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In Reply Refer To:
FWS/CDFG-SDG/IMP-08B0423-11TA0456

JUN 24 2011

Donald E. Haines AICP
Environmental Mitigation Manager
San Diego Gas & Electric
8315 Century Park Court CP21G
San Diego, California 92123-1548

Subject: Sunrise Powerlink Project, Request for Modification to Construct during the 2011
Peninsular Bighorn Sheep Lambing Season

Dear Mr. Haines:

On May 11, 2011, the U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), hereafter collectively referred to as the Wildlife Agencies, received a request from San Diego Gas and Electric (SDG&E) to modify the construction period within Peninsular bighorn sheep (*Ovis canadensis cremnobates*; PBS) habitat for the Sunrise Powerlink Project (Project). SDG&E proposes a variance to the PBS lambing season restriction (January 1 through June 30) that would allow construction of portions of the Project during the 2011 lambing season. SDG&E's justification for the request is that it would facilitate the construction of all structures within suitable PBS habitat such that construction within the Interstate 8 (I-8) Island could occur between July 1st and November 15th when fewer PBS are likely to be encountered in the I-8 Island.

The Wildlife Agencies requested and received additional justification from SDG&E on June 9, 2011. Based upon the Department's recent ground observation last week (June 13th) of ewe/lamb pairs throughout the I-8 Island, aerial detection of several collared ewes (likely with lambs) on the slopes above several Coyote Mountain tower sites, and recent movement of collared ewes and lambs throughout the I-8 Island area, the potential for disturbance to lambs and ewe/lamb pairs from construction activities remains. However, if the proposed risk reduction measures as described in the revised justification document are adhered to including restricting low-level-helicopter overflights to depicted flight corridors, use of a 1,500-foot or above flight ceiling over known occupied habitat, and the placement of construction/holding yards in areas depicted in the additional information, the risk to PBS should be minimized.

An aerial telemetry flight on June 16, 2011 revealed that most of the collared sheep in the vicinity of the Project area have moved or are moving towards Carrizo Canyon. This area is used by sheep seasonally during the lambing period (winter/spring) with movement west to Carrizo Canyon typically occurring as the weather turns hot. However, several collared ewes were

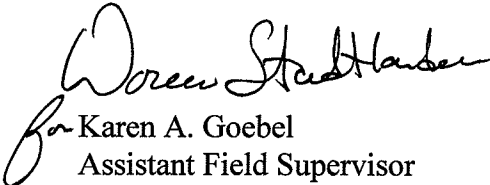
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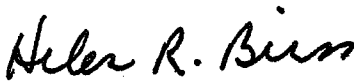
detected on the slope above Towers EP 303-2 through EP 306. While it is unlikely that construction activities at Towers EP 303-2 through EP 306 would directly affect PBS, the potential for indirect impacts remains. Therefore, the Wildlife Agencies consider it necessary for SDG&E to adhere to the PBS lambing season restriction and exclude work on Tower sites EP 303-2 through EP 306 in the Coyote Mountains until after July 1, 2011.

Although condition SS-CM-16 of the Service's biological opinion for the Project (FWS-08BO423-11F0047) prohibits work during the lambing season, it does allow for exceptions to this prohibition provided the Wildlife Agencies approve. Based on the information provided by SDG&E and the Department, the Wildlife Agencies hereby authorize construction activities within PBS habitat during the current 2011 lambing season at the following sites: EP256, EP258-3, EP 263A-2, EP293, EP294, EP300-1, EP301, and EP307-1 through EP312. All other Project measures to avoid and minimize potential impacts to PBS including monitoring of the Project site remain in effect.

We appreciate your continued coordination and cooperation on the subject project. Should you have any questions regarding this letter, please contact Eric Porter of the Service at (760) 431-9440 extension 285 or Erinn Wilson of the Department at (714) 968-0953.

Sincerely,


for Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service


Helen R. Birss
Environmental Program Manager
California Department of Fish and Game

cc:

Tom Zale, Bureau of Land Management, El Centro, CA
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