

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 15, 2006

Mr. Kevin O'Beirne
San Diego Gas & Electric Company
8830 Century Park Court - CP32D
San Diego, CA. 92123

**Re: Data Request #2 for the SDG&E Sunrise Powerlink Transmission Project,
Application No. 06-08-010**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed the documents and materials that SDG&E has provided including the Proponent's Environmental Assessment (dated August 4, 2006), the Application Supplement Materials (dated September 1, 2006), and SDG&E's Response to Data Request No. 1 (responses received through November 10, 2006). We understand that the remaining responses to Data Request No. 1 will be provided on November 15, 2006. During the analysis of the aforementioned materials and in our evaluation of alternatives, we have identified additional items that require information from SDG&E. Attached please find Data Request No. 2, which defines the additional questions we have at this time. Additional data requests may be necessary to address alternatives and other CEQA/NEPA topics.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current EIR/EIS schedule. We request that responses to these items be provided to us within two weeks (no later than November 29, 2006).

Please submit one set of responses to me and one to Susan Lee at Aspen in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit

Attachment

cc: Sean Gallagher, CPUC Energy Division Director
Ken Lewis, CPUC Program Manager
Steve Weissman, ALJ
Traci Bone, Advisor to Commissioner Grueneich
Nicholas Sher, CPUC Legal Division
Lynda Kastoll, BLM
Susan Lee, Aspen Environmental Group

Sunrise Powerlink Transmission Line Project

Data Request No. 2

General

- GEN-4 [Follow-up to Gen-1] Given the responses provided by SDG&E on October 12 and 31 listing properties where no right of entry (ROE) exists, please provide the following information. This is especially important to us because of the status of biological and cultural resources surveys:
- a. A series of maps (by link, or more detailed if needed) showing the parcels where no ROE has been obtained, illustrating the non-ROE parcels in shading or with outlines.
 - b. What percentage of each link and of the entire proposed route is currently without ROE?
- GEN-5 [Follow-up to Gen-3] a. Please provide one map book with no environmental overlay that shows all of the proposed and existing structures that appear on each page of the Proposed Project and Alternatives map books previously provided.
- b. We note that the response to Gen-3 states that existing tower information is provided only west from Narrows Substation (within SDG&E territory). We also need existing tower data for the Desert Link, including IID towers and SWPL towers, where these towers are in the same corridor as the Proposed Project.
- GEN-6 In a meeting with staff of the MCAS Miramar Public Works Division and the Environmental Management Department (November 8, 2006), we were informed that the terms of SDG&E's easement across MCAS Miramar lands do not allow "major modifications" without the base conducting NEPA compliance. "Major modifications" were described to us as including installation of new towers or new conductors. In this regard:
- a. Please provide a copy of the easement documents between SDG&E and MCAS Miramar for the proposed SRPL route east and west of Sycamore Canyon Substation, and also for the Sycamore Canyon-Elliott line that would be reconducted as part of the SRPL Project.
 - b. Provide copies of all NEPA or CEQA compliance documents prepared in the past 10 years for any new or modified SDG&E transmission lines on MCAS Miramar, or for any leasing or easement processes.
- GEN-7 Attachment PD 2-f in the Supplemental PEA filing (September 1, 2006) included maps of the Sycamore Canyon-Elliott reconductor segment that illustrate existing towers and towers to be replaced. We do not have Map Book coverage (most importantly, biological and cultural resources survey results) for this segment. Please provide that data.
- GEN-8 SDG&E's November 13, 2006 press release entitled "**SDG&E to Buy 120 Megawatts of Solar, Geothermal Energy**" states the following: "Two solar contracts with Bethel Energy LLC will add nearly 100 MW of renewable electricity to SDG&E's energy portfolio. Another contract with Esmeralda Energy Co. will supply an additional 20 MW of geothermal energy beyond the 20 MW SDG&E announced in March 2006." We understand that BLM has received no permit applications for any of these projects. Please describe SDG&E's understanding of the timing for application and construction of these projects.

Project Description

- PD-13 Please specify the disturbance area in square feet resulting from construction of 69 and 92 kV transition structures.
- PD-14 Relocation of the existing 69 kV transmission line to parallel the SRPL within the Central Link is considered as part of the Proposed Project. Please provide detailed attribute information on this segment for incorporation into GIS. Required information includes structure location and disturbance area per structure.
- PD-15 Limited information regarding the Sycamore Canyon–Elliot Reconductor was included in the PEA. Please provide the following information:
- a. For the replacement structures, please provide an illustration that includes height and conductor spacing dimensions.
 - b. Please indicate the required disturbance area in square feet for construction of the 69 kV replacement poles.
 - c. Please provide the following information regarding structure foundation installation: depth in feet, hole diameter, concrete required in cubic yards.
- PD-16 Please specify what the proposed conductor spacing is for 500 kV tubular poles (horizontally), 230 kV lattice towers (vertically), and 230 kV tubular poles (horizontally and vertically).
- PD-17 Please provide specific information pertaining to insulator assemblies for the Proposed Project transmission support structures. PEA Figures 2.3-2A through 2.3-2D depict a “V-shaped” configuration. Verify that this would be used for all SRPL 500 and 230 kV structures and provide the proposed material composition of the insulators.
- PD-18 Concerns were raised during the October scoping meetings regarding blasting noise and potential effects on wildlife and nearby residents. Please provide information on the anticipated frequency of blasting, and the decibel level of blasting.
- PD-19 At the scoping meetings in early October, many people were concerned about the possibility that the proposed transmission towers would have red blinking lights on them.
- a. Please define the circumstances and agency requirements that would require blinking lights on towers.
 - b. Define specific towers along the proposed route where such lights would be required.
- PD-20 Please update the schedule provided in the PEA in accordance with ALJ Weissman’s Scoping Ruling.

Alternatives

- ALT-46 [Follow-up to ALT-1] a. Data provided in this response says that parallel transmission lines would violate planning standards except where these lines would be on multiple circuit towers for short distances (e.g., station entrances, river crossings). Please describe how the following circumstances comply with those same planning standards:

- a. The Proposed Project where it is collocated with the SWPL for the first 4 miles out of Imperial Valley Substation.
- b. The Western Alternative where the new 500 kV line would be collocated with the SWPL for about 12 miles.
- ALT-47 [Follow-up to ALT-4] Sheet 18 of 30 shows that tower 50096 is very close to the US/Mexico border. What is the distance from that tower to the border?
- ALT-48 [Follow-up to ALT-6.b] a. The response to ALT-6b states that the SWPL transmission line could be relocated to new 500 kV towers placed a minimum of 130 feet south of the existing towers on the Campo Reservation. From the drawings provided in the response to ALT-6, it appears that the existing SWPL is approximately 100 feet from the south side of the easement, leaving 220 feet of easement on the north side of the existing line within which an additional line could be installed. Please verify that there is adequate space in the existing easement to add a second 500 kV line north of the existing line.
- b. The response to ALT-6b states that installing a new line south of the existing easement "... *may* [emphasis added] require approval by the Campo Indian Tribe and an amendment of our existing easement." Regarding the portion of the existing SWPL that is on an easement across Campo Reservation land, please verify whether the addition of a second 500 kV line within this existing 330 foot easement or south of that easement would require tribal approval.
- ALT-49 [Follow-up to ALT-10] a. In responding to ALT-10 about substation alternatives, SDG&E is using a "standard" size for a 500/230 sub of 800'x2000' (or about 37 acres). The responses state that the "general arrangement of the 500/230 substation has been overlaid on the aerial imagery." However, the substation arrangement is not illustrated. Please explain how the substation dimensions were determined. How many 230 kV circuits leaving the substation are assumed to be accommodated within the substation illustrated in these figures?
- b. What is the minimum acreage required for a 500/230 kV substation to be constructed?
- c. Is it generally possible to reconfigure the overall shape of a sub once the acreage is determined (e.g., would it be equally feasible at either 800x2000 or 1200x1300)? If not, please describe the specific constraints to substation shape in this situation.
- d. [Follow-up to ALT-10] The response states that the Loveland and Barrett Smith (Caltrans Yard) sites are considered to be infeasible due to "high development constraints." Please explain what these constraints are.
- e. [Follow-up to ALT-10a] The suggested locations for a substation near the existing Barrett Substation in the Data Request were north or south because of the residences west of the site. The location illustrated in this response is west of the existing site — closest to the residences. If the substation were either smaller or configured differently (see a and b above), could it be located to the north or southeast, or could the existing substation site be expanded?
- f. [Follow-up to ALT-10c] What is the location of the potential "Marron Valley Substation"? Please provide a location map for this site that also shows roads, the SWPL towers, and other features that will allow us to identify the location.

- ALT-50 [Follow-up to ALT-11] The response to some segments of ROW width say “no width.” Please explain what this means.
- ALT-51 [Follow-up to ALT-17, data table] The table following the response to ALT-17 includes the following data: Indian Land (55.2 acres), ORV area (157.4 acres), and Military Land (55.3 acres). We have not found these three land categories illustrated on the detailed map books provided. Please explain where those parcels are located, and, if necessary, provide corrected map book pages.
- ALT 52 [Follow-up to ALT-43] The second and third sentences of this request have not been answered: “When is construction expected to be completed, and when will operation begin? How will the plant be operated?”
- ALT-53 Please provide a copy of the Memorandum of Understanding between SDG&E and the California Department of Forestry & Fire Protection that relates to brush clearance along the SWPL ROW.
- ALT-54 Describe the recent (after year 2000) and ongoing/planned improvements to the SWPL access road system.
- ALT-55 Members of the EIR/EIS team met on November 9, 2006 with Sheila Donovan and LCDR Wesley Bomyea of the DOD – El Centro Naval Air Station regarding the feasibility of transmission alternatives west of the proposed SRPL route in Imperial County. DOD staff informed us that while the approval or denial of a transmission line on BLM land was not within their jurisdiction, the use of restricted airspace in that area would be severely compromised if the following conditions were not met:
- (a) a new transmission line would have to be in close proximity to an existing line (i.e., no new corridor would be created), and
 - (b) the new towers would be no taller than those of the existing line.
- We are aware of only one existing transmission line through the restricted airspace: the IID 92 kV line (from Imperial Valley to Narrows Substations) with pole heights of approximately 65 feet.
- Please provide any information, including copies of correspondence with DOD, that include any information indicating that a western alternative would be feasible given the restricted airspace requirements.
- ALT-56 Regarding solar power alternatives:
- a. Please provide information about SDG&E's proposed program to place solar panels on third-party rooftops (press release dated April 18, 2005; see Attachment 2). Describe how the program was envisioned to operate.
 - b. Did this program ever occur and did SDG&E receive proposals? Did SDG&E ever enter into any agreements with bidders? Please provide a summary of the number of bids received, the amount of capacity bid, the number of bids accepted, and the amount of capacity related to the accepted bids.

- c. Explain whether and how this program could be expanded substantially beyond the 3 MW described in the press release to a larger program.
- ALT-57 The proposed route passes directly through the Bull Frog Dairy property in the area west of El Centro. Apparently this routing was based on an outdated air photo in which the dairy improvements were not shown; the landowner concern is documented in SDG&E's Property Owner Meeting Form dated September 26, 2006. Please propose alternate routing in this area to avoid direct effects to the dairy, and provide both GIS files and the Map Book showing revised routing options.

Biological Resources

- BIO-1 In an email to Aspen Team member Tom Huffman of HELIX Environmental (dated September 20, 2006), Chris Otahal of the USFWS requested that burrowing owl surveys be included in the list of focused species surveys to be conducted by SDG&E. Burrowing owl surveys are especially important in the area southwest of the Salton Sea, in or near agricultural lands. Please include burrowing owls as one of the focused species surveys for the project.
- BIO-2 On September 5, 2006, Chris Otahal of the USFWS submitted detailed comments regarding SDG&E's Applicant Proposed Measures. Please make a determination regarding whether these comments should be accepted by the CPUC for incorporation into the EIR/EIS or if SDG&E would like to take these comments into consideration and potentially develop revised APMs based on USFWS comments. The comments from Mr. Otahal of USFWS are included as Attachment 1 to this Data Request No.2.

Cultural Resources

- CULT-2 [Follow-up to CULT-1] Regarding historic data:
- (a) Do you have records search results from the clearinghouse for built environment resources/historic sites (e.g., houses, barns, bridges, other structures) within some radius of the proposed route? If so, we would like copies of that data, also by 11/24 at the latest.
- (b) Please verify whether there has been any consideration of potential for the proposed project to affect built environment/historic resources located outside of the ROW (i.e., visual impacts), and if so, the methods used for the analysis.
- Regarding GIS survey data & site records:
- (c) Please provide by November 24 the proposed project data on all surveys completed through October. We expect to receive GIS files that include hyperlinked site records for all surveys completed through October. Please provide with the GIS files that include all project components (towers, pull sites, access roads, towers to be removed, etc) with the survey records, and ensure that archaeology layers are compatible with the GIS project components layers.
- (d) Please provide to us ASAP (by Wednesday 11/15, if possible) with data stating the percentage of survey coverage for each link of the proposed project, and the overall percentage survey coverage for the entire proposed project for the surveys completed through October. This is important to us in planning for our alternatives surveys.

Regarding Map Books:

(e) Please provide 3 copies of the new map book (one shipped [overnight] to each of the Aspen Team members previously defined), including all sites identified in the surveys completed through October. We will expect these map books also to be complete on November 24.

Regarding Alternatives Data:

(f) For all surveys already completed on alternative routes, please provide to us the same data and map books described in items 1–3 above for the Proposed Project, by December 22. No additional surveys should be done on alternative routes.

Cumulative Impacts

CUM-1 Section 11.0 of the PEA describes three energy-related projects and lists many residential and recreation development projects. Please describe any other projects in the Sunrise project area for which SDG&E is the proponent, including planned transmission upgrades or generation projects. Please include any other projects that are to be built through SDG&E's sponsorship with power purchase agreements. Please list the types of information shown in PEA Table 11.1-1: Project name, type, size and description, location, and status. Also, provide maps showing the locations of the listed projects.

Noise

NOI-1 The description of Impact NOI-3 for each link indicates that corona noise levels along a 500 kV line in Washington do not exceed 46 dBA (PEA p. 5.4-5). Noise over 45 dBA occurring at night usually exceeds the limits of local ordinances, because most ordinances penalize nighttime noise by adding 10 dB to the measured level (as noted on PEA p. 4.4-8). The level of corona noise near the edge of any transmission line right-of-way is variable dependent on other characteristics than the line voltage. The configuration of the circuits, condition and type of conductors, sag, tower height, and distance to edge of right-of-way each affect the audible noise levels at the ground. Because the Proposed Project includes noise-sensitive areas with reduced tower heights, namely within ABDSP, the impacts of project-specific noise levels need to be modeled and analyzed. Please provide estimates of audible noise for the Proposed Project for each different overhead line configuration during rain or fog conditions, at the edge of the proposed right-of-way.

Public Health & Safety (Fire)

PS-1 a. Please list the state, federal, and industry regulations and guidelines that govern ROW clearance, access requirements, and fire prevention, and provide copies of all those that apply to SDG&E for either a new project (e.g., SRPL) or an existing transmission line (e.g., SWPL).

b. The PEA references SDG&E's "Fire Plan Standard Practice" and states that this document is currently undergoing legal review and will be approved in November 2006. Please provide a copy of this document, and all other SDG&E documents or internal plans/procedures related to ROW maintenance, fire prevention, and fire fighting procedures.

- c. SDG&E has developed a MOU with CDF for the SWPL corridor (see ALT-53 above) that addresses brush clearing for fire hazard reduction. Is a similar MOU anticipated to be developed with CDF for the proposed Sunrise Powerlink?
- PS-2 In the PEA’s discussion of alternatives (Chapter 3), SDG&E describes forest lands traversed by the SWPL as “highly susceptible to wildfires” and identifies fires during summer and autumn as the main cause of outages on that line. SDG&E’s response to ALT-3 provided information on SWPL outages. However, high fire risk also exists in the remainder of San Diego County. Please provide the following information as it pertains to wildfires of any size within SDG&E’s service territory:
- a. Records of fire-related outages in SDG&E’s service territory including the dates of occurrence, their location, and duration, the type of line affected, and any damage to energy infrastructure.
 - b. Records of SDG&E transmission and distribution infrastructure that have been found to be the cause of fire, including the line voltage, type of structure involved, and the contributory incident (e.g., bird electrocution, pole downed by wind or vehicle collision, dropped conductor due to insulator failure, or fuse or equipment failure that caused the ejection of molten metal or sparks).

Transportation and Traffic

- TRANS-1 In order to adequately assess impacts to transportation and traffic, information on project construction trips is required. Specifically, the peak number of trucks and employees coming in and out of any one location during one day should be provided. The tables within Section 2.5 of the PEA break down each type of truck used over the duration of the project for each site. It is not clear whether adding all of the number of estimated vehicles listed in the tables would estimate the peak number of trucks for each site. Please clarify whether it correct to assume that all of these vehicles would be brought in the same day and that they would come in and out of the site on a daily basis?
- TRANS-2 The tables in Section 2.5 of the PEA include crew trucks. Could it be assumed that all workers will only come to the site via trucks (# specified in the table)? This assumes that none of the employees drive to the site separately.

**Standard SDG&E-Proposed Measures Specific to Biological Resources
USFWS Comments (Attachment 1 to Data Request No. 2)**

Preliminary USFWS Comments - We anticipate that more detailed comments, including possible additional measures, will follow during the EIR/EIS review and Section 7 Consultation process. Yellow highlights are explanatory notes, also from USFWS.

Number	Description
BIO-APM-1	<p>SDG&E would perform any detailed on-the-ground USFWS protocol surveys, with regard to specific sensitive plant or wildlife species whose habitat would be impacted by the Project based on final design, in accordance with state or federal regulations or statutes. SDG&E would submit results of these surveys to the USFWS and CDFG and consult on reasonable and feasible mitigation measures for potential impacts, prior to any ground disturbing activities associated with the Project (Note: The Project must be addressed as a single unit - it can not be phased). . Mitigation would prioritize avoidance and minimization as the primary means to address impacts. If avoidance is not feasible, then relocation/restoration would be implemented in areas of temporary impacts in accordance to a Wildlife Agency approved Restoration Plan. Where relocation/restoration is not feasible or deemed not to fully address impacts, then mitigation though compensation via on- or off-site purchase or dedication of habitat at a ratio as agreed to by SDG&E and the Wildlife Agencies. (Note: Consultation may require higher ratios for some habitat types - i.e., vernal pools are typically off-set at 4:1. The ratios should be habitat based, not based on “inside”/”outside” of preserve)A Habitat Management Plan, approved by the Wildlife Agencies, must be developed for any on-site/off-site mitigation lands, a conservation easement must be placed over such properties, and an in perpetuity Management Endowment must be established.</p>
BIO-APM-2	<p>Prior to construction, all SDG&E, contractor and subcontractor Project personnel would receive training regarding the appropriate work practices necessary to effectively implement the biological APMs and to comply with the applicable environmental laws and regulations including appropriate wildlife avoidance, and impact minimization procedures, the importance of these resources and the purpose and necessity of protecting them; and methods for protecting sensitive ecological resources.</p>
BIO- APM-3	<p>Except when not feasible due to physical or safety constraints, all Project vehicle movement would be restricted to existing access roads and access roads constructed as a part of the Project and determined and marked by SDG&E in advance for the contractor, contractor-acquired accesses, or public roads. When it is not feasible to keep vehicles on existing access roads SDG&E would perform a site survey, or more as appropriate, in the area where the work is to occur. This survey would be performed to determine presence or absence of nesting birds (of any species), or other sensitive species (i.e. plants, mammals, reptiles etc.) in the work area. SDG&E would submit results of this survey to the USFWS and CDFG at least 10 business days in advance of the proposed activity and consult on reasonable mitigation measures to avoid or minimize for potential impacts, prior to vehicle use off existing access roads</p> <p>New access road construction for the Project would be allowed year-round. To the extent feasible, all vegetation clearing</p>

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO- APM-3 (cont.)	<p>activities would take place outside of the general avian breeding season (February 15 through August 30). If construction (other than vegetation clearing) cannot occur outside the avian breeding season, pre-construction surveys for active avian nests shall be conducted by a Service-permitted biologist no more than seven days prior to the initiation of construction. If active nests are found, work may proceed provided that construction activity is located at least 300 feet from nests (500 feet for raptors), and noise levels do not exceed 60 dBA Leq hourly at the nest site. These buffers may be reduced in width upon approval of the Wildlife Agencies if noise attenuation measures or alternate construction operations reduce noise levels below 60 dBA Leq hourly. All active nests would be monitored on a weekly basis until after the nestlings fledged. If noise levels still exceed 60 dBA Leq hourly at the nest site and/or a no-construction buffer can not be maintained, construction shall be deferred in that area until after the nestlings have fledged. (Note: This reflects “standard” avoidance/minimization measures.)</p> <p>The surveys outlined above would not replace the need for SDG&E to perform detailed on-the-ground surveys otherwise required by BIO-APM-1.</p> <p>Parking or driving underneath oak trees is not allowed in order to protect root structures. In addition to regular watering to control fugitive dust created during clearing, grading, earth-moving, excavation, and other construction activities which could interfere with plant photosynthesis, a 15 mile per hour speed limit shall be observed on dirt access roads to reduce dust and allow reptiles and small mammals to disperse.</p>
BIO-APM-4	<p>The area limits of Project construction and survey activities would be predetermined based on the temporary and permanent disturbance areas noted on the final design engineering drawings, with activity restricted to and confined within those limits. All limits of construction would be delineated by orange construction fencing. Survey personnel shall keep survey vehicles on existing roads. During Project surveying activities, brush clearing for footpaths, line-of-sight cutting, and land surveying panel point placement in sensitive habitat would require surveys for sensitive resources and prior approval from the Project biological resource monitor in conformance with the APMs. Hiking off roads or paths for survey data collection is allowed year-round as long as other APMs are met. Stringing of new wire and reconductoring for the Project would be allowed year round in sensitive habitats if the conductor is not allowed to drag</p>

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-4 (cont.)	on the ground or in brush and all vehicles used during stringing remain on Project access roads. Where stringing requires that conductor drag on the brush or ground or vehicles leave Project access roads, SDG&E would perform a site survey, or more as appropriate, to determine presence or absence of endangered nesting birds or other endangered species in the work area. SDG&E would submit results of this survey to the USFWS and CDFG at least 10 business days prior to the proposed activity and consult on reasonable and feasible mitigation measures for potential impacts, prior to dragging wire on the ground or through brush, or taking vehicles off Project access roads. However, this survey would not replace the need for SDG&E to perform detailed on-the-ground surveys as otherwise required by BIO-APM-1. No paint or permanent discoloring agents would be applied to rocks or vegetation to indicate limits of survey or construction activity where any sensitive biological resources or wildlife habitats are encountered in the field.
BIO-APM-5	To the extent feasible, access roads would be built at right angles to the streambeds and washes. Where it is not feasible for access roads to cross at right angles, SDG&E would limit roads constructed parallel to streambeds or washes to a maximum length of 500 feet at any one transmission line crossing location. Such parallel roads would be constructed in a manner that minimizes potential adverse impacts on “waters of the U.S.” or waters of the state. Streambed crossings and roads constructed parallel to streambeds would require review and approval of necessary permits from the ACOE, CDFG, and RWQCB. Culverts would be installed where needed for right angle crossings, but rock crossings would be utilized across most right angle drainage crossings. All construction and maintenance activities would be conducted in a manner that would minimize disturbance to vegetation, drainage channels and stream banks (e.g., structures would not be located within a streamchannel, construction activities would avoid sensitive features). Prior to construction in streambeds and washes, SDG&E would perform a pre-activity survey or more as appropriate to determine the presence or absence of sensitive plants or animals and/or nesting birds (all species). However, this survey would not replace the need for SDG&E to perform detailed on-the-ground surveys as otherwise required by the BIO-APM-1.
BIO-APM-6	In the construction, operation, and maintenance of the Project, SDG&E would comply with all applicable environmental laws and regulations, including, without limitation, those regulating and protecting wildlife and its habitat.
BIO-APM-7	Littering is not allowed. Project personnel would not deposit or leave any food or waste in the Project area, and no biodegradable or non-biodegradable debris would remain in the right-of-way following completion of construction.
BIO-APM-8	Prior to construction, the boundaries of plant populations designated as sensitive by USFWS or CDFG and other resources designated sensitive by SDG&E and the resource agencies would be clearly delineated with clearly visible flagging or fencing. The flagging and fencing shall remain in place for the duration of construction. Flagged areas would be avoided to the extent practicable during construction activities in that area. Where these areas cannot be avoided, focused

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-8 (cont.)	surveys for covered plant species shall be performed in conformance with BIO-APM-1, and the responsible resource agency(s) would be consulted for appropriate mitigation and/or revegetation measures prior to disturbance. Notification of the presence of any covered plant species to be removed in the work area would occur within ten (10) working days prior to the Project activity, during which time the USFWS or CDFG may remove such plant(s) or recommend measures to minimize or reduce the take. If neither USFWS nor CDFG has responded to SDG&E within the ten (10) working days following the written notice, SDG&E may proceed with the work and cause a take of such plant(s).
BIO-APM-9	Brush clearing around any Project facilities (e.g., structures, substations) for fire protection, visual inspection or Project surveying, in areas which have been previously cleared or maintained within a two-year or shorter period shall not require a pre-activity survey. In areas not cleared or maintained within a two-year period, all vegetation clearing activities would take place outside of the general avian breeding season (February 15 through August 30) to the extent feasible. If brush clearing cannot occur outside the avian breeding season, pre-construction surveys for active avian nests shall be conducted by a Service-permitted biologist no more than seven days prior to the initiation of construction. If no nests are observed, clearing may proceed. Where burrows or dens are identified in the reconnaissance-level survey, soil in the brush clearing area would be sufficiently dry before clearing activities occur to prevent mechanical damage to burrows that may be present. If active nests are found, work may proceed provided that construction activity is located at least 300 feet from nests (500 feet for raptors), and noise levels do not exceed 60 dBA Leq hourly at the nest site. These buffers may be reduced in width upon approval of the Wildlife Agencies if noise attenuation measures or alternate construction operations reduce noise levels below 60 dBA Leq hourly. All active nests would be monitored on a weekly basis until after the nestlings fledge. If noise levels still exceed 60 dBA Leq hourly at the nest site and/or a no-construction buffer can not be maintained, construction shall be deferred in that area until after the nestlings have fledged. (Note: This reflects “standard” avoidance/minimization measures.)
BIO-APM-10	No wildlife, including rattlesnakes, may be harmed except to protect life and limb. Firearms shall be prohibited in all Project areas except for those used by security personnel.
BIO-APM-11	Feeding of wildlife is not allowed.
BIO-APM-12	Project personnel are not allowed to bring pets to any Project area in order to minimize harassment or killing of wildlife and to prevent the introduction of destructive animal diseases to native wildlife populations.
BIO-APM-13	Plant or wildlife species may not be collected for pets or any other reason.

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-14	<p>All steep-walled trenches or excavations used during construction shall be covered at all times except when being actively utilized. If the trenches or excavations can not be covered, exclusion fencing (i.e., silt fencing) will be installed around the trench or excavation. Open trenches would be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in the trench or excavation, the on-site biological resource monitor shall be called immediately to remove them if they cannot escape unimpeded. The on-site biological resource monitor would make the required contacts with the USFWS and CDFG resource personnel and obtain verbal approval prior to removing any entrapped wildlife. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency (such as Project Wildlife) may be employed to remove the wildlife and transport them safely to other suitable habitats.</p>
BIO-APM-15	<p>Emergency repairs may be required during the construction and maintenance of the Project to address situations (e.g., downed lines, slides, slumps, major subsidence, etc.) that potentially or immediately threaten the integrity of the Project facilities. During emergency repairs the APMs shall be followed to the fullest extent practicable. Once the emergency has been abated, any unavoidable environmental damage would be reported to the Project biological construction monitor, who would promptly submit a written report of such impacts to the USFWS and CDFG and any other government agencies having jurisdiction over the emergency actions. If required by the government agencies, the biological construction monitor would develop a reasonable and feasible mitigation plan consistent with the APMs and any permits previously issued for the Project by the governmental agencies.</p>
BIO-APM-16	<p>Environmentally sensitive tree trimming locations for the Project would be identified in SDG&E's existing vegetation management tree trim database utilized by tree trim contractors. The biological field construction monitor shall be contacted prior to trimming in environmentally sensitive areas. Whenever feasible, trees in environmentally sensitive areas, such as areas of riparian or native scrub vegetation, would be scheduled for trimming during nonsensitive (i.e., outside breeding or nesting) times. Where trees cannot be trimmed during non-sensitive times, SDG&E would perform a site survey, or more as appropriate, to determine presence or absence of nesting bird species..</p> <p>SDG&E would submit results of this survey to the USFWS and CDFG and consult on mitigation measures for potential impacts, prior to tree trimming in environmentally sensitive areas. However, this survey would not replace the need for SDG&E to perform detailed on-the-ground surveys as otherwise required</p>
BIO-APM-16 (cont.)	<p>by BIO-APM-1. Where riparian areas with overstory vegetation are crossed, tree removal (i.e., clear-cut) widths would be varied where feasible to minimize visual landscape contrast and to maintain habitat diversity at established wildlife corridor edges. Where tree removal widths cannot be varied, SDG&E would consult with the USFWS and CDFG to develop alternative tree removal options that could reasonably maintain edge diversity.</p>

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-17	<p>All new access roads constructed as part of the Project that are not required as permanent access for future Project maintenance and operation would be permanently closed and restored according to the Wildlife Agency approved to the Restoration Plan outlined in APN-1 above. Where required, roads would be permanently closed using the most effective feasible and least environmentally damaging methods appropriate to that area with the concurrence of the underlying landowner and the governmental agency having jurisdiction (e.g., stockpiling and replacing topsoil or rock replacement). This would limit new or improved accessibility into the area. Mowing of some vegetation types (i.e., grasslands) can be an effective method for protecting the vegetative understory while at the same time creating access to the work area. Mowing should be used when permanent access is not required since, with time, total revegetation is expected. Any such temporarily impacted areas would be monitored to ensure that expected revegetation takes place. The monitoring regimen, success criteria, and contingency measures for areas which do not revegetate on their own would be described in the Wildlife Agency approved Restoration Plan outlined in APN-1 above. If mowing is in response to a permanent access need, but the alternative of grading is undesirable because of downstream siltation potential, it should be recognized that periodic mowing would be necessary to maintain permanent access. Mowing on permanent access roads must take place at least on a bi-annual basis (i.e., no more than two years shall pass between mowing events). The Project biological construction monitor shall conduct checks on mowing procedures to ensure that mowing for temporary or permanent access roads is limited to a 12-foot-wide area on straight portions of the road (slightly wider on turns), and that the mowing height is no less than 4 inches from finished grade.</p>
BIO-APM-18	<p>In areas designated as sensitive by SDG&E or the resource agencies, to the extent feasible structures and access roads would be designed to minimize impacts to sensitive features. These areas of sensitive features include but are not limited to high-value wildlife habitats, sensitive vegetation communities, and high value plant habitats, and/or to allow conductors to clearly span the features, within limits of standard structure design. If the sensitive features cannot be completely avoided, structures and access roads would be placed to minimize the disturbance to the extent feasible. When it is not feasible to avoid constructing poles or access roads in high value wildlife habitats, SDG&E would perform a site survey to determine presence or absence of sensitive plant and animal species (including all nesting birds). SDG&E would submit results of this survey to the USFWS and consult on mitigation measures for potential impacts, at least 10 business days prior to constructing structures or access roads. However, this survey would not replace</p>

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-18 (cont.)	the need for SDG&E to perform detailed on-the-ground surveys as otherwise required by BIO-APM-1. Where it is not feasible for access roads to avoid sensitive water resource features, such as streambed crossings, such crossings would be built at right angles to the streambeds. Where such crossings cannot be made at right angles, roads constructed parallel to streambeds would be limited to a maximum length of 500 feet at any one transmission line crossing location. Such parallel roads would be constructed in a manner that minimizes potential adverse impacts on “waters of the U.S.” Streambed crossings or roads constructed parallel to streambeds would require review and approval of necessary permits from the ACOE, CDFG, and RWQCB.
BIO-APM-19	Restoration and habitat enhancement and mitigation measures developed during the consultation period with the BLM under Section 7 of the Endangered Species Act (ESA) would be implemented and complied with as specified in the Biological Opinion (BO) of the USFWS. The Section 7 process would be used to obtain an incidental take authorization through a compensation-based mitigation program for permanent impacts to occupied sensitive plant and animal habitat as outlined in BIO-APM-1.
BIO-APM-20	In construction areas where recontouring is not required, vegetation shall be left in place wherever possible to avoid excessive root damage and allow for re-sprouting.
BIO-APM-21	Structures shall be constructed to conform to “Suggested Practices for Raptor Protection on Power Lines” (Raptor Research Foundation, Inc. 1981), to minimize impacts to raptors.
BIO-APM-22	Species identified as sensitive by the land managing agency shall be salvaged where avoidance is not feasible in accordance with state law. Generally, salvage may include • removal and stockpiling for replanting on site, • removal and transplanting out of surface disturbance area, • removal and salvage by private individuals, • removal and salvage by commercial dealers, or any combination of the above.
BIO-APM-23	Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed. Topsoil located in areas containing sensitive habitat shall be conserved during excavation and reused as cover on disturbed areas to facilitate regrowth of vegetation. Topsoil located in developed or disturbed areas containing no sensitive plant species is excluded from this APM.
BIO-APM-24	Construction holes left open over night shall be covered. Covers shall be secured in place nightly, prior to workers leaving the site, and shall be strong enough to prevent livestock or wildlife from falling through and into a hole. Holes and/or trenches shall be inspected prior to filling to ensure absence of wildlife.

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-25	<p>1. Existing vegetation shall be cleared only from areas scheduled for immediate construction work and only for the width needed for active construction activities. (Note: For some species, such as Quino Checkerspot Butterfly and bird species (California Gnatcatcher) it is preferable to remove vegetation prior to the egg laying/nesting season. Therefore, it may be preferable to remove the vegetation ahead of active construction, especially where larger facilities are concerned)</p> <p>2. Disturbed soils shall be revegetated with an appropriate seed mix that does not contain invasive non-native plant species.</p>
BIO-APM-26	Excavations shall be sloped on one end to provide an escape route for small mammals, reptiles and amphibians.
BIO-APM-27	<p>1. Prior to construction, SDG&E shall remove all existing raptor nests from structures that would be affected by Project construction.</p> <p>2. Removal of nests shall occur outside the raptor breeding season (January to July).</p> <p>3. If it is necessary to remove an existing raptor nest during the breeding season, a qualified biologist shall survey the nest prior to removal to determine if the nest is active. If the nest is inactive, it shall be removed promptly. If a nest is determined to be active, the nest shall not be removed and the biologist shall monitor the nest to ensure nesting activities/breeding activities are not disrupted. No active construction or vegetation removal shall take place within 500 feet of an active raptor nest. If the biological monitor determines that Project activities are disturbing or disrupting nesting activities, the monitor shall make feasible recommendations to reduce the noise and/or disturbance in the vicinity of the nest.</p>
BIO-APM-28	<p>Potential bat roost trees that must be removed will be surveyed and identified in the field for application of the following procedures: Before felling the tree:</p> <ol style="list-style-type: none"> 1. Trees should be removed under the warmest possible conditions. 2. Peel any sections of the exfoliating bark off the tree gently and search for any roosting bats underneath. 3. Create noise and vibrations on the tree itself. Noise and vibrations include: <ol style="list-style-type: none"> a. Running chain saw and making shallow cuts in the trunk (where bark has been peeled off). b. Striking the tree base with fallen limbs or tools such as hammers. Felling the tree: 4. Disturbance should be near-continuous for ten minutes, and then another ten minutes should pass, before the tree is felled. 5. When cutting sections of the bole, if any hollows or cavities (such as woodpecker holes) are discovered, be especially careful to check for the presence of bats in those areas. Cut slowly and carefully at all times. If possible, section bole near cavities to focus noise and vibrations, and open hollows by sectioning off a side.

Standard SDG&E-Proposed Measures Specific to Biological Resources USFWS Comments (Attachment 1 to Data Request No. 2)	
BIO-APM-29	Reduce construction night lighting on sensitive habitats. Exterior lighting within the project area adjacent to preserved habitat shall be of the lowest illumination allowed for human safety, selectively placed, shielded, and directed away from preserved habitat to the maximum extent practicable. Vehicle traffic associated with project activities would be kept to a minimum volume and speed to prevent mortality of nocturnal wildlife species that may be moving about.

Attachment 2 to Data Request No. 2

http://public.sempra.com/newsreleases/viewpr.cfm?PR_ID=1822&Co_Short_Nm=SDGE

SDG&E seeks to expand local use of solar energy

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SAN DIEGO, April 18, 2005 – San Diego Gas & Electric (SDG&E) has filed a request with the California Public Utilities Commission to place solar panels on its roofs and other property to bolster the use of renewable energy resources in the San Diego region.

If the request is approved, SDG&E will ask for bids to place the panels on its buildings and will use the energy to power both its facilities and its customers' homes and businesses. SDG&E is estimating that the solar displays will generate 1 megawatt to 3 megawatts, enough to supply 1,000 to 3,000 homes with electricity. Three megawatts of solar energy would represent an increase of almost 40% over today's use of solar energy within San Diego County.

"For several years, SDG&E has been aggressively purchasing renewable energy for use by its customers," said Terry Farrelly, vice president of procurement at SDG&E. "We are committed to supplying 20 percent of our customers' total energy needs from renewable resources like wind and solar by 2010."

SDG&E submitted its request as part of its 2005 short-term resource plan, along with an updated long-term renewable resource plan through 2014. The updated renewable plan included draft Requests For Offers for both solar panels and wind resources.

In the filing, SDG&E also said it wants to issue a second Request for Offers for more renewable resources within San Diego County. If approved, SDG&E expects to issue the two requests in the third quarter of 2005.

The request to purchase more renewable energy resources is part of SDG&E's long-term energy resource plan. The plan proposes to meet growing customer needs by advocating more energy efficiency and demand-response, purchasing more renewable resources, expanding electric transmission lines and building or buying more energy form from fossil-fuel power plants.

SDG&E is a regulated public utility that provides safe and reliable energy service to 3.3 million consumers through 1.3 million electric meters and more than 800,000 natural gas meters in San Diego and southern Orange counties. The utility's area spans 4,100 square miles. Exceptional customer service is a priority of SDG&E as it seeks to enhance the region's quality of life. SDG&E is a regulated subsidiary of Sempra Energy (NYSE: SRE). Sempra Energy, based in San Diego, is a Fortune 500 energy services holding company. To learn more, go to www.sdge.com.