

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 28, 2010

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 - Notice to Proceed (NTP #4)

Dear Mr. Colton

On January 26, 2010, San Diego Gas and Electric (SDG&E) requested authorization from the California Public Utilities Commission (CPUC) to commence with preparation and occupation of the Alpine Regional Field Offices Yard 18A, Segment 15, Section 6, Link 4 of the Sunrise Powerlink Project.

The SDG&E Sunrise Powerlink Transmission Line Project was evaluated in accordance with the National Environmental Policy Act and California Environmental Quality Act. The mitigation measures and applicant-proposed measures (APMs) described in the Final Environmental Impact Report/Statement were adopted by the CPUC and BLM as conditions of project approvals. 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 CPUC voted on December 18, 2008 to approve the Final Environmentally Superior Southern Route (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 same route on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture Forest Service on the Cleveland National Forest; however, the Forest Service has not yet issued its Record of Decision. The area requested under this NTP does not fall under Forest Service jurisdiction.

The Sunrise Powerlink Project will be constructed in 26 segments, as defined on the CPUC's project website (<http://www.cpuc.ca.gov/Environment/info/aspensunrise/sunrise.htm>). It is anticipated that, even within the 26 project segments, SDG&E will submit multiple separate requests for Notice to Proceed (NTPs) during the construction process. This is a typical process for transmission line projects. Given that the Sunrise Powerlink Project has been approved by the CPUC and BLM, as described above, this segmented construction review process allows SDG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented.

This letter and the attached Compliance Status table document the CPUC's thorough evaluation of all activities covered in this NTP. The evaluation process ensures that all mitigation measures and Biological Opinion Conditions applicable to the location and activities covered in the NTP are implemented, as required in the CPUC's Decision and in BLM's Record of Decision.

NTP #4 for the Alpine Regional Field Offices Yard 18A is granted by CPUC for the proposed activities based on the factors described below.

## SDG&E NTP Request

The CPUC has carefully reviewed the NTP request submitted by SDG&E and verified that it incorporates compliance with all applicable mitigation measures. Excerpts from the SDG&E NTP request dated January 26, 2010 are presented below with CPUC clarifications based on discussions and/or correspondence with SDG&E inserted **(in parenthesis and in bold)**. Additional information was provided by SDG&E in an e-mail received February 23, 2010. On April 2, 2010 a more extensive submittal of additional information was made in which the description of yard parameters was modified. Further clarification was provided April 30, 2010. This information has been incorporated into the following:

- The area requested is an administrative field construction office complex, identified as the Alpine Regional Field Offices. For reference purposes, this yard is identified as Yard 18A. The Alpine Regional Field Offices will support the entire Sunrise project area. These offices will be comprised of a series of connected mobile office units, sanitary facilities, and a parking area on **(mostly)** already disturbed portions of **(an existing)** yard. This complex is temporary in nature and will be dismantled and removed at the completion of the project, restoring the site to its present condition. SDG&E has arranged and secured a lease term of 3 years for this site from the property owner.

Field Office construction will consist of: installation of temporary prefabricated modular building structures and associated structures that will function as administrative office facilities for project personnel; installation of vehicle parking areas for project personnel using facilities; and installation of temporary and portable radio communications microwave tower system with retractable tower anticipated to be set at a height of 25 feet.

- Proposed improvements to the yard will include: improved site entrance with automated gate system and security access control system; perimeter fencing with visual screening (see below for greater detail); surfacing of existing dirt fill yard with all weather permeable aggregate base material; installation of temporary lighting; and installation of site utilities
- Site utility additions include: installation of temporary overhead electrical service to the site; installation of a diesel-powered emergency generator to support emergency power loss; extension of potable water and fire water service; and extension of sewer laterals and tie into main sewer line.
- Trenching will occur to install water and sewer utilities. SDG&E is currently pursuing applicable ministerial permits and will provide them **(to the CPUC prior to construction)** when available.
- The parcels are bordered by Tavern Road to the North and the East, and Interstate 8 to the South and are zoned M52 – Limited Industrial.
- The pads are accessed via an existing unpaved entrance at Tavern Road. Approximately 85% of the property has been graded by the owner for use as an equipment and materials storage area. The parcels are cleared of vegetation and consist of bare ground with some scattered re-growth of native and non-native vegetation. The useable area proposed for the Alpine Regional Field Offices is relatively flat and **(mostly)** clear of vegetation. This portion of the construction yard occupies approximately 10.52 Acres of land.

SDG&E has proposed the installation of a new security perimeter fence system with visual screening to be located along the perimeter of the existing property line in accordance with setbacks as required by the County of San Diego. Upon completion of the proposed perimeter fence installation, it is anticipated that the existing temporary perimeter fence will be removed and replaced with appropriate delineation to barricade any identified sensitive habitat or vegetation. **(If SDG&E decides not to remove the fencing, the CPUC shall be notified,**

**and sensitive habitat will be appropriately delineated for exclusion.)** It is anticipated that some vegetation clearing will be required for the installation of the proposed perimeter fence system. **(Fence system vegetation clearing stipulations are discussed below.)**

SDG&E has also proposed improvements to the existing temporary site driveway entrance to comply with site access requirements set forth by the County of San Diego DPW (**Department of Public Works**) and in general conformance with San Diego County DPW Design Standards DS-18 gated driveway entrance. County of San Diego DPW has required that the proposed entrance be modified to transition and taper out to the ultimate roadway width at County Right of Way. As a result of this requirement, some clearing of vegetation and tree removal will be required. In addition as a condition of final inspection and building occupancy approval by the Alpine Fire District, all vegetation within 100 feet of the proposed temporary modular buildings must be trimmed down to no more than 12 inches above the ground. SDG&E plans to defer the installation of the proposed perimeter fence system, site entrance modifications, and fuel modification brush clearing until all required biological clearances, approvals and/or permits have been obtained **(these shall be submitted to the CPUC before start of work at this site).**

In addition SDG&E requests that the NTP be conditioned for CPUC receipt and approval of the Habitat Acquisitions Plan (HAP) and Habitat Management Plan (HMP) **(as required by Mitigation Measure B-1a)** prior to initiating work which impacts habitat including the proposed perimeter fence system, site entrance modifications, and fuel modification brush clearing. No **(habitat)** restoration will be conducted at the Alpine Regional Field Offices, Yard 18A site. The site has been previously disturbed and the contractual agreement with the property owner does not include any restoration. Impacts to vegetation at this site will be mitigated under the HAP. **(Submittal of the HAP, HMP, Weed Control Plan and a summary of total acreage impacts resulting from the installation of the parameter fence, driveway improvements and vegetation trimming shall be tabulated and submitted to the CPUC for review and approval prior to conducting any activities that disturb habitat areas. )**

As provided by SDG&E, construction can commence on-site prior to site entrance modifications. In coordination with Kenneth Brazell of the San Diego County DPW, SDG&Es current understanding is the existing Alpine Regional Field Offices, Yard 18A site driveway is suitable for mobilization and preparation of the site. The proposed driveway improvements and taper at right of way are required by the County DPW before occupancy of the site as a temporary administrative facility.

A Construction Lighting Plan was provided with the NTP request. Fixtures for lighting at the Alpine Regional Field Offices shall be installed in conjunction with the overhead electrical utility system. Fixtures shall occupy the same poles as overhead cable. SDG&E identified the need for 24 lighting fixtures dispersed throughout the site where parking and offices are located. These lighting fixtures will be located on poles of 24 feet in length above grade. Lighting fixtures shall be weatherproof. The lighting consists of Fully Shielded 90W Low Pressure Sodium lamps in order to meet County Light Pollution Code requirements protecting local observatories. Site parking and security lighting will comply with County Light Pollution Code, Ordinance #9716. In an effort to improve energy efficiency and reduce night time lighting, approximately 50% of lighting circuits will remain on for critical safety and security from 11:00PM to sunrise. **(All complaints received by SDG&E in regard to its use of the yard shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting as well as noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, lighting at the site may need to be modified and/or sound attenuation devices may need to be installed etc., depending on the nature of the complaint.)**

The yard will be restored to its original condition, with the exception of any permitted site improvements as agreed to by the landowner. This will include demobilization of any temporary facilities as well as clean-up of the site including collection and proper disposal of any waste, trash and debris. It is anticipated that the extension of

underground potable water, fire water service, and sewer laterals will be capped at their point of connection above grade and remain. **(The CPUC shall be notified when laterals are capped.)** It is anticipated that any permitted right-of-way improvements for the site entrance/access will also remain post demobilization.

SDG&E has completed a Traffic Impact Analysis report specific to Alpine Yard 18A. The report has indicated that the operations at local intersections are acceptable for projected pre-construction and full-construction project related traffic. It has been determined that there are no significant impacts related to project traffic.

A construction document permit package has been submitted to the County of San Diego DPLU/DPW for the implementation of the Alpine Regional Field Offices Yard 18A and plan check is in progress. It is anticipated that the following ministerial permits will be required by the County of San Diego: Non-Vesting Underground Site Utilities Permit, Tree Removal in County Right of Way Permit, Traffic Control Plan and Permit for construction in County Right of Way, Building Permit and Waste Water Discharge Permit. These permits will be submitted upon receipt and prior to construction as applicable to construction phasing and permit issuance. The permits will be submitted **(to CPUC)** upon receipt.

SDG&E requests that the Alpine Regional Field Offices, Yard18A, NTP be conditioned for verification of noticing mailings including address lists, postings and newspaper postings , as required under Mitigation Measures L-1a, LU-APM-1. **(Verification shall of noticing be supplied to the CPUC prior to construction.)**

Applications have been made for the appropriate air district permit for the back-up generator and an Authority to Construct will be obtained before the emergency generator is installed. A Hazardous Material Business Plan will be filed with the San Diego County Dept. of Environmental Health prior to arrival of the generator. (HMBP – Emergency Generator, Mitigation Measures HS-APM-1, HS-APM-3, and AQ-1b.) In addition, a Spill Prevention Control and Countermeasures Plan (SPCC) will be implemented prior to installation of the generator. **(The HMBP and SPCC will be submitted to the CPUC prior to installation of the emergency generator.)**

Construction activities will occur during daytime, weekday hours as designated by local ordinances. Should construction activities need to occur outside of this time frame, a variance for night construction will be obtained 45 days prior to construction if any night activities are proposed.

SDG&E has assigned an Environmental Field Representative for construction set-up, utilization, and demobilization of this construction yard: Rebecca Carson, Staff Environmental Scientist, Burns & McDonnell, 858.603.9215 or 415.710.8486.

Under **(Mitigation Measure)** AQ-1h, the CPUC has approved the SDG&E Monitoring and Mitigation Programs **[Sunrise Powerlink Transmission Project, Construction Emissions Monitoring Plan (CEMP)]** to reduce NOx and PM10 impacts from Project construction. The reductions of NOx and PM10 under these Programs should be **(would be)** sufficient in themselves to satisfy the requirement for mitigation under **(Mitigation Measure)** AQ-1h. In addition, SDG&E is coordinating with the San Diego Air Pollution Control District (SDCAPCD) and the Imperial County Air Pollution Control District (ICAPCD) on mitigation fund award payments to further reduce NOx and PM10 impacts from construction through agency-directed projects. The SDAPCD is in the process of identifying the best programs for utilization of this funding. Once they have identified the potential projects the SDAPCD is planning to take the MOU to their Board of Directors in June or July 2010. **(The MOU must be approved prior to the start of construction.)**

A project specific Fire Prevention and Response Plan (FPRP) was acknowledged\* by CAL Fire Chief **(the plan has been CPUC approved)**. A project Fire Marshall has been hired onto the project and is assigned to enforce the FPRP. **(\*In regard to the FPRP the Cal Fire Chief provided “The signatory reviewing officials are acknowledging that SDG&E has a Construction Fire Prevention Plan that is appropriate and necessary**

**to mitigate fire hazard and risk for the SRPL construction and maintenance activities. They do not accept any responsibility for SDG&E interpretation or implementation of this Plan during the construction and maintenance of the SRPL or for any resulting actions associated with these activities.”)**

### **CPUC Evaluation of Mitigation Implementation**

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. For biological and cultural resources, those additional conditions are defined in this section.

Please see also the attached Compliance Status Table documenting pre-construction requirements identified in the Final EIR/EIS. Note that entries shaded in yellow are outstanding and must be completed prior to the start of construction. Entries shaded in purple are to be conducted during construction. Entries shaded in gray have either been fulfilled or are not applicable to this action.

Following the discussion of biological, cultural, and paleontological resources, a list of bulleted conditions is presented to define additional information and clarifications regarding outstanding 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. In these cases, the conditions will not also appear in the Compliance Status Table.

### **Biological Resources**

This section presents background on biological resources that occur at or near the site. This summary of biological issues was provided by SDG&E in the initial NTP request and the supplemental information provided in April 2010 included this summary of biological issues.

As provided in the request there are no riparian/wetland, rivers, wells, springs, or drainage areas located in this area. The portion of the property adjacent to Interstate 8 includes more than an acre of undisturbed native vegetation (chaparral) which is not proposed to be disturbed outside of minor fencing and setback impacts as described above and will be delineated/flagged and protected from impacts throughout the duration of the project. The southeast portion of the property has an area of re-established chaparral, which will also be delineated/flagged and protected from impacts outside of minor fencing and setback impacts as described above throughout the duration of the project.

The first reconnaissance habitat survey was conducted October 15, 2009. On March 16, 2010, a second reconnaissance habitat survey of the proposed Alpine Regional Field Offices was conducted. The objective of the most recent survey was to assess sensitive and non-sensitive biological resources within the existing fence line and within the footprint of the proposed revised driveway to the field office as required by County of San Diego DPW. While approximately 85 percent of the Yard 18A parcels consist of bare ground, recent rains and warmer temperatures have resulted in a flush of spring growth of native and non-native plant species. However, the re-growth of these species does not constitute habitat according to SDG&E (Please note that these statements were reviewed by the CPUC biological consultant).

SDG&E requests that the Alpine Regional Field Offices, Yard 18A, NTP be conditioned for conducting pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days

prior to the initiation of construction that would occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction that would occur between January 15 and August 15 **(Please note that Mitigation Measure B-8a requires raptor surveys between January 1 and September 15, this is the requirement under NTP #4). (Results of these surveys will be submitted to the California Department of Fish and Game (CDFG) and United States Fish and Wildlife Service (USFWS) (collectively the “Wildlife Agencies”) for review and approval prior to initiating any construction activities. These conditions are consistent with Mitigation Measure B-8a.)**

**Vegetation Management.** The slopes along the existing driveway from Tavern Road into the Yard 18A parcels support disturbed coastal sage scrub habitat. This driveway will be widened a few feet to the east and tapered where it joins Tavern Road. As a result of the driveway improvements, some of the vegetation lining the eastern edge of the driveway and vegetation next to Tavern Road (disturbed coastal sage scrub) will be removed. One large laurel sumac (*Malosma laurina*) at the intersection of the west side of the driveway and Tavern Road will also be removed by these driveway improvements.

Impact to vegetation will occur as a result of the installation of the proposed perimeter fence system, site entrance modifications (as required by the County of San Diego DPW), and fuel modification brush clearing (as required by the Alpine Fire District) at the Alpine Regional Field Offices, Yard 18A. As discussed previously, this work will not begin until all required biological clearances, approvals and/or permits have been obtained and CPUC has received and approved the HAP, HMP and Weed Control Plan.

**Quino Checkerspot Butterfly (QCB).** The impact to vegetation at the Alpine Regional Field Offices, Yard 18A includes impacts to Quino checkerspot butterfly (QCB) habitat. In accordance with Mitigation Measure B-7i, SDG&E has completed QCB surveys. On May 11, 2010 a protocol QCB survey report was submitted to CPUC. Results demonstrated that no QCB were observed within the Alpine Yard 18A. SDG&E also submitted documentation that the survey report was submitted to the United States Fish and Wildlife Service (USFWS), which agreed that “the site is not currently occupied by QCB.”

Impacts to QCB habitat will occur as a result of yard modifications and will be mitigated as defined in Mitigation Measure B-7i. As discussed above, this work will not begin until all required biological clearances, approvals and/or permits have been obtained and CPUC has received and approved the HAP, HMP and Weed Control Plan.

**Coastal California Gnatcatcher.** As provided in the NTP #3 Alpine Yard 18 request which relates directly to this NTP because the two parcels are adjacent to each other, the area surrounding the site is potential habitat for the gnatcatcher. In accordance with Mitigation Measure B-7i, SDG&E is currently conducting protocol-level coastal California gnatcatcher surveys in appropriate habitat along the Project alignment and within associated yards, access roads, pull sites, etc. Surveys began in March 2010. (Results of these surveys will be submitted to the Wildlife agencies for review and approval prior to initiating any construction activities.) SDG&E requested that the Alpine Construction Yard 18A NTP be conditioned for completion of pre-construction surveys for nesting birds (including gnatcatchers) within 10 calendar days prior to the initiation of construction. A USFWS permitted coastal California gnatcatcher biologist will conduct the nesting bird surveys and will play a tape recording of coastal California gnatcatcher calls (if needed) to help determine presence/absence of the species. Results of

the nesting surveys will be submitted to the Wildlife Agencies for their review and approval prior to initiating any construction activities.

If coastal California gnatcatchers are determined to be present, but not nesting, SDG&E's permitted biologist will survey for nesting coastal California gnatcatchers approximately once per week within 500 feet of the construction zone for the duration of construction activities during the breeding season. If an active coastal California gnatcatcher nest(s) is located within 500 feet of the construction zone, a 300-foot-no-construction buffer will be established around each nest site. USFWS will be consulted for any reduction to this buffer zone. If construction must occur within the 300-foot buffer, a qualified acoustician will monitor noise. If the noise meets or exceeds the noise threshold defined in Mitigation Measure B-7I (60 dBA), or if it is determined that nesting activities are being otherwise compromised, the biologist shall have the authority to halt construction and shall consult with the Wildlife Agencies to devise methods to reduce the noise and/or disturbance in the vicinity are established, such as installing a noise barrier.

**CPUC Review.** The CPUC biological consultant reviewed the initial NTP request as well as follow-up materials and provided comments on February 3 and April 11, 2010. Based on the aerial photograph provided with the request, Diegan coastal sage scrub appears to occur immediately adjacent to the site. The CPUC consultant reviewed the December 2009 California Gnatcatcher Report, prepared by Chambers Group, Inc. (SDG&E Biological Resource Consultant), to determine whether this area was previously assessed for habitat potential for coastal California gnatcatcher and/or whether focused surveys for the species were conducted. The report did not identify Yard 18A as a project feature, and it does not appear that this area was previously assessed for coastal California gnatcatcher. Therefore, SDG&E shall conduct a coastal California gnatcatcher habitat survey of the Yard 18A site, including 500 foot perimeter, as conditioned above and in compliance with Mitigation Measure B-7I. The results of the survey shall be submitted to the Wildlife Agencies and CPUC for review and approval prior to initiating any construction activities.

Based on review of initial NTP request materials, the CPUC biological consultant also provided input that a QCB survey should be completed, as discussed above.

### **Cultural Resources**

In compliance with Mitigation Measure C-1a, the Inventory of Cultural Resources letter report pertaining to Alpine Yard 18a was submitted to the CPUC and BLM on March 23, 2010. No cultural resources were identified in the record searches or cultural surveys for the Area of Potential Effect (APE). The report was reviewed by the CPUC cultural resources consultant. The report indicates that the yard is currently covered by as much as 12 feet of fill, thus precluding the possibility of encountering or disturbing cultural resources. The letter report stated that "All earth-disturbing activities (e.g., grading, trenching, etc.) within Alpine Yard 18a shall be monitored by a professional archaeologist and a Native American consultant; and in the event of an archaeological discovery, all construction activity in the vicinity of the find shall be redirected or halted. In consultation with the BLM and the CPUC, SDG&E shall develop a plan to assess the find and mitigate impacts/effects to the resource."

### **Paleontological Resources**

In compliance with Mitigation Measure PAL-1a, the Paleontological Resources Review letter report pertaining to Alpine Yard 18a was submitted to the CPUC on March 19, 2010. The Paleontology Report stated that "Given the lack of paleontological resources at the proposed Alpine Regional Field Offices support site, any construction activities related to development of the site will not result in

any resource impacts. However, in the unlikely event that a paleontological discovery is made during site development, all earthwork must cease in the area of discovery until a recovery plan is prepared, reviewed, and approved by CPUC ..." The report was reviewed by the CPUC consultant.

### **Conditions of NTP 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 shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable. Please see the attached table of pre-construction mitigation measure requirements. Note that entries shaded in yellow are outstanding and shall be completed prior to the start of construction. Purple entries shall be conducted during construction. Grey entries have either been fulfilled or are not applicable to this action. Bulleted items can be found below which provide additional information and clarifications to outstanding requirements.
2. Prior to construction, SDG&E must submit all applicable ministerial, encroachment, and haul permits to the CPUC.
3. Copies of all relevant permits, compliance plans, and this Notice to Proceed shall be available on site for the duration of construction activities.
4. All necessary and/or appropriate ministerial permits applicable to Mitigation Measure LU-APM-9 shall be submitted to the CPUC prior to construction.
5. Verification of noticing including address lists, postings and newspaper postings, as required under Mitigation Measures L-1a, LU-APM-1 shall be submitted to the CPUC prior to construction.
6. Per Mitigation Measure LU-APM-6, crews shall flag (yard and fence line) boundaries and limits of construction activity inside and outside the environmentally sensitive areas to alert construction personnel that those areas should be avoided.
7. No clearing or disturbance to vegetation shall occur outside of approved work areas.
8. All required biological clearances, approvals and/or permits will be obtained and submitted to the CPUC and approved prior to the installation of the proposed perimeter fence system, site entrance modifications, and fuel modification brush clearing. In addition, a summary of total acreage impacts, the HAP, and HMP (Mitigation Measure B-1a) and Weed Control Plan (Mitigation Measure B-3a) shall be submitted to the CPUC for review and approval prior to initiating work that involves removal of potential habitat.
9. For construction activities conducted during the coastal California gnatcatcher breeding season (February 15 through August 30), a permitted biologist shall survey for potential species habitat within 10 calendar days prior to initiating activities in the yard. The survey shall include potential gnatcatcher habitat within the yard and up to a 500 foot boundary surrounding the yard. As agreed to by SDG&E, a permitted coastal California gnatcatcher biologist conduct the habitat survey so that he/she can play a tape recording of gnatcatcher calls (if needed) to help determine presence/absence of the species. The results of the surveys (habitat and audio) shall be submitted to the wildlife agencies (and CPUC) for review and approval prior to initiating any construction activities.

10. If California gnatcatcher or Quino Checker Spot butterfly are identified prior to or during construction, the USFWS shall be notified immediately.
11. In compliance with Mitigation Measure B-8a, pre-construction surveys for nesting birds within 100 feet of the construction zone within 10 calendar days prior to the initiation of construction shall occur between January 15 and August 15. In addition, nesting surveys for listed species including raptors shall be conducted within 500 feet of the construction zone within 10 days prior to the initiation of construction shall occur between January 1 and August 15.
12. "Survey sweeps" will occur immediately preceding and during active construction as part of required biological monitoring activities. If active nests are found, 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 CDFG and USFWS, and with prior knowledge of the CPUC.
13. Prior to tree removal, appropriate tree removal permits shall be submitted. Immediately proceeding tree removal activities a biologist shall survey for nesting birds and roosting bats. If resources are identified, appropriate agencies (County, CDFG and/or USFWS depending on species) shall be notified prior to proceeding with tree removal activities.
14. Per MM B-7h, no construction shall occur within 4,000 ft of an eagle nest during breeding season December-June. Information obtained from the U.S. Forest Service and the BLM provided that no potential eagle nesting or foraging areas are near the Alpine Regional Field Offices, Yard 18A site. Should eagle nests be discovered, appropriate buffer zones will be established.
15. All earth-disturbing activities (e.g., grading, trenching, etc.) within Alpine Yard 18A shall be monitored by a professional archaeologist and a Native American consultant; and in the event of an archaeological discovery, all construction activity in the vicinity of the find shall be redirected or halted. In consultation with the BLM and the CPUC, SDG&E shall develop a plan to assess the find and mitigate impacts/effects to the resource.
16. In the event that a paleontological discovery is made during site development, all earthwork must cease in the area of discovery until a recovery plan is prepared, reviewed, and approved by CPUC.
17. All complaints received by SDG&E in regard to the use of the yard shall be logged and reported immediately to the CPUC. This includes complaints relevant to lighting as well as noise and dust, etc. Complaints should also be forwarded immediately to San Diego County. If complaints cannot be resolved, lighting at the site may need to be modified and/or sound attenuation devices may need to be installed etc., depending on the nature of the complaint.
18. If the application of water is needed to abate dust in construction areas and on dirt roads, 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).
19. As detailed in Mitigation Measure S-3b, availability of reclaimed water will be determined and documentation provided to the CPUC for review and approval.
20. In regard to Mitigation Measure WQ-APM-8, per the NTP request, groundwater will not be removed and discharged to surface water or storm drains. If dewatering is necessary, it will be contained and

be disposed of in accordance with local and regional disposal requirements. The appropriate permits shall be acquired and submitted to the CPUC.

21. As provided by SDG&E, no lane closures are anticipated. If required, SDG&E will obtain required permits for any temporary lane closures from the County of San Diego or other jurisdictions as necessary. These will be submitted to the CPUC. If temporary lane closures are needed, advance coordination with emergency service providers will occur and documentation will be submitted to the CPUC.
22. As proposed, the SDG&E Environmental Monitoring Program will be implemented during construction which will include implementation of the applicable environmental plans (as defined in HS-APM-1, HS-APM-2, HS-APM 3, HS-APM-8 and HS-APM-10). SDG&E has designated an Environmental Field Representative for the Alpine Regional Field Offices, Yard 18A. The Representative will be on site to observe and document adherence to the applicable environmental plans.
23. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.
24. Applications have been made for the appropriate air district permit for the back-up generator and an Authority to Construct will be obtained before the emergency generator is installed. A Hazardous Material Business Plan will be filed with the San Diego County Dept. of Environmental Health prior to arrival of the generator. (HMBP – Emergency Generator, Mitigation Measures HS-APM-1, HS-APM-3, and AQ-1b.) In addition, a Spill Prevention Control and Countermeasures Plan (SPCC) will be implemented prior to installation of the generator. The HMBP and SPCC will be submitted to the CPUC prior to installation of the emergency generator.
25. In regard to the Hazard Communication Plan to fully satisfy the intent of Mitigation Measure P-1a, documentation of training for personnel who would be working near or handling hazardous materials shall be submitted to the CPUC for review after completion of these training activities.
26. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level are required, a Variance Request shall be submitted for CPUC review.
27. If construction debris or spills enter into environmentally sensitive areas, appropriate jurisdictional agencies and the CPUC Environmental Monitor (EM) shall be notified immediately.

Please contact me if you have any questions or concerns.

Sincerely,

*Billie Blanchard*

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

cc: Ken Lewis, CPUC Program Manager  
Nicholas Sher, CPUC Legal Division  
Daniel Steward, BLM El Centro Field Office  
Tom Zale, BLM El Centro Field Office  
Susan Lee, Aspen Environmental Group  
Vida Strong, Aspen Environmental Group  
Anne Coronado, Aspen Environmental Group  
Hedy Koczwar, Aspen Environmental Group  
Don Haines, San Diego Gas and Electric Company  
Tina Carter, San Diego Gas and Electric Company  
Robert Hawkins, U.S. Forest Service  
Michael Bennett, BLM Palm Spring South Coast Field Office  
Cliff Harvey, State Water Resources Control Board  
Eric Porter, USFWS  
Doreen Stadtlander, USFWS  
Paul Schlitt, CDFG  
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Enclosures (2): Figure  
Compliance Table