Service wants to relocate a section of C157 (a 12 kV distribution line) out of the Hauser Wilderness and into the area between the Hauser and Pine Creek Wilderness areas. Removal/relocation of that line also will require restoration of the affected area consistent with wilderness objectives.

Commissioner issued a ruling to establish the scope and schedule, as required by Pub. Util. Code § 1701.1(b).

In September 2014, the Commission and the Forest Service released a draft of the joint EIR/EIS. At a second PHC on November 17, 2014, Backcountry Against Dumps (Backcountry) appeared and requested party status by oral motion, which Rule 1.4(a)(4) of the Commission's Rules of Practice and Procedure (Rules) authorizes. The ALJ granted Backcountry's motion, but expressly limited its participation to the established scope of this proceeding. On November 25, 2014, the assigned Commissioner issued an amended scoping memo to revise the schedule and, given continuing environmental review, to extend the statutory period for resolving this proceeding.

When release of the final environmental document was delayed, the ALJ suspended the schedule by email ruling on February 4, 2015. In early July 2015, the Commission and the Forest Service released the final EIR/EIS.

In a subsequent ruling on August 6, 2015, the ALJ set dates for SDG&E to file an amendment to its Magnetic Field Management Plan (Appendix F to the application) and for responses by other parties. SDG&E filed the amendment on August 10, 2015, and no responses to the amendment were filed.

In a second amended scoping memo, filed August 13, 2015, the assigned Commissioner set the remainder of the schedule and for good cause extended the statutory period for resolving this proceeding.

On August 18, POC, CNFF and Backcountry filed a motion to amend the scoping memo, which SDG&E opposed on August 21, 2015; by ruling dated September 17, 2015, the ALJ denied the motion.

Consistent with the schedule in the second amended scoping memo, SDG&E, POC, Backcountry, and CNFF served prepared direct testimony on

September 16, 2015, and SDG&E and POC served prepared rebuttal testimony on September 28, 2015.[7]

Evidentiary hearing was held on October 11, 2015, as scheduled. SDG&E, POC, UCAN and, jointly, CNFF and Backcountry (CNFF/Backcountry) filed concurrent opening briefs on November 2, 2015, and concurrent reply briefs on November 16, 2015.[8] The record of the proceeding was submitted for decision upon the issuance of the Forest Service's Record of Decision for the Cleveland National Forest Master Special Use Permit on March 15, 2016.

4. Scope of Issues

The assigned Commissioner's scoping memo determined the following issues to be within the scope of the proceeding.

1. Will the proposed project create significant environmental impacts?
2. Are there potentially feasible mitigation measures or project alternatives that will eliminate or lessen the significant environmental impacts?
3. As between the proposed project and identified project alternatives, which is environmentally superior?
4. Are the mitigation measures or project alternatives infeasible?

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[7] On September 18, 2015, SDG&E filed a motion to strike the prepared direct testimony of POC, Backcountry, and CNFF; Backcountry and CNFF filed responses in opposition on September 25, 2015, and POC filed a response in opposition on September 28, 2015. By ruling dated October 5, 2015, the ALJ granted the motions in their entirety with respect to Backcountry and CNFF, and granted the motion in part with respect to POC.

[8] In their opening brief, CNFF/Backcountry presented additional argument in support of reconsideration of the ALJ's October 5, 2015, striking their prepared testimony. By ruling dated December 3, 2015, the ALJ reversed in part the earlier ruling, and set evidentiary hearing to receive the unstricken evidence. By ruling dated January 4, 2016, the ALJ received that evidence as well as SDG&E's prepared rebuttal testimony to it, and removed the evidentiary hearing from calendar.

5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed Project or Project alternative?
6. Was the EIR completed in compliance with CEQA, did the Commission review and consider the EIR prior to approving the project or a project alternative, and does the EIR reflect the Commission's independent judgment?
7. Are the proposed project and/or project alternative designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures?

(Scoping Memo and Ruling, March 15, 2014, at 11-12.)

The scoping memo further determined that, as issue nos. 1, 2 and 3 are properly addressed in the course of the CEQA environmental review process and preparation of the EIR, the assigned ALJ would receive the final EIR/EIS (which would include comments on the draft EIR/EIS and responses to them) in evidence, and that no evidentiary hearings or further evidence is needed on these issues. The scoping memo contemplated the taking of evidence on issue nos. 4, 5 and 7, so long as it did not duplicate matters to be addressed in the EIR (i.e., issue nos. 1, 2, 3 and 6). The amended scoping memo and second amended scoping memo affirmed this scope and schedule.

POC, supported by UCAN, objects to the exclusion of the issues of project need and economic cost from the scope of the proceeding.[9] POC argues that

[9] By motion filed November 16, 2015, SDG&E moves to strike this argument from POC's and UCAN's opening briefs for being beyond the scope of issues in the scoping memo. The motion is denied. The argument is offered in challenge to the assigned Commissioner's scoping memo which sets the scope of issues, including issues upon which evidence may be taken. The Commission may review such rulings in determining the matter on its merits (see Rule 13.6(c)) and it is appropriate for parties to seek such review in their closing briefs.

those issues should be included because, notwithstanding the fact that GO 131-D specifies a more limited review for projects which are designed for operation at voltage between 50 kV and 200 kV, the Commission's justification for that "simpler" PTC process does not apply to this project. (POC opening brief, p.7.) Specifically, Decision (D.) 94-06-014, which adopted GO 131-D, states:

> "The CPCN [certificate of public convenience and necessity] permit procedure currently required for all transmission lines over 200 kV is unsuited for under-200-kV power lines and substations for several reasons: a large number of power lines and substations are built or upgraded each year, generally to meet distribution needs, and must be completed in a short time; under-200-kV power lines cover short distances compared to over-200-kV transmission lines, and substations involve relatively compact parcels of land; and, under-200-kV power lines use single poles and short-span lines, and do not present unique engineering or construction problems. Accordingly, under-200-kV lines impose little economic risks for ratepayers, and thus, absent the potential for environmental impacts and related CEQA obligations, would not otherwise trigger Commission pre-construction review." (1994 Cal. PUC LEXIS 453, *32; 55 CPUC 87, 101.)

POC asserts that, in contrast to this rationale, there is no evidence that this project "must be completed in a short time," the project is not designed to "cover short distances," SDG&E's proposed budget of $418 million does not "impose little economic risks for ratepayers," the project is not designed "to meet distribution needs," and the project does "present unique engineering or construction problems" as reflected in the EIR/EIS. POC argues that failing to consider the need for the project or project cost is a violation of the Commission's obligation under Sections 451 (requiring the Commission to assure utility rates are "just and reasonable") and 1005.5(a) (requiring the Commission to specify the maximum

cost of any project over $50 million for which the Commission issues a certificate to construct).

To be clear, D.94-06-014 did not adopt a "simpler" review process for projects between 50 kV and 200 kV than was previously required. To the contrary, prior to D.94-06-014 and the issuance of GO 131-D, the Commission did not require a utility to obtain *any* permit or certificate to construct projects designed to operate at or below 200 kV or require *any* review of such projects. D.94-06-014 implemented the PTC process for the express and exclusive purpose of subjecting projects between 50 kV and 200 kV (but not those below 50 kV), that were previously exempt from any review under GO 131-C, to environmental review pursuant to CEQA. D.94-06-014 does not revisit the Commission's determination that projects with operating voltages at or below 200 kV should be exempt from a review of project need or project cost pursuant to Section 1005.5, or create a new standard to deter mine when a project is eligible for exemption from such review.

POC argues that the Commission nevertheless has a duty to consider project need and cost pursuant to Sections 451 and 1005.5(a). This argument amounts to an improper collateral attack on the many Commission decisions approving the exemption of projects with operating voltages at or below 200 kV from such review.[10] As the Commission has explained:

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[10] CNFF/Backcountry cite to D.07-03-012 at 25 for the proposition that "the Commission may only reject the No Project Alternative as an '[un]desirable alternative to the proposed Project' if there is a demonstrated 'need' for the Project." (CNFF/Backcountry opening brief, p.7.) CNFF/Backcountry misstate the decision. The decision states that the No Project Alternative was not environmentally preferable to the mitigated proposed project in that matter, and continues that the No Project Alternative was "not a desirable alternative to the proposed Project" "because of the need both to enable California to meet the RPS as well as to assure the

Footnote continued on next page

> This 200 kV jurisdictional limitation was first stated in Decision (D.) 77301 issued June 3, 1970 when the original GO 131 was adopted. The 200 kV limitation was reaffirmed on February 10, 1976 when D.85446 was issued approving GO 131-A. On August 28, 1979, the Commission issued D.90700 and promulgated GO 131-B. Thus, the Commission on three occasions has considered and approved the 200 kV jurisdictional limitation [*13] contained now in GO 131-B.
>
> The time for appeal of any of the above decisions is past. In order to challenge the propriety of any of those decisions it was necessary to have filed a petition for rehearing within 30 days of the decision. (PU Code § 1731.) The filing of a petition for rehearing is a prerequisite for seeking judicial review of the Commission's action. (PU Code § 1731.) Although complaint may request that a prior proceeding, such as that adopting GO 131-B, be reopened, a collateral attack on a final decision of the Commission is improper. (PU Code § 1709.) H.B. is foreclosed from challenging GO 131-B at this time.
>
> D.8304090 (1983 Cal. PUC LEXIS 460, 12-13.)

5. Project Alternatives

An EIR must identify the significant adverse impacts of the proposed project, as well as a reasonable range of alternatives to a proposed project that feasibly attains most of the basic project objectives but avoids or substantially lessens any of the significant effects of the project. (CEQA Guidelines § 15126.6.)

The EIR/EIS fully evaluated the proposed project as well as 11 alternatives. These include five alternatives for relocating TL626, one alternative for removing and replacing TL626, two alternatives for partially relocating C157, an alternative for undergrounding additional portions of C440, an alternative for

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continuing reliability and safety of the transmission grid in Southern California as renewable power generation increases and SCE customer demands increase."

undergrounding portions of TL682, and an alternative for partially removing overland access roads.[11] In addition, the EIR/EIS fully evaluated the No Project Alternative required by CEQA, and the No Action Alternative required by NEPA.

The EIR/EIS considered 15 additional alternatives that were not carried forward for full analysis. These 15 alternatives included alternate routes, demand-side management options, undergrounding alternatives, alternate pole designs, and system alternatives including the consolidation and removal of facilities, a no-wires alternative, management and system maintenance oversight, and distributed generation. These 15 alternatives were eliminated from full analysis because, for example, they failed to meet most of the project objectives, failed to eliminate significant environmental impacts, and/or were determined to be technically infeasible.

6. Environmental Impacts

The EIR/EIS determined that the CEQA-required No Project Alternative is the only alternative that would not result in new environmental impacts. The EIR/EIS determined that the proposed project, the federal No Action Alternative,

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[11] Pursuant to NEPA, the federal permitting agencies may develop a proposed action modifying the applicant's proposed project. In this case, the Forest Service developed the proposed actions for relocating TL626 (five alternatives), rerouting C157 (two alternatives), and the additional undergrounding of C440. The Forest Service subsequently replaced the TL626 relocation alternatives in its federal proposed alternative with the TL626 removal alternative.

The BIA developed the proposed action for undergrounding TL682.

The BLM developed proposed actions for TL629, TL625, and TL6923. Those proposed actions would not modify the proposed project, and so their environmental effects would be identical to those for the proposed project.

and each of the fully analyzed alternatives would have environmental impacts in one or more resource areas under CEQA, as identified below.[12]

6.1. Proposed Project

SDG&E's proposed project would have significant and unavoidable impacts on visual resources (the Inaja scenic overlook), air quality (construction-related short-term emissions of VOC, NO_x, CO and PM_2 above criteria pollutant thresholds), water resources (erosion, etc., along certain segments attributable to slopes in excess of 25%) and land use (conflicts with wilderness). The proposed project would not have any other significant impacts that cannot be mitigated to a less than significant level with the mitigation measures identified in the Mitigation Monitoring, Compliance, and Reporting Plan.

6.2. Removal of TL626 from Service Alternative

The removal of TL626 from service alternative would remove TL626 out of areas that the Forest Service manages as high-value resource protection, and replace it with facilities that require a similar or reduced footprint within existing overhead electric utility right of ways (ROW). The alternative would reduce significant and unavoidable impacts on visual resources (scenic vista associated with the Inaja Scenic Overlook) and hydrology and water quality (erosion and water quality impacts in the Cedar Creek riparian area), without substantially increasing impacts to other issue areas. Thus, the removal of TL626 from service alternative would be environmentally superior to the proposed project.

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[12] Our discussion focusses on CEQA, unless NEPA yields a different result which we must acknowledge.

6.3. Relocation of TL626 Alternatives

Options 1, 2, 3 and 4 for relocating portions of TL626 would reduce the impacts to water resources to less than significant with mitigation, and Options 3 and 4 would avoid the unmitigable impacts to land use; however, all four options would create an additional significant and unavoidable impact to visual resources (visual prominence and contrast of new poles and power lines) and require mitigation to reduce the additional impacts to public health (aviation hazards), fire and fuels management (reduced firefighter effectiveness), cultural resources,[13] and land use (divide an established community)[14] to less than significant. Although Option 5 would reduce the impact to visual resources (scenic vista) to less than significant by relocating TL626 away from the Inaja Memorial Picnic Area, it would require mitigation to reduce the additional impacts to public health (aviation hazards) and fire and fuels management (reduced firefighter effectiveness). On balance, Option 5 for relocating TL626 would be environmentally superior to the proposed project, but not to the removal of TL626 from service.

6.4. C157 Relocation Alternatives

Options 1 and 2 for relocating C157 under the federal proposed action would eliminate the significant and unavoidable impacts to land use (wilderness). Although both options would likely cause significant impacts to biological resources (arroyo toad critical habitat and City of San Diego conservation lands), those impacts can be mitigated under Option 2 (termed the City of San Diego's Modified Alignment) by the addition of other mitigations.

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[13] Options 1 and 2 only.

[14] Options 1, 2 and 4 only.

Thus, Option 2 for relocating C157 would be environmentally superior to the proposed project.

6.5. C440 Partial Undergrounding Alternative

Undergrounding additional portions of C440 under the federal proposed action would reduce long-term impacts due to fire hazards and visual impacts, but would have greater short-term impacts due to the increased disturbance area required for construction. While this alternative is environmentally preferable under NEPA, it is not environmentally superior to the proposed project under CEQA because the proposed project's fire hazards and visual impacts are either less than significant or mitigated to less than significant, while the alternative would increase the significant air quality impacts.

6.6. TL682 Partial Undergrounding Alternative

The BIA's proposed action for TL682 would relocate a portion of the line and underground 1500 feet of it. While the relocation would reduce the proposed project's visual, recreational, fire, public safety, and land use impacts, those impacts are either less than significant or mitigated to less than significant. Accordingly, the BIA alternative is not environmentally superior to the proposed project because it would not reduce or avoid the proposed project's significant effects.

6.7. Partial Removal of Overland Access Roads Alternative

The partial removal of overland access roads alternative would remove or realign specified, problematic access roads within sensitive watersheds. This alternative would reduce significant and unavoidable impacts to hydrology and water quality (erosion and sedimentation) to less than significant with mitigation, without creating additional impacts. Thus, the partial removal of overland access roads is environmentally superior to the proposed project.

6.8. No Project Alternative

Under the No Project Alternative, the proposed project would not be constructed. The No Project Alternative assumes no change in existing operations, i.e., it presumes SDG&E would (and could) continue to operate the existing electrical facilities under limited extensions of the expired permits, and that no fire-hardening would occur and no reliability improvements would be made. The No Project Alternative represents the status quo and, consequently, would result in no environmental impacts over existing baseline conditions.

6.9. No Action Alternative

Under the No Action Alternative as well, the proposed project would not be constructed. However, it also assumes that the requested MSUP would not be issued and that the expired permits would terminate according to their terms, which require SDG&E to remove its electric facilities and access roads and to restore the site to its pre-existing conditions. In addition, the No Action Alternative assumes that SDG&E would be required to replace the existing electric facilities with new facilities located outside the Cleveland National Forest in order to continue to provide power to the area now served. Impacts resulting from the removal, restoration and replacement of existing facilities would be equal to or greater than those resulting from the proposed project.

7. Environmentally Superior Alternative

The EIR/EIS find that, as the only alternative that would not result in new environmental impacts, the No Project Alternative is the environmentally superior alternative under CEQA.

SDG&E argues that the No Project Alternative is not environmentally superior to the proposed project because it would result in continued land use impacts associated with the operation and management of the current facilities,

and because failure to implement the proposed fire-hardening measures would result in potentially greater fire safety and service reliability impacts. SDG&E is incorrect. The No Project Alternative would not cause these impacts to increase over existing conditions, which is the appropriate measure of an alternative's environmental impacts. (See CEQA Guidelines § 15126.6(e)(1).)

CEQA Guidelines § 15126(d)(2) stipulates that, "if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Based on the comparison of the environmental impacts of the alternatives as summarized above, the EIR/EIS identifies the environmentally superior alternative other than the No Project Alternative as SDG&E's proposed project with respect to TL682, TL625, TL629, TL6923, C79, C78, C442, C440 and C449; Option 2 for relocating C157; the partial removal of overland access roads; and the removal and replacement of TL626 (including the conversion of 13 miles of TL626 to 12 kV); including all applicable mitigation measures specified in the Mitigation Monitoring, Compliance, and Reporting Plan. This alternative would avoid the proposed project's impacts to visual resources, water resources, and land use, and would not have any other significant impacts that cannot be mitigated to a less than significant level with the mitigation measures identified in the MMCRP.

8. Federal Preferred Alternative

The federal preferred alternative under NEPA differs from the environmentally superior alternative (other than the No Project Alternative): The federal preferred alternative includes the TL626 removal from service alternative, except that it includes an off-grid solution for replacing the load served by Boulder Creek Substation with an option to serve the load by converting only

6.8 miles of TL626 to 12 kV; the C440 partial undergrounding alternative; and the TL682 partial relocation and undergrounding alternative.

The following table summarizes the differences between the environmentally superior alternative (other than the No Project Alternative) and the federal preferred alternative.

	Environmentally Superior Alternative	**Federal Preferred Alternative**
TL625, TL629, TL6923, C79, C78, C442, and C449	SDG&E proposal	SDG&E proposal
C440	SDG&E proposal	Partial undergrounding
C157	Rerouting (Option 2)	Rerouting (Option 2)
TL626	Removal of TL626, and replace with: • TL6931 reconstruction • Convert 13.3 miles of TL626 to 12 kV	Removal of TL626, Option 1: • TL6931 reconstruction • Convert 6.8 miles of TL626 to 12 kV • Off-grid solution to replace load served by Boulder Creek Substation; if infeasible, then convert 6.5 miles to 12 kV using Option 5 re-route
TL682	SDG&E proposal	Partial relocation and undergrounding
Overland Access Roads	Partial removal	Partial removal

9. Federal Records of Decision

On March 15, 2016, the Forest Service issued its Final Record of Decision[15] granting SDG&E the MSUP for the proposed project configured as the federal preferred alternative, except that it does not authorize the "on-grid solution" to replacing load served by Boulder Creek Substation (i.e., conversion of 13.3 miles of TL626 to 12 kV) in the event the off-grid solution is infeasible. However, the Record of Decision allows for consideration of an on-grid solution for serving the load served by Boulder Creek Substation in such event:

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

(Final Record of Decision, San Diego Gas & Electric Master Special Use Permit, U.S. Forest Service, Cleveland National Forest, at 5.)

On March 30, 2016, the BIA issued its Record of Decision approving amendments to SDG&E's right of way over Indian lands subject to the relocation and undergrounding of TL682 as set forth in the federal preferred alternative.[16]

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[15] By ruling dated March 16, 2016, official notice is taken of the Forest Service's Final Record of Decision in this matter.

[16] We hereby take official notice of the BIA's "Record of Decision, SDG&E Power Line Replacement Project, La Jolla, Campo and Pauma-Yuima Indian Reservations" dated March 30, 2016.

10. Certification of the EIR

The EIR/EIS was completed after notice and opportunity for public comment on the scope of the environmental review and the draft EIR, as required by CEQA. The initial 45-day public scoping period (September 23-November 7, 2013) included two public scoping meetings held in Southern California on October 22, 2013 in Julian and on October 23, 2013 in Alpine. Subsequently, the Commission and the Forest Service determined to hold a supplemental scoping session, from January 21 to March 7, 2014, with a public meeting held February 19, 2014 in Alpine. Following release of the draft EIR/EIS on September 5, 2014, the lead agencies set a 60-day public comment period (an expansion of the 45-day minimum) and also held a public meeting/workshop in Alpine on October 1, 2014. The public comment period closed on November 4, 2014.

The final EIR/EIS was released on July 10, 2015. An initial errata to the EIR/EIS was issued on August 31, 2015, and a second errata was issued on January 7, 2016. The EIR/EIS documents and responds to all written and oral comments made on the draft EIR/EIS, as required by CEQA. As also required by CEQA, the EIR/EIS examines the environmental impacts of the proposed project and a number of alternatives, including the No Project Alternative; it identifies their significant and unavoidable environmental impacts and the mitigation measures that will avoid or substantially lessen them, where possible, and identifies the environmentally superior alternative pursuant to CEQA.

We have reviewed and considered the information contained in the EIR/EIS, as well as parties' challenges to the adequacy of the EIR/EIS as discussed below. We find that substantial evidence supports the EIR/EIS's findings, and we certify that the EIR/EIS was completed in compliance with

CEQA, that we have reviewed and considered the information contained in it, and that, with the revisions to the mitigation measure reflected in the Mitigation Monitoring, Compliance, and Reporting Program attached to this order, it reflects our independent judgment and analysis.

10.1. POC's Challenges to the EIR/EIS

10.1.1. Alleged Failure to Conduct Independent Analysis

POC asserts that the EIR/EIS is deficient for failing to independently analyze whether steel poles are superior to wood poles for the purpose of meeting the project objectives or whether less expensive and more effective options exist, and that the EIR/EIS bases its conclusion solely on the basis of the applicant's claims. (POC opening brief, pp. 12-13.) POC cites to the absence of any such technical evidence in SDG&E's testimony as evidence of this deficiency. (POC opening brief, p.13.) To the contrary, whether or not SDG&E did any such research is immaterial to the question of whether the EIR/EIS was based on the Commission's independent analysis. We give no weight to POC's bald, unsupported assertion that the Commission and Forest Service staff who prepared the EIR/EIS failed to undertake an independent assessment consistent with law.

10.1.2. Exclusion of Evidence

POC asserts that, by virtue of the ALJ's October 15, 2015, ruling excluding POC's and CNFF/Backcountry's prepared testimony regarding the feasibility of alternatives that the EIR/EIS rejected, the Commission lacks substantial evidence to support the EIR/EIS's determination to reject those alternatives. (POC opening brief, p. 13.) As an initial matter, we reject POC's premise that intervenors were denied an opportunity to present evidence challenging the EIR/EIS's rejection of project alternatives: Pursuant to CEQA, and as affirmed

and noticed in the March 17, 2014, scoping memo, the time and place for presenting evidence challenging the EIR/EIS is in comments on the draft EIR/EIS, and such comments are received in evidence in the final EIR/EIS; POC availed itself of that opportunity and its extensive comments are included in the final EIR/EIS and in the record of the proceeding. (Reference Exhibit B, pp. D6-1 through D6-32.)

In any event, POC's stricken prepared testimony largely repeats and references the draft and final EIR/EIS, and consists of legal argument challenging the adequacy of the final EIR/EIS; pursuant to the scoping memo, the time and place for presenting such legal argument is in closing briefs, and POC has availed itself of that opportunity. Furthermore, the ALJ largely reversed her ruling striking CNFF/Backcountry's prepared testimony that ruling on the basis that, although it was ostensibly offered in challenge to the findings in the EIR/EIS, it also went to the issue of overriding considerations and was permissible evidence on that basis. (ALJ ruling, December 3, 2015.)

10.1.3. Substantial Evidence

POC broadly asserts that the EIR/EIS's findings are not supported by substantial evidence. (POC opening brief, pp. 15-17.) To the contrary, the EIR/EIS fully discloses its analysis and presents the "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts" that form the basis for reaching its findings. (CEQA Guidelines § 15384.)

POC asserts that the EIR/EIS failed to fully analyze the following topics upon which POC commented in its comments on the draft EIR/EIR:

- The feasibility of the installation of micro-grids or onsite facilities as a project alternative,
- The feasibility of vegetation managements as a project alternative,

- The feasibility of undergrounding existing lines as a project alternative,
- The feasibility of conductor spacing changes as a project alternative,
- Whether the proposed project will improve system reliability,
- The failure to propose mitigation to reduce project-related greenhouse gas emissions,
- The failure to consider the project's impact on rural communities or local communities' objections to the proposed project,
- The failure to identify significant visual impacts of the proposed project,
- The failure to identify significant cumulative impacts of the proposed project, and
- That the project has not been required or proposed by any governmental entity or the California Independent System Operator (CAISO).

To the contrary, the EIR/EIS appropriately summarizes and responds to POC's comments. (See EIR/EIS at Volume 1, pp. C-18 to C-19 and Volume 2, pp. D5-12 to D5-14, D6-40 (micro-grids); Volume 1, p. C-20 and Volume 2, pp. D6-40 to D6-41 (vegetation management); Volume 1, pp. C-13 to C-15 and Volume 2, pp. D6-36 to D6-39 (undergrounding); Volume 1, pp. C-15 to C-16 and Volume 2, pp. D6-41, F13-18 to F13-19 (conductor spacing); Volume 1, pp. A-9 to A-10, G-3, and Volume 2, pp. F15-13 to F15-14 (service reliability); Volume 1, pp. D.6-12 to D.6-15, and Volume 2, pp. D5-11 to D5-12 (greenhouse gas impacts); Volume 1, pp. G-11 and I-1 to I-12, and Volume 2, pp. 1-2 to 1-3 (disproportionate

impacts on rural communities);[17] Volume 1, pp. ES-11 to ES-15, D.2-66 to D.2-113, D.2-133, and Volume 2, pp. B7-17, D6-39 to D6-40, D7-37 to D7-38 (visual impacts of steel poles); Volume 1, pp. F-11 to F-14, F-33 to F-37, and Volume 2, p. D4-23 (cumulative impacts); and Volume 1, pp. A-6, A-8 to A-9, and Volume 2 , D6-42 (project is not required by CAISO).[18] We reiterate CEQA Guideline § 15151 which states in part, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts." The EIR/EIS does so.

10.2. CNFF/Backcountry's Challenges to the EIR/EIS

10.2.1. Rejection of Increased Vegetation Management Alternative

CNFF/Backcountry assert that the EIR/EIS fails to adequately explain or support its rejection of the increased vegetation management alternative. (CNFF/Backcountry opening brief, pp. 36-38.) To the contrary, the EIR/EIS explains that it rejects the increased vegetation management alternative because it would not include the superior strength and fire resistance of steel poles, avoid sensitive resources, or mitigate the risk of wildfire ignition via line failure, arcing, or conductor-to-conductor contact during high wind events. (EIR/EIS, Vol. I, p. C-20.)

CNFF/Backcountry counter that SDG&E has not presented any evidence that steel poles are stronger and more fire-resistant than wood poles, while their

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[17] Table 2-1 presents an index of commenters on the draft EIR/EIS, whose comments in addition to POC's were formally considered and responded to in the final EIR/EIS.

[18] While the EIR/EIS does not claim that the project is "required" by a government entity or the CAISO, it states that the purpose of the project is to consolidate SDG&E's rights and responsibilities in connection with the continued operation of its lines and other existing facilities in the Cleveland National Forest (Volume 1, p. A-6) and responds on this point to comment from CNFF regarding Forest Service purpose and need (Volume 2, pp. D5-8 to D5-9).

witness Rahn testified that the risk of line failure during a fire is higher with steel poles versus wood poles. As an initial matter, we note that the EIR/EIS is prepared by staff of the Commission and the Forest Service, and the question of whether its findings are based on substantial evidence turns on what is contained in the EIR/EIS itself; whether or not SDG&E offered evidence regarding the feasibility of alternatives is irrelevant to this inquiry.[19]

In any event, as explained in the second errata to the EIR/EIS, the purpose of the proposed project is to reduce the existing fire risk due to line failure, not to build a power line that is fire proof. The EIR/EIS explains that wood poles, unlike steel poles, are susceptible to deterioration from fire, woodpeckers, termites and weather, and have inherent variability in the material strength properties. (EIR/EIS, Volume 1, pp. D.8-45 to D.8-46, D.8-64 to D.8-65.) This constitutes substantial evidence in support of the EIR/EIS's conclusion that replacing wood poles with steel poles will reduce the risk of power line-related wildfires.

CNFF/Backcountry argue that evidence that SDG&E has experienced a significant decline in the number of wildfires over the last five years attributable to its improved vegetation management undermines the EIR/EIS's rejection of the increased vegetation management alternative. To the contrary, this evidence does not refute the EIR/EIS's reasons for rejecting the increased vegetation management alternative, i.e., that it would not include the superior strength and

[19] By the same token, we note that CNFF/Backcountry purportedly offered Rahn's testimony for the purpose of addressing issue no. 5 (overriding considerations) and not to challenge the EIR/EIS's determination of issue no. 2 (alternatives), as directed by the assigned Commissioner's scoping memo; evidence regarding issue no. 2 was to be offered in comment on the draft EIR/EIS in the course of the CEQA environmental review process.

fire resistance of steel poles, avoid sensitive resources, or mitigate the risk of wildfire ignition via line failure, arcing, or conductor-to-conductor contact during high wind events.

CNFF/Backcountry further argue that the EIR/EIS's reasoning that the vegetation management alternative would not mitigate the risk of wildfire ignition via line failure, arcing, or conductor-to-conductor contact during high wind events is a conclusory statement that does not qualify as substantial evidence. To the contrary, the statement is irrefutable.

10.2.2. Rejection of No-Wire and Distributed Generation Alternatives

Citing to the draft EIR/EIS, CNFF/Backcountry assert that the EIR/EIS lacks a sufficient basis for rejecting the no-wire and distributed generation alternatives; CNFF/Backcountry further challenge the EIR/EIS for failing to provide a meaningful response to comments on the draft EIR/EIS regarding the feasibility of these alternatives. (CNFF/Backcountry opening brief, pp. 38-39.) To the contrary, as stated in the response to POC's comment (EIR/EIS, Volume 2, p. D6-40), the final EIR/EIS was modified in response to POC's comment to add additional discussion that sufficiently explains how these alternatives would degrade local service reliability. (EIR/EIS, Volume 1, pp. C-18 to C-19.)

10.2.3. Rejection of Complete Undergrounding Alternative

Citing to the draft EIR/EIS, CNFF/Backcountry assert that the EIR/EIS lacks a sufficient basis for rejecting the complete undergrounding alternative. (CNFF/Backcountry opening brief, pp. 40-43.) To the contrary, as stated in the response to POC's comment on this subject (EIR/EIS, Volume 2, pp. D6-36 to D6-37), the final EIR/EIS was modified to add additional discussion that sufficiently explains how this alternative presents significant construction

challenges and would result in greater impacts than the proposed project. (EIR/EIS, Volume 1, pp. C-18 to C-19.)

10.2.4. Failure to Specifically Respond to Comment Regarding the Impact of Wildfire Temperatures on Steel Poles

CNFF/Backcountry contend that the EIR/EIS violates CEQA for failing to specifically respond to Backcountry's president Donna Tisdale's comment on the draft EIR/EIS "incorporating by reference" her earlier scoping comments, which included the assertion that wildfire temperatures can lead to failure of steel poles. (CNFF/Backcountry opening brief, p.44.) Errata #2 to the EIR/EIS, which issued on January 8, 2016, subsequent to the filing of opening briefs, clarifies the EIR/EIS's response to Backcountry's comment. As clarified therein, the purpose of the proposed project is to reduce the risk of wildfire due to powerline failure, not to build a powerline that is resistant to wildfires. Thus, the comment asserting that the proposed project is susceptible to failure in the event of wildfire does not inform the question of whether the proposed project will achieve its purpose.

10.2.5. Lack of Alternative That Would Avoid or Lessen Air Quality Impacts

CNFF/Backcountry contend that the EIR/EIS violates CEQA because it does not analyze a "reduced construction" alternative that would reduce avoid or lessen the proposed project's construction-related significant air quality impact. (CNFF/Backcountry opening brief, pp. 39-40, 40-43.) To the contrary, CEQA does not require an EIR to develop an alternative to mitigate each and every impact; rather, it must include a reasonable range of alternatives which would "avoid or substantially lessen *any* of the significant effects of the project." (CEQA Guidelines § 15126.6(a), emphasis added.) In this case, the mitigation

measures developed for the proposed project will mitigate all of the project's significant effects, other than air quality, to less than significant.

CNFF/Backcountry cite to *Watsonville Pilots Assn. v. City of Watsonville*, 183 Cal. App. 4th 1059, and *Habitat & Watershed Caretakers v. City of Santa Cruz*, 213 Cal. App. 4th 1277, for their proposition that CEQA requires the EIR to develop an alternative that could avoid or lessen the proposed project's significant air quality construction impacts, but neither case supports it. To the contrary, as *Watsonville Pilots* aptly notes, " 'CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR. Each case must be evaluated on its facts, which in turn must be reviewed in light of the statutory purpose.' " (*Watsonville Pilots* at 1086, citing to *Preservation Action Council v. City of San Jose*, 141 Cal.App.4th at p. 1350.)

11. Infeasibility of Environmentally Superior Alternative

Where construction of a project alternative would have significant environmental effects, the Commission may not approve the project without the mitigation identified to reduce those effects to a less than significant level unless the Commission finds that the identified mitigation or project alternative is infeasible for specific economic, legal, social, technological or other considerations. (CEQA Guidelines § 15091(a)(3).)[20]

We find that the environmentally superior alternative is infeasible with respect to TL682 and C440 because the BIA's and Forest Service's respective

[20] Backcountry and CNFF offered testimony asserting that the environmentally superior alternative is infeasible because it does not improve fire safety or system reliability in the event of fire. (Exhibits 3 and 4.) While this testimony may inform the issue of whether there are overriding considerations that merit approval of the project, it does not inform the issue of whether it is infeasible to implement the project. We address the issue of overriding considerations below.

Records of Decision approved the federal preferred action requiring additional undergrounding of those lines.[21]

12. Overriding Considerations

Pursuant to CEQA Guidelines § 15093, the Commission may only approve a project that results in significant and unavoidable impacts upon a finding that there are overriding considerations. Section 15093(a) describes the underlying analysis:

> CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. (CEQA Guidelines § 15093(a).)

As discussed above, the proposed project will reduce the risk of powerline failure and thereby reduce the risk of wildfires in and around the Cleveland National Forest and power outages caused by powerline failure by replacing wood poles with steel poles. Wood poles, unlike steel poles, are susceptible to deterioration from fire, woodpeckers, termites and weather, and have inherent variability in the material strength properties. (EIR/EIS, Volume 1, pp. D.8-45 to D.8-46, D.8-64 to D.8-65.) As discussed above in Part 9, above, the Forest Service

[21] Although the Forest Service's Record of Decision does not authorize the environmentally superior alternative "on-grid solution" for replacing load served by TL626 after its removal from service, we do not find it to render the alternative infeasible because the Record of Decision allows for consideration of an on-grid solution in the event that the off-grid solution proves to be infeasible.

requires the projects as a condition of granting SDG&E a MSUP to continue operating its electric facilities within the Cleveland National Forest. It is axiomatic that allowing SDG&E to continue operating its electric facilities will avoid the cost, delay and potential environmental impacts of re-routing its facilities outside of the Cleveland National Forest. These safety, reliability, economic and environmental benefits present overriding considerations that merit approval of the environmentally superior alternative (modified by the BIA's and Forest Service's respective Records of Decision with respect to TL682 and C440 proposed action), notwithstanding its significant, unmitigable effects on air quality during project construction.

UCAN asserts that the benefit of obtaining a MSUP from the Forest Service is not an overriding consideration that merits project approval because there is no evidence that the Forest Service would not issue the MSUP absent the proposed project. (UCAN opening brief, pp. 9-13.) To the contrary, the Final Record of Decision makes clear that the Forest Service requires fire-hardening of SDG&E's electric facilities in order to continue their operations in the Cleveland National Forest. The EIR/EIS has identified the environmentally superior alternative for achieving that.

CNFF/Backcountry argue that the proposed project does not appreciably reduce fire risks (CNFF/Backcountry opening brief, pp. 14-16), that the risk of powerline related fires is low (*id.*, p. 22), and that the proposed fire hardening activities therefore do not provide overriding benefits.[22] To the contrary, while

[22] CNFF/Backcountry further argue that this risk can be managed by alternatives such as vegetation management and powerline maintenance. (*Id.*) As discussed in Section 8.2.1, the EIR/EIS reasonably finds that such alternatives do not achieve the project purpose.

the likelihood of powerline-related fires occurring may be low, the potential harm from such fires in the Cleveland National Forest is enormous.

13. Electric and Magnetic Field

The Commission has examined EMF impacts in several previous proceedings, concluding that the scientific evidence presented in those proceedings was uncertain as to the possible health effects of EMFs.[23] Therefore, the Commission has not found it appropriate to adopt any related numerical standards. Because there is no agreement among scientists that exposure to EMF creates any potential health risk, and because CEQA does not define or adopt any standards to address the potential health risk impacts of possible exposure to EMFs, the Commission does not consider magnetic fields in the context of CEQA and the determination of environmental impacts.

However, recognizing that public concern remains, we do require, pursuant to GO 131-D, Section X.A, that all requests for a PTC include a description of the measures taken or proposed by the utility to reduce the potential for exposure to EMFs generated by the proposed project. We developed an interim policy that requires utilities, among other things, to identify the no-cost measures undertaken, and the low-cost measures implemented, to reduce the potential EMF impacts. The benchmark established for low-cost measures is 4% of the total budgeted project cost that results in an EMF reduction of at least 15% (as measured at the edge of the utility ROW).

SDG&E has filed a Magnetic Field Management Plan, Appendix F to the application, and an Amendment Magnetic Field Management Plan. These

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[23] *See* D.06-01-042 and D.93-11-013.

two documents detail the EMF measures for the proposed project and the environmentally superior project, respectively. These measures include increasing structure height and phasing circuits to reduce magnetic fields, arranging conductors of the transmission lines for magnetic field reduction ("phasing"), and raising the minimum conductor height above ground by four or seven feet, respectively, for those portions of TL625C and TL682 where easement width is 50 or 100 feet. We find that this design uses no cost and low cost mitigation measures in compliance with the Commission's EMF decisions.

14. Comments on Proposed Decision

The proposed decision of ALJ Yacknin in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on May 16, 2016, and reply comments were filed on May 23, 2016.

CNFF, POC, and Backcountry assert that Errata #2 to the EIR impermissibly narrowed the projects purpose by clarifying, in a response to comment on the EIR, that the purpose of the proposed project is to reduce the risk of wildfire due to power line failure. To the contrary, the EIR identifies the reduction of fire risk as a basic project objective (EIR at A-8), and Errata #2 repeats it.

CNFF, POC, and Backcountry assert that the proposed decision expands the project objectives to include cost-effectiveness and obtaining the Commission approvals that the Forest Service will require before issuing an MSUP. This assertion mischaracterizes the proposed decision and has no merit.

CNFF, POC, and Backcountry repeat the arguments that they previously made in briefs that the EIR improperly rejected and failed to consider a

reasonable range of alternatives, that the project's benefits do not outweigh the project's significant, unmitigable effects on air quality during construction; and that the Commission must consider the reasonableness of cost and project need. The proposed decision addressed and properly disposed of those arguments.

SDG&E proposes revisions to Mitigation Measures PSU-1 and REC-2 to provide consistency with the Forest Service's Final Record of Decision. We agree that the revisions are appropriate because they are consistent with the Forest Service's final Record of Decision and do not affect CEQA compliance, and we have incorporated them into the attached Mitigation Monitoring, Compliance, and Reporting Program.

15. Assignment of Proceeding

Liane M. Randolph is the assigned Commissioner and Hallie Yacknin is the assigned ALJ in this proceeding.

Findings of Fact

1. SDG&E's proposed project would have significant and unmitigable impacts to visual resources (the Inaja scenic overlook), air quality (construction-related short-term emissions of VOC, NOx, CO and PM_2 above criteria pollutant thresholds), water resources (erosion, etc., along certain segments attributable to slopes in excess of 25%) and land use (conflicts with provisions of the Wilderness Act). Other impacts either would not be adverse or could be mitigated to less than significant.

2. The environmentally superior alternative to the proposed project under CEQA includes SDG&E's proposed power line replacement with respect to TL682, TL625, TL629, TL6923, C79, C78, C442, C440, and C449; relocation of C157 out of wilderness (City of San Diego Modified Alignment); removal of TL626 and replacement with electric facilities within existing electric utility ROWs, including

reconstruction of TL6931 and conversion of 13.3 miles of TL626 to 12 kV; and the partial removal of overland access roads. The environmentally superior alternative would avoid the significant and unavoidable impact to land use (conflicts with provisions of the Wilderness Act) and reduce the impact to visual resources (the Inaja scenic overlook) to a less than significant level, but would not reduce the significant short- term air quality impacts due to construction related emissions of VOC, NOx, CO and PM_2 above criteria pollutant thresholds.

3. The federal preferred alternative under NEPA is the same as the environmentally superior alternative under CEQA, except that it includes additional undergrounding of C440 and TL682 and an off-grid solution for replacing the load served by Boulder Creek Substation with an option to serve the load by converting only 6.8 miles of TL626 to 12 kV (as compared to 13.3 miles under the environmentally superior alternative).

4. The Forest Service's Record of Decision granting SDG&E an MSUP is conditioned on the federal preferred alternative, except that it does not include an on-grid option for the load served by Boulder Creek Substation; however, it allows for consideration of an on-grid solution in the event the off-grid solution becomes infeasible.

5. The BIA's Record of Decision authorizes the wood to steel pole replacements on Indian lands subject to the relocation and undergrounding of TL682 as set forth in the federal preferred alternative.

6. The Cleveland National Forest Power Line Replacement Projects would provide the safety and reliability benefits of reducing the risk of power line failure and thereby reducing the risk of wildfires in and around the Cleveland National Forest and power outages caused by power line failure by replacing wood poles with steel poles.

7. The Cleveland National Forest Power Line Replacement Projects would provide economic and environmental benefits by allowing SDG&E to continue operating its electric facilities by avoiding the cost, delay and potential environmental impacts of re-routing its facilities outside of the Cleveland National Forest.

Conclusions of Law

1. The EIR/EIS was completed in compliance with CEQA and, with the revisions to the mitigation measures reflected in the Mitigation Monitoring, Compliance, and Reporting Program attached to this order, it reflects the Commission's independent judgment and analysis on all material matters.

2. The environmentally superior alternative configuration of the Cleveland National Forest Power Line Replacement Projects is infeasible to the extent that it conflicts with the additional undergrounding of C440 and TL682 required by the Forest Service's Record of Decision granting SDG&E an MSUP and the BIA's Record of Decision authorizing the wood to steel pole replacements on Indian lands.

3. The safety, reliability, economic and environmental benefits of the proposed project (configured as SDG&E's proposed power line replacement with respect to TL625, TL629, TL6923, C79, C78, C442, and C449, and with the additional undergrounding of TL682 and C440 pursuant to the federal preferred alternative; relocation of C157 out of wilderness (City of San Diego Modified Alignment); removal of TL626 and replacement with electric facilities within existing electric utility ROWs, including reconstruction of TL6931 and conversion of 13.3 miles of TL626 to 12 kV; and the partial removal of overland access roads) present overriding considerations that merit its approval, notwithstanding its significant, unmitigable effects on air quality during project construction.

4. SDG&E's Field Management Plan is consistent with the Commission's EMF policy for implementing no-cost and low-cost measures to reduce potential EMF impacts.

O R D E R

IT IS ORDERED that:

1. San Diego Gas & Electric Company (SDG&E) is granted a permit to construct the Cleveland National Forest Power Line Replacement Projects, configured as SDG&E's proposed power line replacement with respect to TL625, TL629, TL6923, C79, C78, C442, and C449; as Option 2 for relocation of C157 out of wilderness; as the federal preferred action with respect to the partial undergrounding of C440 and TL682; with the removal of TL626, its replacement with electric facilities within existing electric utility ROWs, including reconstruction of TL6931 and conversion of up to 13.3 miles of TL626 to 12 kV; and with the partial removal of overland access roads, subject to the Mitigation Monitoring, Compliance, and Reporting Program attached to this order.

2. The Commission's Energy Division may approve requests by San Diego Gas & Electric Company (SDG&E) for minor project refinements that may be necessary due to final engineering of the project, so long as such minor project refinements are located within the geographic boundary of the study area of the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and do not, without mitigation, result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the EIR/EIS; conflict with any mitigation measure or applicable law or policy; or trigger an additional permit requirement. SDG&E shall seek any other project refinements by a petition to modify today's decision.

3. The Environmental Impact Report/Environmental Impact Statement is certified.
4. Any and all pending motions are deemed denied.
5. Application 12-10-009 is closed.

This order is effective today.

Dated _____, at San Francisco, California.

ATTACHMENT

Mitigation Monitoring, Compliance, and Reporting Program

This attachment provides a list of mitigation measures identified in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the San Diego Gas & Electric (SDG&E) Master Special Use Permit (MSUP) and Permit to Construct (PTC) Power Line Replacement Projects. The mitigation measure tables provided in this attachment are numbered as they are in the Final EIR/EIS. Table 1 provides a directory to the list of mitigation measures for each environmental topic requiring mitigation (to go directly to an environmental topic click on the table number in the first column).

Table 1
Mitigation Measures for Each Issue Area

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

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

Mitigation Measure	MM VIS-1	**Prepare and Implement a Scenery Conservation Plan**. SDG&E shall file with the CPUC a Scenery Conservation Plan that is approved by the Forest Service and provided to other applicable jurisdictional agencies for review and comment. Each 69 kV power line or 12 kV distribution line segment will be covered under an individual section of the plan, and each section will be reviewed and approved by the appropriate agencies prior to any ground-disturbing activities for the specific segment. The purpose of this plan is to identify and implement specific actions that will minimize the project's visual disturbance to the naturally established scenery. Specific actions shall also be identified and implemented for individual poles to protect existing views from established scenic vistas and roadways located outside of the CNF. Power and distribution line support towers shall be designed to minimize their visual prominence and contrast to the natural landscape. Individual poles anticipated to create adverse effects to scenic vistas and/or particularly noticeable visual contrast in existing views shall be designed, located, shaped, textured, and/or screened as necessary to minimize their visual contrast, blend and complement the adjacent forest and community character. Methods such as limiting the number of climbing pegs and identifying less visually intrusive pole markings for high voltage lines, consistent with CPUC requirements, shall be considered. SDG&E shall also be required to provide photorealistic visual simulations of typical proposed designs that include design

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

	features that may be incorporated into poles identified for visual treatment to demonstrate the effectiveness of such features in reducing visual contrast and prominence as viewed from sensitive viewsheds.
Location	*SDG&E's Proposed Project:* **TL625** (Z273002, Z272998, Z272997, Z272996, Z272995, Z272993, Z272992, Z272991, Z272990, Z272989, Z272980, Z272972, Z272971, Z272970, Z272969, Z272960, Z272934, Z239692, Z272922, Z272901, Z272886, Z272885, Z272870); **TL626** (Z213734, Z213735, Z213736, Z213737, Z213738, Z213739); **TL629** (along River Drive, Viejas Boulevard and SR-79 through Descanso, Z812701, Z173133, Z173134, Z173135, Z173136, Z173137, Z173138, Z173139, P373878, Z173141, Z173142); **TL682** (Z118035, Z118036, Z711236, Z118037, Z118038, and Z118144); **C440** (P-304, P-60, P-303, P-305, P-306, P40368, P109956, P40370) *Project Alternatives:* Forest Service proposed actions (TL626 Options 1–5; C157 Options 1 and 2; undergrounding C440); BIA proposed action (TL682) and Removal of TL626 from Service (TL625 and TL6931)
Compliance Documentation(a) and Consultation	a. Provide final design for review (appropriate design considerations are identified and implemented for poles along the TL625, TL626, TL629, TL682 and C440 alignments) b. CPUC/Forest Service Monitor: Line item in compliance monitoring report (individual treatment for replacement poles identified in "Location" is consistent with the plan)
Timing	a. Prior to project final design for each power line replacement project b. Final monitoring report for each power line replacement project
Responsible Agency	*SDG&E's Proposed Project:* CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629) *Forest Service Proposed Actions:* CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action:* CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Removal of TL626 from Service:* CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM VIS-2** If the Forest Service selects to fire harden TL626,TL629, TL6923 or C157 or relocate TL626 (Options 1,2,3a,3b,4 and 5, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistencies with the CNF Land Management Plan scenic integrity objectives. SDG&E would be required to compensate the Forest Service for the loss in scenic quality associated with the negative scenery effects that are inconsistent with the LMP scenic integrity objectives. Compensation shall be accomplished through agency approved scenery restoration activities, fee-payment for scenery restoration projects, or preservation of comparable lands.
Location	Existing High SIO lands traversed by TL626, TL629, TL6923 as viewed from KOP 4, 13, and 15 and Very High SIO lands traversed by C157 and TL626 (for SDG&E's proposed project and Forest Service proposed action TL626 Options 1, 2, 3a, 3b, 4, and 5).
Compliance Documentation[(a)] and Consultation	a. Forest Service amends the Land Management Plan contemporaneously with the authorization of the MSUP and approval to rebuild, operate, and maintain TL626, TL629, TL6923, C157, and TL626 (Options 1, 2, 3a, 3b, 4, and 5). b. The Land Management Plan Amendment is described in any project Record of Decision authorizing TL626, TL629, TL6923, C157, and TL626 (Options 1, 2, 3a, 3b, 4, and 5) as proposed.
Timing	a. Contemporaneously with the Record of Decision.

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

Responsible Agency	Forest Service

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

Mitigation Measure	**MM BIO-1** **Confine all construction and construction-related activities to the minimum necessary area.** All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas identified in Section B, Project Description, Table B-7. The limits of approved work spaces (not including existing access roads) shall be delineated with stakes and/or flagging prior to beginning work in any area. In areas where SDG&E will not work within exclusive-use easements, SDG&E will post temporary signage along approved work limits, indicating that the area is an active construction/work zone and access is temporarily restricted. An environmental monitor shall complete weekly observations to ensure that all work is completed within the approved work limits, and in the event any work occurs beyond the approved limits, it shall be reported by SDG&E's compliance team in accordance with the Mitigation Monitoring, Compliance, and Reporting program (see Section H).
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Delineate approved work limits on final engineering plans b. Provide maps showing phased work areas and proposed locations for temporary restricted access signs c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to construction of segments as phased in final project schedule and maps b. At least one week prior to construction activities as phased in final project schedule and maps c. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-2** **Conduct contractor training for all construction staff.** Prior to construction, all developer, contractor, and subcontractor personnel shall receive training regarding the appropriate work practices necessary to implement the mitigation measures and comply with environmental regulations, including plant and wildlife species avoidance, impact minimization, and best management practices. Sign-in sheets and hard hat decals shall be provided that document contractor training has been completed for construction personnel.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Conduct contractor training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets and hard hat decals) of project personnel training c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. Prior to and during construction

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

Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-3** **Conduct biological construction monitoring.** An authorized biological monitor must be present at the construction sites during all initial ground-disturbing and vegetation-removal activities in undeveloped areas (i.e., not roads or existing developed areas). The monitor shall survey the construction project footprint and surrounding areas for compliance with all environmental specifications. Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies through the duration of the ground-disturbing and vegetation-removal construction phase. Monthly biological construction monitoring reports shall be prepared and submitted through the duration of project construction to document compliance with environmental requirements.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Brief report weekly/monthly (identify issues/solutions through regular monitoring and reporting) c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to the authorized biological monitor performing work associated with ground-disturbing and vegetation removal activities. b. Weekly during ground disturbance and vegetation removal activities/monthly for remaining construction duration c. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM BIO-4** **Restore all temporary construction areas pursuant to a Habitat Restoration Plan (HRP).** All previously undisturbed temporary work areas not subject to long-term use or ongoing vegetation maintenance shall be revegetated with native species characteristic of the adjacent native vegetation communities in accordance with a Habitat Restoration Plan as described in SDG&E NCCP 7.2 Habitat Enhancement Measures. Restoration techniques may include the following: hydroseeding, hand-seeding, imprinting, and soil and plant salvage. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. The HRP shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to construction of the project. At the completion of project construction, all construction materials shall be completely removed from the site. Topsoil located in areas to be restored will be conserved and stockpiled during the excavation process for use in the restoration of sites requiring restoration. Wherever possible, vegetation will be left in place or mowed, and not grubbed, per the NCCP, to avoid excessive root damage and allow for natural regrowth following construction. Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas does not meet success criteria per the HRP, the temporary impact shall be considered a permanent impact and compensated accordingly (see MM BIO-5). Specifically, the HRP will include the following sections: Introduction Mitigation Measure Summary Plan Objectives Plan Implementation o Pre-Construction Documentation o Clearing and Grading o Cleanup o Seeding o Other Planting Methods Schedule o Restoration o Seeding and Planting Restoration Monitoring o Monitoring Success Criteria, and Remedial Measures o Reporting o Completion of Restoration Program References The HRP will be prepared by a habitat restoration specialist (approved by the CPUC and Forest Service) who will oversee implementation of the HRP. The HRP shall be submitted to the CPUC and the Forest Service for review and approval prior to implementation.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.

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

Compliance Documentation[(a)] and Consultation	a. Habitat restoration specialist qualifications (resumes; approved by CPUC and Forest Service) b. Prepare habitat restoration plan c. Final review and approval of plan d. Implementation of plan e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Permitting agency approval of the habitat restoration specialist prior to development of the HRP. b. At least 90 days prior to ground disturbance activities c. Prior to notice to proceed d. Restoration initiated in accordance with schedule provided in the HRP. e. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-5** **Provide habitat compensation or restoration for permanent impacts to native vegetation communities.** Permanent impacts to all native vegetation communities shall be mitigated by either on- or off-site restoration of suitable but degraded habitat, or by the procurement and protection of off-site habitat as compensation for permanent impacts. Permanent impacts shall be compensated at a minimum of a 1:1 ratio and in accordance with SDG&E NCCP 7.4 Mitigation Credits or as required by the permitting agencies. Where discrepancies occur, the higher of the two ratios will be applied, but these ratios are not additive (i.e., ratios of 1:1 and 2:1 do not equal 3:1. Mitigation would be applied at the 2:1 ratio only). Impacts to vegetation communities on Forest Service land will be mitigated as follows: 2:1 for habitats that are sensitive or support listed species; 2:1 for coastal sage scrub, chaparral, grassland, or oak/conifer forest; and 3:1 for riparian oak woodland. "Disturbed" habitat is to be mitigated per ratio for the surrounding vegetation. Forest Service requirements related to MM BIO-5 will only apply to National Forest System lands. Habitat compensation shall be accomplished through agency-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting comparable habitats to those lands impacted by the proposed power line replacement projects. Land preservation or mitigation fee payment for habitat compensation must be completed within 36 months of permit issuance. Habitat restoration may be appropriate as compensation for permanent impacts provided that restoration is demonstrated to be feasible and the restoration effort is implemented pursuant to a Habitat Restoration Plan, which includes success criteria and monitoring specifications as described for MM BIO-4. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed power line replacement projects on private lands shall include long-term management and legal protection assurances.
Location	On the project/alternative site or to-be-identified mitigation parcels

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

Compliance Documentation[a] and Consultation	a. Documentation that habitat compensation and/or habitat restoration has been identified b. Documentation of long-term management of restored habitat, if applicable c. Documentation of consultation with permitting agencies d. Compliance will be documented internally with the applicable responsible agency.
Timing	a. Habitat Compensation: Within 1 year of the initiation of project construction (habitat mitigation lands shall be identified and approved); Habitat Restoration: in accordance with timing identified in MM-BIO-4. b. No later than 36 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) c. Within 2 weeks of completion of coordination with permitting agencies d. Post-construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-6 Implement fire prevention best management practices during construction and operation activities.** Fire prevention best management practices shall be implemented during construction and operation of the project as specified by the Construction Fire Prevention/Protection Plan (to be developed as required under MM FF-1 and MM FF-2). The PALS system will be followed for any work on National Forest System lands.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.
Compliance Documentation[a] and Consultation	See fire plan requirements under MM FF-1 and MM FF-2 a. Implement fire prevention best management practices b. Provide evidence of coordination with applicable fire authorities c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. Prior to and during project construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-7 Prepare and implement a Stormwater Pollution Prevention Plan.** Prepare a Stormwater Pollution Prevention Plan pursuant to the specifications described in APM HYD-05 and MM HYD-1.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.
Compliance Documentation[a] and Consultation	See SWPPP requirements under APM HYD-05 and MM HYD-1 a. Implement SWPPP as outlined b. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. and b. Prior to and during project construction

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

Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-8** **Procedural requirements for herbicide applications.** Herbicide applications shall follow measures as described in MM HYD-5 and MM BIO-23. In addition, herbicides shall only be applied to the minimum area necessary to achieve fire safety objectives and not used in excess or inadvertently be applied to special-status plant species in the vicinity. Special-status plant species of concern are listed below under Impact BIO-6 (a total of 48 species, of which 46 are further described in Table D.4-11). If the professional is unfamiliar with the identification of special-status plant species, an SDG&E biologist shall provide additional supplemental training prior to the application of herbicides along the project as described in MM BIO-23. This training will be administered by an SDG&E biologist and shall include an overview of special-status species along the ROW, identification features, and avoidance measures.
Location	All areas disturbed by construction activities for *SDG&E's* proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Verification that professional is familiar with special-status plant species b. Documentation of herbicide application approach c. Map of special-status plant species and locations of herbicide applications d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. At least 2 weeks prior to application d. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-9** **SDG&E shall identify all proposed replacement pole locations within the vicinity of RCAs** to identify those poles and associated access roads that can be reasonably relocated outside these areas and consult with the Forest Service for authorization of their relocation and proposed placement. These Forest Service requirements will only apply to National Forest System lands.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Implement measure as defined b. Map of pole and access road locations in the vicinity of RCAs c. Final approval by Forest Service of relocation outside of RCAs d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. Prior to notice to proceed d. Prior to and during construction

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

Responsible Agency	*SDG&E's Proposed Project and all Alternatives*: Forest Service
Mitigation Measure	**MM BIO-10** **Limit temporary and permanent impacts to jurisdictional features to the minimum necessary.** Formal jurisdictional delineation and permits are required prior to construction for all work areas located within or adjacent to jurisdictional wetlands and waters. The applicant shall obtain and implement the terms and conditions of agency permit(s) for unavoidable impacts to jurisdictional wetlands and waters. All construction areas, access to construction areas, and construction-related activities shall be strictly limited to the areas within the approved work limits and delineated with stakes and/or flagging that shall be maintained throughout the construction period. The project applicant shall obtain applicable permits and provide evidence of permit approval, which may include but not be limited to a Clean Water Act Section 404 Permit from the ACOE, a Clean Water Act Section 401 water quality certification from the RWQCB, and a Section 1602 Streambed Alteration Agreement with the California Department of Fish and Wildlife for impacts to jurisdictional features prior to project construction. These permits are anticipated to be approved under the MSUP. The terms and conditions of these authorizations shall be implemented. In addition, prior to conducting work or establishing the final design of a selected transmission line alignment, a planning-level assessment of aquatic resources will be conducted to identify the environmentally preferred alternative. The assessment will include review of the National Hydrography Dataset, National Wetland Inventory, U.S. Geological Survey topographic maps, high-resolution digital photography, and necessary field checking. Once the environmentally preferred alternative is identified, a jurisdictional delineation will be conducted of the selected transmission line to ensure the final design is the Least Environmentally Damaging Practicable Alternative (LEDPA) and is in compliance with the Clean Water Act (CWA) Section 404(b)(1) Guidelines. The CWA Section 404 permit authorization will be obtained for any discharges into waters of the United States and the widths of access roads and construction of bridges over waters of the United States will be minimized to the extent feasible.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Documentation of all permits obtained b. Maps showing delineated work areas and proposed flagging or fencing areas c. Documentation of implementation of permit terms and conditions d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. Prior to notice to proceed d. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-11** **Implement habitat creation, enhancement, preservation, and/or restoration pursuant to a wetland mitigation plan to ensure no net loss of jurisdictional waters and wetlands.** Temporary and permanent impacts to all jurisdictional resources shall be compensated through a combination of habitat creation (i.e.,

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

	establishment), enhancement, preservation, and/or and restoration at a minimum of a 1:1 ratio or as required by the permitting agencies. Any creation, enhancement, preservation, and/or restoration effort shall be implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications, and shall be approved by the permitting agencies prior to construction of the project. A habitat restoration specialist will be designated and approved by the permitting agencies and will determine the most appropriate method of restoration. Restoration techniques may include hydroseeding, hand-seeding, imprinting, and soil and plant salvage (as discussed in SDG&E NCCP 7.2 Habitat Enhancement Measures). Temporary impacts shall be restored sufficient to compensate for the impact to the satisfaction of the permitting agencies (depending on the location of the impact). If restoration of temporary impact areas is not possible to the satisfaction of the appropriate agency, the temporary impact shall be considered a permanent impact and compensated accordingly. All habitat creation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat creation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.
Location	Identified habitat creation and/or restoration areas in the project/alternative site or at off-site mitigation parcel(s)
Compliance Documentation[(a)] and Consultation	a. Implement measure as defined b. Documentation of no net loss of jurisdictional waters and wetlands (Habitat Restoration Plan) c. Documentation of consultation with permitting agencies d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to and during construction b. Prior to notice to proceed c. Within 2 weeks of completion of coordination with permitting agencies d. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-12 Where drainage crossings are unavoidable, construct access roads at right angles to drainages.** Unless not possible due to existing landforms or site constraints, access roads shall be built perpendicular to drainages to minimize the impacts to these resources and prevent impacts along the length of jurisdictional features.
Location	All drainage crossing in the project area or alternative site areas.
Compliance Documentation[(a)] and Consultation	a. Incorporate measure in final engineering design b. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to issuance of notice to proceed b. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)

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

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

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

	Service to refine prospective survey locations before implementing this measure.
Compliance Documentation[a] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Survey report c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. At least 2 weeks prior to surveys b. Prior to issuance of a notice to proceed c. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-14** **Install fencing or flagging around identified special-status plant species populations in the construction areas.** Prior to the start of construction, a qualified biologist shall conduct focused surveys during the appropriate blooming period for special-status plant species for all construction areas. All of the special-status plant locations shall be recorded using a Global Positioning System (GPS), which will be used to site the avoidance fencing/flagging. Special-status plant species shall be avoided to the maximum extent possible by all construction activities. The boundaries of all special-status plant species to be avoided shall be delineated in the field with clearly visible fencing or flagging. The fencing/flagging shall be maintained for the duration of project construction activities. Cutting down or damaging coniferous trees that occur along C79 within California Department of Parks and Recreation lands is prohibited. Equipment within staging areas will be situated to avoid damage to coniferous tress. If avoidance to coniferous trees along C79 within California Department of Parks and Recreation lands is not feasible, the applicant will work closely with the California Department of Parks and Recreation to determine alternative staging location(s). In addition, all areas along C79 associated with the Cuyamaca Rancho State Park Reforestation Project will be avoided, including disturbance to these areas and the temporary establishment of staging and stringing sites. This reforestation project is registered with the Climate Action Reserve (www.climateactionreserve.org), where more details can be found.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Notification of planned special-status plant species surveys c. Results of survey d. Map of special-status plant species (GPSed) and location of construction flagging/fencing e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. At least 2 weeks prior to conducting surveys b. At least 1 week prior to surveys and per survey windows timing c. Within 2 weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area

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

	e. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-15** **Implement special-status plant species compensation.** Impacts to special-status plant species shall be maximally avoided. Where impacts to special-status plant species are unavoidable, the impact shall be quantified and compensated through off-site land preservation and/or plant salvage and relocation. Where off-site land preservation is biologically preferred, the land shall contain comparable special-status plant resources as the impacted lands and shall include long-term management and legal protection assurances to the satisfaction of the Forest Service. Land preservation must be completed within 36 months of initiation of construction. Where salvage and relocation is demonstrated to be feasible and biologically preferred, it shall be conducted pursuant to an agency-approved plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Any salvage and relocation plans shall be approved by the permitting agencies prior to project construction. Any salvage and relocation of species considered desert native plants shall be conducted in compliance with the California Desert Native Plant Act. Success criteria and monitoring shall also be included in the plan. If salvage and relocation is not possible to the satisfaction of the Forest Service, off-site land preservation shall be required. Forest Service requirements will only apply to National Forest System lands.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Documentation of off-site land preservation and/or plant salvage and relocation b. Documentation of agency consultation and plan approval c. Documentation of long-term management of restored habitat, if applicable d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. and b. Prior to construction c. No later than 36 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) d. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-16** **Install fencing or flagging around identified special-status butterfly host species populations in the construction areas and road maintenance.** Prior to the start of construction, a qualified biologist shall conduct focused

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

	surveys during the appropriate blooming period for larvae or adult (nectar sources or egg laying sources) plant for the following species: Hermes copper butterfly, Laguna Mountains skipper, or Quino checkerspot butterfly. These host plants include Cleveland's horkelia, western plantain, bird's beak, owl's clover, California buckwheat, and spiny redberry. Similar protective measures for special-status plants (identified in MM BIO-13 and MM BIO-14) shall be implemented. Occupied or suitable habitat for these species shall be avoided to the greatest extent feasible. In addition to the implementation of SDG&E NCCP Operational Protocols, site visits will be conducted prior to construction and road maintenance. Prior to site visits, a digital database of known host plant populations will be reviewed. Site visits will verify the known locations of host plant populations in the area and, if present, avoid those locations.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Botanist qualifications (resumes; approved by CPUC and Forest Service) b. Notification of planned special-status plant species surveys c. Results of survey d. Maps showing the proposed flagging or fencing areas e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. At least 2 weeks prior to conducting surveys b. At least 1 week prior to surveys and per survey windows timing c. Within 2 weeks after surveys are completed and at least two weeks prior to construction d. At least 3 days prior to construction activities that would take place near the fenced area e. Prior to and during construction
Responsible Agency	SDG&E's *Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-17** **Conduct protocol surveys for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterflies within 1 year prior to project construction activities in occupied habitat.** The project proponent shall conduct preconstruction protocol surveys for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly within 1 year prior to construction activities (or unless coordination with the U.S. Fish and Wildlife Service determines that SDG&E's low-effect habitat conservation plan (HCP) for Quino (SDG&E 2007) adequately protects the species, historical surveys are adequate, or as superseded by consultation with the USFWS and Forest Service) in any project construction area known to support the species. Surveys shall be conducted by a qualified biologist[1] in accordance with the most currently accepted protocol survey methods for Quino checkerspot and Laguna

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

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

	Mountains skipper. This includes current habitat assessment and reporting requirements. Results shall be reported to USFWS and the CDFW South Coast Regional Office within 45 days of the completion of the survey. Surveys for Hermes copper butterfly shall follow County of San Diego Guidelines.[2] A qualified biologist shall survey all potential habitat for Hermes copper which includes any woody (mature) spiny redberry shrub with California buckwheat within 15 feet. California buckwheat without spiny redberry nearby is not considered suitable habitat. If California buckwheat is within 15 feet of a mature spiny redberry shrub, additional vegetation within 15 feet should also be considered potential habitat for Hermes copper. All butterfly protocol survey data shall be provided to the CDFW South Coast Regional Office.
Location	Suitable habitat for Quino checkerspot butterfly, Laguna Mountains skipper, and Hermes copper butterfly of project/alternatives area
Compliance Documentation[(a)] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Notification of planned surveys c. Survey Report d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. At least 2 weeks prior to surveys b. Within 1 year of planned project construction in occupied habitat. c. Within 45 days after surveys are completed and at least 2 weeks prior to construction d. Prior to and during construction
Responsible Agency	SDG&E's *Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

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

Mitigation Measure	**MM BIO-18** **Provide compensation for temporary and permanent impacts to Occupied or Critical Habitat for Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat through conservation and/or restoration.** Temporary and permanent impacts to Quino checkerspot butterfly and Laguna Mountains skipper shall be compensated through a combination of habitat compensation and habitat restoration at a minimum of a 2:1 mitigation ratio for occupied non-critical habitat and a minimum of a 3:1 mitigation ratio for critical habitat, or as required by the permitting agencies. Forest-related impacts will be mitigated at the ratios provided above on Forest Service lands and in coordination with the Forest Service. Habitat compensation shall be accomplished through U.S. Fish and Wildlife Service-approved land preservation or mitigation fee payment for the purpose of habitat compensation of lands supporting Quino checkerspot butterfly or Laguna Mountains skipper as appropriate. Mitigation for Hermes copper butterfly shall consist of 1:1 replacement of temporary impacts to occupied habitat, where host plants are impacted, and at a 2:1 ratio where permanent impacts occur. Land preservation or mitigation fee payment for habitat compensation must be completed within 18 months of permit issuance. Habitat restoration may be appropriate as habitat compensation provided that the restoration effort is demonstrated to be feasible and implemented pursuant to a Habitat Restoration Plan, which shall include success criteria and monitoring specifications and shall be approved by the permitting agencies prior to project construction. All habitat compensation and restoration used as mitigation for the proposed project on public lands shall be located in areas designated for resource protection and management. All habitat compensation and restoration used as mitigation for the proposed project on private lands shall include long-term management and legal protection assurances.
Location	On the project/alternative site or on to-be-identified mitigation parcels
Compliance Documentation[(a)] and Consultation	a. Documentation that habitat preservation and/or habitat restoration has been identified and implemented (Habitat Restoration Plan). b. Documentation of long-term management of restored habitat, if applicable c. Documentation of consultation with USFWS d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Within 1 year of the initiation of project construction (habitat mitigation lands shall be identified and approved) b. No later than 18 months after the initiation of project construction (long-term management and legal protection for mitigation lands shall be in place) c. Within 2 weeks of coordination with USFWS d. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM BIO-19** **Final design of power and distribution line and access roads through Quino checkerspot and Laguna Mountains skipper critical habitat and Hermes copper occupied habitat shall maximally avoid host plants for these species.** The final design of the proposed project through Quino checkerspot, Hermes copper, and Laguna Mountains skipper butterfly habitat shall maximally avoid and minimize habitat resources used by these species based on safety and other superseding regulatory requirements. The applicant shall explore alternate tower locations, reduced road widths, reduced vegetation maintenance, and other design modifications to minimize impacts to host plants in critical habitat for these species, and it shall obtain agency approval of the final design through this area. If impacts are not avoided, compensatory mitigation, as described per MM BIO-18, will be required. This measure shall apply to all locations that have been designated as critical or occupied habitat for these species.
Location	Occupied Quino checkerspot, Laguna Mountains skipper, or Hermes copper butterfly habitat along the project/alternatives area
Compliance Documentation[(a)] and Consultation	a. Final design review and approval (design maximizes avoidance of critical habitat) b. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. and b. Prior to notice to proceed
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM BIO-20**	**Obtain and implement the terms of agency permit(s) with jurisdiction federal or state-listed species.** In addition to the obligation of the Forest Service consulting with the USFWS on the project, if federally listed wildlife species not already covered by SDG&E's NCCP (including any species that may be listed prior to issuance of the PTC and MSUP) may be impacted by the project, the Forest Service will initiate a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). If state-listed wildlife species not already covered by SDG&E's NCCP may be impacted by the project, SDG&E will seek a Section 2081 permit (or consistency determination) from the California Department of Fish and Wildlife (CDFW). In addition, take authorization for golden eagles will require coordination with the USFWS and CDFW. SDG&E shall implement and/or adhere to all USFWS recommendations stipulated by the Forest Service in the Special Use Permit; SDG&E shall implement and/or adhere to all requirements in CDFW permit. SDG&E will not need a Section 2081 permit if the potentially impacted species or action is covered by SDG&E's NCCP. The Forest Service is required to consult with the USFWS for their federal action (approving the MSUP) as identified in Section A, Table A-3. When conducting work within designated critical habitat for the Quino checkerspot butterfly, SDG&E shall implement all applicable protocols to avoid and minimize impacts to this species defined in the SDG&E Low-Effect Habitat Conservation Plan for Quino. Additionally, when working within designated critical habitat for Laguna Mountains skipper, SDG&E shall implement all impact minimization measures for Laguna Mountains skipper (USFS 2006c), consistent with USFWS direction (USFWS 2006, 2007), which includes: 1. Prior to project work, a qualified biologist shall identify all LMS habitat (to include host plant and nectar sources) within 10 meters of the proposed project(s) ROW. SDG&E facilities that are within designated critical habitat for Laguna Mountains skipper are shown on USFWS Critical Habitat maps (71 FR 74592–74615). During any maintenance activities, a qualified biologist will be present to monitor work and ensure that Laguna Mountains skipper habitat is not affected. 2. Chipping of vegetation shall not be allowed in known or potential Laguna Mountains skipper habitat. This includes the ROW within or adjacent to (within 10 meters) known or potential Laguna Mountains skipper habitat. Potential habitat shall be identified by the qualified biologist either during the host plant/nectar source survey or some time previous to the onset of ROW work. 3. Vehicles or tracked equipment shall only be allowed on existing roads or trails when operating within or adjacent to Laguna Mountains skipper habitat. Prior to operation of vehicles on existing roads or trails, a qualified biologist will ensure that the road or trail itself does not contain host plants or nectar sources. 4. Any project that may adversely affect the Laguna Mountains skipper shall require consultation with the U.S. Fish and Wildlife Service. If the NCCP is not used, then formal consultation with the USFWS and CDFW will need to occur to determine the need for take permits.
Location	Terms and conditions of permits may apply anywhere within the project/alternative site or on off-site mitigation parcels, but would mostly relate to the occupied Quino checkerspot, Laguna Mountains skipper, or Hermes copper butterfly habitat areas and the designated critical habitat for Quino checkerspot butterfly and Laguna Mountains skipper.	

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

Compliance Documentation[a] and Consultation	a. Documentation of permit compliance b. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to notice to proceed b. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-21 If construction occurs in occupied and/or suitable habitat for sensitive butterfly species, SDG&E will implement the following:** **Quino checkerspot:** SDG&E will comply with the avoidance and minimization measures outlined in the existing Low-Effect Habitat Conservation Plan for Quino checkerspot butterfly. **Hermes copper:** Because this species is not state- or federally listed, the following will only be required for activities: While performing construction activities within the flight season, a qualified biological monitor will be on-site for all project activities to assure that both impacts to host plants and direct take of Hermes copper butterflies are avoided to the greatest extent feasible. The biological monitor may temporarily stop work in the event a Hermes copper butterfly is observed within the immediate construction area (i.e., the flagged work areas currently being used for construction activities.) **Laguna Mountains skipper butterfly:** Construction will occur outside of the flight season OR at least 10 meters (33 feet) away from all host plant locations. If there is a known or newly discovered occurrence during the flight season, construction shall be prohibited within 1 kilometer (0.6 mile) of the occurrence or unless coordination with the U.S. Fish and Wildlife Service determines construction activities may commence. The Laguna Mountains skipper flight season occurs from April to July.
Location	Occupied and/or suitable Quino checkerspot or Laguna Mountains skipper habitat along the project/alternatives area. Also in immediate construction areas where Hermes copper butterfly are observed.
Compliance Documentation[a] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Maps showing occupied/suitable habitat c. Provide construction schedule in occupied/suitable habitat areas d. Documentation of coordination with USFWS or field verification (construction occurs outside of 1 kilometer (0.6 miles of known or newly discovered occurrences)) e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. At least 2 weeks prior to construction and per survey windows timing d. Prior to and during construction e. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682);*

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

	BIA and Campo Indian Tribe (TL629) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-22** **Biologists will monitor construction activities.** San Diego Gas & Electric (SDG&E) shall retain qualified biologists and other qualified resource specialists, as necessary, to monitor all project construction activities that could reasonably result in impacts to biological resources. All monitor qualifications shall be reviewed and approved by the California Public Utilities Commission (CPUC) prior to conducting monitoring activities along the right-of-way. Monitors shall be responsible for preconstruction surveys, work area delineations (i.e., staking, flagging, etc.) to comply with SDG&E's Natural Community Conservation Plan, on-site monitoring, and documentation of violations and compliance. Monitors shall also delineate pre-determined access routes using markers or signs and ensure the maintenance of markers or signs on a regular basis. SDG&E shall submit a weekly report to CPUC that summarizes the biological monitoring activities that were completed during construction. The weekly report shall, at a minimum, include environmental training sign-in sheets, biological monitors assigned to project components, compliance issues/concerns, and general wildlife observations.
Location	All areas disturbed by construction activities for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Conduct field monitoring c. Weekly summary report of monitoring activities as defined in measure d and e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. At least 2 weeks prior to construction b. and c. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-23** **Biologists will inspect open holes at the end of each workday.** At the end of each workday, any open holes (including large/steep excavations) shall be inspected by the on-site biologist and subsequently fully covered with steel plates, plywood, or other effective coverings to prevent entrapment of wildlife species. If fully covering the excavations is impractical, ramps will be used to provide a means of escape for wildlife that enter the excavations, or open holes will be securely fenced with exclusion fencing. If common wildlife species are found in a hole, the designated biological monitor shall immediately be informed and the animal(s) shall be removed. If the animal(s) is/are a sensitive species that require(s) special handling authorization, a qualified biologist (agency-permitted

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

	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.
Location	All construction areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Implement open hole covering procedures b. Documentation that covering requirements in BIO-23 have been incorporated into construction contracts c. Documentation that notification and handling procedures are utilized for wildlife found in open holes d. CPUC monitor: Line item in monitoring report.
Timing	a – d. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-24 Enforce speed limits in and around all construction areas.** Vehicles shall not exceed 15 miles per hour on unpaved roads (as stated in SDG&E NCCP 7.1 Operational Protocols) and the right-of-way accessing the construction site or 10 miles per hour during the night.
Location	All construction areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Documentation and verification of enforcement mechanisms b. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to and during construction b. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-25 Minimize night construction lighting adjacent to native habitats.** Lighting of construction areas at night shall be the minimum necessary for personnel safety and shall be low illumination, selectively placed, shielded and directed away from adjacent native habitats.
Location	All construction areas adjacent to native vegetation for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Documentation of night lighting specifications b. CPUC/Forest Service monitor: Line item in compliance monitoring reports

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

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

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

Mitigation Measure	**MM BIO-28 Implement Bird Protection Measures.** A. Construction activities, including but not limited to tree trimming, road maintenance (i.e., re-establishing of existing access roads), grading, or site disturbance, may occur during the avian bird breeding season that runs between March 1 and September 1, for non-listed birds, and other seasons as defined below for special-status species, in compliance with the procedures and provisions of this mitigation measure. To avoid avian disturbance by construction activities, an Avian Protection Plan, including a Nesting Bird Management Plan, shall be developed in coordination with the Wildlife Agencies prior to project onset to develop measures based on site specific conditions to protect birds. This Avian Protection Plan shall be implemented by SDG&E and their biological monitors with oversight by the CPUC and the Forest Service. The Plan shall include procedures to allow the Wildlife Agencies open communication with the biological monitor(s) and access to scientific data collected that will be electronically stored in a database approved by the CPUC, the Forest Service, and the Wildlife Agencies. Between February and September during project construction, SDG&E shall provide a monthly summary of nesting bird monitoring activities and at the completion of each nesting season shall provide an evaluation of the data collected to date as specified in the Nesting Bird Management Plan. B. The Project's transmission pole and line design may have an impact on certain raptor species. Consequently, in addition to the construction activities, the Plan shall address avian mortality related to line strikes through the use of adaptive management (i.e., measures to make the lines more visible to the suite of species affected), in response to reported mortalities. C. The Avian Protection Plan shall include the following measures: a. Compliance with the Migratory Bird Treaty Act b. Compliance with Fish and Game Code Sections 3503, 3503.5, and 3511 c. Activities shall be prohibited within: i. Approximately 0.25 mile of California spotted owl active nest sites (or activity centers) during the breeding season (February 1 through August 15) unless surveys confirm that California spotted owls are not nesting within the 0.25-mile radius; ii. 500 feet of raptor and owl active nests; iii. 500 feet of federally and/or state-listed birds active nests; iv. 250 feet of occupied burrowing owl burrows from February 1 to August 31 or within 160 feet from September 1 through January 31; and v. 150 feet of non-listed birds and as specified in the avian protection plan for other bird species of concern. If year-round burrowing owls are identified and there would only be temporary indirect impacts, then work may continue through coordination with the CDFW and monitoring. If it appears that the burrowing owls may be directly impacted, then a relocation plan will be developed for the specific burrowing owl(s). This plan would include the methods to relocate, location of the relocation, and post-relocation monitoring. Active relocation and banding of birds is not required. Similar buffers will be utilized for non-Forest Service lands as specified in the Avian Protection Plan and Nesting Bird Management Plan. "Nest" is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young.

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

	Perching sites and screening vegetation are not part of the nest. "Active nest" is defined as once birds begin constructing, preparing, or using a nest for egg-laying. A nest is no longer an "active nest" if abandoned by the adult birds or once nestlings or fledglings are no longer dependent on the nest. d. Apply APLIC Measures. Specific APLIC measures to be applied must, at a minimum, must allow the circuits to meet National Electric Safety Code (NESC) requirements and should provide general information on specialized construction designs to meet APLIC standards. In particular, conductor separation between the energized and grounded hardware should meet the current state of the art requirements to protect species up to California condor. If appropriate separation is not feasible, then the energized parts and hardware should be covered. As appropriate, bird diverters should be deployed as well. D. The database shall include special features to accommodate additional variables (covariate) information requested by the Wildlife Agencies designed for this Project that will provide data which will contribute to the scientific standards of effective avian avoidance measures. In order to help evaluate buffer effectiveness, nests shall be monitored on a daily basis by a qualified biologist during disturbance and-related activities (i.e., brushing, tree trimming, ground-disturbing activities, mechanized or manual construction/removal/ installation, and restoration activities) and every 4 days following disturbance until nest fates have been determined for entry into the database. Daily nest monitoring will be conducted by a qualified biologist, from as far away as possible while still being able to observe activity. The biologist need not observe the actual contents of the nest, but may extrapolate status based on adult behaviors. Actual surveys of the nest contents must not occur more than weekly (i.e., allow at least 7 days between nest visits) and visits should be very brief, paths should go by the nest without stopping if possible, the biologist should not touch leaves or branches, and should take a new route each time they pass by the nest. If brown-headed cowbirds or potential nest predators (e.g., scrub jays, crows, ravens) are in the area, then the visit should be postponed until they are gone. At a minimum, the plan(s) shall include the following sections: Plan Objectives Applicable Mitigation Measures Environmental Awareness Program Existing Avian Resources Construction Process and Timing (related to avian resource protection) Specific APLIC measures to be Applied Nest Survey and Monitoring Methods o Surveyor Experience and Training o Nesting Bird Survey Protocol o Standard Buffer Distances as determined in consultation with Wildlife Agencies o Protections of Listed Species, Raptors, and Eagles o Nest Monitoring o Data Collection Avian Reporting System o Nest Monitoring Log to include fates of all nests monitored o Reporting including update of database accessible to Wildlife Agencies Nest Management

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

	○ Nesting Habitat Reduction ○ Nesting Deterrents ○ Nest Removal Risk Assessment and Mortality Reduction Quality Control and Effectiveness Avian Enhancement Key Resources Prior to the start of construction and implementation, SDG&E shall submit the plan to the U.S. Fish and Wildlife Service, CDFW, CPUC, and Forest Service for review and approval. E. In order to identify locations of current bald eagle (*Haliaeetus leucocephalus*), golden eagle (*Aquila chrysaetos*), California spotted owl (*Strix occidentalis*), American peregrine falcon (*Falco peregrinus anatum),* or federally and/or state-listed or fully protected bird nests, the monitoring biologists will coordinate with the U.S. Forest Service (Forest Service), U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife (CDFW) to ensure that the most up to date information is made available to monitoring biologists. If work will be conducted within a 1 mile buffer of historic and currently known nests during the bald or golden eagle breeding season (December 15 through July 31), SDG&E will survey the historic and currently known nests sites to determine if they are active. If nests are determined to be active, then work within 1 mile of active nests shall be rescheduled until after the completion of nesting activity at those nests. Alternatively, SDG&E may plan work activities to occur outside of the 1 mile buffers during the breeding season.
Location	In and around any construction activity in the project/alternative area, with the exception of existing access roads. Standard buffer distances will be determined in consultation with Wildlife Agencies.
Compliance Documentation[(a)] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Prepare an Avian Protection Plan, including a Nesting Bird Management Plan c. Final review and approval of plan d. Implementation of plan e. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to construction b. At least 90 days prior to ground disturbance activities c. Prior to notice to proceed d. Avian protection implemented in accordance with approved plan e. Prior to or during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM BIO-29** **Rock blasting.** In the unlikely event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission (CPUC) and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. This Blasting Plan would include a site-specific nesting bird survey to be conducted by a CPUC-approved biologist. The results of this survey would be communicated to the CPUC. If the CPUC-approved biologist observes an active nest (as defined in MM BIO-28) for any special-status species (including federal, state, and county candidate, sensitive, fully protected, or special-status species) or species covered by the Migratory Bird Treaty Act that may be impacted by blasting activities, San Diego Gas & Electric shall postpone any activity that may impact the success of the nest until the nest no longer meets the given definitions.
Location	In project/alternative areas considered for blasting
Compliance Documentation[(a)] and Consultation	See blasting requirements under MM PSU-3. e. Site-specific nesting bird survey (as part of Plan) and communicate results to CPUC/Forest Service Biologist qualifications (resumes; approved by CPUC and Forest Service) Documentation of postponing construction activities with respect to active nests (if applicable) CPUC monitor: Line item in compliance monitoring report
Timing	f. Prior to blasting activities g. Prior to blasting activities/Prior to construction h. Prior to construction i. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-30** **Prior to work being conducted, measures will be employed to protect (a) Townsend's bat and (b) bats in general.** A. **Townsend's bat protection measures** Prior to work being conducted, qualified biologists will conduct a literature search for potential roost sites and follow-up surveys for Townsend's big-eared bat maternity roosts within 500 feet of project lines during the breeding/pupping season (April–mid-September). Typical Townsend's big-eared bat roosts occur in mines, caves, buildings, long and dark culverts, and older bridges (pre-1960) (Pierson and Rainey 1994). If any potential structures or features for Townsend's big-eared bat are present within the project area they shall be surveyed. Inspections of potential roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or

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

		indirectly impacted by the project. Where active roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number present at the time of visit (count or estimate); 3) the location, amount, distribution, and age of all droppings shall be described and pinpointed on a map; and 4) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance. If non-maternity roosts are identified, the CDFW will be notified and consulted. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 500 feet of the roost location until the end of the pupping season or until the roost is determined to be unoccupied by Townsend's big-eared bat. For the protection of young (i.e., unable to fly) and hibernating adults all project-related activities shall be avoided where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season. B. **General bat protection measures for other bat species** Prior to work being conducted, qualified biologists will conduct a literature search for known general bat roost sites and follow-up surveys within 100 feet of project lines during the breeding/pupping season (April–mid-September). In general, bat species may roost in rock outcrop, dense tree canopies, flaking tree bark, snags, bridges, mine, caves, flumes, and buildings. If any known sites for bats in general are present within the project area they shall be surveyed. Inspections of known roosts shall be conducted using an appropriate combination of visual and acoustic survey techniques (including structure inspection, sampling, and/or exit counts) for areas that may be directly or indirectly impacted by the project. Bats shall be identified to the most specific taxonomic level possible. Where active bat roosts are located, reporting shall include: 1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present shall be named (include how the specific was identified); 4) the location, amount, distribution, and age of all bat droppings shall be described and pinpointed on a map; and 5) the type of roost (i.e., night roost – rest at night while out feeding vs. day roost – maternity colony) must also be clearly stated. All survey results, including field data sheets, shall be provided to the CDFW South Coast Regional Office. Locations of all roosts shall be kept confidential to protect them from disturbance. If potential roosts are determined to be present then the roosts must be analyzed further to determine if Townsend's big-eared bats are present and if maternity roosts are present. If maternity roosts are present, the CDFW and CPUC will be notified and no work will occur within 100 feet of the roost location until the end of the pupping. For the protection of young (i.e., unable to fly) and hibernating adults, all project-related activities shall be avoided

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

	where roosts are present during the winter and spring. No restrictions apply to project vehicle traffic on existing access roads, or to construction activity that occurs outside of the pupping season.
Location	In historically occupied sites and current suitable habitat within 500 feet of all project lines, not including access roads.
Compliance Documentation[(a)] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Conduct surveys c. Provide CDFW South Coast Regional Office survey results d. CDFW notification if species maternity roosts present e. Apply Townsend's big-eared bat avoidance measures to known bat roost locations within a 100-foot buffer. f. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to construction b. Prior to ground disturbance activities c. Minimum 7 days prior to ground disturbance activities d. Minimum 7 days prior to ground disturbance activities e. During construction f. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-31** **Biologists will conduct surveys for Stephens' kangaroo rat.** In locations where Stephens' kangaroo rat habitat assessments were not accessible during the 2010 surveys (including the extensive parcels of land westward of Santa Ysabel owned by a single landowner – Map Pages MS-016-025 [Chambers Group Inc. and SJM Biological Consultants 2012; Appendix A] and the large parcel immediately south of Old Highway 80 and southward of southern end of Kitchen Creek Road [Map Page MS-069 [Chambers Group Inc. and SJM Biological Consultants 2012]; Appendix A]), a pedestrian preconstruction survey for potentially occupied suitable habitat (open habitat with suitable soils, slope, and kangaroo rat burrows) and follow-up trapping to confirm species, will be conducted by a California Public Utilities Commission (CPUC)-approved biologist to assess the potential areas for Stephens' kangaroo rat to occur within SDG&E's proposed project area. Any burrows, utilized habitat, or signs of Stephens' kangaroo rat utilizing a habitat (e.g., track prints) will be flagged for avoidance during construction activities. The monitoring biologist shall halt construction activities if he or she determines that the construction activities are disturbing Stephens' kangaroo rat occupied habitat. If Stephens' kangaroo rat occupied habitat cannot be avoided during construction, the monitoring biologist shall make recommendations to ensure minimal impacts to the existing Stephens' kangaroo rat habitat and burrows during construction. Recommendations may include, but are not limited to: (1) re-routing access to the project work area for complete avoidance of Stephens' kangaroo rat occupied

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

	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.
Location	In areas previously not accessible to SKR surveys for proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Biologist qualifications (resumes; approved by CPUC and Forest Service) b. Pedestrian preconstruction survey for potentially occupied suitable habitat (and follow-up trapping) in areas where survey was not conducted in 2010 c. Documentation that burrows, utilized habitat, and sign have been flagged for avoidance/provide map d. Biologist recommendations to minimize areas that cannot be avoided submitted to CPUC e. Prepare report and submit to CPUC f. CPUC monitor: Line item in compliance monitoring report
Timing	a. At least 2 weeks prior to construction b. At least 2 weeks prior to construction c. Prior to construction d. Prior to construction e. Prior to construction f. During construction
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-32** **Procedural requirements for pesticide applications.** Herbicide application shall occur under the direction of a professional applicator with an Agricultural Pest Control Adviser License. If the professional has only obtained a Qualified Applicator License, an SDG&E biologist shall provide additional supplemental training prior to the application of pesticides along the project right-of-way. This training will be administered by an SDG&E biologist and shall include topics, such as pertinent laws and regulations (California Department of Fish and Game Code, Migratory Bird Treaty Act, and Endangered Species Act), that may impact special-status wildlife species.
Location	All operation and maintenance areas for SDG&E's proposed project, alternatives, and lines not part of the power line replacement projects to be covered under the MSUP.
Compliance Documentation[a] and Consultation	Also see procedural requirements for pesticide and herbicide applications under MM HYD-5 a. Documentation of professional applicator training of special-status wildlife species
Timing	a. Prior to pesticide application
Responsible Agency	*SDG&E's Proposed Project: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682); BIA and Campo Indian Tribe (TL629)* *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)

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

	Partial Removal of Overland Access Roads: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM BIO-33** **Focused surveys for arroyo toad shall be conducted.** Prior to initiating construction, all riverbed areas within 1,000 feet of construction sites and access roads shall be surveyed during the appropriate season (December 1 through July 31)[3] for arroyo toad. The applicant shall contract with a qualified biologist to conduct focused surveys for arroyo toad. If arroyo toads are detected in or adjacent to the project site, no work will be authorized within 500 feet of occupied habitat until the project applicant receives concurrence from the U.S. Fish and Wildlife Service (USFWS) that work may proceed. If arroyo toads are detected in or adjacent to the project site, the project applicant shall develop and implement a monitoring plan that includes the following measures, in consultation with the USFWS: 1. The applicant shall retain a qualified biologist with demonstrated expertise with arroyo toads to monitor all construction activities in potential arroyo toad habitat and assist the project applicant in the implementation of the monitoring program. This person will be approved by the CPUC and Forest Service prior to the onset of ground-disturbing activities. This biologist will be referred to as the "authorized biologist" hereafter. The authorized biologist will be present during all activities immediately adjacent to or within habitat that supports populations of arroyo toad. 2. Prior to the onset of construction activities, the authorized biologist shall provide all personnel who will be present on work areas within or adjacent to the project site with the following information: a. A detailed description of the arroyo toad, including color photographs; b. A description of the protection the arroyo toad receives under the Endangered Species Act (ESA) and possible legal action that may be incurred for violation of the act; c. The protective measures being implemented to conserve the arroyo toad and other species during construction activities associated with the proposed project; and d. A point of contact if arroyo toads are observed. 3. All trash that may attract predators of the arroyo toad will be removed from work sites or completely secured at the end of each workday. 4. Prior to the onset of any construction activities, the project applicant shall meet on site with staff from the USFWS and the authorized biologist. The applicant shall provide information on the general location of construction activities within habitat of the arroyo toad and the actions taken to reduce impacts to this species. Because arroyo toads may occur in various locations during different seasons of the year, the project applicant, USFWS, and authorized biologists will, at this preliminary meeting, determine the seasons when specific construction activities would have the least adverse effect on

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

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

	arroyo toads. The goal of this effort is to avoid mortality of arroyo toads during construction. 5. Where construction can occur in habitat where arroyo toads are widely distributed, work areas will be fenced in a manner that prevents equipment and vehicles from straying from the designated work area into adjacent habitat. The authorized biologist[4] will assist in determining the boundaries of the area to be fenced in consultation with the USFWS. All workers will be advised that equipment and vehicles must remain within the fenced work areas. 6. The authorized biologist will direct the installation of the fence and conduct a minimum of three nocturnal surveys to move any arroyo toads from within the fenced area to suitable habitat outside of the fence. If arroyo toads are observed on the final survey or during subsequent checks, the authorized biologist will conduct additional nocturnal surveys if he or she determines that they are necessary in concurrence with the USFWS. 7. Fencing to exclude arroyo toads will be at least 24 inches in height. 8. The type of fencing must be approved by the authorized biologist and the USFWS. 9. Construction activities that may occur immediately adjacent to breeding pools or other areas where large numbers of arroyo toads may congregate will be conducted during times of the year (fall/winter) when individuals have dispersed from these areas. The authorized biologist will assist the project applicant in scheduling its work activities accordingly. 10. If arroyo toads are found within an area that has been fenced to exclude arroyo toads, activities will cease until the authorized biologist moves the arroyo toads. 11. If arroyo toads are found in a construction area where fencing was deemed unnecessary, work will cease until the authorized biologist moves the arroyo toads. The authorized biologist, in consultation with USFWS, will then determine whether additional surveys or fencing are needed. Work may resume while this determination is being made, if deemed appropriate by the authorized biologist and USFWS. 12. Any arroyo toads found during clearance surveys or otherwise removed from work areas will be placed in nearby suitable, undisturbed habitat. The authorized biologist will determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities. Clearance surveys shall occur on a daily basis in the work area. 13. The authorized biologist will have the authority to stop all activities until appropriate corrective measures have been completed.

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

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

	14. Staging areas for all construction activities will be located on previously disturbed upland areas designated for this purpose. All staging areas will be fenced within potential toad habitat. 15. To ensure that diseases are not conveyed between work sites by the authorized biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force (DAPTF 2009) will be followed at all times. 16. Drift fence/pitfall trap surveys will be implemented in toad sensitive areas prior to construction in an effort to reduce potential mortality to this species. Prior to any construction activities in the project site, silt fence shall be installed completely around the proposed work area and a qualified biologist should conduct a preconstruction/clearance survey of the work area for arroyo toads. Any toads found in the work area should be relocated to suitable habitat. The silt fence shall be maintained for the duration of the work activity. On Forest Service lands, occupied arroyo toad breeding habitat will be mitigated at a 3:1 ratio; occupied arroyo toad upland burrowing habitat will be mitigated at 2:1; and unoccupied arroyo toad habitat (or designated critical habitat) will be mitigated at 2:1[5]. In addition, a Forest Service consultation will be conducted to verify limited operating periods for arroyo toad are defined. The applicant shall restrict work to daylight hours, except during an emergency[6], in order to avoid nighttime activities when arroyo toads may be present on the access road. Traffic speed should be maintained at 15 mph or less in the work area.
Location	Arroyo toad designated critical habitat area along Forest Service Proposed Action C157 Options 1 and 2.
Compliance Documentation[(a)] and Consultation	a. Implement measure as defined b. Biologist qualifications (resumes; approved by CPUC and Forest Service) c. Survey summary report d. Documentation of monitoring plan and consultation with the USFWS, if required e. Maps showing the proposed flagging or fencing areas f. Brief report of monitoring activities g. CPUC monitor: Line item in compliance monitoring report
Timing	a. Prior to and during construction b. At least 2 weeks prior to construction c. d. and e. Prior to construction f. and g. During construction
Responsible Agency	*Forest Service Proposed Action C157 Options 1 and 2*: CPUC and Forest Service, City of San Diego

[5] Per Robert Hawkins (pers. comm. 2014)

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

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

Mitigation Measure	**MM CUL-1**: In order to avoid adverse effects to historic properties, SDG&E will implement a comprehensive approach to cultural resource management consistent with any project specific Programmatic Agreement developed between the federal agencies and the SHPO. The comprehensive approach will include, at a minimum, the following elements: **1a. – Inventory and evaluate cultural resources in the Final Area of Potential Effect (APE)**. Prior to any ground disturbing activities, SDG&E will complete inventories within the APE and submit the results of those inventories for approval by the CPUC and federal agencies. These surveys shall supplement surveys done for the EIR/EIS and will satisfy Section 106 requirements. **1b. – Avoid and protect potentially significant resources.** Where feasible, complete avoidance of impacts shall be the preferred strategy. Where the federal agencies and CPUC decide that cultural resources cannot be avoided, they will be incorporated into a Historic Properties Management Plan (HPMP), as described below. **1c. – Develop and Implement Historic Properties Treatment Plan**. After completing the inventory and avoidance phase of site design, SDG&E will prepare and submit for approval an HPMP to avoid or mitigate identified potential impacts. **1d. – Conduct data recovery to reduce adverse effects.** If eligible resources, as determined by the federal agencies and the SHPO, cannot be protected from direct impacts of the project or alternatives, data-recovery investigations shall be conducted by SDG&E to reduce adverse effects to the characteristics of each property that contribute to its eligibility, using procedures described in the HPMP. **1e. – Monitor construction activities**. Incorporate monitoring as described in APM CUL-04. If any cultural resources are unexpectedly encountered, the monitor will stop work and notify the Principal Investigator, who will notify the appropriate federal Heritage Program Manager or CPUC representative, depending on the location of the discovery.
Location	SDG&E's proposed project and all alternatives
Compliance Documentation[(a)] and Consultation	a. Approval of Final APE surveys b. Approval of final designs documenting avoidance. c. Approval of HPMP d. Approval of recovery plans e. Monitor construction activities and data recovery
Timing	a. Prior to construction b. and c. Prior to issuance of notice to proceed e. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC ,Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM, California State Parks (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM CUL-2**: In order to reduce adverse effects and significant impacts to historic resources along C79, C440, and C442 as identified in Table D.5-12 of the EIR/EIS, the original exterior materials on the cabins shall not be removed, modified, or covered. If equipment attached to the cabins must be replaced, the equipment shall retain its original appearance in terms of materials and size. If this cannot be met, then a cultural monitor is required to be present during the replacement of the lines to minimize modifications to the cabin exteriors.
Location	C79, C440, and C442 for SDG&E's proposed project and all alternatives with identified historic resources
Compliance Documentation[(a)] and Consultation	a. Letter of conformance b. Map of locations of cabins where requirement cannot be met c. CPUC/Forest Service monitor: Conduct in-field inspections of historic structures d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. and b. Prior to issuance of notice to proceed c. During construction d. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC, Forest Service, and California State Parks *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM CUL-3**: During construction of the proposed power line replacement projects, all measures as identified in Tables 3 and 6 for TL625, Tables 9 and 11 for TL626, Tables 14 and 17 for TL629, Table 20 for TL682, Table 23 for TL6923, Table 26 for C78, Table 29 for C79, Table 31 for C157, Table 34 for C440, Table 37 for C442, and Table 40 for C449 of the Cultural Resources Technical Report prepared by ASM (ASM 2011) shall be implemented. All measures shall be implemented by a qualified archaeologist who is approved by the California Public Utilities Commission and Forest Service. Further, when on City-owned land (portions of C157, T625, and C449), the City's Land Development Manual – Historical Resource Guidelines per the San Diego Municipal Code, Chapter 14, Article 3, Division 2, Section 14.0201, shall be followed (http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division02.pdf).
Location	TL625, TL626, TL629, TL682, TL6923, C78, C79, C157, C440, C442, C449
Compliance Documentation[(a)] and Consultation	a. Documentation indicating completion of all measures provided in the cultural resources report prepared by ASM for each power and distribution line. b. Map identifying all environmentally sensitive areas to be flagged and avoided during construction c. Archaeologist qualifications d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Prior to and during construction b. Prior to issuance of notice to proceed c. At least 1 week prior to construction d. Prior to and during construction

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

Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629, TL625, and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM PHS-1**: San Diego Gas & Electric (SDG&E) shall provide written documentation that all staff, including contractor, and subcontractor project personnel, have received training regarding the appropriate work practices necessary to effectively implement hazardous materials procedures and protocols and to comply with the applicable environmental laws and regulations, including, without limitation, hazardous materials spill prevention and response measures.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation[a] and Consultation	a. Conduct training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets) of project personnel training to the CPUC and Forest Service. c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. b. and c. Prior to notice to proceed and throughout construction.
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM PHS-2**: San Diego Gas & Electric (SDG&E) shall implement best management practices (BMPs) to prevent impacts from release of hazardous materials during construction, operation, and maintenance activities. Typical BMPs could include, but would not be limited to, practices such as the use of absorbent pads for spill containment, specified locations for vehicle refueling, and a daily vehicle inspection schedule designed to identify leaking fuels and/or oils as early as possible. No hazardous material, as defined by 40 CFR 355, shall be stored on site above threshold planning quantities, as defined in Appendices A and B of 40 CFR 355. All vehicle maintenance activities shall be conducted at designated locations within approved staging areas or other locations specified for this activity. In the event emergency maintenance is required on site, or removal of the equipment to an off-site repair facility is determined by SDG&E to be infeasible, SDG&E will use BMPs to prevent the release of hazardous materials during these emergency maintenance activities. SDG&E will be required to complete a Spill Response and Notification Plan for agency approval before commencing construction.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation[a] and Consultation	a. Prepare a Spill Response and Notification Plan b. Implement measures as defined and as further defined in the project SWPPP. c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. Prior to construction b. During construction, operation, and maintenance activities

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

	c. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM PHS-3**: In the event that rock blasting is used during construction, a noise and vibration calculation will be prepared and submitted to the California Public Utilities Commission and the County of San Diego for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions: • The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by San Diego Gas & Electric (SDG&E) or SDG&E's contractor. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan. • The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the *Blasting Guidance Manual* of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. • The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation[a] and Consultation	a. Prepare a program-level blasting plan followed by specific blasting plans during construction b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. and b. Prior to and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC, Forest Service and County, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service and County, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service and County, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service and County, BIA and Campo Indian Tribe

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

	(TL6931)
Mitigation Measure	**MM PHS-4:** Prior to construction, all San Diego Gas & Electric (SDG&E), contractor, and subcontractor project personnel anticipated to work between poles Z173105 and Z173109 shall receive training regarding the location of suspected soil and groundwater contamination along TL629 between poles Z173105 and Z173109, and will be instructed to avoid any ground disturbance in the area.
Location	Along TL629 between poles Z173105 and Z173109.
Compliance Documentation[a] and Consultation	a. Conduct training program including content in mitigation measure b. Provide documentation (attendee sign-in sheets) of project personnel training to the CPUC.
Timing	a. Prior to notice to proceed for TL629 b. Prior to and during construction
Responsible Agency	CPUC
Mitigation Measure	**MM PHS-5:** Prior to flight operations for helicopter use during construction as well as operations, San Diego Gas & Electric (SDG&E) shall coordinate with local air traffic control and comply with all Federal Aviation Administration (FAA) regulations regarding helicopter use to prevent conflicts with air traffic generated by local airstrips. Documentation verifying SDG&E has coordinated with local air traffic control shall be provided to California Public Utilities Commission prior to use of helicopters for construction and operations and maintenance activities. SDG&E shall prepare an Aviation Safety Plan for Forest Service approval prior to any use of helicopters in support of activities on the Cleveland National Forest. The Aviation Safety Plan will outline the procedures used to ensure safe transportation of external loads, and will identify coordination requirements with Forest Service aviation resources operating in the area.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation[a] and Consultation	a. Prepare an Aviation Safety Plan as defined in measure b. Documentation showing coordination with Forest Service aviation resources as defined in plan, local air traffic control, and compliance with all applicable FAA regulations. c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a and b. Prior to use of helicopters for construction activities c. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM PHS-6:** If, during construction activities, it is anticipated or planned that helicopters will be used for external load operations, including carrying structures, San Diego Gas & Electric (SDG&E) will prepare a Helicopter Lift Plan. This plan will be prepared in accordance with and comply with all relevant FAA regulations, as well as SDG&E's Aviation Operations Manual. Prior to initiation of construction activities for each alignment, if determined that helicopters would be used, the Helicopter Lift Plan will be provided to the California Public Utilities Commission.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.

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

Compliance Documentation[a] and Consultation	a. Helicopter Lift Plan b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a.. Prior to construction-related flight operations b. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM PHS-7: Conduct geotechnical investigations.** The applicant shall perform design-level geotechnical investigations to evaluate the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where these hazards are found to exist, appropriate engineering design and construction measures that meet California Building Code (CBC), CPUC General Order 95, and Electric Power Research Institute (EPRI) Moment Foundation Analysis and Design parameters shall be incorporated into the project designs.
Location	All construction work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[a] and Consultation	a. Geotechnical investigations for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards for approved project facilities. b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. Prior to construction b. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM PHS-8: Facilities inspections conducted following major seismic event.** If large levels of ground shaking (such as Modified Mercalli Intensity VI or greater) are experienced or a major earthquake (magnitude 6.0 and above) occurs along the Elsinore Fault, a professional licensed geologist, geotechnical engineer, and structural engineer employed or contracted by SDG&E shall perform facilities inspections as quickly as possible. Careful examination shall be conducted of all project facilities within the identified area of effect. Any required repair or needed improvements shall be implemented as soon as feasible to ensure that the integrity of project facilities has not been compromised.
Location	All construction work areas for SDG&E's proposed project and all alternative locations.
Compliance Documentation[a] and Consultation	a. Professional investigation of all approved project facilities following a major seismic event b. Submittal of report (indicates required repairs or needed improvements, actions taken to repair facilities, if needed, and timing of repair work)
Timing	a. Following a major seismic event b. During construction and operation

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

Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM FF-1: Develop and Implement a Construction Fire Prevention/Protection Plan.** SDG&E shall develop a multiagency Construction Fire Prevention/Protection Plan in consultation with the U.S. Forest Service, Bureau of Land Management (BLM), Bureau of Indian Affairs (BIA), California Department of Forestry and Fire Protection (CAL FIRE), San Diego Rural Fire Protection District (SDRFPD), and San Diego County Fire Authority (SDCFA) to the satisfaction of lead agencies. SDG&E shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the commenting agencies prior to the initiation of construction activities and shall be implemented during all construction activities by SDG&E. At minimum, the plan will include the following:
	• Procedures for minimizing potential ignition
	  ○ Vegetation clearing
	  ○ Fuel treatment area establishment
	  ○ Parking requirements
	  ○ Smoking restrictions
	  ○ Hot work restrictions
	• Red Flag Warning restrictions
	• Fire coordinator role and responsibility
	• Fire suppression equipment on site at all times work is occurring
	• Requirements of Title 14 of the California Code of Regulations, 918 "Fire Protection" for the private land portions
	• Applicable components of the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice 113-1 (July 2012)
	• Emergency response and reporting procedures
	• Emergency contact information
	• Worker education materials; kick-off and tailgate meeting schedules
	• Other information as provided by responsible and commenting agencies (as appropriate for each project).
	Additional restrictions will include the following:
	• During the construction phase of the project, the applicant shall implement ongoing fire patrols. The applicant shall maintain fire patrols during construction hours and for 1 hour after end of daily construction and hotwork.
	• Fire Suppression Resource Inventory – In addition to 14 CCR 918.1(a), (b), and (c), the applicant shall update in writing the 24-hour contact information and on-site fire suppression equipment, tools, and personnel list on a quarterly basis and provide it to the Forest Service, BLM, BIA, SDRFPD, SDCFA, and CAL FIRE.
	• During Red Flag Warning events, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), and when the Forest Service Project Activity Level (PAL) is "E" on Cleveland National Forest (CNF) (as appropriate), all non-essential, non-emergency construction and maintenance activities shall cease or be required to operate under a Hot Work Procedure. The Hot Work Procedure will be in compliance with the applicable sections in NFPA 51-B "Fire prevention during welding,

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

	cutting, or other hot work" and CFC Chapter 26 "Welding and other Hot Work." o The applicant and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF. o All construction crews and inspectors shall be provided with radio and/or cellular telephone access that is operational throughout the project area to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction activities at each construction site. All fires shall be reported to the fire agencies with jurisdiction in the project area as soon as the fire is identified/discovered. o Each crew member shall be trained in fire prevention, initial attack firefighting, and fire reporting. Each member shall carry at all times a laminated card listing pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on contact cards shall be updated and redistributed to all crew members as needed, and outdated cards destroyed, prior to the initiation of construction activities on the day the information change goes into effect. o Each member of the construction crew shall be trained and equipped to extinguish small fires with hand-held fire extinguishers in order to prevent them from growing into more serious threats. Each crew member shall at all times be within 50 feet of fire suppression equipment, as outlined in ESP 113.1. SDG&E will provide a draft copy of the Construction Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the start of any construction activities. The final plan will be approved by the responsible lead agencies with input from the fire and permitting agencies, as desired, prior to the initiation of construction activities and provided to SDG&E for implementation during all construction prior to the initiation of construction activities. All construction work on the proposed power line replacement projects shall follow the Construction Fire Prevention/Protection Plan guidelines and commitments.
Location	All access roads and work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Prepare Construction Fire Prevention/Protection Plan b. Approval and implementation of Construction Fire Prevention/Protection Plan c. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Draft Plan: At least 90 days prior to scheduled start of construction. b. Final Plan: At least 30 days prior to scheduled start of construction (plan in effect throughout construction). c. During construction
Responsible Agency	CAL FIRE, SDRFPD, SDCFA for proposed project and all alternatives *SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM FF-2: Develop and Implement an Operations and Maintenance Fire Prevention/ Protection Plan.** The plan will address all SDG&E electric facilities proposed to be covered under the Master Special Use Permit (MSUP) within the Cleveland National Forest (CNF), and

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

	other project facilities off the CNF, and will be implemented during all operational maintenance work associated with the project for the life of the project. This plan will satisfy the requirements of the SDG&E Project Specific Fire Plan, as identified in SDG&E's Electric Standard Practice 113-1. Important fire safety concepts that shall be included in the plan and make it an essential overall mitigation measure are the following: • Guidance on where maintenance activities may occur (non-vegetated areas, cleared access roads, and work pads that are approved as part of the project design plans) • Fuel treatment area maintenance • When vegetation work will occur (prior to any other work activity) • Timing of vegetation clearance work to reduce likelihood of ignition and or fire spread • Coordination procedures with fire authority • Integration of the project's Construction Fire Prevention/Protection Plan content • Personnel training and fire suppression equipment • Red Flag Warning restrictions for operation and maintenance work • Fire safety coordinator role as manager of fire prevention and protection procedures, coordinate with fire authority and educator • Communication protocols • Incorporation of responsible agency review and approved Response Plan mapping and assessment. • Other information as provided by responsible and commenting agencies, as applicable. SDG&E will provide a draft copy of the Operations and Maintenance Fire Prevention/Protection Plan to the responsible fire agencies for comment a minimum of 90 days prior to the completion of the first project segment. The final plan will be approved by the CPUC and Forest Service prior the first construction segment being deemed complete and the final plan will be provided to SDG&E for implementation during all operations and maintenance activities.
Location	All access roads and work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Prepare draft Operations and Maintenance Fire Prevention/Protection Plan b. Approval and implementation of plan (no operations and maintenance work during Red Flag Warnings and Very High PAL) c. Ongoing coordination with Fire Authority d. CPUC/Forest Service monitor: Line item in compliance monitoring reports
Timing	a. Draft Plan: At least 90 days prior to completion of the first project segment b. Final Plan: At least 30 days prior to completion of the first project segment (revision every 5 years thereafter) c. and d. During construction [b], operations and maintenance
Responsible Agency	CAL FIRE, SDRFPD, SDCFA for proposed project and all alternatives *SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service

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

	Removal of TL626 from Service: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM HYD-1**: **Erosion Control Plan / Stormwater Pollution Prevention Plan.** SDG&E shall develop and implement an Erosion Control Plan (ECP) for construction, operations, and maintenance activities in order to prevent and control soil erosion and gullying . The ECP shall include Forest Service best management practices specific to re-vegetation requirements (scarifying the soil, and fertilizing, seeding and/or mulching, as required to achieve proper post-construction site stabilization) and incorporate Construction General Permit SWPPP requirements for each construction segment as the SWPPP(s) for that segment are completed. Additionally, the ECP shall complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4. The ECP shall be updated for each construction segment and provided to the CPUC and the federal agencies for review and approval prior to each agency's Notice to Proceed issuance for that construction segment. As required by the Construction General Permit, SDG&E shall develop a Storm Water Pollution Prevention Plan (SWPPP) for the project or for individual construction segments, as required, to reduce soil erosion during construction. The SWPPP(s) and verification of submittal to the RWQCB shall be submitted to the CPUC and Forest Service prior to Notice to Proceed issuance for the respective construction segment. SDG&E shall provide the CPUC and Forest Service with subsequent amendments to the SWPPP as part of SDG&E's weekly compliance reports. In weekly construction compliance reports, SDG&E shall note when Storm Water Construction Site Inspection Report Forms have been posted to the Storm Water Multiple Application and Report Tracking System (SMARTS) following storm events.
Location	All construction work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Prepare Draft Erosion Control Plan / Stormwater Pollution Prevention Plan and submit to agencies b. Submit Final approved Erosion Control Plan / Stormwater Pollution Prevention Plan (SWPPP) c. CPUC/Forest Service monitor: Line item in compliance monitoring reports d. Implement post-construction maintenance activities and note in compliance monitoring reports
Timing	a. Prior to notice to proceed b. Prior to and during construction c. During construction d. Post construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe

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

	(TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM HYD-2a**: **Documentation of purchased water source(s)**. For water that is to be purchased from one or more public or private water/utility district(s), private landowners, or from tribes, SDG&E shall provide to the CPUC written documentation from such district(s) and/or landowners indicating the total amount of water to be provided and the time frame that the water will be made available to the project. The documentation shall also indicate the type of water (potable or reclaimed) and the specific source of the water (groundwater well or surface diversions). The sources and amounts of water to be obtained by SDG&E shall be documented in a Water Supply Plan to be submitted to the CPUC prior to notice to proceed for each project component.
Location	All construction work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Submit Water Supply Plan including copies of "will serve" letters providing verification that water quantities are available to meet project needs.
Timing	a. Prior to notice to proceed for each project component.
Responsible Agency	*SDG&E's Proposed Project and all Alternatives*: CPUC and Forest Service
Mitigation Measure	**MM HYD-2b**: **Groundwater Evaluations of Off-Site Water Import Sources**. For identified water sources that derive their water supply from groundwater, SDG&E shall commission a groundwater study by a registered/certified hydrogeologist, as reviewed and approved by CPUC, to assess the existing condition of the underlying groundwater/aquifer and all existing wells (with owner's permission) in the vicinity of proposed well location/water sources and to verify that the proposed source is capable of supplying the amount of water needed. The groundwater study shall evaluate whether the volume and duration of the proposed groundwater use would exceed County of San Diego thresholds for impacts with respect to groundwater supply and well interference. If the evaluation indicates the potential for significant impacts, the registered/certified hydrogeologist shall recommend feasible mitigation measures (e.g., a groundwater monitoring program) to avoid exceeding applicable thresholds. The groundwater evaluation shall be provided along with the documentation of purchased water sources, and the CPUC shall not authorize construction of the project unless such documentation have been provided by SDG&E and approved by CPUC. If the evaluation finds that impacts cannot be avoided given the volume and duration of the proposed groundwater use, the CPUC will not authorize use of the water source and shall require SDG&E to seek other viable sources of water. Total confirmed water supplies from the combination of above documented sources shall equal the total gallons of water needed through construction of the project. SDG&E shall submit monthly water logs documenting compliance with the water supply plan and groundwater thresholds.
Location	All construction work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Copy of water study with verified groundwater quantities and will serve letters providing verification that water adds up to equal estimated project construction needs b. Provide monthly water logs documenting compliance with the water supply

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

	plan and groundwater thresholds
Timing	a. At least 30 days prior to noticed to proceed for each project component. b. During construction
Responsible Agency	*SDG&E's Proposed Project and all Alternatives*: CPUC and Forest Service
Mitigation Measure	**MM HYD-3**: **Access Road Decommissioning Plan.** SDG&E shall prepare an Access Road Decommissioning Plan for review and approval by the CPUC and Forest Service within 1 year of project approval or permit issuance. The plan will be prepared by qualified professionals (e.g., PG, PE, or CEG contracted by SDG&E) whose qualifications are reviewed and approved by the CPUC and the Forest Service. The plan will include a schedule for decommissioning activities. Under the plan, SDG&E shall be responsible for the prevention and control of soil erosion and gullying in areas proposed for access road removal and shall implement the following activities:: • Remove any flagging, signs, or other markings within or around sensitive resource areas after road removal, except where such signs are necessary for long-term access control and interpretation purposes. • Remove temporary fill and structures to the extent practical. • Provide appropriate access control for temporary work areas, such as fencing posts, and/or signage, and ensure gates are locked in accordance with MM-REC-1 to minimize unauthorized traffic and/or access road circumvention during construction • Ensure that the road surface is in stable condition when the road is closed. Seed and fertilize disturbed surfaces as necessary. • To facilitate regeneration, back blade or otherwise scarify road beds where appropriate. Use native grass or forb mixes if available. • All earthwork shall be confined to the road corridor and no soil shall be sidecast onto adjacent areas; if necessary, excess soil material shall be incorporated into restoration activities or hauled off site to an approved disposal facility. • Activities will complement restoration goals and objectives identified in the Habitat Restoration Plan, as required under MM BIO-4.
Location	Road removal locations for SDG&E's proposed projects and all alternatives.
Compliance Documentation[a] and Consultation	a. Implement access road decommissioning best practices (MSUP permit condition for Forest Service) b. Monitor success of passive restoration, prevention of unauthorized use/access c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. and b. During construction and operation c. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682)

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

	Partial Removal of Overland Access Roads: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)

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

Mitigation Measure	**MM HYD-4**: **Access Road Condition Evaluation and Repair Design Report**. Planned grading and repair activities along SDG&E exclusive-use access roads that a) exceed grades of 15% (over a minimum distance of 100 feet), b) are within RCAs, or c) are anywhere within a sediment-sensitive watershed (as defined by the SWRCB) shall be evaluated by a qualified professional (e.g., PG, PE, or CEG contracted by SDG&E and reviewed and approved by the CPUC and the Forest Service) prior to initiating construction on the associated segment, who will identify areas experiencing chronic erosion and drainage issues. At a minimum, segments shall include, but are not limited to, the following: TL626 south of Eagle Creek Road and north of Boulder Creek Road TL625 in the Vicinity of Barber Mountain Road TL625 north of Lyons Valley Road and south of Carveacre Road C442 east of Oak Valley and south of I-8, on the western flanks of Long Peak Short segments of TL629 on either side of Cameron Valley and east of Pine Valley The qualified professional shall design an engineered solution(s) to be implemented within the existing access roadway disturbance area in accordance with Forest Service standards, as described in Forest Service Handbook 2509.22 (Section 12.2), for each area determined to experience chronic erosion and/or drainage issues prior to beginning work on those facilities associated with the problematic access road. The designed solution(s) shall be included into the approved project to ensure the avoidance or minimization of substantial damage or soil loss along the identified road segments. Examples of such solutions could include, but are not limited to the following: Crowning road sections with gentle slopes to prevent standing water on the road Outsloping roads at 3%-5% wherever possible Where required for proper maneuvering and safety, insloping roads at 3-5% into properly designed ditches Installing rolling dips, ditch relief culverts, and/or water bars at intervals appropriate for the road-grade and the soil erosivity Minimizing the number of water crossings, and maintaining crossings as close to a 90-degree angle as possible to the streambed. Constructing perennial and seasonal/ephemeral stream crossings so as not to change the cross-sectional area of the stream channel or impede fish migration. Constructing perennial and seasonal/ephemeral stream crossings with materials that will not degrade water quality (e.g., concrete, coarse rock, riprap and/or gabions) Surfacing roads with erosion-resistant materials such as rock or asphalt concrete. The Access Road Condition Evaluation and Repair Design Report shall identify locations, if any, where no feasible and/or effective solutions can be implemented to adequately handle runoff or comply with Forest Service soil and water quality management standards as contained in Forest Service Handbook 2509.22 (Section 12.2). The report will be updated for each construction segment according to SDG&E's final construction schedule.

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

	In these locations, the qualified professional shall recommend options for access road removal (i.e., requiring access by helicopter) or realignment (e.g., to achieve a lower slope) that would still achieve project objectives. Construction of each segment shall not proceed until the report section pertaining to that segment has been reviewed and approved by CPUC and Forest Service. In the event there are disputes regarding specific problem locations, CPUC and Forest Service will allow construction to proceed on those portions of the construction segment not impacted by access roads requiring evaluation under this measure; however, SDG&E shall not work in areas under dispute until resolution is achieved.
Location	SDG&E exclusive use access roads for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Prepare Access Road Condition Evaluation and Repair Design Report b. Final review and approval of report c. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. and b. Prior to start of construction for each individual replacement project. c. Prior to final design d. Prior to notice to proceed and during construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923)) *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM HYD-5**: **Procedural Requirements for Pesticide and Herbicide Applications.** Pesticide and herbicide application shall occur under the direction of a professional pesticide applicator with either a Qualified Applicator License (QAL) or an Agricultural Pest Control Adviser License in the State of California (see MM-BIO-32 for additional biological training requirements for applicators with a QAL). Label instructions and all applicable laws and regulations shall be strictly followed in the application of pesticides and herbicides and disposal of excess materials and containers. Only those materials registered by the EPA for the specific purpose planned shall be authorized for use. Before applying any pesticides or herbicides on National Forest System land, SDG&E shall receive approval from the Forest Service for all pesticides and herbicides proposed for use on National Forest System land prior to their application on these lands. For portions of the project crossing BLM lands, SDG&E shall obtain a BLM Pesticide Use Permit as well. Additionally, prior to any pesticide or herbicide use, SDG&E shall submit an anticipated schedule to the Forest Service for planned use within the CNF on an annual basis, or more frequently as needed, and will work with the Forest Service to determine the appropriate pesticide and herbicide per location.
Location	All construction work areas for SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Pesticide applicator qualifications b. Implement in accordance with EPA requirements c. Provide pesticide application schedule

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

Timing	a. At least 2 weeks prior to first pesticide application b. Post-construction during routine operation and maintenance c. Submit on annual basis (or more frequently as needed)
Responsible Agency	Forest Service
Mitigation Measure	**MM HYD-6**: **Implementation of Creek-Crossing Procedures.** Where creek crossings can be completed during dry season, with no flows present in the creek, seasonally timed restorative open trenching will be completed. This procedure will use minimum trench widths. Trench cut material will be placed outside of the creek bed and outside of 100-year inundated areas. Trench fill will be compacted and replaced to match existing creek bed gradations, and vegetation will be restored. Open trenching restoration will be completed prior to any wet season flows, and will include anti-erosion action plans for any unplanned rainfall during construction. SDG&E shall obtain all required permits prior to completing open trenching through drainages. In any case, flows will be isolated from open trenching by best management practices mandated by the General Construction Permit. Areas of trenching would be restored and/or vegetated at completion of work. Where creek crossing cannot be completed during the dry season creek crossing shall use jack-and-bore procedures to avoid direct impacts and shall be conducted in a manner that does not result in sediment-laden discharge or hazardous materials release to the water body. SDG&E shall develop a Jack-and-Bore/Horizontal Directional Drill (HDD) Contingency Plan for this work in accordance with MM-HYD-8. Additionally, SDG&E shall implement the following measures during horizontal boring (jack-and-bore) operations and shall be included in the HDD Contingency Plan: 1 Site preparation shall begin no more than 10 days prior to initiating horizontal bores to reduce the time soils are exposed adjacent to creeks and drainages. 2 Trench and/or bore pit spoil shall be stored a minimum of 25 feet from the top of the bank or wetland/riparian boundary. Spoils shall be stored behind a sediment barrier and covered with plastic or otherwise stabilized (i.e., tackifiers, mulch, or detention). 3 Portable pumps and stationary equipment located within 100 feet of a water resource (i.e., wetland/riparian boundary, creeks, and drainages) shall be placed within secondary containment with adequate capacity to contain a spill (i.e., a pump with 10-gallon fuel or oil capacity should be placed in secondary containment capable of holding 15 gallons). A spill kit shall be maintained on site at all times. 4 Within 24 hours following backfill of the bore pits, disturbed soils shall be seeded and stabilized to prevent erosion, and temporary sediment barriers shall be left in place until restoration is deemed successful. SDG&E shall obtain the required permits prior to conducting creek crossing work. Required permits may include ACOE CWA Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement 1602. SDG&E shall implement all pre- and post-construction conditions identified in the permits issued.
Location	TL626 alternative alignment (Option 3 underground in Boulder Creek Road)

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

Compliance Documentation[a] and Consultation	a. Implement Creek Crossing Procedures during the dry season b. Prepare a Jack-and-Bore HDD Contingency Plan with associated SWPPP in accordance with the requirements and timing in MM-HYD-8 c. Conduct directional drilling rather than trenching, where/when applicable d. CPUC/Forest Service Monitor: Line item for standard trenching (Creek Crossing Procedures) in compliance monitoring report
Timing	a. During creek-crossing construction activities b. At least 60 days prior to construction c. Prior to and during construction d. During construction
Mitigation Measure	**MM HYD-7**: **Horizontal Directional Drill Contingency Plan.** If horizontal directional drilling is to be used during construction, SDG&E shall prepare a Horizontal Directional Drill (HDD) Contingency Plan to address procedures for containing an inadvertent release of drilling fluid (frac-out). The plan shall contain specific measures for monitoring frac-outs, for containing drilling mud, and for notifying agency personnel. The plan shall also discuss spoil stockpile management, hazardous materials storage and spill cleanup, site-specific erosion and sediment control, and housekeeping procedures, as described in the Stormwater Pollution Prevention Plan. The Jack-and-Bore HDD Contingency Plan shall be submitted to the CPUC, Forest Service, Bureau of Indian Affairs, and ACOE 60 days prior to construction. SDG&E shall obtain the required permits prior to conducting work associated with jack-and-bore/horizontal directional drilling activities. Required permits may include U.S. Army Corps of Engineers Clean Water Act Section 404, Regional Water Quality Control Board Clean Water Act 401, and CDFG Streambed Alteration Agreement Section 1602. The applicant shall implement all pre- and post-construction conditions identified in the permits issued for the jack-and-bore/horizontal directional drilling.
Location	TL626 alternative alignment (Option 3 underground in Boulder Creek Road)
Compliance Documentation[a] and Consultation	a. Prepare Jack-and-Bore HDD Contingency Plan with associated SWPPP and obtain required permits b. Approval and implementation of Jack-and-Bore HDD Contingency Plan, if necessary d. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. Prior to creek-crossing construction activities b. Prior to and during construction, if applicable c. During construction
Responsible Agency	*Forest Service Proposed Action – Option 3*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), ACOE

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

Mitigation Measure	**MM LU-1: Prepare Construction Notification Plan**. Forty-five (45) days prior to construction of the first segment, the project applicant shall prepare and submit a Construction Notification Plan to the appropriate land use jurisdiction agency for approval. The plan will be updated with additional information 45 days before construction of each additional segment. The plan shall identify the procedures that will be used to inform private landowners, schools, and agencies with authority over recreational areas/facilities of the location and duration of construction; identify approvals that are needed prior to posting or publication of construction notices; and include text of proposed public notices and advertisements. The plan shall address at a minimum the following components: Public notice mailer. A public notice mailer shall be prepared and mailed no less than 15 days prior to construction. The notice shall identify construction activities that would restrict, block, remove parking, or require a detour to access existing residential properties and other sensitive land uses. The notice shall state the type of construction activities that will be conducted and the location and duration of construction, including all helicopter activities. The project applicant shall mail the notice to all residents or property owners within 1,000 feet of project components and to all land use agencies having jurisdiction over a recreation area/facility located within 1,000 feet of a project component. If construction delays of more than 30 days occur, an additional notice shall be prepared and distributed. To facilitate access to properties obstructed by construction activities, the project applicant shall notify property owners and tenants at least 24 hours in advance of construction activities and shall provide alternative access if required. Newspaper/website advertisements. Fifteen (15) days prior to construction of any project component, notices shall be placed in local newspapers and bulletins, including Spanish language newspapers and bulletins, and on the relevant websites of jurisdictional agencies. The Forest Supervisor, District Rangers, and Public Affairs Officer of the Cleveland National Forest shall also be notified. The notice shall state when and where construction will occur and provide information about the public liaison person and hotline. If construction is delayed for more than 7 days, an additional round of newspaper notices shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty (30) days prior to construction, notice of construction shall be posted at public venues such as libraries, community notification boards, rest stops, community centers, trailheads, informational kiosks, and other public venues applicable to the electrical facility under construction to inform affected residents and recreationists of the purpose and schedule of construction activities. Public liaison person and toll-free information hotline. The project applicant shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. The project applicant shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan.
Location	Any project component where residences are located within 1,000 feet of SDG&E's proposed project and all alternatives.
Compliance Documentation[(a)] and Consultation	a. Prepare construction notification plan as defined. b. Provide construction notices for review and approval c. CPUC/Forest Service Monitor: Line item in compliance monitoring report

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

Timing	a. At least 45 days prior to construction as defined b. Prior to construction as defined c. During construction
Responsible Agency	*SDG&E's Proposed Project*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682), BIA and Campo Indian Tribe (TL629), BLM (TL629 and TL6923), CSP (C79), *Forest Service Proposed Actions*: CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626), City of San Diego (C157) *BIA Proposed Action*: CPUC and Forest Service, BIA and La Jolla Indian Tribe (TL682) *Partial Removal of Overland Access Roads*: Forest Service *Removal of TL626 from Service*: CPUC and Forest Service, BIA and Campo Indian Tribe (TL6931)
Mitigation Measure	**MM LU-2:** If the Forest Service selects to leave TL626 or C442 in place, it would have to approve a project-specific CNF Land Management Plan Amendment contemporaneously with the decision to authorize the MSUP and pole replacement project. The project-specific plan amendment would amend the Land Management Plan to allow project-specific exemptions for inconsistences with the CNF Land Management Plan land use zones and standards.
Location	TL626, C442, TL626 Forest Service Alternative (Options 1,2, and 5)
Compliance Documentation[(a)] and Consultation	a. Forest Service amends the LMP contemporaneously with the authorization of the MSUP and approval to rebuild, operate, and maintain TL626, C442, and TL626 Forest Service Alternative (Options 1, 2, and 5) as proposed or modify the land use zones b. The LMP Amendment is described in any project Record of Decision authorizing TL626, C442, and TL62 Forest Service Alternative (Options 1, 2, and 5) as proposed
Timing	a. and b. Contemporaneously with the Record of Decision
Responsible Agency	Forest Service
Mitigation Measure	**MM LU-3: Revise project elements to minimize land use conflicts**. At least Ninety (90) days prior to completing final transmission line design for the approved route, the project applicant shall notify landowners of parcels through which the alignment would pass regarding the specific location of the ROW, individual towers, staging areas, access roads, or other facilities associated with the project that would occur on the subject property. The notified parties shall be provided 30 days in which to identify conflicts with any planned development on the subject property and to work with the project applicant to identify potential reroutes of the alignment that would be mutually acceptable to the project applicant and the landowner. Property owners whose land may be divided into potentially uneconomic parcels shall be afforded this same opportunity, even if development plans have not been established. The project applicant shall endeavor to accommodate these reroutes to the extent that they are feasible and do not create adverse impacts to resources or to other properties that would be greater in magnitude than impacts that would occur from construction and operation of the alignment as originally planned.
Location	TL626 alternative alignment (Option 1, 2, and 4) where new ROW across private lands would be required
Compliance Documentation[(a)] and Consultation	a. Provide verification of property owner notification. b. Identified by property owners provide potential conflicts to SDG&E c. SDG&E provides potential conflicts to the Forest Service and CPUC for review d. SDG&E shall provide written responses to each submitted conflict/comment. e. CPUC/Forest Service Monitor: Line item in compliance monitoring report

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

Timing	a. At least 90 prior to final transmission line design b. At least 30 prior to final transmission line design c. Reasonable and feasible reroutes reviewed by CPUC, Forest Service, BIA and Inaja and Cosmit Tribe to minimize land use conflicts. Reduced land use conflicts to be reviewed against potential increased impacts to other resource areas. d. Prior to final transmission line design e. Prior to notice to proceed
Responsible Agency	CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)
Mitigation Measure	**MM LU-4**: Prior to construction, for any structure or object that is placed in, under, or over any portion of a county roadway, SDG&E shall obtain, from the San Diego County Director, Department of Public Works (DPW), a written encroachment permit in accordance with Section 71 (Highway and Traffic) of the San Diego County code of Regulatory Ordinances.
Location	TL626 alternative alignment (Option 3 and 4 in and along Boulder Creek Road), C440 Additional Undergrounding Alternative (County-maintained roads in Laguna Mountain Recreation Area)
Compliance Documentation[(a)] and Consultation	a. Provide verification of Encroachment Permit(s) obtained from the San Diego County Department of Public Works b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. and b. Prior to construction
Responsible Agency	CPUC and Forest Service, BIA and Inaja and Cosmit Tribe (TL626)

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

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

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

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

Table D.12-3
Mitigation Monitoring, Compliance, and Reporting – Public Services and Utilities

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

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

Mitigation Measure	**MM REC-1: Installation of Gates and Appropriate Signage.** To deter unauthorized access to specially designated or restricted areas via SDG&E access roads authorized by the MSUP, the project applicant shall submit a plan and schedule for gate (or other barriers, such as pipe rails, where appropriate) installation to the Forest Service for approval. Gates will meet Forest Service engineering standards, and designs will be approved by the Forest Service prior to installation. In addition, appropriate deterrence signage approved by the Forest Service shall be installed on gates to SDG&E access roads. Maintenance of gates and signage shall be the responsibility of the project applicant.
Location	Where determined necessary by Forest Service
Compliance Documentation[(a)] and Consultation	a. SDG&E to install gates and appropriate signage as identified by the Forest Service to deter unauthorized access along SDG&E access roads authorized by the MSUP). b. CPUC/Forest Service Monitor: Line item in compliance monitoring report
Timing	a. Prior to initiation of construction activities. b. Maintained during construction, operations and maintenance.
Responsible Agency	Forest Service
Mitigation Measure	**MM REC-2: Enforcement of Proper Gate Protocol.** During construction and ongoing operations and maintenance activities, gates on access roads authorized by the MSUP shall be locked immediately after ingress and egress has occurred. Should SDG&E or Forest Service staff observe unlocked gates, SDG&E will be required to review gate protocols with personnel.
Location	Along all exclusive use access roads with existing and new gates on Forest Service managed-lands.
Compliance Documentation[(a)]	a. SDG&E will provide access and gate monitoring throughout construction, maintenance, and

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

and Consultation	operations. SDG&E will notify the Forest Service of roadway damage or off-site disturbance suspected to be caused by unauthorized access and will provide the Forest Service with proposed restoration activities for damaged areas. The Forest Service may request additional restoration efforts specific to the damaged/disturbed area caused by unauthorized access if determined necessary. b. SDG&E will provide documentation of all pre- and post-restoration activities (with respect to this measure) to the Forest Service upon completion. c. Prior to operations, SDG&E will provide the Forest Service with a maintenance schedule in order to ensure gates and locks are kept in good working order/condition.
Timing	a. b. and c. Throughout construction, operations, and maintenance activities
Responsible Agency	Forest Service

(END OF ATTACHMENT)