



**SUNRISE POWERLINK:
FINAL – Response to Non-Compliance Report #5
Operation Outside of Approved Work Areas at EP345/EP346**

Corps of Engineers File Number: SPL-2007-00704-SAS
State Water Resources Control Board File Number: SB09015IN
Department of Fish and Game Notification Number: 1600-2009-0365-R5

Date Filed:	2.21.2012		
Preliminary Notification Date	2.8.2012		
Date of Event:	2.8.2012		
Event Location	Between EP345 and EP346		
Reported by:	Robert Jackson General Manager and Director – Construction and Engineering Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116 rcjackson@semprautilities.com		
Originator/ Reporter:	Cassandra Garza (Don Spires, Link Lead) CPUC EM		
Witnesses:	N/A		
Responsible Department(s)	<input type="checkbox"/> Aviation (Beige section below) <input checked="" type="checkbox"/> Construction/Operations <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Public Affairs <input type="checkbox"/> Safety <input type="checkbox"/> Waters of the U.S./State (Environmental) (Blue section below)		
Aviation	N/A		
Aircraft Involved:	N/A		
Waters of the U.S./State	Must be submitted within 24 hours of incident. N/A		
Effect on Waters of the U.S. and/or Waters of the State	N/A		
Location:	Mapsheet #	Structure or Facility	Water #
UTM or Other Coordinates:			



Type of Project Impact Associated with Incident	<input type="checkbox"/> Permanent impact <input checked="" type="checkbox"/> Temporary impact <input type="checkbox"/> Other
Injuries or Property Damage	No
Cited Permit/Mitigation Measure	MM B-2a, MM C1-b, MM G-2, and Project Memorandum #5
Compliance Level	Level 2
Corrective Action(s)	<p>SDG&E takes these events very seriously and has made repeated efforts to ensure that contractors stay in compliance. In response to the incident on 2/8/12, SDG&E ensured that the following took place:</p> <ol style="list-style-type: none"> 1. Temporarily stopped hauling activities in the desert and stressed the importance of ESA signage. 2. Re-training was conducted at morning tailboards for all crews re: staying within approved disturbance areas and adhering to ESA signage at all times. SDG&E's contractors including the truck driver responsible for this incident understand that this was not an appropriate decision under any circumstances. 3. SDG&E sent biological and cultural monitors to the site to identify any potential sensitive resource impacts and additional restoration of the site that may be necessary after the incident. 4. Reports from the biological and cultural monitors after their detailed site assessments are provided below in the detailed description of event section. 5. PAR will conduct all restoration activities (in coordination with SDG&E's Habitat Restoration Specialist) in accordance with the Desert Pavement Protection Plan (July 2009). Rock mulch salvage activities carried out previously will provide the material necessary to restore this area. The Restoration Team will assess the appropriate methodology, which is likely to include application of rock mulch salvage and watering to reconstitute the vesicular horizons. No mechanical contouring will take place given the previously disturbed nature of the area (see photographs below that show other tire tracks in the same area which were not caused by Project activities). If any tilling is required, it will be carried out with light raking.



<p>Detailed Description of Event:</p>	<p>San Diego Gas & Electric Company (SDG&E) is in receipt of Sunrise Powerlink Transmission Project (Project) Non-Compliance Report (NCR) Number 5.</p> <p>NCR Number 5, issued on February 8, 2012, states the following:</p> <p>”On February 8, 2012, a driver hauling rock for restoration utilized access road EP346-E to turn around after making the delivery. The turnaround point was not an approved project workspace due to the large ESA between structures EP345 and EP346. Additionally, these tower sties were identified in the Desert Pavement Plan (DPP) as having patina coverage. Section 6.0 of the DPP for avoidance or minimization of disturbance is applicable.”</p> <p>SDG&E provides the following clarifications and summary of events leading up to the incident on February 8, 2012:</p> <p>On February 7, 2012, three drivers from Pyramid Construction received Safety/Environmental Training from the Contract Administrator (CA) and Foreman. On February 8, 2012, a fourth driver was added to the crew. He received training at the tailboard that morning. This was a PAR/Colwell crew.</p> <p>The Link Lead was notified at 10:06 a.m. that there had been an off ROW incident. He arrived at the site of the incident at 10:20 a.m. The CA, biological monitor, and CPUC representative, Brit O’Brian, were also present on site.</p> <p>After delivering a load of gravel, the driver attempted to turn around at EP346. When that was not possible he drove in the direction of EP345. Midway between the tower structures he attempted to back onto a road used by off road vehicles. This area is on BLM land, is not in the ROW, is in an ESA, and is surrounded by desert pavement. This maneuver was unsuccessful and the driver proceeded to EP345 and turned around.</p> <p>There are tire tracks that extend approximately 35 feet off the ROW. Assessments commensurate with the level of impact for cultural and biological resources are below.</p> <p>The biological assessment of the area was performed by Pangea Biological. The full assessment was as follows:</p> <p>”I assessed the impact from the gravel truck backing off the access road into an ESA between EP345/346. Disturbance was on both sides of the access road. I did not observe any vegetation, burrows, or FTHL that were disturbed at the site.”</p> <p>The full cultural assessment of the site was performed by ASM Affiliates the following day. That report included the following (specific information regarding</p>
--	--

the exact location of the ESA has been eliminated):

“We went out yesterday (02/09/12) and looked at the area where the gravel truck pulled off the SWPL access road between towers EP345 and EP346...*(specific location eliminated for confidentiality)*....The truck pulled off onto an existing disturbance within the site created by previous off-road recreational vehicle activity not associated with the Project. No artifacts or features were identified near or within the tire ruts. Please let me know if you have any questions or concerns.”



Photo of the site taken by ASM showing tire tracks in the foreground.



SUNRISE POWERLINK™

	 <p style="text-align: center;">Photo of the site provided by CPUC EM. New tracks between monitor and bottom of photo.</p>
Follow-up Required	No further action required.
Attachments	None
Confirmation of Receipt	If you acknowledge receipt of this form and no further action is needed, please retain for your records. If, however, you would like additional information to determine regulatory action needed, please contact Rachel Romani Briles, SDG&E, Environmental Compliance Project Manager, Sunrise Powerlink Project: 858-636-6865 (office) 858-750-0754 (cell) rbriles@semprautilities.com

Distribution List:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> Billie Blanchard, CPUC | <input checked="" type="checkbox"/> Anne Coronado, Aspen | <input checked="" type="checkbox"/> Joan George, Applied Earthworks |
| <input checked="" type="checkbox"/> Daniel Steward, BLM | <input checked="" type="checkbox"/> Cassandra Garza, Aspen | <input checked="" type="checkbox"/> Susan Goldberg, Applied Earthworks |
| <input checked="" type="checkbox"/> Tom Zale, BLM | <input checked="" type="checkbox"/> Fritts Golden, Aspen | |
| <input checked="" type="checkbox"/> Carrie Simmons, BLM | <input checked="" type="checkbox"/> Vida Strong, Aspen | |