

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 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 #26

Dear Mr. Colton,

On September 16, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) for continued use of a dirt area in front of the Barrett Substation for placement of a water stand tank which has recently been approved by the CPUC for temporary use, Link 2 (NTP #13, overhead on non-federal lands), of the Sunrise Powerlink Project.

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

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

Variance #26 for continued use of a dirt area in front of the Barrett Substation for placement of a water stand tank 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 September 16, 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 and the Project Modification Report (PMR) for the FESSR that was approved through a Determination Memorandum dated September 22, 2010. SDG&E is requesting a stand water tank (stand tank) in front and to the west of the existing Barrett Substation, adjacent to the approved access road to **(tower sites)** EP39-1, EP40-1, EP41, EP42, and the Barrett Canyon Yard. The stand tank will be used for refilling water trucks accessing the road and will minimize travel time for water trucks working in this area for the Sunrise Powerlink Project. This request is for placement of the stand tank within a triangular-shaped disturbed dirt area in front of and to the west of the substation and use of the paved driveway into

Barrett Substation immediately north of and adjacent to the triangular-shaped dirt area. All other access roads have been approved as part of the PMR.

Staging the stand tank in this location will allow water tankers to easily fill and refill the stand tank and is preferable to staging the stand tank at the Barrett Canyon Yard due to the need for water to build the road and Barrett Canyon Yard. Water trucks will fill up with water from the stand tank in this location and transport it to the tower sites, Barrett Canyon Yard /wire pull site, and other nearby project locations.

Potential activities to occur on the site include:

- Parking and storage of a 10,000 gallon water tank (9 feet wide by 35 feet long)
- Driving of water trucks, some as long as 60 feet long, through the disturbed area
- Parking of additional support vehicles and equipment during daytime hours

The type and number of vehicles that will use the approved access road will not change because of placement of a stand tank and parking area at this location. Instead, the water tank and parking area are meant to support the vehicles that will be used in this area of construction. Because this area is surrounded by a concrete curb, some roadwork may be done in the paved areas to increase accessibility. The site would be returned to pre-construction condition after the conclusion of construction. At no time would parked vehicles block access to the Barrett Substation. Storage of the stand tank at this location will eliminate the need for water trucks to make a minimum 10-mile roundtrip journey to the SWAT Construction Yard to refill with water (the SWAT Construction Yard is currently the nearest approved stand tank storage location). This property is owned by SDG&E. Coordination with the Substation Construction and Maintenance Department of SDG&E regarding staging the stand tank adjacent to the Barrett Substation occurred on September 8, 2011. Temporary installation of the stand tank at this location will not impact normal and emergency operations at the substation.

A biological resource survey was performed on September 10, 2011. This area is described as Disturbed Habitat characterized by limited vegetation, and previously graded decomposing granitic soils. Vegetation in the proposed work area is sparse and is comprised of both native and non-native species. While the number of individuals of the following plant species is low, the dominant species observed in the proposed work space included California buckwheat, deerweed, telegraph weed, and broom baccharis. Non-native species observed include short-pod mustard and soft chess. The proposed site is not located in a known weed control area for the project. Wildlife species observed in the vicinity include western scrub-jay, California towhee, common raven, house finch, and side-blotched lizard. No sensitive wildlife species were observed during this survey; however, during previous construction monitoring efforts in the area several San Diego coast horned lizard were observed foraging and basking in the sun along the access roads EP39-1-N-B and EP42-N. No nests or nesting activities were observed in the vicinity of the proposed extra work space during the survey.

The nearest jurisdictional water is an ephemeral stream that leads into Cottonwood Creek. It is located approximately 875 feet east of the proposed work area along the access road EP39-1-N-B.

This area has been surveyed recently for archaeological materials and during that time no cultural resources were identified in the vicinity of the Barrett Substation. The use of this area for stand tank staging will not impact any NRHP/CRHR eligible site and no further cultural resources work is recommended.

Use of this area will require the grinding down of the asphalt curb in two or more locations to accommodate vehicular traffic. **(Appropriate SWPPP BMPs will be implemented including street sweeping if dirt and mud are tracked into the paved road).** The site will be returned to its original condition after construction.

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) recently visited the area of the request and approved the site for use under Temporary Extra Work space (TEWS) documentation. 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. A biological resource survey was performed on September 10, 2011. This area is disturbed with limited vegetation. Vegetation in the proposed work area is comprised of both native and non-native species. The proposed site is not located in a known weed control area for the project. No sensitive wildlife species were observed during this survey; however, during previous construction monitoring efforts in the area several San Diego coast horned lizard were observed foraging and basking in the sun along the access roads EP39-1-N-B and EP42-N. No nests or nesting activities were observed in the vicinity of the proposed extra work space during the survey.

As outlined in the TEWS approval and as required under this variance approval, area usage shall be limited to disturbed areas only. General biological monitoring of the area shall occur.

Hydrological Resources. The nearest jurisdictional water is an ephemeral stream that leads into Cottonwood Creek. It is located approximately 875 feet east of the proposed work area along the access road EP39-1-N-B. No drainages or water resources will be affected by continued use of the proposed areas. The SWPPP will be implemented at all areas. Appropriate BMPs will be implemented including street sweeping if dirt and mud are tracked into the paved road.

Cultural and Paleontological Resources. This area has been surveyed recently for archaeological materials. No cultural resources were identified in the vicinity of the Barrett Substation or the area presented under this request.

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

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

Visual. No concerns 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 site use.

3. As outlined in the TEWS approval and as required under this variance approval, area usage shall be limited to disturbed areas except for curb removal activities.
4. 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.
5. 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.
6. SDG&E will control the spread of invasive plant species by implementing the 2009/2010 Weed Control Plan.
7. In the event of an unanticipated discovery of archaeological or paleontological materials, all 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 PMDTP.
8. 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.
9. The SWPPP will be implemented at all areas. Appropriate BMPs will be implemented including street sweeping if dirt and mud are tracked into the paved road.
10. The site shall be returned to its original condition post use.

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
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