

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 8, 2007

Mr. Kevin O'Beirne
San Diego Gas & Electric Company
8830 Century Park Court - CP32D
San Diego, CA. 92123

**Re: Data Request #5 for the SDG&E Sunrise Powerlink Transmission Project,
Application No. 06-08-010**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed the documents and materials that SDG&E has provided including the Proponent's Environmental Assessment (dated August 4, 2006), the Application Supplement Materials (dated September 1, 2006), and SDG&E's Response to Data Requests No. 1 through 4. During the analysis of the aforementioned materials and in our preparation of EIR/EIS sections, we have identified additional items that require information from SDG&E. Attached please find Data Request No. 5, which defines the additional questions we have at this time. Additional data requests may be necessary to address alternatives and other CEQA/NEPA topics.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current EIR/EIS schedule. We request that responses to these items be provided to us within two weeks or by no later than January 22, 2007.

Please submit one set of responses to me and one to Susan Lee at Aspen in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit

Attachment

cc: Sean Gallagher, CPUC Energy Division Director
Ken Lewis, CPUC Program Manager
Steve Weissman, ALJ
Traci Bone, Advisor to Commissioner Grueneich
Nicholas Sher, CPUC Legal Division
Lynda Kastoll, BLM
Susan Lee, Aspen Environmental Group

Sunrise Powerlink Transmission Line Project

Data Request No. 5

Biological Resources

- BIO-3 Please respond to HELIX's December 11, 2006 letter (to John Messina, ARCADIS; copy attached). Identify which changes were made to the vegetation maps and which changes were not made, and provide justification for changes that were not made.
- BIO-4 Explain if/how ARCADIS reviewed the map book pages to look for other possible vegetation mapping errors, as HELIX believes it noticed some besides those already brought to ARCADIS' attention.
- BIO-5 HELIX understands that ARCADIS has been, and may still be doing, its own field checks of the vegetation mapping, and that Larry Sward of HELIX was going to accompany John Messina of ARCADIS in the field for some of these checks during the early January 2007. Please identify what types of changes were made to the vegetation mapping based on these field checks, and provide corrected map pages. When would such map pages be provided?
- BIO-6 Please tell us the minimum mapping unit that was used and why that size of an area was chosen.
- BIO-7 Where there was "lumping" of vegetation communities, please explain how was that done.
- BIO-8 We request that all of the vegetation data gaps that appear in the GIS files be filled in.
- BIO-9 Please provide a map showing where ARCADIS is proposing to do focused (protocol) species surveys for the proposed project route.



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Inland Empire Office
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December 11, 2006

AEG-05

Mr. John Messina
 ARCADIS
 9474 Kearny Villa Rd., Ste 103
 San Diego, California 92126

Subject: Sunrise Powerlink Vegetation Mapping

Dear John,

HELIX Environmental Planning, Inc. remapped the vegetation for the Central East Substation and formally spot-checked the vegetation mapping at approximate five-mile intervals along the Sunrise Powerlink proposed project route where access was easiest. Some of the locations listed below were specifically chosen because there appeared to be an inconsistency between the mapped vegetation and the underlying aerial photo. This letter provides our findings and our concerns, and they are in addition to our discussion of concerns in our impromptu meeting on November 8, 2006.

Table 1 shows the locations that were spot-checked and what we found. For the Coastal and Inland Valley links, the locations are shown on copies of the map pages that were delivered to you with a letter dated December 5, 2006. A form was filled out for each location with information on dominant species, etc., and photographs were taken of each location with low or medium confidence ratings.

The locations for the Central, Desert West, and Desert East links are shown (and vegetation re-mapped) on the map pages attached to this letter. A form was also filled out for each location with information on dominant species, etc., and photographs were taken of each location with low or medium confidence ratings. These forms and photographs are attached to this letter.

Table 1 Summary of Field Spot-Checks Sunrise Powerlink Proposed Project Route ¹			
Map Page/ Location	Confidence in ARCADIS mapping	ARCADIS Vegetation Classification	HELIX Vegetation Classification
Co-03	High	SMC	SMC
Co-07	Low	MSC	DCSS
Co-10 west of Texana	Medium	DCSS	DCSS-D
Co-10 east of Texana	Low	DCSS	DH
Co-13	Low	FW	FW, SWS, FWM, NNG, DCSS



Mr. John Messina
 ARCADIS

December 11, 2006
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Table 1 Summary of Field Spot-Checks Sunrise Powerlink Proposed Project Route (continued)			
Map Page/ Location	Confidence in ARCADIS mapping	ARCADIS Vegetation Classification	HELIX Vegetation Classification
Co-16	Medium	CC	SMC, DH (for dirt road)
IV-P23	High	CS-CS	CS-CS
IV-P19	Low	SCLORF	CLOW, SMC
IV-P13 east of San Vicente Rd.	Low	ILOC	CLOW, U/DEV
IV-P13 west of San Vicente Rd.	Low	F/P	NNG, CLOW
IV-P07 (along dirt road up to water tank—Node 22)	Low	DH	DH and CS-CS
IV-P07 (along water tank ridge)	Medium	CS-CS	DH (for dirt road) and CS-CS
Co-03	High	SMC	SMC
Co-07	Low	Maritime succulent scrub	DCSS
Co-10 west of Texana	Medium	DCSS	DCSS-D
Co-10 east of Texana	Low	DCSS	DH
Co-13	Low	FW	FW, SWS, FWM, NNG
Co-16	Medium	CC	SMC, DH
IV-P23	High	CS-CS	CS-CS
IV-P19	Low	SCLORF	CLOW
IV-P13 east of San Vicente Rd.	Low	ILOC	CLOW, U/DEV
IV-P13 west of San Vicente Rd.	Low	F/P	NNG
IV-P07 (along dirt road up to water tank)	Low	DH	DH and CS-CS
IV-P07 (along water tank ridge)	Medium	CS-CS	DH (for wide dirt road) and CS-CS
Ce P01 and Ce P02 (Central East Substation)	Low	SMC, NNG, CLOW	SMC, NNG, CLOW (some polygons missed), DCSS
Ce P08	Low	DW and NNG	DCSS
Ce P14	Low	NNG	CLOW
Ce P19	Low	SCLORF	SAWRF
DW P04	High	CS	CS
DW P08	Medium	SWS	DDWW ²
DW P13	Low	CBS	DDWW and SMWSS
DW P18	Low	CDWS	SMWSS and DDWW
DW P22	High	SMWSS	SMWSS
DW P26	Medium	DW	Emergent wetland
DW P26	Low	CDWS	Semi-desert chaparral



Mr. John Messina
 ARCADIS

December 11, 2006
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Table 1 Summary of Field Spot-Checks Sunrise Powerlink Proposed Project Route (continued)			
Map Page/ Location	Confidence in ARCADIS mapping	ARCADIS Vegetation Classification	HELIX Vegetation Classification
DW P26	Low	SDC	DDWW
DE P07	High	TS	TS
DE P14	Low	CBS	DSaltS
DE P14	Medium	TS	AS
DE P22	Low	TS	AS
DE P22	High	TS, AS	TS, AS
DE P28	High	CBS	CBS
DE P35	High	CBS	CBS
DE P43	Low	CBS	TS and desert wash
DE P50	Low	CBS	DH and DD-D
DE P50	Medium	TS	TS and DSaltS
DE P50	High	DSaltS	DSaltS
DE P50	Low	CBS	DSaltS
DE P55	Medium	CBS	CBS, DD, and DH
DE P61	High	DD	DD

¹Coastal and Inland Valley links: November 20 and 21, 2006 (Deborah Leonard, Kathy Pettigrew). Central and (western) Desert West links: December 5 and 6, 2006 (Larry Sward, Deborah Leonard). (Eastern) Desert West and Desert East links: December 6 (Larry Sward, Deborah Leonard) and December 7, 2006 (Larry Sward, Sarah Haas)

²CBS mapped adjacent is correct.

Table 1 represents a small area of the mapping and may not give a clear picture of the accuracy of the vegetation mapping for the entire proposed project route. The above sampling indicates low confidence in 54 percent, medium confidence in 22 percent, and high confidence in 24 percent of the vegetation mapping in the areas that were checked.

Please review the maps, forms, and photos that are attached, and make necessary changes to the vegetation mapping. We strongly believe that ARCADIS should review more of the mapping on its own to look for necessary corrections as we have subsequently noticed other possible errors.

Please contact me, Tom Huffman, or Larry Sward if you have any questions.

Sincerely,

Deborah Leonard
 Senior Scientist