PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



October 20, 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 #23

Dear Mr. Colton,

On August 15, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) to allow use of both temporary and permanent landing platforms and temporary tower staging access pads (TSAP)(NTP #13, overhead on non-federal lands), of the Sunrise Powerlink Project. Additional information was submitted on August 17 and 18, and September 15. On October 13, 2011, SDG&E submitted a revised Variance #23 request reducing the number of locations being requested.

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 #23 to allow use of both temporary and permanent landing platforms and a temporary TSAP 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 #23, received August 15, 2011, and the revision to the request received October 13, 2011 are presented below (indented) with CPUC additions in parenthesis and in bold. Please note that locations at towers EP 87-1, EP 233-1 and CP 108 which were part of the original variance request were not included in the revised variance and discussions for those areas no longer apply and are not shown:

SDG&E is submitting this variance request (as well as Variance Revision 1) as a modification to the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) issued October 2008 and the Project Modification Report (PMR) approved on September 22, 2010, to the CPUC to incorporate the following modifications to the Sunrise Powerlink alignment within non-Federal Lands.

SDG&E is requesting to install and utilize landing platforms with temporary impacts (to be used for construction only), a temporary TSAP (to be used for construction only), and landing platforms with permanent impacts (to be used for construction and maintenance) on non-Federal land. These landing platforms and TSAPs are required to assist with personnel transport to the structure site. The proposed landing platforms with temporary TSAP is located near the following structures: CP71, CP74-2, CP76-1, CP79-1, and EP232-1. The proposed temporary TSAP is located near EP227. The proposed landing platforms with permanent impacts are located near the following structures with permanent impacts are located near the following structures: CP54-1, EP118-2, and EP261-2.

Questions were raised with regard to the landing platforms at CP54-1 and EP118-2 because of the presence of TSAPs in the PMR. Due to safety concerns regarding the slope of the terrain and the need to grade far too large an area for these two TSAPs, they have been eliminated in favor of temporary landing platforms. Their locations however remain the same.

For each of the sites listed above there are several reasons to submit this variance request:

1. For temporary - CP71, CP74-2, CP76-1, CP79-1, EP227 and permanent - CP54-1 and EP118-2, the nearest approved access roads are great distances from the tower sites, many times in steep, rugged terrain. The additional sites will increase safety by allowing crews closer access to tower sites, with less hiking, and decrease impacts by reducing hiking path lengths. 2. For sites located within proximity to existing roadways, such as temporary - EP232-1 and permanent -EP261-2, a helicopter landing zone was not originally identified due to the nearby road. However, construction of these sites requires multiple support vehicles and equipment, in addition to crew members, monitors, and inspectors. Even with implementation of employee carpooling, vehicle-only access would result in increased vehicular traffic compared with crew and employees being shuttled to the site via helicopter.

3. In addition to alleviating the distance traveled by personnel, a landing platform will also aid quick evacuation in emergency situations, such as a medical emergency. During the summer months, the landing platform will also limit the time that the crew members will be required to hike in hot weather conditions, thus limiting their potential exposure for heat exhaustion.
4. To help minimize disturbance, landing platforms will not require grading but will require vegetation clearing to create a safe space for the helicopter to land where the rotor blades will not come into contact with foreign objects, such as vegetation, and these temporary platforms will be restored post-construction. In regard to the landing SDG&E provided that they will only be impacting the vegetation in the footings area. Some brush may need to be trimmed to ensure the helicopter blades will not come in contact with vegetation. No additional vegetation removal will be required.

Habitat and cultural assessments were performed for each individual work area and are included in their respective sections (below). Any impacts to sensitive plants during construction will be restored per the Sensitive Vegetation Restoration Plan, approved by the CPUC on October 30, 2010. When necessary, impacts to sensitive plant species will be mitigated at an offsite mitigation parcel. SDG&E will implement the 2009/2010 Weed Control Plan for the Environmentally Superior Southern Route of the SDG&E Sunrise Powerlink Project (Weed Control Plan) as approved by the CPUC on September 8, 2010, as necessary.

LANDING PLATFORMS WITH TEMPORARY IMPACTS

CP71: The proposed temporary landing platform is approximately 301 feet southwest of structure CP71. The platform area is within a relatively flat area categorized as southern mixed chaparral habitat. Wildlife species observed in the vicinity include wrentit, western scrub-jay, Anna's hummingbird, and California quail. Sensitive plant species observed include delicate clarkia. There were no nests or nesting activity observed in the vicinity of the proposed temporary landing platform during the survey. **CP74-2**: The proposed temporary landing platform is approximately 181 feet northeast of structure CP74-2. The platform area is on a slight north sloping area categorized as southern mixed chaparral habitat. Wildlife species observed in the vicinity include wrentit, western scrub jay, and California quail. Sensitive plant species observed include delicate clarkia. There were no nests or nesting activity of the proposed temporary landing platform area is on a slight north sloping area categorized as southern mixed chaparral habitat. Wildlife species observed in the vicinity include wrentit, western scrub jay, and California quail. Sensitive plant species observed include delicate clarkia. There were no nests or nesting activity observed in the vicinity of the proposed temporary landing platform during the survey.

CP76-1: The proposed temporary landing platform is approximately 173 feet west of structure CP76-1. The platform area is on a slight north sloping area categorized as diegan coastal sage scrub habitat. Weed species observed include maltese star thistle and the brome grasses. Wildlife species observed in the vicinity include western scrub-jay, hooded oriole, acorn woodpecker, California quail, and canyon wren. There were no sensitive plant species observed in the vicinity, although some species are noted to occur here. There were no nests or nesting activity observed in the vicinity of the proposed temporary landing platform during the survey.

CP79-1: The proposed temporary landing platform is approximately 104 feet west of structure CP79-1. The platform area is on a slight north sloping area categorized as diegan coastal sage scrub habitat. Weed species observed include cheat grass, maltese star thistle, and short pod mustard. Wildlife species observed in the vicinity include red tail hawk, side blotched lizard, Sara's orange-tip butterfly, and canyon wren. There were no sensitive plant species observed in the vicinity although some species are

noted to occur here. There were no nests or nesting activity observed in the vicinity of the proposed temporary landing platform, during the survey.

EP232-1: The proposed temporary landing platform is approximately 119 feet southwest of proposed structure EP232-1. The landing platform will be situated south of an existing access road, on a rocky south-facing slope. The vegetation community observed onsite is semi-desert chaparral. Wildlife species observations include special-status coast horned lizard and turkey vulture. There were no special-status plants, nests, or nesting activities observed in the vicinity of the proposed temporary landing platform area during the survey.

TEMPORARY TOWER STAGING ACCESS PAD (TSAP)

EP227: The proposed temporary TSAP is approximately 197 feet south of structure EP227, northwest of the existing dirt access road within a relatively flat, open area. The vegetation community observed is semi-desert chaparral. Wildlife species observed include western scrub-jay and spotted towhee. No sensitive plant species, nesting activity, or nests were observed in the vicinity of the proposed temporary TSAP during the survey.

LANDING PLATFORMS WITH PERMANENT IMPACTS

CP54-1: The proposed permanent landing platform is approximately 85 feet south of structure CP54-1 along a west-facing slope. The vegetation community observed onsite is southern mixed chaparral-burned. Wildlife species observed during the site visit include red-tailed hawk, western scrub-jay, wrentit, spotted towhee, and canyon wren. Sensitive plant species observed in the vicinity include delicate clarkia and lakeside-lilac. There were no nests or nesting activities observed in the vicinity of the proposed permanent landing platform during the survey.

EP118-2: The proposed permanent landing platform is approximately 100 feet east of structure EP118-2, north of the existing dirt access road on an east-facing slope. The vegetation communities observed onsite are chamise chaparral and big sagebrush scrub Wildlife species observed in the vicinity include house finch, Bullock's oriole, western scrub jay, California quail , and common side-blotched lizard. There were no sensitive plant species observed in the vicinity. There were no nests or nesting activities observed in the vicinity of the proposed permanent landing platform during the survey.

EP261-2: The proposed permanent landing platform is approximately 182 feet northeast of structure EP261-2 on the south side of the existing access road. The landing platform will be situated in a relatively flat, open area with surrounding boulders. The vegetation community observed onsite is Sonoran mixed woody scrub. Wildlife species observed in the vicinity include cactus wren and western side-blotched lizard. A single inactive cactus wren nest, in poor condition, was observed in the vicinity of the proposed permanent landing platform area during the survey. There were no active nests or sensitive plants observed during the survey.

Some areas under this request fall in sensitive habitat areas, SDG&E provided the following acreage impacts by species:

- · CP74-2 California gnatcatcher habitat (0.18 acre)
- · CP76-1 California gnatcatcher habitat (0.11 acre in non-Federal)
- · EP232 Quino checkerspot butterfly habitat (0.18 acre)
- · EP261 Peninsular Bighorn Sheep habitat (0.18 acre)

Additional permanent and temporary impacts will be mitigated through a combination of offsite conservation and onsite restoration. Offsite conservation will occur at the mitigation sites identified in the September 2010 Habitat Acquisition Plan and Habitat Management Plan (HAP/HMP) approved by the USFWS on December 2, 2010. A final accounting of impacts and mitigation will be prepared during the post-construction phase and provided to the responsible agencies.

(The cultural discussions for each area have been extracted and consolidated as follows.) All proposed areas were surveyed for cultural resources during both preconstruction fielding activities and cultural resources inventory work for the Sunrise Powerlink Final Environmentally Superior Southern Route (Garcia-Herbst, Iversen, Laylander, and Williams 2010). Construction (areas proposed under this request including permanent and temporary landing platforms and a temporary TSAP) will not impact any cultural resources.

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 Monitors (EMs) visited all areas of the request to review access constraints and

confirmed that each proposed area appeared necessary. In regard to landing platforms proposed at CP54-1 and EP118-2 the CPUC verified the proposed locations against the PMR map books and confirmed that the platforms will be placed in the exact locations of the previously approved TSAPs. The CPUC visual consultant conducted a field tour to evaluate the areas under this request. He provided several recommendations which are detail under the Visual section below.

In regard to the request for the permanent installations, long-term use of helicopters for operation and maintenance of the SRPL was addressed in the Final EIR/EIS. Section B.5.1.1, Transmission Line Maintenance, on page B-81 of the Final EIR/EIS noted that inspection patrols of the transmission lines would be required and that regular ground and aerial inspections would be performed in accordance with the CAISO requirements per the Transmission Control Agreement between CAISO and SDG&E concerning transmission facility maintenance. As required by CAISO, aerial inspection (visual and infrared) of the entire system and climbing inspections of transmission structures would be conducted annually. Aerial inspection would be conducted by helicopter. Additional use of helicopters during operations and maintenance was addressed for emergency response. Section B.5.2, Emergency Response, on page B-82 of the Final EIR/EIS noted that emergencies would be any event requiring immediate response to a condition by SDG&E personnel. Crews may be required to respond to an emergency in a remote area without roads. In areas without vehicle access, helicopters may be used to respond quickly to emergencies.

The following discussion summarizes analyses 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 CPUC Biological reviewer provided comments on August 18, 2011: While no bird nests or nesting activity were observed during the surveys, impacts to nesting birds could still occur if construction was to occur during the nesting season. Therefore, construction may be subject to Mitigation Measure B-8a (Nest Survey Protocol and Nesting Bird Management Plan) to protect nesting birds. 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 wildlife including nesting birds and the conditions of this variance approval found below.

Increases in impacts from Variance Request #23 (i.e., increases in those from the Project Modification Report; PMR) would occur to Quino checkerspot butterfly habitat, coastal California gnatcatcher habitat, and Peninsular Bighorn Sheep (PBS) habitats. Therefore, compliance with mitigation measures for these species would be required, as would compliance with the PBS Construction Monitoring Plan, Biological Opinion, and Special Status Species Construction Monitoring Approaches.

The proposed temporary landing platform west of CP79-1 is located in Diegan coastal sage scrub, which is habitat for the coastal California gnatcatcher. This site should be included in the Special Status Species Construction Monitoring Approaches for the gnatcatcher. The description of the habitat is very similar to that for the proposed temporary landing platform west of structure EP76-1, and structure EP76-1 is included in the Special Status Species Construction Monitoring Approaches.

Sensitive vegetation includes all community types except non-native vegetation, developed areas, and disturbed habitat. The increases in impacts since the PMR including areas under the Variance Request #23 (as revised), include a total of approximately 13.7 acres of temporary impacts and approximately 1.9 acres of permanent impacts. The total required off-site mitigation for new impacts to sensitive vegetation would be approximately 13.5 acres.

The HAP/HMP (dated September 21, 2010) provides sensitive vegetation and special status species habitat mitigation. The total impacts defined in the PMR, coupled with the increases defined after the PMR including areas covered under Variance Request #23 (as revised) do not exceed mitigation lands set aside by the HAP/HMP.

Variance Request #23 does not represent substantial changes to the PMR and would not create new significant impacts to biological resources. Where there would be increases in impacts (e.g., to sensitive vegetation, special status species habitats), the types of impacts were already assessed in the FEIR/FEIS as Class I or Class II, so they would not present new significant impacts that would require additional CEQA/NEPA analysis. The significance of the impacts listed in the Final EIR/EIS also would not change.

To avoid harm to wildlife and nesting birds, SDG&E and its contractors will implement the Project mitigation measures for wildlife including nesting birds and the conditions of this variance approval found below.

Hydrological Resources. BMPs will be installed in accordance with the SWPPP. Fueling shall not occur within 200 feet of the drainages delineated on site unless documentation of jurisdictional authorization is provided to the CPUC.

Cultural and Paleontological Resources. On August 18, 2011, the CPUC cultural consultant provided review comments on the Variance #23 request. The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010 (Garcia-Herbst et al. 2010). One cultural resource site was identified near a proposed landing platform site as identified by the CPUC cultural expert. Therefore, in accordance with Mitigation Measure C-01b: Erect protective flagging or other markers for ESA; sites will be flagged off with temporary orange fencing and designated as Environmentally Sensitive Areas (ESA). ESA buffers around the site will be established and this site will be protected as an exclusionary zone. Mitigation Measure C-01e: Implement archaeological monitoring at cultural ESAs, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESA will be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) will be implemented during construction, as required (Iversen et al. 2010).

Based on the Final Paleontological Monitoring and Discovery Treatment Plan, accepted on June 17, 2010, there are no sensitive paleontological resources located on non-Federal lands near any of the following structures: CP54-1, CP71, CP74-2, CP76-1, CP79-1, EP118-2, EP227, EP232-1, and EP261-2. No variance conditions are recommended.

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

Traffic/Sensitive Land Uses/Noise. No concerns noted.

Visual. On September 19, 2011, the CPUC visual consultant provided a Visual Resources Field Assessment. Given the visibility of the ancillary structures (landing platforms and TSAP) covered under this Variance as described below, and the considerable visual contrast that is presently being introduced into the landscape by the highly specular (reflective) transmission towers, it is important that no additional visual contrast be added to the existing landscape. Therefore, it is recommended that the ancillary structures be treated (by galvanizing or painting) in such a manner so as to achieve a sufficiently dulled surface such that no additional reflectivity occurs along the project right-of-way. This recommendation is consistent with the requirements of Visual Resources Mitigation Measure V-7a.

Permanent Landing Platform **CP54-1**: The landing platform at structure location CP54-1 would be visible to travelers on Wildcat Canyon Road, but the views would be brief due to travel speeds and the winding driving conditions. The structure is not expected to skyline (extend above the ridgeline) and would be backdropped by a rocky/vegetated slope with colors ranging from gray (rock outcrops) to tan and browns (vegetation). The structure should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility.

Temporary Landing Platforms **CP71 to CP76-1**: The temporary landing platforms at structure locations CP71, CP74-2, and CP76-1 would be visible to travelers on El Monte Road and recreationists and boaters at El Capitan Reservoir (and the boat launch area). While views to travelers on El Monte Road would be brief, views of the structures for recreationists and boaters would be extended. The platforms are not expected to skyline and would be backdropped by a rocky/vegetated slope with colors ranging from gray (rock outcrops) to pale green, tan, and browns (for vegetation). The structures should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility.

Temporary Landing Platform **CP79-1**: The temporary landing platform at structure location CP79-1 would be visible to recreationists and boaters at El Capitan Reservoir (and the boat launch area), and residents. Views of the structure for recreationists and boaters would be extended. The platform is not expected to skyline and would be backdropped by a rocky/vegetated slope with colors ranging from gray (rock outcrops) to pale green, tan, and browns (for vegetation). The structure should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility.

Permanent Landing Platform **EP118-2**: The permanent landing platform at structure location EP118-2 would be visible to travelers on La Posta Road, Old Highway 80, and Interstate 8 (I-8). Views of the structure would be relatively brief. Given the prominence of the structure location in La Posta Valley and the close proximity to I-8, the structure should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility.

Temporary TSAP and Landing Platform **EP227 to 232-1**: Although the temporary TSAP at structure location EP227 and temporary landing platform at structure location EP232-1, would have limited public visibility from Old Highway 80 (given their remote location northwest of the community of Jacumba and

east of Old Highway 80), they should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility.

Permanent Landing Platform **EP261-2**: The permanent Landing Platform at structure location EP261-2 would have moderate public visibility from Old Highway 80 and limited public visibility from I-8 (given the high travel speeds). The structure would be situated in a prominent and highly exposed location, but back dropped by a rocky/vegetated slope with colors ranging from gray (rock outcrops) to pale green, tan, and browns (for vegetation). Given the close proximity to Old Highway 80 and I-8, the structure should have a dull, non-specular, non-reflective finish (galvanizing treatment or paint) to minimize the addition of structure visual contrast, prominence, and visibility within the travel corridor.

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 including the PBS Construction Monitoring Plan, Biological Opinion, and Special Status Species Construction Monitoring Approaches shall be implemented. The 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. The proposed temporary landing platform west of CP79-1 shall be included in the Special Status Species Construction Monitoring Approaches for the gnatcatcher. Verification shall be submitted to the CPUC prior to use of the proposed site.
- 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 sites 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 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 temporary TSAP and landing platform areas post construction per the requirements in the Restoration Plan.
- 8. SDG&E will control the spread of invasive plant species by implementing the 2009/2010 Weed Control Plan.

- 9. 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.
- 10. The SWPPP shall be implemented.
- 11. SDG&E shall delineate cultural ESAs and install exclusion fencing. 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.
- 12. In the event of an unanticipated discovery of archaeological or paleontological materials, all grounddisturbing 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.
- 13. The structure surface treatments as determined by the CPUC visual consultant (see discussion in the visual section) shall be implemented prior to installation. A reporting of treatments used by SDG&E including reference photographs shall be submitted to the CPUC. In summary the structure treatments include:
 - The permanent landing platform at structure location CP54-1 should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).
 - The temporary landing platforms at structure locations CP71, CP74-2, and CP76-1 should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).
 - The temporary landing platform at structure location CP79-1 should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).
 - The permanent landing platform at structure location EP118-2 should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).
 - The temporary landing platform at structure location EP232-1 should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).
 - The permanent landing Platform at structure location EP261-2 the structure should have a dull, non-specular, non-reflective finish (achieved by galvanizing treatment or paint).

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