



Robert C. Jackson
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Sunrise Powerlink Project

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February 13, 2012

Mr. Donn Christiansen, District Ranger
U.S. Department of Agriculture, Forest Service
Descanso Ranger District
3348 Alpine Boulevard
Alpine, CA 91901

Subject: Response to the Notice of Non-Compliance Dated February 6, 2012:
Sunrise Powerlink Project Helicopter Incursions into Golden Eagle Habitat Buffers

Dear Mr. Christiansen:

San Diego Gas & Electric Company (SDG&E) is in receipt of the formal notice of noncompliance with the terms and conditions of the Sunrise Powerlink Transmission Project (Project) Special Use Permit (SUP) issued by the National Forest Service (NFS) on February 6, 2012. SDG&E takes this and any noncompliance very seriously. The notice of noncompliance was issued due to certain Sunrise construction helicopters inadvertently intruding into two identified golden eagle nest buffers at Bell Bluff and Thing Valley. Neither nest territory is known to be currently occupied this nesting season based upon ongoing observations of golden eagle nesting behavior. Golden eagle nest surveys conducted in 2010 and 2011 showed no nest or nesting activity at Bell Bluff for both 2010 and 2011 and no nesting activity at Thing Valley in 2011. The purpose of this letter is to provide the specific information required in the notice of noncompliance.

Clarification

The notice states that "There were SPL project helicopter incursions into golden eagle habitat buffer areas at Bell Bluff on January 24 & 26 and at Thing Valley on January 27, 2012. Helicopters are restricted from entering these areas as outlined in Part 3 of the Avian Monitoring & Mitigation Plan of the SUP." Specifically, the notice was issued due to a helicopter intruding (i) once at 10:07 a.m. on January 24 approximately 621 feet into the 4,000-foot historic Bell Bluff eagle nest buffer; (ii) once at 11:35 a.m. on January 26 approximately 521 feet into the 4,000-foot historic Bell Bluff eagle nest buffer; and (iii) once on January 27 when the Erickson Air Crane intruded approximately 161 feet into the Thing Valley 4,000-foot eagle nest buffer.

Required Information

The February 6, 2012, notice of noncompliance included two informational requests due by Monday, February 13, 2012. Attached to this letter, please find:

1. **NFS Requirement Bullet Item 1:** Rosters, agendas, and results of any “stand down” and/or “all pilots” meetings that have or will be conducted addressing SPL project helicopter incursions into eagle buffer areas on NFS land.

SDG&E Response to Bullet Item 1: The attachment to this letter provides rosters, agendas, and results of the stand downs and pilot meetings that occurred to address helicopter incursions into eagle buffer areas on NFS land.

2. **NFS Requirement Bullet Item 2:** Copies of resulting action plans from the “stand down” with a list of specific measures developed by SDG&E to ensure compliance with the Avian Monitoring & Mitigation Plan (Exhibit 24).

SDG&E Response to Bullet Item 2: The following specific corrective actions have been developed as the resulting action plan from the pilot “stand down(s)” that occurred on February 1 and February 4 to ensure compliance with the AMMP (Exhibit 24).

1. Effective 2/3/2012, out of an abundance of caution and due to the need to ensure safety of pilots as well as maintain compliance with the eagle buffer areas, SDG&E has expanded the buffer zone to a 4200-foot radius as a no-fly zone. We also designated a “restricted flying zone” from the 4200-foot radius to a 6000-foot radius. Any work or aerial activities in the “restricted flying zone” will require additional authorization the day when work is conducted. These new zones have been loaded into the Garmin GPS of the Project helicopters.
2. Effective 2/3/2012, SDG&E stopped all aerial construction in the “restricted flying zones” (within 6000 feet of the four known eagle nests along the alignment, e.g., El Cajon, historic Bell Bluff, Thing Valley, and Barrett/Echo). This 6000-foot work restriction was lifted once all pilots had been notified of the new procedures at the February 4 stand down for all pilots (Item 6 below).
3. Construction work within the “restricted flying zones” will require either an additional observer in the helicopter or on the ground to assist with navigation in order to prevent buffer zone violations.
4. Meanwhile, SDG&E will continue to search for a technology to alarm the pilot if the helicopter is near the eagle buffer zone perimeter.
5. SDG&E held a stand down for all SDG&E pilots on Wednesday, February 1. The agenda and sign in sheets are provided as an attachment to this notification form.
6. SDG&E held a stand down for all PAR and SDG&E pilots on February 4. The agenda and sign-in sheets for this meeting are also provided as an attachment to this notification form.
7. SDG&E has indefinitely suspended the pilots involved in these incidents.

We hope that through the actions identified in the responses above and continued coordination and communications between SDG& E and the NFS staff that the NFS understands SDG&E's commitment to completing Project construction in the NFS in compliance with the SUP conditions. If the NFS has any additional questions or concerns regarding SDG&E's response to this noncompliance matter, please do not hesitate to contact me. Thank you in advance for your consideration.

Sincerely,



Robert C. Jackson
General Manager & Director
Construction & Engineering
Sunrise Powerlink Project

Attachment – Pilot Stand Down Roster, Agendas, and Results

cc:	Billie Blanchard, CPUC	Fritts Golden, Aspen	Aaron Franz, SDG&E
	Tom Zale, BLM	Vida Strong, Aspen	Art Holland, SDG&E
	William Metz, USFS	Tara Baxter, Helix	Mike Manry, SDG&E
	Brian Paul, USFS	Gerry Akin, SDG&E	Laura McDonald, SDG&E
	Cassandra Garza, Aspen	Rachel Romani Briles, SDG&E	Karen Wilson, SDG&E
	Anne Coronado, Aspen	Dayle Cheever, SDG&E	Phil Brand, Bureau Veritas
	Scott DeBauche, Aspen	Alan Colton, SDG&E	

**Attachment
Rosters, Agenda, and Results**

Sunrise Powerlink Construction
SDG&E Contracted Pilots Meeting
02/01/2012

Opening Remarks / Introductions		Chris Steeb
Eagle Buffer Violations		
Guests-	Alan Colton, SDG&E, Manager of Environmental Services SPL	
	Rachel Briles, SDG&E, Project Manager, Environmental Services SPL	
	Bob Jackson, SDG&E, GM & Director of Construction & Engineering	
	Patrick Lee, SDG&E, VP Sunrise Powerlink	
Environmental Mitigation Measures – Overview		Randy Lyle
Eagle Buffers –	Historic Sites	Randy Lyle
	Dimensions	
	Occupied vs. Non-Occupied Nests	
	USFS Constraints	
Bird Circles-	Types / Dimensions	Randy Lyle
	Expectations for the season	
Garmins-	Brightness Setting	Chris Steeb
	Zoom levels when in proximity to circles	
	Pre-Flight Planning	
	Passenger Authority vs. Garmin	
	PIC Authority	
Complacency-		Randy Lyle
Questions / Comments		

Sunrise Powerlink Construction

02/01/2012

SDG&E Contracted Pilots Meeting

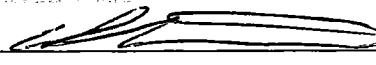

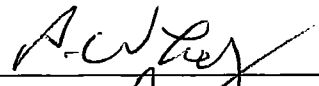
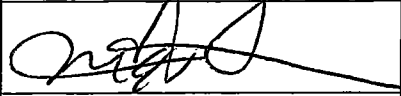
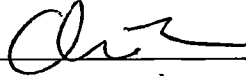




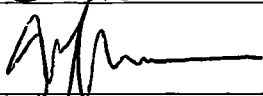



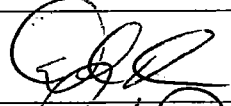
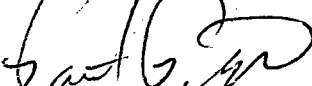
Pilot Feedback


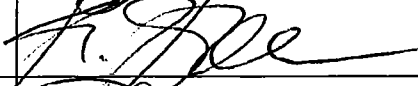


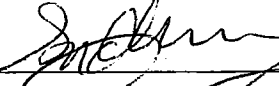

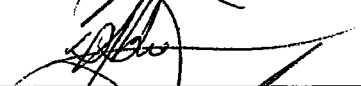
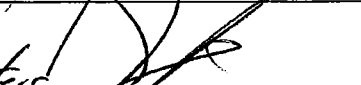
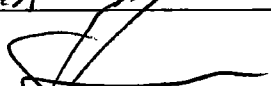

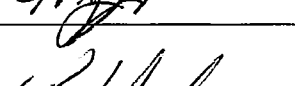
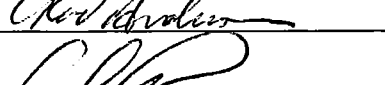

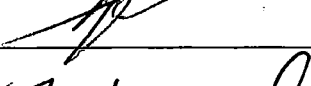
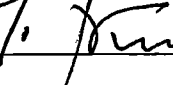
As a result of the SDG&E Contracted Pilots Meeting held of February 1, 2012, here is a list of the suggestion/ comments from the pilots who participated in this meeting.

1. It was suggested to get Garmins with a bigger screen size to allow more visibility of the corridors when flying.
2. The Eagle Warning Tracks are a good idea, is there a way to change setting on the Garmin to allow them to beep or make a noise when getting close to a buffer zone.
3. Pilots need to slow down and take their time when planning their routes.
4. There is too much talk on the FM radios (800). Each pilot is calling in every time they fly to a different site.
 - a. It was suggested that they "call their locals" when they are flying in a concentrated area on the route (over a span of a few sites).
5. It was requested that Sunrise Base take an active role in watching the pilots when flying close to Eagle Buffers. When a pilot is close to an Eagle buffer, take the time to contact them on the radio and ensure they see are aware of their proximity to the buffer.
 - a. It was also suggested for the base to go over any restrictions a pilot may encounter when flying to a specific destination prior to them beginning their flight.
6. There was request to have more pilot or PM meetings.

SDGE Helicopter Pilot Meeting

Feb 1, 2012

Printed Name	Company	Signature
Ed Wieringa	US FOREST SERVICES	
COLIN RUSSEL	CORPORATE HELI	
PAT WHACEY	HELICWEST	
TONY BOWEN	CORPORATE	
Chris Thomas	Corporate	
PAUL HOWE	CORPORATE	
JOHN STEADMAN	SDGE	
VERN SANDERS	EAC	
DAVE BARNETT	EAC	
Michael Life	EAC	
Tyler Burk	Helistun	
GERNOI HOLL	HELISTREAM	
MICHAEL CARON	HELISTREAM INC	
Dale Favre	ERICKSON AIRCRAFT	
Pat Pilolla	ERICKSON AIR-CRAFT	

BERNARD JULESON	BLACKHAWK	
KEN KOTAUSS	BLACKHAWK	
Vic JOHNSON	ERICKSON AIR-CRANE	
LANE WALKER	ERICKSON AIR-CRANE	Lane Walker
James Corey	Erickson AirCrane	
Tom Brand	SDGE	Tom Brand
Bruanne Mysser	Erickson Air Crane	
GARY ROESINK	CORPORATE	
Deann J Shier	Corporate Helicopters	
David Fernandez	Helistream Helicopters	
Scott DeBanche	CPUC / ASPEN	
Mike Toby	SDGE	
Rod Anderson	Helistream, Inc.	
Chris Aultman	Helistream, Inc.	
IVOR SHIER	Corporate Helicopt.	
Tim Knowl	SDGE	
Joe Cordero	BMD	

Sunrise Powerlink Project Pilot Meeting Eagle Violation Meeting

Feb. 4, 2012

Introduction:

- Patrick Lee, SDG&E VP Sunrise Powerlink
- Alan Colton, SDG&E Manager of Environmental Services SPL

Dwight Jones/ Gary Roesink

- Project flight hours and accomplishments
 - Total flight hours to date – 14,500 flight hours
 - PAR Utility helicopters (8500 project flight hours)
 - SDG&E helicopters (6,000 project flight hours)
 - 300 of 436 towers have been built
 - 41 of 118 miles of wire have been strung
 - Approximately 60% of the project has been completed
- Upcoming schedule and project completion estimates

Randy Lyle

- SDG&E – General Eagle Discussion
 - Buffer changes
 - 4200/5,808
 - Cockpit resources
 - SRB
 - Authorization rules

Dwight Jones/Gary Roesink

- Garmin 696 Uploads –
 - Lock box's
 - Location of lock box's and combinations – No longer at Manzanita
 - Late day changes (incorporated into 696?)
 - Breadcrumb downloads – Has this program been working for SDG&E / CPUC?
- Work load stress -
 - Productivity pressure
 - Poor weather
 - Pilot limits and comfort zone
 - Adherence to FAR's
 - Adherence to project rules
- Long line inspection records –
 - Daily completion
 - Turn in weekly (each Saturday evening in lock box)
 - Michael Johnson's role on collection
 - Inspection criteria – if you don't know go to Michael J.

Sunrise Powerlink Project Pilot Meeting Eagle Violation Meeting

Feb. 4, 2012

- Weather information
 - Email list – EDO Weather Briefing Executive Summary
 - PAL daily prognosis – StormWatch 7 day
 - What is an EV / E day?

- Daily objective –
 - What is the mission (morning brief)
 - Crew log in / log out (accountability of each field crew)

- Noise Abatement –
 - Fly neighborly

- Adherence to flight rules –
 - Flight restrictions in “no fly” zones. Do not make that decision.
 - Flight into “no fly” zones or out of corridor for safety purposes.

- Safety concerns –
 - Radio communications
 - East/West split location
 - Open discussion

- ATA’s /Yard Boss / Coordinators Communications –
 - Radio Com protocol during the long line mission
 - Traffic advisory – clear area to lift / land
 - Number of helicopters working in confined corridors

Chris Steeb

- Garmin functionality
 - Brightness
 - Zoom
 - Passengers vs. Garmin
 - Questions?

General Pilot Round Table

Adjourn

Sunrise Powerlink Project Pilot Meeting Minutes 02/04/2012

Eagle Violation Meeting

- **Introductions : Mike Manry, Alan Colton, Stan Markwell, Randy Lyle, Chris Steeb**
- **Mitigation measures: Alan Colton**
 - Briefing and discussion
- **Dwight Johnson/Randy Lyle:**
 - Project flight hours 14,500, 70% of project completed.
- **Randy Lyle:**
 - Eagle Buffer violations review, Buffer changes (sizes & additional buffers, restricted vs. prohibited).
 - Discussion around additional resources in the cockpit (Observer/navigator)
 - Sunrise Base role in authorization process to enter restricted areas. No access to 6000' restricted areas until 2/13.
- **Dwight Jones / PAR operational Issues**
 - Garmin equipment and database management... use of Garmin Tracs by SDG&E
 - Workload/Productivity
 - Poor weather operations
 - Pilot Limitations / FAR's / Project Rules
 - Long-line inspection records / Michael Johnson, PAR Safety Representative introduction.
 - Weather / PAL activity levels... E vs. EV day work restrictions discussion. These are not restrictions for aviation operations, rather they are for ground activities within USFS territory.
 - Fly Neighborly reminder... Noise impact on the project.
 - PAR FM radio discussion... Yard divisions.
- **Chris Steeb- Garmin Pitfalls**
- **Chris Steeb- CPUC imposters, non project personnel on site**

MEETING SIGN-IN SHEET

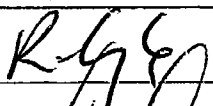

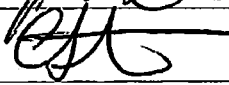
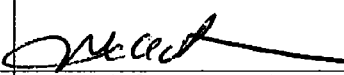
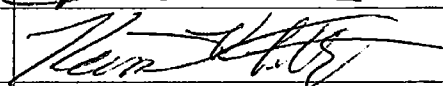
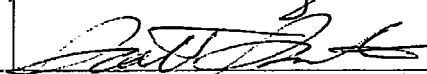
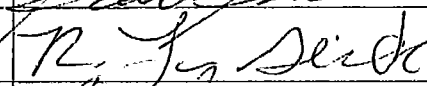
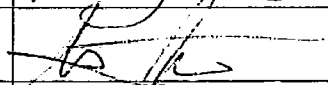
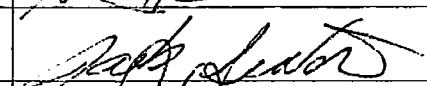
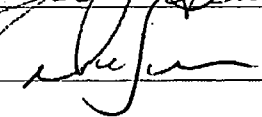
Project: Sunrise Powerlink Project- All Project Pilot Meeting

Meeting Date: 02/04/2012

Facilitator: Randy Lyle and Chris Steeb

Place/Room: Gillespie Hangar

Pilots- Dwight Jones and Gary Roesink

Name	Title	Company	Signature
Randy Lyle	Helicopter Specialist	SDGR	
Joe Cordero	PM	BMCI	
CHRIS STEEB	HELICOPTER SPECIALIST	SDGIC	
TONY BOWEN	PILOT	COMPRAZE	
Kevin Whitley	Coordinator	PAR	
Scott Sinton	Owner	Sinton Helicopters	
Lorne Glick	Pilot	Sinton Helicopters	
NATE MARSHALL	RESOURCE WORD..	PAR	
JACK SINTON	OWNER	Sinton Helicopters	
DWIGHT JONES	President	Mt. Air Heli	

MEETING SIGN-IN SHEET


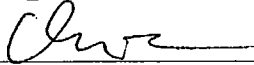
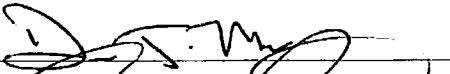

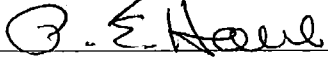

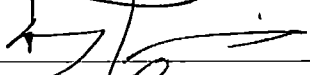

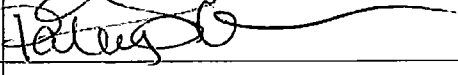
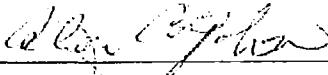

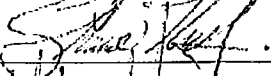
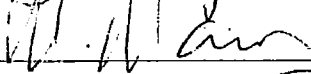
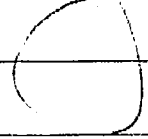
Project: Sunrise Powerlink Project- All Project Pilot Meeting

Meeting Date: 02/04/2012

Facilitator: Randy Lyle and Chris Steeb

Place/Room: Gillespie Hangar

Pilots- Dwight Jones and Gary Roesink

Name	Title	Company	Signature
ROLAND REED	SAFETY DR	PAR	
Chris Thomas	pilot	Corporate	
Dan Megna	Pilot	Corporate	
GARY ROESINK	PILOT	CORPORATE	
PAUL HOWE	PILOT	CORPORATE	
Andy Fagan	Pilot	CORP.	
AZEEZ JAMES	PILOT	CORPORATE	
BERNARD JULESSA	PILOT	BLACKHAWK	
PAUL SULLIVAN	SRB	DR McNally	
ALAN COLTON	ENV. MGR.	SONG	
Dave Kinnear	Pilot	Helistream	
SHAWN KELLY	Pilot	WINCO	
M. Wilcox	PM	SPEC	
			

MEETING SIGN-IN SHEET

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Meeting Date: 02/04/2012

Facilitator: Randy Lyle and Chris Steeb

Place/Room: Gillespie Hangar

Pilots- Dwight Jones and Gary Roesink

Name	Title	Company	Signature
JOHN STEADMAN	HELICOPTER SPEC.	SD36	<i>[Signature]</i>
VIC JOHNSON	PILOT	ERICKSON AIRCRANE	<i>[Signature]</i>
VERN SANDERS	PILOT	EAC	<i>[Signature]</i>
Michael Life	Pilot	EAC	<i>[Signature]</i>
LANE WALKER	PM	EAC	<i>[Signature]</i>
James Corey	P.M.	EAC	<i>[Signature]</i>
Drew Furr	Aviation Safety Manager	EAC	<i>[Signature]</i>
BREAN WARRICK	PILOT	EAC	<i>[Signature]</i>

MEETING SIGN-IN SHEET

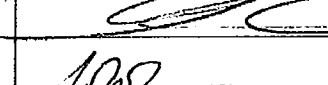
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Place/Room: Gillespie Hangar

Pilots- Dwight Jones and Gary Roesink

Name	Title	Company	Signature
Steve Lyons	Pilot	Patrol	
Gary Hall	Pilot	MT Air	
Andreas Hoser	Pilot	HelioStream	
Chris A. Huran	Pilot	HelioStream	
MICHAEL LARCH	PILOT	HELIOSTREAM	
Tyler Burk	Project Mgr	HelioStream	
Glenn Camus	PILOT	HelioWest	
ADAM TATE	PILOT	HQ	
Ken Krauss	Pilot	Blackhawk	
MIKE MCKINNEY	PROJECT MANAGER	MOUNTAIN AIR	
Tara Baxter	Helicopter Monitor	CPUC/Helix	
Ryan Hedue	Flight Coordinator	PAR	
R. Kimball	Pilot	Winco	
PIT WATCOY	PILOT	HELIOWEST	
valerie yep		Aspen	
HAROLD SKRAR	PILOT	WINCO	
MYLES ELSINK	PILOT	CORPORATE	
ROGER CHASE	Helicopter Coordinator	PAR	

MEETING SIGN-IN SHEET

Project: Sunrise Powerlink Project- All Project Pilot Meeting

Meeting Date: 02/04/2012

Facilitator: Randy Lyle and Chris Steeb

Place/Room: Gillespie Hangar

Pilots- Dwight Jones and Gary Roesink

Name	Title	Company	Signature
Shawn Krainovich	Air Boss	FAK	
Morgan Kozlowski	Pilot	Mountain Air	
Brian Johnson	Pilot	TMI	
ZARON WELCH	Pilot	Mountain Air	
Barry Wilson	pilot	Mountain Air	
DAVE BROWN	pilot	Mountain Air	
DAVE WITTECHT	PILOT	NORTHWEST	
Brian Fleming	Sunrise Base	SDGE	
Doug Collier	Sunrise Base	SDGE	
MELISSA SUTTE	AIR BOSS	PAR	
MATTEN	PILOT	FAK	
JONATHAN ABRAHAM	PILOT	SUNSHINE	
SULLIVAN, GREG	AIR BOSS	PAR	
Cody Wostenhime	Flight Controller	PAR	
DAVID KRESSER	PILOT	MTN AIR	
RIKI MOORE	P. LOT	Timberline	
JACK MATIASZUCH	Pilot	Corporate	
STEVEN WILSON	COM MGR	PAR	
JIMMY CARTER	AIR TRAFFIC ADVISER	PAR	