

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 3, 2011

Mr. Alan F. Colton
Manager – Environmental Services
Sunrise Powerlink Transmission Project
8315 Century Park Court, CP21G
San Diego, CA 92123-1550

RE: SDG&E Sunrise Powerlink Transmission Line Project – Variance Request #14

Dear Mr. Colton,

On April 28, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) to revise the *Construction Yard Visual Screening Plan* approved by the CPUC on October 22, 2010, for the Sunrise Powerlink Project.

The CPUC voted on December 18, 2008 to approve the SDG&E Sunrise Powerlink Transmission Line Project ([Decision D.08-12-058](#)) and a [Notice of Determination](#) was submitted to the State Clearinghouse (SCH#2006091071). The BLM issued a [Record of Decision](#) approving the Project on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture; and Forest Service on the Cleveland National Forest; the Forest Service issued its Record of Decision and Supplemental Information Report on July 9, 2010.

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as the need for additional workspace, are anticipated and common practice for construction efforts of this scale and that a Variance Request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this variance, and that no new impacts or increase in impact severity would result from the requested variance activities.

Variance #14 to revise the Sunrise Project *Construction Yard Visual Screening Plan* is granted by CPUC for the proposed activities based on the factors described below.

SDG&E Variance Request. Excerpts from the SDG&E Variance Request, received April 18, 2011, are presented below (indented) with CPUC additions in parenthesis and in bold:

SDG&E is requesting a variance from the *Construction Yard Visual Screening Plan* ("Plan"), approved by the CPUC on October 22, 2010 to modify the screening at construction yards where helicopter use is incompatible with conventional screening methods.

Sunrise Powerlink Mitigation Measure V-1a requires SDG&E to reduce the visibility of construction activities and equipment at all substation construction sites and all staging and material and equipment storage areas and to locate these work areas away from areas of high public visibility. Those yards that are visible from nearby roads, residences, public gathering areas, or recreational areas, facilities, or trails are required to be screened with temporary screening/fencing. The fencing is supposed to be designed for each specific location. A construction yard screening plan was prepared and submitted to the CPUC for thirteen of the construction yards.

In order to minimize or avoid ground disturbance, land scaring, road construction, and/or natural and cultural resource impacts, 443 structures require helicopter construction methods. Helicopter construction entails the use of helicopters to move construction personnel, equipment, and lattice structures to the individual construction areas. Lifting and moving structure steel requires the use of a large and specialized helicopter called an Air Crane.

During practice lifts of smaller sections of lattice towers, the Air Crane, under approximately 60 percent power, produced localized wind speeds of up to 180 miles per hour (mph). In order to lift heavier, larger structure sections, the Air Crane will increase power and will produce wind speeds in excess of 180mph. During practice lifts the generated winds knocked over segments of construction yard fencing that was within 100 yards of the lift. The interlocked plastic slat screening system on the fence catches the wind produced by the Air Crane and the fencing is not able to withstand the force, see Attachment A **(at the end of this variance letter)**. Segments of fence have been pulled from the ground and damaged, creating a serious safety concern. Given the sizes of the construction yards and the nature of the process that is necessary to construct these structures, it is not possible to move all of the anticipated Air Crane activity more than 100 yards from a given fence segment and it appears that a distance from the perimeter fences that is in excess of 100 yards will be necessary when the Air Crane is used at full power for a lift.

1)Evaluation of the locations of the construction yards where Air Crane lifts will occur **(has been conducted)** to determine which yards can have the screening removed for all or large sections of the yard fencing and not create a visual impact to the public. Remoteness of yards from the public **(was analyzed)**. Yards that are situated in remote or restricted access areas and are removed from the public include the Imperial Substation, McCain Valley, Kreuzkamp, Barrett Canyon, and Wilson. The proposal is to remove screening slats from the fences at these yards to eliminate the sail impacts created by the Air Crane. This will not result in an impact to the public because of the isolation of these yards and the fact they are not visible from public vantage points. **(The CPUC visual consultant reviewed the entire request package and provided "This is not an accurate statement for the McCain Valley yard (visible from McCain Valley Road) However, I would agree that it would be exposed to a fairly limited viewing population.")** Additionally, SDG&E proposes to remove fencing slats along portions of yards where certain sides are not visible to the public. For example, the northwest side of Bartlett/Hauser Creek is not in the viewshed of a sensitive visual receptor and is masked by an adjacent hillside. SDG&E is proposing in locations such as these, that screening be removed along these portions of the fence. Yards Include Dunaway Road, Plaster City, S2, AER, Jacumba Valley Ranch, Bartlett/Hauser Creek, SWAT Training Facility, Hartung, Helix and Sycamore. **(The CPUC visual reviewer provided "The list of yards includes the SWAT Training Facility Yard proposing removal of slats along the west and south sides of the yard. However, the west and south sides of that yard are visible from the west and southwest along Lyons Valley Road. Again, this is probably not a significant issue because some of those vantage points along Lyons Valley Road would view over the 6-foot tall fencing into the interior of the yard. So, removal of the slats would not substantially affect visibility of yard interior.")** SDG&E would remove screening from other future locations where portions of the yard would not be visible to sensitive receptors.

2)Evaluation of yards that are viewable by the public where modifications of the screening would be possible **(has been conducted)**. For yards which are visible to the public, the screening will be retained to the **(greatest)** degree possible, starting with the use of screening fabric with air vents in lieu of the interlocked plastic slats **(as detailed in the Construction Yard Visual Screening Plan)**, to avoid damage from the Air Crane engine wash. The proposed screening fabric will match the approved beige color. The ideal solution will be to retain as much screening as possible while maintaining the safety and integrity of the yards and avoiding fence failure during the use of the Air Crane. The screening fabric with air vents will allow the generated wind the opportunity to pass through the fence and avoid collapsing or lifting segments of fence. Examples of the proposed appearance at the identified construction yards that are visible to the public are provided in Attachment B **(at the end of this variance letter)**. This would occur at the identified yards viewable to the public, with the exception of the Thing Valley Yard, which was identified by the Forest as requiring a black coated fence material with no screening unless the Forest determines that they require it.

The proposed screening modification described in part 2 above is proposed at the following construction yards which are visible in varying degrees to the public; AER, Bartlett/Hauser Creek, Dunaway, Hartung, Helix, Jacumba Valley Ranch, Plaster City, S-2, SWAT, and Sycamore Estates.

Temporary areas for helicopter landing have been designated at each yard, however, because tower assembly can potentially occur at any location in the yard, engine wash from helicopters, including the Air Crane, may impact screening along the entire perimeter of the yard. In order to maximize utilization of the construction yard, assembly of tower structures may occur adjacent to designated parking areas, designated trailer offices, and sloped areas. Additionally, equipment to be flown to tower locations may be staged anywhere within these yards as well. It is unrealistic to determine a specific location in these yards where helicopter engine wash would never create a potential impact to the screened fence segments.

CPUC Evaluation of Variance Request

In accordance with the MMCRP, the subject variance request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested variance activities. The following discussion summarizes this analysis for biological, cultural, paleontological, and hydrological resources, sensitive land uses/noise, and visual. A list of conditions is presented below to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SDG&E.

Biological Resources. No concerns noted under this variance.

Hydrological Resources. No concerns noted under this variance.

Cultural and Paleontological Resources. No concerns noted under this variance.

Traffic/Sensitive Land Uses/Noise. No concerns noted under this variance.

Visual. The CPUC Visual consultant reviewed the entire Variance #14 request package. The visual reviewer provided that the use of vented screening fabric instead of slats at those yards highly visible to the public is a reasonable solution to the rotor wash problem. The effectiveness of that screening will depend on how much of the screening is actually installed. SDG&E's description is somewhat vague about the extent of screening that would be deployed: *"The ideal solution will be to retain as much screening as possible while maintaining the safety and integrity of the yards and avoiding fence failure during the use of the Air Crane."* So, it is unclear as to how much (or where) screening will be deployed at the various yards. SDG&E also states that lifts may occur throughout the yards to maximize use of the yards. This seems to leave open the possibility that screening may be eliminated from any or all portions of the yard fencing if the wind force is too great for the fabric. Yard screening will need to be refined in coordination with the CPUC on a case by case basis and with specific proposals as to where screening is to be used based on tests with the Sky Crane and the vented fabric screens.

SDG&E shall install fabric at all locations visible by the public where slatted fencing is not feasible. The CPUC will require SDG&E to test the fabric against the air crane wind forces within 10-days of this variance approval at the Helix Yard and submit findings to the CPUC. If the fabric does not work effectively, SDG&E shall submit an alternative proposal to the CPUC.

Conditions of Variance Approval.

The conditions presented below shall be met by SDG&E and its contractors:

1. All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.

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2. Copies of all relevant permits, compliance plans, and this Variance approval shall be available on site for the duration of construction activities.
3. SDG&E shall test the fabric against the air crane wind forces within 10-days of this variance approval at the Helix yard and submit findings to the CPUC for review and approval.
4. SDG&E shall install fabric at all yard locations visible by the public where slatted fencing is not feasible. Yard screening will need to be refined in coordination with the CPUC on a case by case basis and with specific proposals as to where screening is to be used based on tests with the Sky Crane and the vented fabric screens.
5. If the fabric does not work effectively, SDG&E shall submit an alternative proposal to the CPUC.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard
CPUC Environmental Project Manager
Sunrise Powerlink Transmission Project

cc: Daniel Steward, BLM El Centro Field Office
Tom Zale, BLM El Centro Field Office
Bob Hawkins, Forest Service
Eric Kershner, USFWS
Erinn Wilson, CDFG
Susan Lee, Aspen Environmental Group
Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group

Attachment A



Attachment B



From: Vida Strong
Sent: Wednesday, May 11, 2011 5:00 PM
To: Cruspero, Amethyst; Anne Coronado
Cc: Romani, Rachel; Telesmanic, Brian; Colton, Alan F.
Subject: RE: Sunrise Powerlink Project - Request to Modify Location of Screening Fabric Test

Based on consultation with CPUC, SDG&E is authorized to conduct the screening fabric test at the Bartlett Construction Yard instead of the Helix Construction Yard, given the reasons stated below.

Vida Strong
Senior Associate
Aspen Environmental Group
(on behalf of CPUC)

From: Cruspero, Amethyst
Sent: Wednesday, May 11, 2011 12:26 PM
To: Vida Strong; Anne Coronado
Cc: Romani, Rachel; Telesmanic, Brian; Colton, Alan F.
Subject: Sunrise Powerlink Project - Request to Modify Location of Screening Fabric Test

Vida/Anne,

SDG&E respectfully requests a modification to condition #3 of Variance #14. Condition #3 states the following:

“3. SDG&E shall test the fabric against the air crane wind forces within 10-days of this variance approval at the Helix yard and submit findings to the CPUC for review and approval.”

SDG&E respectfully requests a modification to the condition to perform the test at the Bartlett/Hauser Creek (Bartlett) Construction Yard instead of the Helix Construction Yard. The Air Crane is currently being utilized for construction activities at the Bartlett Construction Yard. Additionally, SDG&E is actively working to put up fabric screening at this yard. SDG&E would like to reduce the number of trips for the Air Crane by performing the fabric screening test in conjunction with the construction activities currently being performed at the Bartlett Yard. This would support the reduction of air emissions and reduction in fuel consumption for the Project.

Your prompt response to this request is greatly appreciated in order to perform the test in a timely manner. Should you have any questions please feel free to contact me at the numbers below.

Thank you,

Amethyst L. Cruspero