

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 29, 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 #19

Dear Mr. Colton,

On June 27, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) to install a temporary foundation and erect temporary towers at the Rough Acres Yard, approved for use under Notices to Proceed (NTP) #5 and #12 for the Sunrise Powerlink Project, within San Diego County.

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 #19 to install a temporary foundation and erect temporary towers at the Rough Acres Yard is granted by CPUC based on the factors described below.

SDG&E Variance Request. Excerpts from the SDG&E Variance Request, received June 27, 2011, are presented below (indented):

SDG&E is submitting this variance request to provide further clarification and details on the installation of temporary foundations and erection of towers at the Rough Acres Construction Yard. The Sunrise overhead construction timetable is being compressed into duration of eight to nine months. The Air Crane heavy lift helicopter operations will see over 1,000 hours of lift operations during this period. To insure the pilots and helicopter are always ready for the heavy demand from lift operations, SDG&E proposes to erect a temporary test tower for the purpose of certifying helicopter and crew performance after helicopter maintenance and/or pilot vacation or turnover.

Footings installed will be concrete and installed on the runway. No vegetation clearing will be needed for this activity. Any towers erected for training will be dismantled at the end of construction or utilized along the alignment, foundations will be removed, and the site will be returned to its previous condition.

During any construction activity requiring excavations, SDG&E shall cover and secure steep-walled trenches or excavations when not actively being utilized per mitigation measure B-7a. The SWPPP shall be implemented where appropriate prior to and during ground disturbing activities.

Biological and cultural surveys have been conducted at this yard and are summarized within NTP#12. Survey sweeps occurred for the yard with Cassandra Garza and David Lee, CPUC Representatives, and Rosina Gallego, Sunrise Lead Monitor. These were completed on December 30, 2010. An archaeologist/Native American monitor shall monitor any ground disturbing activities near a designated ESA.

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. A CPUC Environmental Monitor visited the area of the request and did not see any issues. 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. The proposed area is an existing airstrip at the Rough Acres Yard and is devoid of vegetation. Biological surveys have been conducted with biological summaries provided in NTPs #5 and #12. No biological impacts are anticipated.

Hydrological Resources. The SWPPP shall be implemented where appropriate.

Cultural and Paleontological Resources. The area was assessed for cultural materials during the cultural resources inventory for the Sunrise Powerlink Final Environmentally Superior Southern Route (Garcia-Herbst, 2010) and as part of a subsequent review for this variance request. Cultural Environmentally Sensitive Areas (ESAs) occur adjacent to the site. During all excavations and ground disturbance associated with the requested foundation work, an archaeologist and a Native American Monitor shall be present.

In the event of an unanticipated discovery of archaeological materials, all ground-disturbing work within the immediate area of the discovery will be suspended. Any new discoveries shall be managed in compliance with the procedures and guidelines for Treatment for Unanticipated Discoveries set forth in the Final Historic Properties Management Plan (HPMP).

The Final Paleontological Monitoring and Discovery Treatment Plan (PMDTP) was accepted on June 17, 2010. The Rough Acres yard does not have any paleontological sensitivity.

Traffic/Sensitive Land Uses/Noise. The yard is currently being used for staging and helicopter operations. No increase in impacts to traffic, sensitive land uses or noise is anticipated.

Visual. The foundation and tower installations are temporary and the site will be restored to pre-existing conditions.

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, permit conditions and conditions of NTPs number five and twelve shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
2. Copies of all relevant permits, compliance plans, and this Variance approval shall be available on site for the duration of alternate access route.
3. Biological monitoring shall be conducted in accordance with Mitigation Measure (MM) B-1c. "Biological survey sweeps" are required to occur during active use of the subject areas as part of required biological monitoring activities.
4. If active nests are found, protocols stipulated by MM B-8a shall be followed. A Biological Monitor shall establish an appropriate buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The Biological Monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. The Biological Monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring. The buffer may be adjusted subject to review by CDFG and USFWS, and with prior knowledge of the CPUC.
5. During all excavations and ground disturbance associated with the requested foundation work, an archaeologist and a Native American Monitor shall be present.
6. In the event of an unanticipated discovery of archaeological materials, all ground-disturbing work within the immediate area of the discovery will be suspended. Any new discoveries shall be managed in compliance with the procedures and guidelines for Treatment for Unanticipated Discoveries set forth in the Final Historic Properties Management Plan (HPMP).
7. If the application of water is needed to abate dust, SDG&E shall use the least amount needed to meet safety and air quality standards and prevent the formation of puddles, which could attract wildlife to construction sites (as requested by USFWS). Conditions of the Dust Control Plan will be implemented and enforced.
8. The SWPPP shall be implemented.
9. The foundation proposed under this request will be completely removed by the conclusion of Project use of the yard.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard
CPUC Environmental Project Manager
Sunrise Powerlink Transmission Project

Alan Colton, SDG&E
Sunrise Powerlink Project
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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
Fritts Golden, Aspen Environmental Group