### PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



August 4, 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 #22

Dear Mr. Colton,

On July 8, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) to allow use of the proposed Fromm Construction Yard (NTP #13, overhead on non-federal lands), of the Sunrise Powerlink Project, within Imperial County, Link 1. Additional information was submitted on August 3 and 4.

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 #22 to allow use of the proposed Fromm Construction Yard 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 July 8, 2011, are presented below (indented) with CPUC additions in parenthesis and in bold:

SDG&E is requesting a variance from the Final Environmentally Superior Southern Route (FESSR), and related facilities, as identified in the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) issued October 2008 by the CPUC and the Project Modification Report (PMR) for the FESSR that was submitted to the CPUC and approved through a Determination Memorandum dated September 22, 2010. Construction Yards were identified in the Final EIR/EIS and the PMR to support construction of the project; the total number of construction yards was reduced from 43 in the FESR to 19 in the PMR (page 3-4, PMR). Since that time, the construction window to complete the construction of the Sunrise Powerlink Transmission Line has been significantly compressed.

The compression of the schedule considerably impacts construction in locations that have time restraints due to sensitive resources, such as Peninsular Bighorn Sheep (PBS) habitat. SDG&E now has a single season, six-month construction work window from July 1, 2011 to December 31, 2011 to install foundations, assemble and erect steel lattice towers and install conductor at Mountain Springs Grade (MSG). No work can occur outside of this window because of PBS in the MSG area. Additionally, due to Project vegetation clearing restrictions, the construction window has been reduced even further from the six-month period. The single season construction window issue is critical. Mitigation measures previously allowed SDG&E to construct in MSG during three three-month work periods (Oct 1, 2009 – December 31, 2009, October 1, 2010 – December 31, 2010, and October 1, 2011 – December 31, 2011). The construction cycle change from a nine-month window to a less than six-month window has compressed the work activities and increased requirements to maximize construction yard usage for this portion of construction. Construction was to begin in MSG on July 1, 2011. All foundations must be complete by September 1, 2011, to enable the completion of the rest of the work within the work window. Structures must be completely assembled by October 1, and wire stringing operations must be completed by December 31, 2011.

The AER Construction Yard was designated to support construction at MSG. The AER Construction Yard was originally more than 15 acres in size, a size that would allow the staging of foundation equipment concurrent with the assembly of steel lattice tower sections for structures EP267 through EP256. Construction scheduling studies indicated that by using the AER Construction Yard in the three construction periods and staggering the work activities, the AER Construction Yard could be reduced to 5 acres. The Project Modification Report (PMR) formalized this reduced impact. This reduction in size was driven in part by the presence of several Environmentally Sensitive Areas (ESAs) within the original 15 acre yard footprint. These ESAs preclude returning the AER Construction Yard to its original size. Staging for wire stringing operations needed during this single season construction period have increased the need for additional yard space. SDG&E has identified a property currently owned by SDG&E that could support construction at MSG and is requesting a variance from the PMR to include this additional yard. SDG&E would use this yard to support the compressed schedule. The proposed Fromm Construction Yard (17.40 acres) is within the Project Right-of-Way (ROW) between structures EP257 and EP259-3. Structure EP258-3 and its associated spur road will be entirely within the southern section of the proposed yard. The proposed yard is an undeveloped parcel east of Old Highway 80, and much of the western border of the yard parallels the highway. The eastern edge of the property supports a segment of the Southwest Powerlink ROW. Access to the yard will be from an existing project access road to EP258-3-E (the access road also traverses the proposed yard, bisecting the yard.).

The Fromm Construction Yard would be fenced and screened per the Construction Yard Screening Plan as approved by the CPUC on October 22, 2010 and as amended by Variance #14 (approved on May 3, 2011). The yard would be used for material lay-down and staging, including fly operations, as well as a contractor crew staging location for Sections 9C and 10A. The Fromm Construction Yard would have work hours between 7 a.m. and 7 p.m. Monday through Saturday, excluding holidays, or as otherwise approved by the local jurisdiction (nighttime work will not be permitted in this area). In the event that construction activity must occur outside these hours, SDG&E will coordinate with the County and submit documentation of coordination to the CPUC.

A Phase I Environmental Site Assessment was performed for the proposed Fromm Construction Yard. Based on supplemental ground reconnaissance and a database search, no evidence of recognized environmental conditions was identified for the Fromm Parcels.

Traffic Impacts for use of the Fromm Construction yard have been assessed. The analysis revealed no significant impacts to traffic with the use of the yard. Access to the Fromm Construction Yard would occur through special access from Interstate-8 (I-8).

Based on the completed resource surveys no impacts will occur to biological or cultural resources.

Biological reconnaissance was performed on June 15, 2011. The proposed construction yard is characterized in part by Sonoran mixed woody scrub and in part by Sonoran mixed woody and succulent scrub. Sonoran mixed woody scrub is found in the southern and western portions of the yard. The eastern half of the northern section is characterized by Sonoran mixed woody and succulent scrub habitat. Sonoran mixed woody scrub habitat onsite is dominated by jojoba, cane cholla, California ephedra, and desert-thorn, with a weedy understory dominated by foxtail chess and

Mediterranean schismus. Other plant species observed in the area included, but were not limited to, turpentine broom, Gander's cholla, deerweed, California buckwheat, desert agave, desert sunflower, boundary goldenbush, rhatany, lotebush, desert woolly-star, hedgehog cactus, small wreath plant, desert stillingia, four-wing saltbush, and fringed spineflower. The Sonoran mixed woody and succulent scrub habitat is dominated by jojoba, cane cholla, boundary goldenbush, California buckwheat, and in some parts, desert sunflower. A weedy understory was present throughout and was comprised of foxtail chess, red-stem filaree, and Mediterranean schismus. Other plant species observed in the area included, but were not limited to, turpentine broom, deerweed, desert agave, rhatany, lotebush, desert woolly-star, hedgehog cactus, small wreath-plant, desert stillingia, fourwing saltbush, Mojave prickly pear, Gander's cholla, San Felipe dyssodia, California scrub oak, rock rose, desert chicory bush, cat claw, California juniper, and fringed spineflower. No project sensitive plants or wildlife were observed during the survey. One sensitive plant species, slender leaved ipomopsis has been documented approximately 600 feet east of the proposed yard during previous project-related surveys. The proposed yard is not in a known weed-avoidance area (the project Weed Control Plan shall still be implemented at the site.)

Wildlife species observed during the survey include mourning dove, black-throated sparrow, ash-throated flycatcher, common raven, side-blotched lizard, long-nose leopard lizard, western whiptail, whitetailed antelope squirrel, desert cottontail, and dotted blue butterfly. No bird nests or nesting activities were observed. No sensitive animal species were observed.

There are two erosion features/drainage systems within the proposed work area. Both are along the western boundaryof the site. The first consists of three tributaries, running west to east across approximately 300 feet of the proposedyard, where they merge just east of the project boundary and end at a cut hillside adjacent to the eastbound on-ramp to Interstate 8. Immediately west of where the drainage ends at the cut hillside, there is a culvert that runs underneath the on-ramp. The second drainage is along the western edge of the proposed yard, approximately 100 feet south of the drainages described above. On August 3, SDG&E provided that waters occur sparingly on the western boundary of the yard. The waters which enter the yard will be delineated as an ESA and SDG&E will avoid any construction in this area. Fencing will still occur for security purposes. As a precautionary measure BMPs will be placed to protect the waters. Fibers rolls will be placed along the upstream portion, gravel bag check dams along the downstream portion, and water bars will be placed crossing the road adjacent to the jurisdictional water.

A cultural resources survey for the proposed yard was performed. There were several archaeological sites noted within the proposed boundary of the yard. (On August 3, a submittal was made by SDG&E revising the yard boundaries to avoid many sites noted in the variance request.) These sites (the remaining features) are new discoveries and will be protected as ESAs and avoided by direct ground disturbance during use of the yard. SDG&E will avoid impacts to these cultural resources and monitor the conditions of the ESAs during the use life of the yard.

The Link 1 Storm water Pollution Prevention Plan (SWPPP) 1 will be amended to include the Fromm Construction Yard. Best Management Practices (BMPs) will be installed in accordance with the SWPPP. Potential fueling for both helicopter operations and construction equipment (diesel only) is anticipated to occur at this yard. Proper BMPs will be installed and implemented in areas designated for fueling. (Fueling shall not occur within 200 feet of the drainages delineated on site unless documentation of jurisdictional authorization is provided to the CPUC.) Should it be necessary to store fuel tankers (over 55 gallons) overnight, a Hazardous Materials Business Plan will be developed and submitted to the local Certified Unified Program Agency (CUPA).

A Noise Study was completed and there are no significant noise issues associated with the proposed uses of the yard. A temporary helicopter landing zone will be used at Fromm Construction Yard. The noise analysis was based on a worst-case operational noise exposure with consideration of terrain, distance to the identified sensitive receptors and zoning. Hours of operation for this temporary landing area will be similar to hours of operation for all construction yards (from 7 a.m. to 7 p.m. or sundown, whichever is earlier, Mondays through Saturdays, except holidays, unless otherwise approved by the local jurisdiction). Approximately 20 flights per day are anticipated to occur out of this yard. It is anticipated that Type 1 (e.g. S64F Air Crane), Type 2 (e.g. Kaymann Kmax, Bell 205, or comparable), and Type 3 (e.g. AS350B3, Hughes 500, Bell 206, MD 530FF, or comparable) helicopters will be used at the Fromm Construction Yard. The number of flights out of the Fromm Construction Yard will be reduced once helicopter construction structures are completed. Helicopter operations out of the Fromm Construction Yard will occur for no more than 365 days from its first

initial use for helicopter operations. SDG&E will implement dust control per the Dust Control Plan, as approved by the CPUC on January 20, 2010.

Based upon review of applicable plans, policies and ordinances, and discussion with the Federal Aviation Administration (FAA) and CalTrans Division of Aeronautics, the proposed helicopter operations at the Fromm Construction yard are exempt from noise ordinance standards. Coordination between SDG&E's noise consultant, the FAA, and the John A. Volpe National Transportations Systems Center advise that temporary uses (such as a temporary helicopter landing zone) are exempt from FAR Part 150 due to the categorical exclusion found under the National Environmental Policy Act of 1969 (40CFR6.107). It is the FAA's position to classify temporary aircraft activities (either fixed wing or rotary-wing) as non-significant. Therefore, the FAA does not assign an International Civil Aviation Organization (ICAO) airport code to temporary or incidental helicopter landing areas. Coordination occurred with the Federal Aviation Administration (FAA) as a courtesy, regarding helicopter use on the Sunrise Project on October 27, 2010. A poster was provided to both entities illustrating the types of helicopters that could potentially be use on the Project. The location of the temporary landing zone would be on private land, outside of the CalTrans ROW, and does not require CalTrans approval. (A call occurred on August 3 between the CPUC and the Caltrans Division of Aeronautics, and the CPUC was informed that SDG&E will need to conduct a consultation with Caltrans Division of Aeronautics.) As clarified by SDG&E on August 3, helicopters will fly parallel to Interstate 8 when entering and leaving the yard. The temporary landing zone is categorized as a Temporary Helicopter Landing Site per 21 CCR 3527(y), which defines a Temporary Helicopter Landing Site as:

"A site, other than an emergency medical service landing site at or near a medical facility, which is used for landing and taking off of helicopters and,

- (1) Is used or intended to be used for less than one year, except for recurrent annual events, and,
- (2) Is not marked or lighted to be distinguishable as a heliport and,
- (3) Is not used exclusively for helicopter operations."

Additionally, pursuant to the Public Utilities Commission (PUC) Section 21661, Section 3533(b)(6), which states, "Temporary helicopter landing sites that are not within 1000 feet of the boundary of a public or private school maintaining kindergarten classes or any classes in grades 1 through 12." Therefore, the proposed temporary landing zone would be exempt from planning and performance standards per PUC Section 21661. Temporary lighting will be used for the safety of convening personnel during approved construction work hours at times of the year when daylight is insufficient for safe movement of personnel around the meeting area. The use of lights will be associated with construction activities such as morning tailboards and during emergencies. Temporary construction lights will be hooded and pointed down-ward and will follow specifications as presented in the Construction Yard Lighting Mitigation Plan that was approved by the CPUC on February 1, 2011.

- SDG&E will implement the Storm Water Pollution Prevention Plan.
- SDG&E will follow the approved Weed Control Plan
- SDG&E will follow the approved Dust Control Plan

#### **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 CPUC Environmental Monitor (EM) visited the areas of the request. 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.** Biological reconnaissance was performed on June 15, 2011. No project sensitive plants or wildlife were observed during the survey.

The CPUC EM reviewed the sites and found greater than 15 percent vegetative cover. No vegetation clearing will be allowed during the bird nesting season until direct approval has been granted or otherwise permitted under the approved *Nest Survey Protocol*. To avoid harm to wildlife and nesting birds, SDG&E and its contractors will implement the Project mitigation measures for nesting birds and the conditions of this variance approval found below. The yard shall be restored post construction.

The yard area is part of the peninsular bighorn sheep monitoring compliance area therefore nighttime work may **not** occur in this location.

**Hydrological Resources.** There are two erosion features/drainage systems within the proposed work area. Both are along the western boundary of the site. The first consists of three tributaries, running west to east across approximately 300 feet of the proposed yard, where they merge just east of the project boundary and end at a cut hillside adjacent to the eastbound on-ramp to Interstate 8. Immediately west of where the drainage ends at the cut hillside, there is a culvert that runs underneath the on-ramp. The second drainage is along the western edge of the proposed yard, approximately 100 feet south of the drainages described above. On August 3, SDG&E provided that waters occur sparingly on the western boundary of the yard. The waters which enter the yard will be delineated as an Environmentally Sensitive Area (ESA) and SDG&E will avoid any construction in this area. As a precautionary measure, Best Management Practices (BMPs) will be placed to protect the waters. Fibers rolls will be placed along the upstream portion, gravel bag check dams along the downstream portion, and water bars will be placed crossing the road adjacent to the jurisdictional water. The CPUC EM shall verify flagging and erosion controls prior to use of the yard.

The Link 1 Storm water Pollution Prevention Plan (SWPPP) 1 will be amended to include the Fromm Construction Yard. BMPs will be installed in accordance with the SWPPP. Potential fueling for both helicopter operations and construction equipment (diesel only) is anticipated to occur at this yard. Proper BMPs will be installed and implemented in areas designated for fueling. Fueling shall not occur within 200 feet of the drainages delineated on site unless documentation jurisdictional authorization is provided to the CPUC. Should it be necessary to store fuel tankers (over 55 gallons) overnight, a Hazardous Materials Business Plan will be developed and submitted to the local Certified Unified Program Agency (CUPA).

**Cultural and Paleontological Resources.** A cultural resources survey for the proposed yard was performed. There were several archaeological sites noted within the proposed boundary of the yard. On August 3, a submittal was made by SDG&E revising the yard boundaries to avoid sites noted in the original variance request. The remaining features are new discoveries and will be protected as ESAs and avoided of direct ground disturbance during use of the yard. SDG&E will avoid impacts to these cultural resources and monitor the conditions of the ESAs during the use life of the yard. The CPUC EM shall field validate the ESA flagging of the yard prior to yard usage.

On July 13, 2011, the CPUC cultural consultant provided review comments. In regard to cultural resources, conditions set forth in the Final Historic Properties Management Plan (HPMP) will be implemented during construction of the Fromm Construction Yard, as required (Iversen et al. 2010). As required by Mitigation Measure C-01b, sites will be flagged off with temporary orange fencing and designated as ESAs. ESA buffers around each site will be established and these sites will be protected as exclusionary zones. Per Mitigation Measure C-01e, Project-wide archaeological and Native American

monitors are to be on-site during the temporary fencing of ESAs. In addition, since the Fromm Construction Yard has been determined to be highly sensitive for buried cultural deposits, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. In addition, per Mitigation Measure C-03a, Archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified as sensitive for buried archaeological deposits and during earth-moving activities associated with the development of the yard.

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, there is a low potential to encounter paleontological resources within the Fromm Construction Yard. As stated in the Treatment Plan and per mitigation measure Pal-01c, construction work which penetrates >5 feet below the ground surface in areas determined to have a low, marginal, and/or undetermined paleontological resource sensitivity will be monitored on a part-time basis as determined by a qualified paleontologist.

In the event of an unanticipated discovery of archaeological or paleontological 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) and Final Paleontological Monitoring and Discovery Treatment Plan (PMDTP).

**Traffic/Sensitive Land Uses/Noise.** Traffic impacts for use of the Fromm Construction Yard have been assessed. The analysis revealed no significant impacts to traffic with the use of the yard. Access to the Fromm Construction Yard would occur through special access from Interstate-8 (I-8). The CPUC traffic consultant reviewed the traffic study and the area would require the same mitigation implementation as the rest of the project (i.e. implementation of a traffic control plan, use of flag men and signs, etc to regulate traffic), and concurred that there would not be significant traffic impacts.

A temporary helicopter landing zone will be used at the Fromm Construction Yard and noise impacts associated with helicopter operations are included in the Noise Study. Hours of operation for this temporary landing area will be similar to hours of operation for all construction yards (from 7 a.m. to 7 p.m. or sundown, whichever is earlier, Mondays through Saturdays, except holidays, unless otherwise approved by the local jurisdiction). Approximately 20 flights per day are anticipated to occur out of this yard. The number of flights out of the Fromm Construction Yard will be reduced once helicopter construction structures are completed. Helicopter operations out of the Fromm Construction Yard will occur for no more than 365 days from its first initial use for helicopter operations. Helicopter flights will be aligned parallel to the I-8 when entering and leaving the yard. SDG&E will implement dust control per the Dust Control Plan, as approved by the CPUC on January 20, 2010. Per CPUC correspondence with Caltrans, SDG&E needs to consult with and apply for a Temporary Heliport Authorization (THA) from the Caltrans Division of Aeronautics Office of Airports prior to any helicopter operations at the site. Documentation of consultation with Caltrans Division of Aeronautics and/or a THA shall be supplied to the CPUC prior to helicopter operations at the Fromm Yard.

**Visual**. The Fromm Construction Yard would be fenced and screened per the Construction Yard Screening Plan as approved by the CPUC on October 22, 2010 and as amended by Variance #14 (approved on May 3, 2011). The yard is a temporary feature and no visual concerns are noted.

#### **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 NTP #13 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. SDG&E needs to consult with and/or apply for a Temporary Heliport Authorization (THA) from the Caltrans Division of Aeronautics Office of Airports prior to any helicopter operations at the site. Documentation of consultation with Caltrans Division of Aeronautics and/or a THA shall be supplied to the CPUC prior to helicopter operations at the Fromm Yard.
- 4. No vegetation clearing will be allowed during the bird nesting season until direct approval has been granted or otherwise permitted under the approved *Nest Survey Protocol*.
- 5. Conduct biological monitoring in compliance with Mitigation Measure B-1c. "Biological survey sweeps" are required to occur during active use of the subject yard as part of required biological monitoring activities.
- 6. If active nests are found, follow protocols in MM B-8a. 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 with the approval of CDFG and USFWS, and with prior knowledge of the CPUC. A chronology of nesting activity, including any buffer reductions, specific construction activity nearby, and bird behavior shall be noted in the project nesting log to be submitted on a weekly basis.
- 7. SDG&E will restore all areas post construction.
- 8. SDG&E will control the spread of invasive plant species by implementing the 2009/2010 Weed Control Plan.
- 9. The area is part of the peninsular bighorn sheep monitoring compliance area; therefore, nighttime work may **not** occur in this location.
- 10. 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.
- 11. The SWPPP shall be implemented. BMPs will be placed to protect drainage waters, as proposed, and in accordance with the SWPPP. The CPUC EM shall verify flagging and erosion controls prior to use of the yard.

- 12. Where coordination with Imperial County is necessary, documentation shall be supplied to the CPUC.
- 13. SDG&E shall delineate cultural ESAs and install exclusion fencing. Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. Appropriate fencing shall be verified by the CPUC EM prior to yard occupation. In addition, since the Fromm Construction Yard has been determined to be highly sensitive for buried cultural deposits, any ground disturbing activities near the designated ESAs will be monitored full-time by an archaeologist and Native American monitor. In addition, per Mitigation Measure C-03a, Archaeological and Native American monitors will be on-site during subsurface construction disturbance at all locations identified as sensitive for buried archaeological deposits and during earth-moving activities associated with the development of the yard.
- 14. Qualified Paleontological Monitors will be present for ground disturbance at > than 5 feet for locations proposed under this request.
- 15. In the event of an unanticipated discovery of archaeological or paleontological 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 HPMP and PMDTP.
- 16. As proposed, the Temporary Landing Site (TLS) will be used for 20 helicopter trips per day. A log shall be maintained documenting the date, time, and type of helicopter used for each trip.
- 17. The TLS will be in use for less than one year, and will not be marked or lighted to be distinguishable as a heliport, nor will the site be used exclusively for helicopter operations.
- 18. Prior to use of the TLS, construction notifications for helicopter operations out of the Fromm Construction Yard will be mailed to potential sensitive noise receptors and property owners within 1000 feet of the yard and proof of mailing will be submitted to the CPUC.
- 19. All complaints received by SDG&E in regard to use of the yard, including those pertaining to TLS activities, shall be logged and reported immediately to the CPUC. This includes complaints relevant to noise and dust, etc. Complaints should also be forwarded immediately to Imperial County.

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
Erinn Wilson, CDFG
Susan Lee, Aspen Environmental Group
Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group