

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**FILED**  
08/05/20  
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August 5, 2020

**Agenda ID #18670**  
**Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 17-11-010:

This is the proposed decision of Administrative Law Judge Brian Stevens. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's September 10, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4)(B).

/s/ ANNE E. SIMON  
Anne E. Simon  
Chief Administrative Law Judge

AES:gp2  
Attachment

Decision **PROPOSED DECISION OF ALJ STEVENS** (Mailed 8/5/2020)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

In The Matter of the Application of  
San Diego Gas and Electric Company  
(U902E) for a Permit to Construct the  
TL 6975 San Marcos to Escondido  
Project.

Application 17-11-010

**DECISION GRANTING SAN DIEGO GAS AND ELECTRIC COMPANY A  
PERMIT TO CONSTRUCT THE TIE LINE 6975 SAN MARCOS TO  
ESCONDIDO PROJECT**

**Summary**

This decision grants San Diego Gas & Electric Company's request for a permit to construct the Tie Line (TL) 6975 San Marcos to Escondido project. This proceeding is closed.

**1. Proposed Project**

Pursuant to Section IX(B) of General Order (GO) 131-D of the California Public Utilities Commission (Commission), and Rules 2.1 through 2.5 and 3.1 of the Commission's Rules of Practice and Procedure (Rules), San Diego Gas & Electric Company (SDG&E) requests a Permit to Construct (PTC) the Tie Line (TL) 6975 San Marcos to Escondido project.

The proposed project involves construction and reconductoring/re-energizing of approximately 12 miles of 69 kilovolt (kV) overhead electric power line from the existing San Marcos Substation to the existing Escondido Substation. Execution of the projected would include a combination of

construction of new overhead single-circuit electric power line structures, rebuild of existing structures from single circuit to double circuit, and reconductoring and re-energizing of existing conductors. The proposed project is broken into three segments<sup>1</sup>:

- Segment 1 Rebuild: Rebuild of approximately 1.8 miles of an existing 69 kV circuit power line near the existing San Marcos Substation (TL 680C), add TL 6975 to create a double 69kV circuit, replace wood poles with steel poles, as well as minor work at the San Marcos Substation to accommodate this rebuilt circuit.
- Segment 2 New Build: Addition of approximately 2.8 miles of a new single-circuit 69 kV overhead power line from the end of Segment 1 to the existing Meadowlark Junction.
- Segment 3 Reconductoring/Re-Energizing: Reconductoring approximately 7.4 miles of a de-energized power line segment to the existing Escondido Substation. Segment 3 includes minor work at the existing Escondido Substation to accommodate this new circuit.

SDG&E is proposing this project to 1) mitigate violations of the North American Electric Reliability Corporation Reliability Criteria, 2) eliminate existing congestion in the Escondido/San Marcos area, and 3) improve power service reliability by providing an additional feed to the existing San Marcos substation.<sup>2</sup>

The project activity is in the cities of Carlsbad, Escondido, San Marcos, and Vista, as well as unincorporated portions of San Diego County.

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<sup>1</sup> Proponent's Environmental Assessment at 3-2, November 15, 2017.

<sup>2</sup> Proponent's Environmental Assessment at 1-1, November 15, 2017.

## 2. Procedural Background

SDG&E filed Application (A.) 17-11-010, including a Proponent's Environmental Assessment (PEA), on November 15, 2017. On January 04, 2018, SDG&E filed a Compliance Filing including a declaration of advertising, posting, and mailing to affected governmental bodies and property owners giving notice of the application, as required by GO 131-D, Section XI.A. No protests or responses to the application were filed. On February 07, 2020 the assigned Administrative Law Judge (ALJ) held a prehearing conference (PHC). On April 26, 2018, an initial Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) was issued. On March 26, 2020, an updated Scoping Memo was issued.

On April 1, 2019, the California Public Utilities Commission's (Commission's) Energy Division circulated a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration (MND) for the project to the State Clearinghouse, Responsible and Trustee Agencies, Property Owners within 600 feet of the project, and other Interested Parties, and released the Draft MND, including an Initial Study (IS), referred to collectively here as the Draft IS/MND, for an initial 45-day public review and comment period, in compliance with the California Environmental Quality Act (CEQA) and Commission Rule 2.4. Copies of the Draft IS/MND were made available online and for public review at the San Marcos Library, Escondido Public Library, and the Carlsbad City Library. On April 25 and 26, 2019, the CPUC published notices extending the public comment period on the IS/MND by 15 days, in response to a request from the City of San Marcos, for a total public review period of 60 days. In addition, the CPUC held two public meetings on April 30, 2019 to give agencies,

organizations, and individuals the opportunity to express any concerns or questions on the Draft IS/MND in a public setting.

The CPUC received over 1,000 mailed letters, e-mails, comment cards, and online comments from members of the public on the Draft IS/MND. Additionally, 15 public agencies/officials, utilities, and interest groups provided comment letters. At the two public meetings, 53 individuals gave oral comments. An e-petition was also filed and included with 266 e-signatures expressing objection to the project and support for an underground alternative. Public input also noted visual issues, issues pertaining to a change in materials (metal vs. wood poles), impact on adjacent preserves, tree and vegetation management, noise, impact on trails, helicopter use, City of San Marcos requirement for nighttime work in streets, emergency evacuation, encroachment permitting, fiscal impacts, and health risks.

Under CEQA, the lead agency “shall evaluate any comments on environmental issues” received from people who have reviewed a draft environmental impact report (EIR) and prepare written responses that “describe the disposition of significant environmental issues raised.”<sup>3</sup> CEQA does not require the lead agency to respond to comments received on a draft IS/MND. Here, however, the CPUC elected to provide written responses to all comments received on the Draft IS/MND.

Energy Division issued the Final IS/MND on January 10, 2020, which included written responses to comments received on the Draft IS/MND.<sup>4</sup>

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<sup>3</sup> Pub. Res. Code §21091(d); CEQA Guidelines §15088(c).

<sup>4</sup> The Final IS/MND is available at [https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/final\\_ISMND/SDGE\\_TL6975\\_69kV\\_Final\\_IS-MND\\_web.pdf](https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/final_ISMND/SDGE_TL6975_69kV_Final_IS-MND_web.pdf). The Final IS/MND is received into the record of this proceeding.

Revisions in the Final IS/MND also included editorial changes, minor changes to mitigation measures and technical clarifications and corrections. “The Final IS/MND provides corrections and clarity to certain facts set forth in the Draft IS/MND and, if necessary, ensures accuracy. No new significant environmental impacts are identified in this Final IS/MND.”<sup>5</sup>

Opening briefs were served and filed by Robert Pack, the City of San Marcos, and the Applicant on April 21, 2020. Reply briefs were served and filed by Robert Pack, the City of San Macros, and the Applicant on May 05, 2020.

### **3. Scope of Issues**

The issues to be determined in this proceeding are:

1. Is there any substantial evidence that, with the incorporation of mitigation measures identified in the Mitigation Monitoring, Reporting, and Compliance Program included in the Final Mitigated Negative Declaration and Initial Study, the project will have a significant effect on the environment;
2. Was the Final Mitigated Negative Declaration and Initial Study completed in compliance with the CEQA;
3. Does the Final Mitigated Negative Declaration reflect the Commission’s independent judgment and analysis; and
4. Is the proposed project designed in compliance with the Commission’s policies governing the mitigation of EMF effects using low-cost and no-cost measures?

### **4. California Environmental Quality Act (CEQA)**

To issue a PTC pursuant to General Order 131-D, the CPUC must find that the project complies with CEQA. In evaluating whether to approve the project,

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<sup>5</sup> Final IS/MND at 1-1.

CEQA requires the lead agency<sup>6</sup> (the CPUC in this case) to conduct a review to identify environmental impacts of the project and ways to avoid or reduce environmental damage. If the initial study shows that there is no substantial evidence that the proposed project may have a significant effect on the environment, or if the initial study identifies potentially significant effects and the project proponent makes or agrees to revisions to the project that will reduce all project-related environmental impacts to less-than-significant levels, then the lead agency shall prepare a negative declaration or MND, subject to public notice and the opportunity for the public review and comment.<sup>7</sup>

CEQA requires that, prior to approving the project, the lead agency consider the MND along with any comments received during the public review process, and that the lead agency adopt the MND only if it finds on the basis of the whole record that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis.<sup>8</sup> If the lead agency adopts an MND, CEQA requires that it also adopt a program for monitoring or reporting on the changes or conditions required to mitigate or avoid significant environmental effects.<sup>9</sup>

Here, the Draft IS/MND for the proposed project determined that the project would have no significant impacts or less than significant impacts with respect to aesthetics, agriculture and forestry resources, air quality, energy,

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<sup>6</sup> The lead agency is the public agency which has the principal responsibility for carrying out or approving a project. The lead agency also must decide whether an EIR or Negative Declaration will be required for the project and prepare the appropriate environmental document. CEQA Guidelines (Cal. Code Regs. Tit. 14, Div. 6, Ch.3) § 15367.

<sup>7</sup> CEQA Guidelines §§ 15070-15073.

<sup>8</sup> CEQA Guidelines § 15074(a)-(b).

<sup>9</sup> CEQA Guidelines § 15074(d).

greenhouse gas emissions, land use and planning, mineral resources, and population and housing. The Draft IS/MND identified potentially significant impacts during and after construction of the proposed project to biological resources, cultural resources, tribal cultural resources, geology, soils, seismicity, and paleontological resources, hazards and hazardous materials, hydrology and water quality, noise, public services, recreation, transportation and traffic, utilities and service systems, and wildfires. Based on the analysis documented in the Draft IS/MND, the CPUC recommended mitigation measures to reduce these impacts to a less-than-significant level, and SDG&E agreed to implement these measures as part of the project.<sup>10</sup> The Final IS/MND includes all mitigation measures recommended in the Draft IS/MND with a few minor modifications. The Mitigation Monitoring, Reporting, and Compliance Program (MMRCP), included in Chapter 4 of the Final IS/MND and attached to this decision as Attachment A, provides a detailed implementation plan to ensure that the identified mitigation measures and APMs are properly implemented. With SDG&E's implementation of the identified APMs and mitigation measures and compliance with the MMRCP, all project-related environmental impacts, would be avoided or reduced to a less-than-significant level with the incorporation of feasible mitigation measures.

Since circulation of the Draft IS/MND, there have been no "substantial revisions" to the MND, as defined in CEQA Guidelines Section 15073.5, and there is no evidence the project may have a significant impact on the

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<sup>10</sup> In its PEA, SDG&E identified Applicant Proposed Measures (APMs) to avoid or reduce potential impacts associated with the project. In some instances, those APMs have been superseded by CPUC-recommended mitigation measures, as described in the Draft IS/MND. Those APMs that have not been superseded are considered part of the project for the purpose of the IS/MND.



environment that cannot be mitigated or avoided. The CPUC finds that recirculation of the MND is not required pursuant to State CEQA Guidelines Section 15073.5.

## 5. Environmental Document

At issue in this proceeding is whether the prepared MND is consistent with CEQA.

An MND may be prepared when “the initial study has identified potentially significant effects on the environment, but: (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.”<sup>11</sup>

For CEQA purposes “substantial evidence” means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency.”<sup>12</sup>

Having evaluated the evidence in the record before the Commission, including the comments submitted on Draft IS/MND and the written responses to those comments,<sup>13</sup> as well as the parties’ opening and reply briefs, the

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<sup>11</sup> Pub. Resources Code, §§ 21064.5, 21080(c).

<sup>12</sup> CEQA Guidelines, § 15384(a), emphasis added; *see also* Pub. Resources Code, § 21082.2.

<sup>13</sup> Final IS/MND, at 2-1 to 2-201

Commission's preparation of an MND is supported by substantial record evidence. This includes the Commission's analysis on aesthetics, wildfire risk, noise impact, and cumulative impacts. The Final IS/MND includes detailed Master Responses documenting the substantial evidence that supports the analysis of visual character and quality along the project route and explaining the reasons that wildfire risk from the project would be less than significant.<sup>14</sup> The analysis in the Draft IS/MND also demonstrates that noise mitigation measure MM NOI-1 is sufficient to reduce noise impacts below the level of significance.<sup>15</sup> Finally, the IS/MND's approach to cumulative impacts is adequate and complies with CEQA.

The record also shows that Commission demonstrated thorough independent analysis that no significant environmental impacts from the proposed project remain after incorporation of SDG&E's applicant proposed measures and the CPUC's imposed mitigation measures.

Additionally, although CEQA does not require evaluation of project alternatives in an IS/MND, in response to comments requesting alternatives or design improvements that would address concerns communicated in the Draft IS/MND, the CPUC issued Data Requests 12 and 13 to SDG&E seeking additional information. SDG&E's response to Data Request 12 indicated that it is not feasible to locate the TL6975 conductor on the existing TL13811/13825 poles in the Segment 2 right of way (including as an underbuilt line); that the underground option described in the PEA was technically feasible but not

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<sup>14</sup> *Id.*, at 2-2 to 2-11.

<sup>15</sup> This is addressed in the Draft IS/MND at 3.13-3.12-25 (2019), available at [https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/SDGE\\_TL6975\\_69kV\\_DraftIS-MND.pdf](https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/SDGE_TL6975_69kV_DraftIS-MND.pdf). The Draft IS/MND is received into the record of this proceeding.

proposed because the cost would be potentially two or three times greater than that of the Project; and identifying additional aesthetic considerations that were incorporated into the proposed pole locations, heights, and finishes.<sup>16</sup>

Adoption of the Final MND complies with the requirements of CEQA. The mitigation measures set forth in the MMRCP (Attachment A to this decision) are designed to reduce or eliminate the potentially significant environmental impacts of the proposed project and meet the criteria set forth in CEQA Guidelines § 15370.

The Commission's Final IS/MND is appropriate and complies with CEQA.

## **6. Electromagnetic Field**

Section X(A) of General Order 131-D requires that applications for a PTC include a description of the measures taken or proposed by the utility to reduce the potential exposure to electric and magnetic fields (EMF) generated by the proposed facilities.<sup>17</sup> In accordance with Section X(A) of General Order 131-D, CPUC Decision 06-01-042 (EMF Decision), and SDG&E's EMF Design Guidelines prepared in accordance with the EMF Decision, SDG&E is required to prepare a Field Management Plan (FMP) that identifies the "no-cost" and "low-cost" magnetic field reduction measures proposed as part of the final engineering design for the project. Low-cost measures have been defined as mitigation measures that cost 4 percent or less of the total project cost, which is also referred to as the 4 percent benchmark.<sup>18</sup>

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<sup>16</sup> SDG&E's response to Data Request 12 is available at [https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/DR12/TL6975\\_DR12\\_102419.pdf](https://www.cpuc.ca.gov/environment/info/esa/TL6975/pdf/DR12/TL6975_DR12_102419.pdf), and is received into the record of this proceeding.

<sup>17</sup> This is addressed in the Draft IS/MND at 2-61 to 2-61 and in the Final IS/MND at 2-11 to 2-12.

<sup>18</sup> D. 06-01-042 defines "low-cost" measures to mitigate EMF exposure for new utility transmission and substation projects.

Analysis of measures taken to reduce EMF exposure by SDG&E is available in its Application for PTC. SDG&E's FMP developed in support of the TL 6975 project considered the inherent benefits, as compared to the status quo, of many of the poles being increased in height which would be considered a no-cost benefit of the project. Additionally, SDG&E identified that increasing the height of poles 5 feet above design would reduce the EMF by more than 15 percent at the edge of the right-of-way. This was considered a low-cost measure that was adopted.

The other measures considered for reduction EFM exposure substantially exceeds the low cost 4 percent benchmark. As a result, other measures were rejected by SDG&E. According to SDG&E, no other low-cost measures are available for this project. A copy of the FMP for this project is attached as Appendix C of the Final IS/MND.

## **7. Administrative matters**

The Commission's Energy Division may approve requests by SDG&E for minor project refinements that may be necessary due to the final engineering of the project, so long as such minor project refinements are located within the geographic boundary of the study area of the IS/MND and do not, without mitigation, result in a new significant impact based on the criteria used in the Final IS/MND; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional discretionary permit requirement. A minor project refinement should be strictly limited to a minor project change that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. SDG&E shall seek any project changes that do not fit within these criteria by a petition to modify

today's decision. A change to the project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the mitigation monitor assigned to the construction for their review and CPUC approval.

All rulings by the assigned Commissioner and ALJ are affirmed herein.

### **8. Comments on Proposed Decision**

The proposed decision of Administrative Law Judge Stevens 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 \_\_\_\_\_, and reply comments were filed on \_\_\_\_\_ by \_\_\_\_\_.

### **9. Assignment of Proceeding**

Genevieve Shiroma is the assigned Commissioner and Brian Stevens is the assigned Administrative Law Judge in this proceeding.

### **Findings of Fact**

1. All environmental impacts related to the proposed project are less than significant or reduced to less-than-significant levels with incorporation of feasible mitigation measures (*see* Mitigation Monitoring, Reporting and Compliance Program, Attachment A to this decision).
2. The proposed project will have either no significant impacts or less than significant impacts with respect to aesthetics<sup>19</sup>, agriculture and forestry

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<sup>19</sup> Draft IS/MND at 3.1-1 to 3.1-30.

resources<sup>20</sup>, air quality<sup>21</sup>, energy<sup>22</sup>, greenhouse gas emissions<sup>23</sup>, land use and planning<sup>24</sup>, mineral resources<sup>25</sup>, and population and housing.

3. With the implementation of the mitigation measures identified in the Mitigation Monitoring, Reporting, and Compliance Plan in the Final IS/MND and attached to this order as Attachment A, potentially significant impacts to biological resources<sup>26</sup>, cultural<sup>27</sup> and tribal cultural<sup>28</sup> resources, geology, soils, seismicity, and paleontological resources<sup>29</sup>, hazards and hazardous materials<sup>30</sup>, hydrology and water quality<sup>31</sup>, noise<sup>32</sup>, public service<sup>33</sup>, recreation<sup>34</sup>, transportation and traffic<sup>35</sup>, utilities and public services<sup>36</sup>, and wildfires<sup>37</sup> will be reduced to less than significant levels.

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<sup>20</sup> *Id.* At 3.2-1 to 3.2-8.

<sup>21</sup> *Id.* At 3.3-1 to 3.3-14.

<sup>22</sup> *Id.* At 3.6-1 to 3.6-12.

<sup>23</sup> *Id.* At 3.8-1 to 3.8-14.

<sup>24</sup> *Id.* At 3.11-1 to 3.11-8.

<sup>25</sup> *Id.* At 3.12-1 to 3.12-6.

<sup>26</sup> *Id.* At 3.4-1 to 3.4-52.

<sup>27</sup> *Id.* At 3.5-1 to 3.5-42.

<sup>28</sup> *Id.* At 3.18-1 to 3.18-8.

<sup>29</sup> *Id.* At 3.7-1 to 3.7-32.

<sup>30</sup> *Id.* At 3.9-1 to 3.9-18.

<sup>31</sup> *Id.* At 3.10-1 to 3.10-18.

<sup>32</sup> *Id.* At 3.13-1 to 3.13-32.

<sup>33</sup> *Id.* At 3.15-1 to 3.15-14.

<sup>34</sup> *Id.* At 3.16-1 to 3.16-10.

<sup>35</sup> *Id.* At 3.17-1 to 3.17-20.

<sup>36</sup> *Id.* At 3.19-1 to 3.19-16.

<sup>37</sup> *Id.* At 3.20-1 to 3.20-20.

4. The proposed project is designed in compliance with the Commission's policies governing the mitigation of EMF effects.

5. The Final IS/MND was completed in compliance with CEQA requirements.

6. The Commission has reviewed and considered the information contained in the Final IS/MND including comments received during the public review period.

7. On the basis of the whole record before it (including the Initial Study and all comments received), the Commission finds that there is no substantial evidence that the project will have a significant effect on the environment.

8. The Final IS/MND reflects the Commission's independent judgment and analysis.

9. The Commission's preparation of an MND was supported by substantial record evidence.

### **Conclusions of Law**

1. SDG&E should be granted a permit to construct the TL 6975 project in conformance with the mitigation measures attached to this order.

2. CEQA requires that, prior to approving the project, the decisionmaking body of the lead agency shall consider the proposed MND together with any comments received during the public review period. The decisionmaking body shall adopt the proposed MND only if it finds on the basis of the whole record before it (including the Initial Study and any comments received) that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis.

3. The Final IS/MND should be adopted by the Commission in this decision.

4. This order should be effective immediately.

**O R D E R**

**IT IS ORDERED** that:

1. The Final Mitigated Negative Declaration is adopted.
2. The mitigation measures included as part of the Final Mitigated Negative Declaration and the Mitigation Monitoring, Reporting, and Compliance Plan attached to this order as Attachment A are adopted.
3. San Diego Gas & Electric Company is granted a permit to construct the Tie Line 6975 project in conformance with the mitigation measures attached to this order.
4. Application 17-11-010 is closed.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California



# ATTACHMENT A

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



# MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM

## San Diego Gas & Electric's San Marcos to Escondido TL6975 69 kV Project (APPLICATION NO. A.17-11-010)

### Introduction

This document describes the mitigation monitoring, reporting, and compliance program (MMRCP) for ensuring the effective implementation of the mitigation measures required for approval by the California Public Utilities Commission (CPUC) of the application by the San Diego Gas and Electric Company's (SDG&E) to construct, operate and maintain the SDG&E San Marcos to Escondido Tie Line (TL) 6975 69kV Project (Project). The MMRCP includes all measures proposed by SDG&E, as well as all mitigation measures identified by the CPUC to reduce potentially significant impacts to less than significant.

If the Project is approved, this MMRCP would serve as a self-contained general reference for the MMRCP adopted by the CPUC for the Project. If and when the Project is approved, the CPUC will compile the Final MMRCP to assure that it includes all measures as adopted.

### California Public Utilities Commission – MMRCP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a reporting or monitoring program when it adopts a mitigated negative declaration for a project that could have potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of a MMRCP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMRCP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The CPUC will address its responsibility under Public Resources Code Section 21081.6 when it takes action on SDG&E's application. If the CPUC approves the application, it also will adopt a MMRCP that includes the mitigation measures, as well as the APMs, the implementation of which will ultimately made conditions of approval by the CPUC.

Because the CPUC must decide whether or not to approve the SDG&E application and because the application may cause either direct or reasonably foreseeable indirect effects on the environment, CEQA requires the CPUC to consider the potential environmental impacts that could occur as the result of its decision and to consider mitigation for any identified significant environmental impacts.

If the CPUC approves SDG&E's application for authority to reinforce the electric transmission and distribution system, SDG&E would be responsible for implementation of all adopted Applicant Proposed Measures (APM) and CPUC-recommended mitigation measures governing the construction, operation, and maintenance of the Project. Though other federal, State, and local agencies would have permit and approval authority over some aspects of the Project, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by the adopted IS/MND. All approvals and permits obtained by SDG&E would be submitted to the CPUC prior to commencing the activity for which the permits and approvals were obtained.

In accordance with CEQA, the CPUC reviewed the impacts that would result from approval of the application. The activities considered include installation of new overhead single-circuit electric power line structures, rebuild of existing structures from single circuit to double circuit, and the reconductoring and re-energizing of existing conductors, pursuant to CPUC General Order (GO) 131-D. This would involve removal and/or replacement of power poles, placement of new poles and other distribution line upgrades. The Project is located primarily in the cities of San Marcos and Escondido and unincorporated areas in northern San Diego County, California. It would originate at the San Marcos Substation on the west and terminate at the Escondido Substation on the east and would be located within SDG&E right-of-way (ROW). To fully accommodate the Project, 1.2 acres of additional ROW would be acquired in San Marcos.

The CPUC review concluded that implementation of the Project would not result in any significant unmitigable impacts. All impacts would be mitigated to less-than-significant levels or would be less than significant. SDG&E has agreed to incorporate all the CPUC-recommended mitigation measures into the Project. The CPUC has included the stipulated mitigation measures as conditions of approval of the application and has circulated an IS/proposed MND for public review.

The attached IS/MND presents and analyzes potential environmental impacts that would result from construction, operation, and maintenance of the Project, and recommends mitigation measures as appropriate. Based on the IS/MND, approval of the application would have no impact or less than significant impacts in the following areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Mineral Resources
- Population and Housing

The IS/MND indicates that approval of the application would result in potentially significant impacts in the areas listed below, and so identifies adopted APMs and mitigation measures that have been accepted by SDG&E to reduce the significance below established thresholds.

- Biological Resources
- Cultural Resources
- Geology, Soils, Seismicity, and Paleontological Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

## Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor the Project, if approved, to ensure that the required mitigation measures and adopted APMs are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMRCP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures and APMs required and relied upon by the CPUC are implemented and that mitigated environmental impacts are reduced to a less-than-significant level. The CPUC has the authority to halt any activity associated with the Project if the activity is determined to be a deviation from the approved Project or the adopted APMs and mitigation measures.

Consistent with CEQA Guidelines section 15097(a), the CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC's Energy Division may approve requests by SDG&E for minor Project refinements that may be necessary due to the final engineering of the Project, so long as such minor Project refinements are located within the geographic boundary of the study area of the IS/MND 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 IS/MND; substantively conflict with any mitigation measure or applicable law or policy; or trigger an additional discretionary permit requirement.

As defined in this MMRCP, a minor Project refinement should be strictly limited to minor Project changes that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A change to the Project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved Project and adopted APMs or mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and

the mitigation monitor assigned to the construction for their review and CPUC approval. In some cases, a minor Project refinement also may require approval by a CEQA responsible agency.

## Enforcement and Responsibility

The CPUC is responsible for enforcing the procedures for monitoring through the mitigation monitor. The mitigation monitor shall note any problems with implementation of mitigation, notify appropriate agencies or individuals about such problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the Project if the activity is determined to be a deviation from the approved Project or adopted APMs or mitigation measures. The CPUC may assign its authority to its mitigation monitor.

## Mitigation Compliance Responsibility

SDG&E is responsible for successfully implementing all of the adopted APMs and mitigation measures in this MMRCPP. The MMRCPP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

SDG&E shall inform the CPUC and its mitigation monitor in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its mitigation monitor will assess whether alternative mitigation is appropriate and specify to SDG&E the subsequent actions required.

## Dispute Resolution Process

The following procedure will be observed for dispute resolution between CPUC staff and the applicant:

- Disputes and complaints should be directed to the CPUC's designated Project Manager for resolution.
- Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the approved Project.

## General Monitoring Procedures

### Mitigation Monitor

Many of the monitoring procedures will be conducted during the construction phase of the Project. The CPUC and the mitigation monitor are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SDG&E. To oversee the monitoring procedures and to ensure success, the mitigation monitor assigned to the construction must be on site during that portion of construction that has the potential to create a significant

environmental impact or other impact for which mitigation is required. The mitigation monitor is responsible for ensuring that all procedures specified in this MMRCP are followed.

## Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures and APMs require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in this MMRCP, will be taken:

- SDG&E shall require all contractors to comply with the conditions of Project approval, including all adopted APMs and mitigation measures.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all adopted APMs and mitigation measures requiring their attention.

SDG&E will also be responsible for retaining the qualified archaeologists, qualified biologists/biological monitors, qualified paleontologists, licensed engineers, qualified environmental trainers, Lead Environmental Inspectors, etc., specified in the adopted APMs and mitigation measures.

## General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the mitigation monitor assigned to the construction. A monitoring record form will be submitted to the mitigation monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the mitigation monitor. A checklist will be developed and maintained by the mitigation monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The mitigation monitor will note any problems that may occur and take appropriate action to rectify the problems. SDG&E shall provide the CPUC with written quarterly reports of the Project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the Project. Quarterly or annual reports shall be required as long as mitigation measures are applicable.

## Public Access to Records

The CPUC will make monitoring records and reports available for public inspection upon request. The CPUC and SDG&E will develop a filing and tracking system.

## Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMRCPP to ensure compliance during project implementation (Pub. Res. Code §21081.6):

- The CPUC may conduct a comprehensive review of measures which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution Process outlined above; and
- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the Project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

## Mitigation Monitoring, Reporting and Compliance Program

The table attached to this MMRCPP presents a compilation of the adopted APMs and mitigation measures in the IS/MND. The purpose of the table is to provide a single comprehensive list of impacts, mitigation measures, adopted APMs, monitoring and reporting requirements, and timing. SDG&E proposed APMs to minimize impacts to the environment from implementation of the Project. In some instances, those APMs have been superseded by CPUC-recommended mitigation measures, as described in the IS/MND. The table below identifies only those APMs that have not been superseded and will be implemented as part of the Project.

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Aesthetics</b>				
	No mitigation required.			
<b>Agriculture and Forestry Resources</b>				
	No mitigation required.			
<b>Air Quality</b>				
	No mitigation required.			
<b>Biological Resources</b>				
<b>Sensitive and Special-Status Areas and Species</b>	<p><b>APM BIO-1:</b> SDG&amp;E will conduct all construction and operation and maintenance activities in accordance with NCCP Operational Protocols to avoid and minimize impacts on biological resources.</p>	<p>SDG&amp;E and its contractors to implement NCCP Operational Protocols. SDG&amp;E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>CPUC mitigation monitor to inspect compliance with NCCP Operational Protocols. Pre-activity surveys and reporting must be completed prior to issuance of an NTP for ground disturbance.</p>	<p>During all phases of construction, operation and maintenance of the Project</p>
	<p><b>APM BIO-2:</b> All earth-moving equipment will be free of mud and vegetative material before being mobilized onto work areas associated with the Project.</p>	<p>SDG&amp;E and its contractors to remove mud and vegetative material and provide inspection to ensure cleanliness of earth-moving equipment prior to bringing it into Project work areas.</p>	<p>CPUC mitigation monitor to inspect compliance at entrance to and within work areas.</p>	<p>Prior to and during construction</p>
	<p><b>APM BIO-3:</b> Except when not feasible due to physical or safety constraints, all Project construction vehicle movement will be restricted to the Project work areas, existing roads, and access roads constructed as a part of the Project and mapped by SDG&amp;E in advance of construction. Approval from a biological monitor will be obtained prior to vehicle travel off of existing access roads.</p>	<p>SDG&amp;E and its contractors to prohibit construction vehicle movement outside of Project work areas, existing roads, and Project access roads.</p>	<p>SDG&amp;E biological monitor to report all impacts associated with vehicle travel off of existing roads. CPUC mitigation monitor to inspect compliance.</p>	<p>Prior to and during construction</p>



MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
<i>Sensitive and Special-Status Areas and Species (cont.)</i>	APM BIO-3 (cont.)	SDG&E and its biological monitor approval for vehicle travel off-road pursuant to NCCP Operational Protocols. SDG&E to provide Operational Protocols to CPUC mitigation monitor.	SDG&E biological monitor to report all impacts associated with on-foot activities off existing roads. CPUC mitigation monitor to inspect compliance.	During Project surveying activities
	<b>APM BIO-4:</b> Civil and land survey personnel will keep survey vehicles on existing roads. During Project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel placement in sensitive habitat prior approval will be required from the Project's biological monitor. Hiking off roads or paths for survey data collection will be allowed year-round as long as all of the other applicable APMs are met.	SDG&E and its biological monitor approval for survey work in sensitive habitat pursuant to NCCP Operational Protocols. SDG&E to provide Operational Protocols to CPUC mitigation monitor.	SDG&E biological monitor to report all impacts associated with on-foot activities off existing roads. CPUC mitigation monitor to inspect compliance.	During Project surveying activities
	<b>APM BIO-5:</b> Prior to the start of construction, the boundaries of sensitive plant populations that require protection will be delineated with clearly visible flagging or fencing by a qualified biologist. The flagging and/or fencing will be maintained in place for the duration of construction. Flagged and fenced areas will be avoided to the extent practicable during construction activities in that area. If impacts on sensitive plant species are unavoidable, SDG&E will perform soil and plant salvage activities to enhance recovery of these special-status plants, consistent with the provisions in the Enhancement Section 7.2.1 of the NCCP. These include the stockpiling of native soil in the area where Nuttall's scrub oak and wart-stemmed Ceanothus occur and top soil replacement after construction. Quality assurances and success criteria milestones for the restoration area as a whole will conform to the standards provided in Enhancement Section 7.2.1 of the NCCP.	SDG&E and its biological monitor to flag and fence areas of sensitive plant populations that require protection. If impacts are unavoidable, SDG&E and its contractors will confer to the standards discussed in Section 7.2.1 of the NCCP.	CPUC mitigation monitor to inspect and confirm compliance with Section 7.2.1 of the NCCP.	Up to 30 days prior to construction and during all phases of construction activities

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Biological Resources (cont.)</b>				
<b>Sensitive and Special-Status Areas and Species (cont.)</b>	<p><b>APM BIO-6: Coastal California Gnatcatcher.</b> Prior to construction, SDG&amp;E shall retain a qualified biologist to conduct surveys for the coastal California gnatcatcher in suitable habitat, to determine if any active nests are within or in the immediate vicinity of proposed construction activities. If feasible, SDG&amp;E will avoid construction during the peak breeding season (February 15 – August 31) for coastal California gnatcatcher and migratory birds. When it is not feasible to avoid trimming or removal of vegetation or during the peak breeding season, SDG&amp;E will perform a site survey in the area where the work is to occur. Trimming or removal of vegetation during the peak breeding season will require a preconstruction survey by a qualified biologist to confirm that active nests will not be affected. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest, if the nesting and/or breeding activities are being conducted by a federal or state-listed species, SDG&amp;E will consult with the USFWS and CDFW as necessary. Monitoring of the nest will continue until the birds have fledged or construction is no longer occurring on site.</p> <p><b>Migratory Birds.</b> Trimming or removal of vegetation during the peak breeding season (February 15 to August 31) will require a pre-construction survey by a qualified biologist to confirm that active nests will not be affected. If an active nest is detected within the construction area during the survey, work will be temporarily halted and redirected away from the site. The qualified biologist in the field will determine a no-work buffer zone around the nest of sufficient size and dimensions that construction activities will not result in disturbance or direct removal of the active nest, or will not cause a breeding bird to abandon its nest.</p>	<p>SDG&amp;E and its contractors to conduct pre-construction survey to determine presence or absence of nesting birds and implement recommendations of biological monitor regarding nesting birds pursuant to NCCCP Operational Protocols. SDG&amp;E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance and review consultation with USFWS and CDFW if nesting and breeding activities found in the vicinity of the Project are a federal or state-listed species.</p>	<p>Up to 30 days prior to construction and during all phases of construction activities</p>
	<p><b>APM BIO-7:</b> if a raptor nest is observed during preconstruction surveys, a qualified biologist would determine if it is active. If the nest is determined to be active, the biological monitor would monitor the nest to ensure nesting activities and/or breeding activities are not substantially adversely affected. If the biological monitor determines that Project activities are disturbing or disrupting nesting and/or breeding activities, the monitor will make recommendations to reduce the noise and/or disturbance in the vicinity of the nest.</p>	<p>SDG&amp;E and its contractors to implement recommendations of biological monitor pursuant to NCCCP Operational Protocols. SDG&amp;E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>Conduct pre-construction surveys prior to and carry out recommendations throughout construction. CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>Up to 30 days prior to construction and during all phases of construction activities</p>
	<p><b>APM BIO-8:</b> A biological monitor will be present during all ground-disturbing and vegetation removal activities. Immediately prior to initial ground-disturbing activities and/or vegetation removal, the biological monitor will survey the site to ensure that no special-status species will be impacted.</p>	<p>SDG&amp;E and its contractors to implement recommendations of biological monitor pursuant to the NCCCP Operational Protocols. SDG&amp;E to provide Operational Protocols to CPUC mitigation monitor.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>Prior to and during all ground disturbing and vegetation removal activities</p>

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Biological Resources (cont.)</b>				
<i>Sensitive and Special-Status Areas and Species (cont.)</i>	<b>APM BIO-9:</b> Wherever possible, vegetation will be left in place or mowed, instead of grubbed, to avoid excessive root damage and to allow for regrowth and to minimize soil erosion.	SDG&E and its contractors to leave vegetation in place and use mowing instead of grubbing.	CPUC mitigation monitor to inspect and confirm compliance.	During all project activities
<i>Special-Status Species</i>	<b>Mitigation Measure BIO-1: Project Compliance with the Federal and California Endangered Species Acts.</b> Prior to approval of the Notice to Proceed (NTP), SDG&E shall provide CPUC with a written commitment to implement its 1995 Subregional Natural Community Conservation Plan (NCCCP) or 2017 Low Effect HCP (LEHCP), including proof that sufficient mitigation/take credits are assigned to the Project to cover potential impacts on all special-status plant and animal species present in the BSA or having moderate or high potential to occur in the biological study area (BSA).  If there are not sufficient mitigation/take credits available in the NCCP or LEHCP at the time of NTP approval, then prior to the commencement of Project construction, SDG&E shall secure take authorization from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), as appropriate, for all federal and State-listed special-status plant and animal species present in the BSA or having moderate or high potential to occur in the BSA that are impacted by the Project. The conditions of these authorizations shall be equally or more effective than the protocols and practices included in the NCCP/LEHCP. SDG&E shall provide the CPUC with copies of these authorizations to show that compliance with permitting conditions would be equal to or more effective than the approved NCCP/LEHCP protocols and practices. SDG&E shall also submit to CPUC any monitoring reports, incident reports, etc., required by USFWS and/or CDFW when submitted to those agencies.	SDG&E and its contractors to provide proof of sufficient mitigation/take credits or take authorization from the identified agencies to the CPUC.	SDG&E to provide the most recent documentation to CPUC Project Manager and mitigation monitor in order to confirm compliance that sufficient mitigation/take credits are available to the Project. If sufficient mitigation/take credits are not available, then take authorization from the identified agencies must be submitted.	Prior to approval of the NTP and construction
<i>Active Nests</i>	<b>Mitigation Measure BIO-2: Establishment of Cylindrical Construction Buffers.</b> The biological monitor shall establish a three-dimensional cylinder-shaped buffer around active nests that have the potential to be affected by helicopter use or ground-based activities associated with helicopter use. A vertical buffer shall extend at least 300 feet vertically above the location of the nest and at least 300 feet horizontally for passerines (or 500 feet vertically and horizontally for raptors and 500 feet vertically and 0.5 mile horizontally for white-tailed kite). The biological monitor and SDG&E project manager shall monitor the helicopter tracks (i.e., flight patterns, durations) daily to ensure compliance with these established buffers. This buffer assumes the helicopter activities are temporary or infrequent in nature (no longer than one minute [e.g., pass-by] or visit the site once in a day) if helicopter work occurs in the vicinity of an active nest for an extended period of time, the biological monitor may determine, based on the nature of the work and nest monitoring observations, that the buffer is insufficient for the nest and adjust the buffer distance appropriately.	SDG&E and its contractors shall monitor the helicopter tracks daily and implement recommendations of the biological monitor.	CPUC mitigation monitor to inspect and confirm compliance.	Daily prior to any helicopter use prior to and during construction
<i>Jurisdictional Areas</i>	<b>Mitigation Measure BIO-3: Avoid Jurisdictional Resources.</b> To avoid impacts on jurisdictional areas, SDG&E and its contractor shall flag work area limits and work shall be restricted to the flagged limits. Additionally, when clearing or grading occurs within 25 feet of a jurisdictional feature, silt fencing shall be installed on the side of the work area closest to the jurisdictional feature, to minimize construction-generated run-off or sedimentation. A qualified biologist shall verify that silt fencing and construction work is properly installed and are located outside of jurisdictional areas to confirm their avoidance. Monitoring shall take place during rain events to confirm the integrity of silt fencing and verify runoff does not enter jurisdictional areas.	SDG&E and its contractors to flag work area limits, install silt fencing as defined, monitor silt fencing during rain events, and repair as necessary.	CPUC mitigation monitor to inspect and confirm compliance, including inspection during rain events.	Prior to and during construction, including rain events

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69kV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Cultural Resources</b>				
<i>Historical and Archaeological Resources</i>	<p><b>Mitigation Measure CUL-1: Retention of Qualified Archaeologist.</b> Prior to the start of any ground disturbing activity, a Qualified Archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior, 2008) shall be retained by SDG&amp;E. The Qualified Archaeologist, or a CPUC-approved archaeological monitor overseen by the Qualified Archaeologist, shall carry out all APMs and mitigation measures related to archaeological resources.</p>	<p>SDG&amp;E and its contractors shall retain a Qualified Archaeologist as described in the measure and implement all APMs and cultural resource mitigation measures.</p>	<p>CPUC mitigation monitor to inspect and confirm implementation of appropriate APMs and mitigation measures.</p>	<p>Prior and during construction</p>
	<p><b>Mitigation Measure CUL-2: Pre-Construction Cultural Resources Sensitivity Training.</b> Prior to the start of any ground-disturbing activity, the Qualified Archaeologist shall prepare cultural resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The cultural resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the Qualified Archaeologist. The Qualified Archaeologist shall determine and ensure the suitability of the qualified environmental trainer. The cultural resources sensitivity training shall be conducted for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be implemented in the event of an inadvertent discovery of archaeological resources or human remains. SDG&amp;E shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.</p>	<p>SDG&amp;E to ensure all construction personnel attends the cultural resources sensitivity training and provide proof of attendance.</p>	<p>CPUC mitigation monitor to confirm documentation that training occurred and attendance of construction personnel.</p>	<p>Prior to construction</p>
	<p><b>Mitigation Measure CUL-3: Development and Implementation of Cultural Resources Monitoring Plan.</b> Prior to the start of any Project-related ground disturbing activities the Qualified Archaeologist shall prepare a Cultural Resources Monitoring Plan (CRMP). The CRMP shall stipulate the location and timing of archaeological and Native American monitoring, including, but not limited to, the monitoring of all ground disturbing activities within 250 feet of P-37-032160 and within 100 feet of the remaining 10 archaeological resources (P-37-004495, -004499, -005501, -007306, -010551, -010550, -011442, -012209, -034831, and TL6975-S-5) that have the potential to contain or are known to contain subsurface archaeological deposits, as well as all ground disturbing activities within Segment 3 and the easternmost 500 feet of Segment 2. The CRMP shall include monitoring protocols to be carried out during Project construction. The CRMP shall stipulate that a Native American monitor associated with one or more of the Native American groups that have expressed interest in the Project (i.e., San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Iipay Nation) be retained to monitor all Project-related ground disturbance stipulated in the CRMP. In preparing the CRMP, the Native American groups that have expressed interest in monitoring shall be consulted regarding the scheduling of monitors. A Native American monitoring schedule shall be incorporated into the CRMP.</p>	<p>Qualifies Archaeologist to prepare CRMP. SDG&amp;E and its contractors to implement the Cultural Resources Monitoring Plan.</p>	<p>CPUC to review and approve CRMP. CPUC mitigation monitor to confirm compliance.</p>	<p>Prior to any Project-related ground disturbing activities and during construction</p>

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing	
<p><b>Cultural Resources (cont.)</b></p>	<p><b>Historical and Archaeological Resources (cont.)</b></p>	<p>Mitigation Measure CUL-3 (cont.)                      The CRMP shall contain an allowance that the Qualified Archaeologist, based on observations of subsurface soil stratigraphy or other factors during initial grading, and in coordination with the Native American monitor(s) and SDG&amp;E, may reduce or discontinue monitoring as warranted if it is determined that the possibility of encountering archaeological deposits is low. The CRMP shall outline the appropriate measures to be followed in the event of unanticipated discovery of cultural resources during Project implementation, including that all ground disturbance within 100 feet of an unanticipated discovery shall cease until a treatment plan is developed by the Qualified Archaeologist in coordination with SDG&amp;E and the Native American monitor(s) and which will consider the resources archaeological and tribal value. The CRMP shall identify avoidance as the preferred manner of mitigating impacts to cultural resources. The CRMP shall establish the criteria utilized to evaluate the significance (per CEQA) of the discoveries, methods of avoidance consistent with CEQA Guidelines Section 15126.4(b)(3), as well as identify the appropriate treatment to mitigate the effect of the Project if avoidance of a significant resource is determined to be infeasible. The CRMP will also include provisions for the treatment of archaeological sites that qualify as unique archaeological resources pursuant to PRC Section 21083.2, which places limits on the costs of mitigation for unique archaeological resources. The plan shall also include reporting of monitoring results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories. The CRMP shall be submitted to SDG&amp;E and CPUC for review and approval prior to the start of Project-related ground disturbance, as well as to the Native American groups that have expressed interest in the Project (i.e. San Luis Rey Band of Mission Indians, Rincon Band of Luiseno Indians, and/or Santa Ysabel Band of the Iipay Nation) for review and comment.</p>	<p>Qualifies Archaeologist to prepare research design. SDG&amp;E to review and approve research design prepared by the Qualified Archaeologist and ensure implementation of approved design.</p>	<p>CPUC to review and approve research design and confirm adequate consultation with San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians.</p>	<p>Prior to any Project-related ground disturbing activities and data recovery excavations</p>
	<p><b>Mitigation Measure CUL-4: Data Recovery Excavations at P-37-032160.</b> Prior to the start of any Project-related ground disturbing activities within 250 feet of archaeological site P-37-032160, data recovery excavations shall be carried out to collect scientifically consequential data associated with known resource P-37-032160 where Project-related ground disturbing activities including but not limited to pole replacement, trenching, potholing, and AC mitigation well and test station installations will be carried out. Prior to the start of the data recovery excavations, a research design shall be prepared by the Qualified Archaeologist outlining the research questions to be addressed as part of the data recovery, as well as the field and lab methods and any special studies proposed to obtain the scientifically consequential information. The research design shall be submitted to SDG&amp;E and CPUC for review and approval prior to the start of the data recovery excavations, as well as to the San Luis Rey Band of Mission Indians and the Rincon Band of Luiseno Indians for review and comment. A data recovery report presenting the methods and results of the data recovery excavations shall be prepared and reviewed by the CPUC and SDG&amp;E, and submitted to the San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians for review and comment. The final data recovery report shall be placed on file at the South Coast Information Center.</p>	<p>Qualifies Archaeologist to prepare research design. SDG&amp;E to review and approve research design prepared by the Qualified Archaeologist and ensure implementation of approved design.</p>	<p>CPUC to review and approve research design and confirm adequate consultation with San Luis Rey Band of Mission Indians and Rincon Band of Luiseno Indians.</p>	<p>Prior to any Project-related ground disturbing activities and data recovery excavations</p>	

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Cultural Resources (cont.)</b>				
<b>Historical and Archeological Resources (cont.)</b>	<p><b>Mitigation Measure CUL-5: Exclusionary Fencing.</b> Prior to Project-related ground disturbing activities, exclusionary fencing shall be installed to ensure that the five previously recorded archaeological sites within or immediately adjacent to the Project alignment that have surface manifestations (P-37-004495, -004499, -007306, -012209, and TL6975-S-5) are not inadvertently impacted during Project implementation. The exclusionary fencing shall encompass the mapped site boundaries plus a 25-foot radius to ensure an appropriate buffer is maintained between the sites and Project-related ground disturbing activities. For the four archaeological resources bisected by Project access roads (P-37-004495, -004499, -007306, and TL6975-S-5), the exclusionary fencing shall be established along the shoulder of the existing roads. To ensure avoidance, the exclusionary fencing shall be marked with signs indicating that staff associated with the Project are not to go beyond the limits of the fencing. The exclusionary fencing shall not identify the protected areas as demarcating archaeological resources in order to discourage unauthorized disturbance, vandalism, or collection of artifacts.</p>	<p>SDG&amp;E and its contractors to install exclusionary fencing and implement measure as defined regarding signage.</p>	<p>CPUC mitigation monitor to inspect and confirm fencing and appropriate signage has been installed.</p>	<p>Prior to Project-related ground disturbing activities</p>
	<p><b>Mitigation Measure CUL-6: Pre-Construction Surveys.</b> Prior to the start of Project-related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5) shall be conducted to map and collect all artifacts located within the road beds. Artifact mapping shall be conducted using a hand held GPS unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&amp;E in coordination with the San Luis Rey Band of Mission Indians.</p>	<p>SDG&amp;E and Qualified Archaeologist to implement measure as defined and coordinate the disposition of the artifacts with the San Luis Rey Band of Mission Indians.</p>	<p>CPUC mitigation monitor to inspect mapping and collection; confirm consultation and compliance with the San Luis Rey Band of Mission Indians.</p>	<p>Prior to Project-related ground disturbing activities</p>
	<p><b>Mitigation Measure CUL-7: Road Maintenance within Archeological Sites.</b> During Project implementation, routine road maintenance, including but not limited to grading and blading, shall be avoided within the four archaeological sites bisected by existing access roads (P-37-004495, -004499, -007306, and TL6975-S-5). Should maintenance activities such as drainage or culvert repairs be required to stabilize the access road, all ground disturbing activities within 100 feet of the four archaeological sites shall be monitored as stipulated in the CRMP.</p>	<p>SDG&amp;E and its contractors will avoid routine road maintenance in the locations specified and implement measure as defined.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>During construction</p>
<b>Human Remains</b>	<p><b>Mitigation Measure CUL-8: Inadvertent Discovery of Human Remains.</b> If human remains are uncovered during Project construction, all work within 100 feet of the find shall be immediately halted, and the San Diego County coroner shall be contacted to evaluate the remains, and follow the procedures and protocols set forth in Section 15064.5(e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the County Coroner shall contact the California Native America Heritage Commission (NAHC), in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98 (as amended by AB 264.1). The NAHC shall then identify a Most Likely Descendant (MLD) of the deceased Native American, who shall then help determine what course of action should be taken in the disposition of the remains. Per Public Resources Code Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.</p>	<p>SDG&amp;E and its contractors shall halt work and notify the San Diego County Coroner if human remains are uncovered. SDG&amp;E and its contractors to follow all protocols in Section 15064.5 (e) (1) of the CEQA Guidelines and instructions from the NAHC.</p>	<p>CPUC mitigation monitor to confirm compliance with CEQA Guidelines, Health and Safety Codes, and Public Resources Codes mentioned in measure if human remains are discovered.</p>	<p>During construction</p>

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Energy	No mitigation required.			
<b>Geology, Soils, Seismicity, and Paleontological Resources</b>				
<b>Ground Failure, Slope Instability, and Landslides</b>	<p><b>Mitigation Measure GEO-1: Geotechnical Report.</b> The structural requirements of the California Building Code (CBC) are applicable to certain structural components of the Project, including retaining walls, screen walls, fences, and control shelters. SDG&amp;E and/or its contractors shall design such structures to comply with such CBC standards and shall adhere to and implement all design recommendations and parameters established in the Project's Geotechnical Investigation Report by GEOCON Inc. and the AC Interference Analysis &amp; Mitigation System Design by ARK Engineering &amp; Technical Services. In addition, SDG&amp;E shall retain a California registered professional engineer(s) to prepare a supplemental geotechnical report. This report shall address specific geotechnical hazards that were not addressed in the Geotechnical Investigation Report, and provide recommendations for mitigating such hazards. The analysis in that report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• recommendations to address the liquefaction risk within the Quaternary alluvium along Segment 1 and 3, if any;</li> <li>• recommendations to address the corrosive soils that are present along Segments 1 and 2, if any, which pose a risk to the concrete pier foundations and direct bury poles;</li> <li>• recommendations to address the landslide potential along Segment 2, if any, where planned ground disturbing activities could trigger landslides; and,</li> <li>• evaluation of the site-specific conditions and recommendations specific to micropiles where proposed, if final design includes the use of micropiles.</li> </ul> <p>The recommendations shall ensure that when incorporated, the Project shall not increase the potential for ground failure, slope instability, and/or landslides, and shall be resistant to damage from ground shaking, ground failure, corrosive soils, unstable slopes, and landslides. SDG&amp;E shall submit the supplemental geotechnical report to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction.</p>	<p>SDG&amp;E and its contractors to implement recommendations and parameters discussed in the Project's Geotechnical Investigation Report and the AC Interference Analysis &amp; mitigation System Design report.</p> <p>SDG&amp;E and its contractors shall retain a California registered professional engineer to prepare a supplemental geotechnical report mitigating hazards, as required in the measure.</p>	<p>CPUC PM to review and approve supplemental geotechnical report(s). CPUC mitigation monitor to confirm compliance.</p>	<p>At least 30 days prior to construction</p>
<b>Paleontological Resources</b>	<p><b>Mitigation Measure PALEO-1: Project Paleontologist.</b> SDG&amp;E or its contractor shall retain a qualified professional paleontologist (qualified paleontologist) meeting the Society of Vertebrate Paleontology (SVP) standards as set forth in the "Definitions" section of Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010) prior to the approval of demolition or grading permits. The qualified paleontologist shall attend the Project kick-off meeting and Project progress meetings on a regular basis, shall report to the site in the event potential paleontological resources are encountered, and shall implement the duties outlined in Mitigation Measures PALEO-2 through PALEO-4.</p>	<p>SDG&amp;E and its contractors to shall retain a qualified paleontologist as described in the measure and attend the Project kick-off meeting and Project progress meetings on a regular basis.</p>	<p>CPUC mitigation monitor to confirm paleontologist qualifications and the completion of trainings/ meetings.</p>	<p>Project meetings (i.e., kick-off and regular basis meetings) and during all project activities (i.e., construction, operation, and maintenance)</p>

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Geology, Soils, Seismicity, and Paleontological Resources (cont.)</b></p>	<p><b>Mitigation Measure PALEO-2: Worker Training.</b> Prior to the start of any ground disturbing activity (including vegetation removal, pavement removal, etc.), the qualified paleontologist shall prepare paleontological resources sensitivity training materials for use during Project-wide Worker Environmental Awareness Training (or equivalent). The paleontological resources sensitivity training shall be conducted by a qualified environmental trainer (often the Lead Environmental Inspector [LEI] or equivalent position) working under the supervision of the qualified paleontologist. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found, as outlined in the approved Paleontological Resources Monitoring and Mitigation Plan in Mitigation Measure PALEO-3. SDG&amp;E and/or its contractor shall retain documentation demonstrating that all construction personnel attended the training prior to the start of work on the site, and shall provide the documentation to the CPUC Project Manager upon request.</p>	<p>SDG&amp;E and its contractors to provide documentation demonstrating all construction personnel attended the training and schedule and document additional trainings for new construction personnel.</p>	<p>SDG&amp;E qualified paleontologist to confirm compliance and provide specified documentation to CPUC PM. CPUC PM to review and confirm documentation.</p>	<p>Prior to any ground disturbing activities and/or when new construction personnel start work</p>
<p><b>Mitigation Measure PALEO-3: Paleontological Monitoring.</b> The qualified paleontologist shall prepare, and SDG&amp;E and/or its contractors shall implement, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). SDG&amp;E shall submit the plan to the CPUC Project Manager for review and approval at least 30 days prior to the start of construction. This plan shall address specifics of monitoring and mitigation and comply with the recommendations of the SVP (2010), as follows.</p> <ul style="list-style-type: none"> <li>• The qualified paleontologist shall identify, and SDG&amp;E or its contractor(s) shall retain, qualified paleontological resource monitors (qualified monitors) meeting the SVP standards (2010).</li> <li>• The qualified paleontologist and/or the qualified monitors under the direction of the qualified paleontologist shall conduct full-time paleontological resources monitoring for all ground-disturbing activities in previously undisturbed sediments in the Project site that have high paleontological sensitivity. This includes any depth of excavation into the Santiago Formation, as well as excavations that exceed 10 feet in depth in areas mapped as young alluvial floodplain deposits that overlie the Santiago Formation. The PRMMP shall clearly map these portions of the Project based on final design provided by SDG&amp;E and/or its contractor(s).</li> <li>• If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location will need to be individually monitored.</li> <li>• Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to evaluate and recover the fossil specimens, establishing a 50-foot buffer.</li> <li>• If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location and regardless of whether the site is being monitored, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment.</li> <li>• The qualified paleontologist shall determine the significance of any fossils discovered, and shall determine the appropriate treatment for significant fossils in accordance with the SVP standards. The qualified paleontologist shall inform SDG&amp;E of these determinations as soon as practicable. See Mitigation Measure PALEO-4 regarding significant fossil treatment.</li> </ul>	<p>Qualified paleontologist prepares PRMMP. SDG&amp;E and its contractors to implement the PRMMP and all recommendations included in the measure.</p>	<p>SDG&amp;E qualified paleontologist to provide PRMMP to CPUC PM at least 30 days prior to construction. SDG&amp;E qualified paleontologist to confirm compliance and provide other specified documentation to CPUC PM at least. CPUC PM to review and confirm documentation.</p>	<p>At least 30 days prior to construction for PRMMP. Other documentation submitted and reviewed during construction, as necessary</p>	



**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/ Reporting Requirements	Timing
<b>Geology, Soils, Seismicity, and Paleontological Resources (cont.)</b>				
<b>Paleontological Resources (cont.)</b>	<p>Mitigation Measure PALEO-3 (cont.)</p> <ul style="list-style-type: none"> <li>Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort and any curation of fossils. SDG&amp;E shall provide the daily logs to the CPUC Project Manager upon request, and shall provide the final report to the CPUC Project Manager upon completion.</li> </ul>			
	<p><b>Mitigation Measure PALEO-4: Significant Fossil Treatment.</b> If any find is deemed significant, as defined in the SVP standards (2010) and following the process outlined in Mitigation Measure PALEO-3, the qualified paleontologist shall salvage and prepare the fossil for permanent curation with a certified repository with retrievable storage following the SVP standards.</p>	<p>SDG&amp;E, its contractors, and qualified paleontologist to prepare and salvage any fossils deemed significant and following SVP standards.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance with SVP standards and MM PALEO-3 if fossil is deemed significant.</p>	<p>During construction, operation, and maintenance of the Project</p>
<b>Greenhouse Gas Emissions</b>				
	<p>No mitigation required.</p>			
<b>Hazards and Hazardous Materials</b>				
<b>Construction Hazards</b>	<p><b>APM HAZ-1:</b> A Health and Safety Plan will be prepared and implemented during construction. The Health and Safety Plan will describe the anticipated hazards that construction workers may encounter while working on the Project, the safety measures that must be taken to address those hazards, and the necessary training requirements for personnel working on the Project. Safety hazards and applicable federal and state occupational standards will be identified in conjunction with the development of appropriate response actions, as well as a protocol for accident reporting. The Health and Safety Plan will also identify security and safety requirements for staging areas, storage yards, excavation areas, and any other areas of the Project where hazards may exist during construction activities. In addition, information regarding medical kits, safety equipment, and evacuation procedures will be outlined in the Health and Safety Plan. A qualified safety field representative will be present on site to observe and document adherence to the Health and Safety Plan as needed. The Health and Safety Plan will be prepared by the SDG&amp;E construction contractor and will be available immediately prior to construction.</p>	<p>SDG&amp;E and its contractors to prepare and implement Health and Safety Plan described in the measure.</p>	<p>SDG&amp;E safety field representative to provide specified documentation to CPUC mitigation monitor to confirm compliance.</p>	<p>Prior to and during construction</p>
	<p><b>APMs TRA-1 and TRA-2,</b> described below.</p>			

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Hazards and Hazardous Materials (cont.)</b>				
<b>Soil Excavation and Dewatering</b>	<p><b>Mitigation Measure HAZ-1: Soil and Dewatering Management Plan.</b> SDG&amp;E and the contractor conducting soil excavation and (if needed) dewatering shall develop and implement a Soil and Dewatering Management Plan (SDMP) that describes the procedures for managing excavated soil and groundwater generated from dewatering activities. The SDMP shall include procedures for monitoring soil for possible contamination, identifying the specific stockpiling locations and measures to contain the stockpiled soil to prevent run on and run off, and materials disposal specifying how the construction contractor(s) will remove, handle, transport, and dispose of all excavated materials in a safe, appropriate, and lawful manner. The SDMP shall specify the contractor will segregate and dispose of soil with chemical concentrations above regulatory standards. Soil with chemical concentrations below regulatory standards may be reused or recycled. Soil with chemical concentrations above regulatory standards shall be disposed of in accordance with the applicable provisions of Cal. Code Regs. Title 22, Chapter 11, Article 3, Section 66261 (i.e., Class III (non-hazardous waste), Class II (non-hazardous and "designated" waste), or Class I (non-hazardous and hazardous waste)). The SDMP must identify protocols for soil testing and disposal, identify the approved disposal sites, and include written documentation that the disposal site can accept the waste. The contractor shall include procedures for the safe and legal disposal of groundwater generated from dewatering, if any. The procedures shall include water sampling and testing procedures to quantify chemical concentrations in the water, and dispose of the water in a safe and legal manner. Note that the disposal of groundwater generated from dewatering may be disposed of under the State's VOC and Fuel General Permit, depending on chemical concentrations and local sanitary sewer acceptance criteria. Contract specifications shall mandate full compliance with all applicable local, State, and federal regulations related to the identification, transportation, and disposal of hazardous materials, including those encountered in soil and groundwater. This SDMP shall be submitted to CPUC for review and approval prior to commencement of construction.</p>	<p>SDG&amp;E and its contractors to develop and implement a Soil and Dewatering Management Plan as described in measure.</p>	<p>CPUC mitigation monitor to review, approve, and confirm the implementation of the Soil and Dewatering Management Plan.</p>	<p>Prior to and during construction</p>
<b>Hydrology and Water Quality</b>				
<b>Violate Water Quality Standards</b>	<p><b>Mitigation Measure HAZ-1: Soil and Dewatering Management Plan</b>, described above.</p>			
<b>Land Use and Planning</b>				
<b>Mineral Resources</b>		<p>No mitigation required.</p>		
<b>Noise</b>		<p>No mitigation required.</p>		
<b>Construction Noise</b>	<p><b>APM NOI-1:</b> Construction activities will occur during the times established by the local ordinances, with the exception of certain activities where nighttime and weekend construction activities are necessary, including, but not limited to, construction work timeframes mandated by permit, pouring of foundations, and pulling of the conductor, which require continuous operation or must be conducted during off-peak hours per agency requirements. SDG&amp;E will meet and confer with the applicable jurisdiction to discuss temporarily deviating from the requirements of the noise ordinance, as described in the noise variance process.</p>	<p>SDG&amp;E and its contractors to meet and confer with the affected jurisdictions of potential deviations from noise ordinance requirements.</p>	<p>CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>During construction activities</p>

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Noise (cont.)</b></p>	<p><b>Construction Noise (cont.)</b></p>	<p><b>APM NOI-2:</b> SDG&amp;E will provide notice of the construction plans to all property owners within 300 feet of the Project by mail at least one week prior to the start of construction activities. The announcement will state the anticipated construction start window, anticipated completion window, and hours of operation, as well as provide a telephone contact number for receiving questions or complaints during construction. SDG&amp;E will maintain functional mufflers and/or silencers on all equipment to minimize noise levels as well as evaluate the potential use of portable noise barriers.</p>	<p>SDG&amp;E and its contractors to provide notice of construction plans to all property owners within 300 feet of the Project as described in the measure. SDG&amp;E and its contractors to implement mufflers and silencers on all equipment.</p>	<p>One week prior to construction activities and during construction</p>
<p><b>Construction Noise (cont.)</b></p>	<p><b>Mitigation Measure NOI-1: Construction Noise Reduction and Mitigation Plan.</b> To reduce noise impacts due to Project construction near sensitive receptors, SDG&amp;E shall develop and implement a Construction Noise Reduction and Mitigation Plan (Plan). The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval. The Plan shall include a requirement for SDG&amp;E to administer a noise monitoring program when construction activities are conducted within 100 feet of sensitive receptor locations to ensure that the provisions of the Plan, including those identified below, are effective in reducing construction noise levels at sensitive receptor locations to 75 dBA <math>L_{eq}</math> or less. The Plan shall present specific measures that identify how the construction noise limit of 75 dBA as an hourly <math>L_{eq}</math> at nearby sensitive receptor locations will be adhered to, how potential exceedances will be documented and corrected, and how impacts on sensitive receptors from exceedances that cannot be corrected or avoided will be mitigated, including but not limited to the following measures:</p> <p><b>Noise Reduction</b></p> <p>The following measures shall apply to construction activities within 100 feet of sensitive receptor locations:</p> <ul style="list-style-type: none"> <li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) shall be hydraulically or electrically powered where feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dB. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dB. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible.</li> </ul>	<p>SDG&amp;E and its contractors to develop and implement a Construction Noise Reduction and Mitigation Plan as described in the measure and conduct a noise monitoring program during construction activities within 100 feet of sensitive receptors.</p>	<p>CPUC PM to review and approve noise monitoring program and Construction Noise Reduction Mitigation Plan. CPUC mitigation monitor to confirm compliance of sufficient noticing and use of mufflers and silencers for construction equipment.</p>	<p>14 days prior to construction activities and during construction</p>

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Noise (cont.)</b></p> <p><b>Construction Noise (cont.)</b></p>	<p>Mitigation Measure NOI-1 (cont.)</p> <ul style="list-style-type: none"> <li>When construction activities that could potentially exceed 75 dBA are conducted, construction equipment and trucks shall be equipped with enhanced noise control measures (where feasible and reasonably available). Enhanced noise control measures shall be identified in the Plan and could include, but are not limited to, improved exhaust mufflers and intake silencers, engine enclosures, noise shields or shrouds, etc.</li> <li>When construction activities that could potentially exceed 75 dBA are conducted, noise barriers such as noise shields, barriers, blankets, or enclosures shall be used, where feasible, adjacent to or around noisy construction equipment. Noise control shields/barriers/blankets shall be made featuring weather-protected, sound-absorptive material on the construction-activity side of the noise shield/barrier/blanket. The noise barrier must be installed in a location that completely blocks line-of-sight between the construction noise source (e.g., generator, backhoe) and sensitive receptors located within 100 feet of the noise source.</li> <li>Stationary construction noise sources shall be located as far from adjacent receptors as possible. They shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent this does not interfere with construction.</li> </ul>			
	<p><b>Notification and Correction</b></p> <ul style="list-style-type: none"> <li>Distribute to the potentially affected residences within 100 feet of Project construction an informational pamphlet, and post signs at conspicuous publicly accessible places at each construction site, that indicate the hours of construction work and applicable noise level limits and provide a "hotline" telephone number, which shall be attended during active construction working hours and record messages outside of working hours, for use by the public to register complaints. SDG&amp;E shall identify whether posted hours and/or the 75 dBA <math>L_{eq}</math> threshold have been exceeded, take action to keep to posted hours and/or reduce noise levels below 75 dBA, and notify CPUC within 24 hours. With regard to any noise complaints received citing project construction, SDG&amp;E shall ensure that all complaints received during or outside of working hours shall be logged noting date, time, complainant's name, nature of complaint, and any corrective action taken, and shall submit such information to the CPUC Project Manager within 48 hours of receiving the complaint.</li> </ul>			
	<p><b>Relocation</b></p> <ul style="list-style-type: none"> <li>The Plan shall provide for temporary relocation of residents in the event that the Plan or the noise monitoring program identifies the potential for construction noise to exceed 75 dBA Leq within 100 feet of such receptors.</li> </ul>			

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Noise (cont.)</b></p>				
<p><b>Blasting</b></p>	<p><b>Mitigation Measure NOI-2: Blasting Plan.</b> Prior to conducting any blasting activities, SDG&amp;E shall develop a Blasting Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor. The Plan shall be submitted to the CPUC at least 14 days prior to the commencement of construction activities for review and approval to ensure that all components of this measure have been included and all required reviews, signatures, and permits obtained. The plan shall include a current/valid copy of the Explosives Permit issued by the San Diego County Sheriff's Office, as well as documentation that all local blasting requirements have been adhered to. The Blasting Plan shall include at a minimum the following measures:</p> <ul style="list-style-type: none"> <li>• Methods of matting or covering of blast area to prevent excessive air blast pressure.</li> <li>• Description of air blast monitoring program.</li> <li>• If necessary, SDG&amp;E and/or its contractors shall use portable noise barriers between the source and affected occupied properties to reduce excessive noise impacts.</li> <li>• Blasting shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. daily.</li> <li>• Blasting notification procedures, lead times, and list of those notified. Public notification to potentially affected sensitive receptors describing the expected extent and duration of the blasting.</li> <li>• Verification that explosives are not being proposed for use within 300 feet of the boundary of any occupied parcels zoned for residential. In the event that blasting activities are proposed within this distance, SDG&amp;E will provide verification to the CPUC that residences affected by noise are notified of the date and time of blasting and offered temporary relocation assistance.</li> </ul>	<p>SDG&amp;E and its contractors to develop and implement a Blasting Plan as described in the measure.</p>	<p>CPUC PM to review and approve Blasting Plan. CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>14 days prior to construction activities or blasting activities</p>
<p><b>Vibration</b></p>	<p><b>Mitigation Measure NOI-3: Vibration Reduction Plan.</b> Prior to any blasting construction, the applicant shall develop a Vibration Reduction Plan in coordination with an acoustical analyst, geotechnical engineer, and construction contractor, and submit the Plan to the CPUC for approval at least 14 days prior to any proposed blasting. The Vibration Reduction Plan shall include vibration reduction measures to ensure that surrounding buildings will be exposed to less than 0.2 PPV to prevent building damage. At a minimum, the plan shall consider the following measures:</p> <ul style="list-style-type: none"> <li>• Evidence of licensing, experience, and qualifications of blasting contractors.</li> <li>• The Plan shall establish a vibration limit of 0.2 PPV at nearby structures in order to protect structures from blasting activities and identify specific locations for monitoring. A pre-blast survey shall be conducted of any potentially affected structures.</li> <li>• The Plan shall identify the appropriate size of the explosive charge to ensure that a vibration level of 0.2 PPV is not exceeded at nearby structures.</li> <li>• Impacted property owners shall be notified at least 48 hours prior to the visual inspections.</li> <li>• Post-construction inspection of structures shall be performed to identify (and repair if necessary) any damage from blasting vibrations. Any damage shall be documented by photograph, video, etc. This documentation shall be reviewed with the individual property owners and SDG&amp;E shall arrange and fund any needed repairs. Documentation of these efforts shall be provided to the CPUC.</li> </ul>	<p>SDG&amp;E and its contractors to develop and implement a Vibration Reduction Plan as described in the measure.</p>	<p>CPUC PM to review and approve Vibration Reduction Plan. CPUC mitigation monitor to inspect and confirm compliance.</p>	<p>14 days prior to any blasting activities or blasting activities</p>

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
Population and Housing	No mitigation required.			
Public Services				
<b>Fire Hazards</b>	<b>Mitigation Measure WIL-1: Fire Safety</b> , described in <i>Wildfire</i> below.	SDG&E and its contractors to develop and implement a Final Project-specific CFPP as outlined in the measure. SDG&E and its contractors to document and report any ignition from project construction activities to local fire departments and suppress all project-caused ignition.	CPUC PM to review and approve the Final CFPP and confirm consultation with local fire authorities. CPUC mitigation monitor to inspect and confirm proper implementation of CFPP.	60 days prior to construction activities
<b>Recreation</b>				
<b>Temporary Recreation Effects</b>	<b>APM PS-1:</b> SDG&E will provide the public with advance notification of construction activities. Concerns related to dust, noise, and access restrictions with construction activities will be addressed within this notification.	SDG&E and its contractors to notify public notification of construction activities and potential concerns discussed in measure.	CPUC mitigation monitor to review public notification to confirm compliance.	Prior to and during construction
	<b>APM PS-2:</b> All construction activities will be coordinated with the property owner or authorized agent for each affected park, trail, or recreational facility prior to construction in these areas.	SDG&E and its contractors to coordinate with the property owner or authorized agent for each affected park, trail, or recreational facility.	CPUC mitigation monitor to inspect and confirm compliance and coordination.	Prior to construction
	<b>APM PS-3:</b> As needed, signs will be posted directing vehicles to alternative park access and parking, if available, in the event construction temporarily affects parking near trailheads.	SDG&E and its contractors to post signs directing the public to alternative park access, trailheads, or parking.	CPUC mitigation monitor to inspect and confirm compliance.	Prior to and during construction
	<b>APM PS-4:</b> All parks, trails, and recreational facilities that are physically impacted during construction activities and are not directly associated with the new permanent facilities, will be returned to an approximate pre-construction state, while still allowing for SDG&E to safely operate and maintain the facilities, following the completion of the Project. SDG&E will replace or repair any damaged or removed public equipment, facilities, and infrastructure in a timely manner.	SDG&E and its contractors to implement replacement or repair of any such facilities.	CPUC mitigation monitor to confirm restoration of damaged recreational facilities.	During and/or following construction
	No CPUC-recommended mitigation measures apply.			

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Transportation and Traffic</b>				
<b>Road Closures and Transit Services</b>	<p><b>APM TRA-1:</b> If construction requires lane closures, traffic delays, or other encroachment of construction activities within public travelways, the Applicant will adhere to local traffic control regulations and establish a traffic control plan as needed to comply with local ordinances. Traffic control plans will describe signage, flaggers, or other controls to be used to regulate traffic where necessary and to maintain a safe transportation corridor during construction.</p> <p><b>APM TRA-2:</b> The Applicant will coordinate with local emergency response agencies during construction within existing public roadways to allow safe passage and access by emergency vehicles and equipment.</p>	<p>SDG&amp;E and its contractors to comply with local traffic control regulations and develop a traffic control plan.</p> <p>SDG&amp;E and its contractors to coordinate with local emergency response agencies.</p>	<p>CPUC mitigation monitor to confirm implementation of local traffic control regulations and traffic control plans.</p> <p>CPUC mitigation monitor to confirm consultation with local emergency response agencies and that SDG&amp;E and its contractors provide access for emergency vehicles and equipment.</p>	<p>Prior to and during construction activities</p> <p>Prior to and during construction activities</p>
<b>Tribal Cultural Resources</b>	<p><b>Mitigation Measure TRA-1: Coordination with North County Transit District (NCTD).</b> SDG&amp;E and its contractor shall:</p> <ul style="list-style-type: none"> <li>• Minimize interruptions to transit services and facilities. In the event that a temporary removal or relocation of a bus stop is necessary, coordination with NCTD shall occur to ensure that any such action is consistent with the transit operator's needs.</li> <li>• The applicant shall coordinate with NCTD at least 30 days in advance of right-of-way construction work to ensure that any such construction activities are consistent with maintaining the transit services' operations.</li> </ul>	<p>SDG&amp;E and its contractors to coordinate with NCTD if temporary removal or relocation of a bus stop would occur.</p>	<p>CPUC mitigation monitor to confirm consultation with NCTD if temporary removal or relocation of a bus stop would occur.</p>	<p>30 days prior to construction activities in affected right-of-way</p>
<b>Tribal Cultural Resources</b>	<p><b>Mitigation Measure CUL-1 through CUL-4,</b> described in <i>Cultural Resources</i>, above.</p>			

**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<b>Utilities and Service Systems</b>				
<b>Construction and Demolition Debris</b>	<p><b>Mitigation Measure US-1: Construction and Demolition Debris Recycling Ordinances.</b> SDG&amp;E and its contractors shall recycle and/or reuse 90 percent of inert materials and 70 percent of all other materials, as well as 100 percent of trees, stumps, rocks, and other vegetation. In order to document and track such diversions, the applicant shall provide the following:</p> <ul style="list-style-type: none"> <li>Prior to construction, the Applicant shall provide a preliminary Construction and Demolition Debris Register (Preliminary Debris Register) that lists all anticipated construction and demolition solid waste streams (by weight) along with how the project will dispose/divert each waste. The Preliminary Debris Register shall also list the anticipated destination(s) (i.e., location or facility) for each waste stream. The Preliminary Register shall document how the project shall achieve the minimum waste diversion percentages.</li> <li>During construction activities, the Applicant shall keep records (e.g., a log) on site documenting the disposal and/or diversion of all construction and demolition debris that leaves the project site. The Applicant shall also keep copies of all corresponding receipts or similar documentation from solid waste facility, recycling center, green waste facility, or other permitted facility.</li> <li>During construction activities, the Applicant shall provide updates for solid waste diversion to the CPUC as part of the Quarterly Project Status Reports required by the Mitigation Monitoring, Reporting, and Compliance Program (MIMRCP).</li> <li>Following the completion of construction activities, the Applicant shall provide a Final Debris Register that documents the final construction and demolition debris totals, destinations, and diversion percentages. The Final Debris Register shall document the Project's final compliance with the minimum diversion percentages.</li> </ul>	<p>SDG&amp;E and its contractors to develop a preliminary Construction and Demolition Debris Register as described in the measure.</p> <p>SDG&amp;E and its contractors to keep records of disposal and diversion of all construction and demolition debris as outlined in the measure.</p>	<p>CPUC mitigation monitor to review Construction and Demolition Debris Register and all follow-on documentation of disposal and diversion of construction materials.</p>	<p>Prior, during, and following construction</p>
<b>Wildfire Hazards</b>	<p><b>Mitigation Measure WL-1: Fire Safety.</b> SDG&amp;E and/or its contractors shall prepare and implement a Final Project-specific Construction Fire Prevention Plan (CFPP) to ensure the health and safety of construction workers and the public from fire-related hazards. The Final Project-Specific Construction Fire Prevention Plan shall include the provisions in the TL 6975 Construction Fire Prevention Plan provided in Appendix 4.8-B of the Proponent's Environmental Assessment (SDG&amp;E, 2017b), as well as the requirements listed below. Prior to construction, SDG&amp;E shall contact and consult with the San Diego Unit of CAL FIRE, the San Diego County Fire Authority, and the fire departments of the cities of Carlsbad, Escondido, San Marcos, and Vista to determine the appropriate amounts of fire equipment to be carried on the vehicles and appropriate prevention measures to be taken. SDG&amp;E shall submit verification of its consultation with the appropriate fire departments to the CPUC Project Manager. SDG&amp;E shall submit the CFPP to the CPUC Project Manager for approval 60 days prior to commencement of construction activities and shall make the approved Final CFPP available to all construction crew members prior to construction of the Project. The Final CFPP shall list fire safety measures including fire prevention and extinguishment procedures, as well as specific emergency response and evacuation measures that would be followed during emergency situations; examples are listed below. The Final CFPP also shall provide fire-related rules for smoking, storage and parking areas, usage of spark arrestors on construction equipment, and fire-suppression tools and equipment. The Final CFPP shall include or require, but not be limited to, the following:</p>	<p>SDG&amp;E and its contractors to develop and implement a Final Project-specific CFPP as outlined in the measure.</p> <p>SDG&amp;E and its contractors to document and report any ignition from project construction activities to local fire departments and suppress all project-caused ignition.</p>	<p>CPUC PM to review and approve the Final CFPP and confirm consultation with local fire authorities. CPUC mitigation monitor to inspect and confirm proper implementation of CFPP.</p>	<p>60 days prior to construction activities</p>



**MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE SDG&E SAN MARCOS TO ESCONDIDO TL6975 69KV PROJECT (CONTINUED)**

Environmental Impact	Applicant Proposed Measures (APMs) and Mitigation Measures (MMs) Identified in the IS/MND	Implementing Actions	Monitoring/Reporting Requirements	Timing
<p><b>Wildfire</b> <i>Wildfire and Fire Hazards (cont.)</i></p>	<p>Mitigation Measure WIL-1 (cont.)</p> <ul style="list-style-type: none"> <li>SDG&amp;E and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available in the study area for fire protection.</li> <li>All construction vehicles shall have fire suppression equipment.</li> <li>SDG&amp;E shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire.</li> <li>As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.</li> <li>SDG&amp;E shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site.</li> <li>SDG&amp;E and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by Project activities (such as welding or use of equipment that could create a spark).</li> <li>At each construction site, after construction has been completed for the day, the project contractor and/or the SDG&amp;E Contract Administrator will perform visual inspections to ensure that all ignition risks are minimized or eliminated before leaving the work site.</li> <li>Successful implementation of Mitigation Measure WIL-1: Fire Safety would be demonstrated by the development of a Final CFPF in consultation with local fire authorities which documented and submitted to the CPUC for final approval. Additionally, successful implementation of Mitigation Measure WIL-1 would require that SDG&amp;E and its contractor comply with all components of the Final CFPF, that ignition from project construction activities is promptly reported to the fire department(s) with jurisdiction, and that when it is safe to do so, any project-caused ignition is suppressed immediately.</li> </ul>			

**(END OF ATTACHMENT A)**