

Worksheet
Determination of NEPA Adequacy (DNA)

Sunrise Powerlink Project
Proposed Changes to the
Approved Project

U.S. Department of the Interior
Bureau of Land Management

April 2011

Worksheet

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

OFFICE: El Centro Field Office

TRACKING NUMBER: DOI-Control No. DES-07-58

CASE FILE/PROJECT NUMBER: CACA-47658

PROPOSED ACTION TITLE/TYPE: The proposed action is a set of minor changes to the approved project, the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project as modified in the Project Modification Report (PMR), and as analyzed in the Final EIR/EIS and Associated Amendment to the Eastern San Diego County Resource Management Plan (RMP) for a single utility crossing in the McCain Valley. These proposed changes include minor realignment of structure pads, roads, and tower staging access pads to avoid sensitive resources, a new pullsite, use of existing unimproved roads to provide access to construction yards, and relocation of tower staging access pads to eliminate need for a helicopter platform. In addition, SDG&E has submitted a revision to their Plan of Development (POD) to include the temporary storage of hazardous materials at construction yards and has stated that if necessary, secondary containment systems would be installed around material storage areas to prevent contaminated run-off from leaving storage areas or to capture product from a leaking container.

The need for each of the proposed changes considered herein was identified subsequent to the approval of the PMR in September 2010 as a result of continued efforts to further reduce impacts to resources including visual, cultural and biological, final engineering, and at the request of agencies and Native American tribes.

LOCATION/LEGAL DESCRIPTION: The Sunrise Powerlink Transmission Project is a 500 kV electrical transmission line from Imperial Valley Substation to a newly-constructed 500/230 kV Suncrest Substation that was identified in the Final EIR/EIS (called Modified Route D Alternative Substation in the Final EIR/EIS), a distance of approximately 92.53 miles. The right-of-way also granted SDG&E the right to use the described public lands to construct, operate, maintain and terminate a 230 kV electrical transmission line from the Suncrest Substation to Sycamore Canyon Substation, located in San Diego. For the first 36 miles of the Selected Alternative

(approved project), the 500 kV transmission line will be built on BLM lands adjacent to the existing Southwest Powerlink 500 kV line. The approved project crosses approximately 49 miles of BLM land, 19 miles of Forest Service land, two miles of Department of Defense land, and 0.4 miles of state land. The remainder of the line crosses lands in various ownerships, including private and local agencies.

The proposed changes to the approved project follow the approved route of the Sunrise Powerlink Transmission Project, as defined in the Final EIR/EIS and modified in the PMR, and would not substantially change the location of the approved project. All are within 250 feet of the approved project alignment as modified by the PMR (approved September, 2010).

APPLICANT: San Diego Gas and Electric Company

A. Description of the Action and any applicable mitigation measures

Proposed Changes to the approved Sunrise Powerlink Transmission Project as modified by the Project Modification Report (approved September, 2010)

Approved Project Components

The Sunrise Powerlink Transmission Project FESSR, as defined in the Final EIR/EIS and approved in the ROD, is a combination of alternatives and route segment options. These are listed in Table 1. The ROD for the approved project adopted the mitigation recommended in the Final EIR/EIS and incorporated it as terms and conditions in the right-of-way grant. Although the ROD applies only to the BLM-administered public lands within the Selected Alternative, the same mitigation was incorporated in the California Public Utilities Commission's (CPUC) approval of the project.

In September 2010, the BLM published a Determination of NEPA Adequacy for the modifications proposed by SDG&E in the Project Modifications Report (May, 2010). The BLM determined that the modifications to the Sunrise Powerlink Project were within the scope of the Record of Decision issued by the BLM. These changes are summarized in Table 1 as part of the approved project.

Table 1 lists the approved components of the Sunrise Powerlink Project, under headings identifying which parts are on public lands under BLM jurisdiction, and which are on private lands and have been approved by the CPUC. The private land segments are described here for informational purposes only; they are not covered in this DNA. For additional information on project components on lands not managed by the BLM, please see the CPUC's website at:

<http://www.cpuc.ca.gov/environment/info/aspen/sunrise/sunrise.htm>

Table 1. Approved Components of the Sunrise Powerlink Project**Approved Components on Public Lands (BLM Jurisdiction)**

Interstate 8 Alternative between the Imperial Valley Substation and MP I8-40 (where the BCD Alternative diverges), including the following reroutes and modifications from the PMR (May, 2010):

- Southwest Powerlink (SWPL) Archaeological Site Reroute; and
- Jacumba SWPL Breakaway Point Revision
- PMR1. Imperial Valley Substation
- PMR2 EP363-1 to EP333 (Dunaway Road)
- PMR3 EP333 to EP324 (Plaster City)
- PMR4 EP324 to EP301 (Pyramid Mining)
- PMR5 EP301 to EP276-1 (Sugarloaf)
- PMR6 EP276 to EP255-1 (Desert View Tower)
- PMR7 EP255 to EP252-1 (Jade Mountain)
- PMR8 EP252-1 to EP239-1 (Jacumba)
- PMR9 EP239-1 to EP229-1 (Quino)
- PMR10 EP229 to EP221-A (Bankhead Springs)
- PMR11 EP221-A to EP219-1 (Jackson-Gatlin)

BCD Alternative and BCD South Option Revisions including the following reroutes and modifications from the PMR (May, 2010):

- PMR12 EP219-1 to EP206-1 (State Corrections)
- PMR13 EP206-1 to EP196-1 (Rough Acres)
- PMR14 EP196-1 to EP170 (McCain Valley)
- PMR15 EP170 to EP141 (JAM)
- PMR16 EP141 to EP122 (Thing Valley)

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Table 1. Approved Components of the Sunrise Powerlink Project

Modified Route D Alternative, including the Modified Route D Alternative Substation, as modified to incorporate the following SDG&E reroutes and modifications from the PMR (May, 2010):

- Cameron Reroute
- Pacific Crest Trail (PCT) Option A, which follows the existing SDG&E 69 kV line, is approved BLM worked with the Forest Service to develop additional mitigation (WR-2c, PCT Route Impact Mitigation) for the PCT crossing
- Western Modified Route D Alternative (MRDA) Reroute
- Star Valley Option Revision was identified by, the Forest Service as its preferred segment in eastern Alpine
- PMR17 EP122 to EP108-2 (La Posta)
- PMR18 EP108-2 to EP99-2 (Lenac)
- PMR19 EP105-2 (Rees)
- PMR20 EP99-2 to EP79 (Bartlett)
- PMR21 EP79 to EP67 (Pacific Crest Trail)
- PMR22 EP67 to EP62A-1 (Long Potrero)
- PMR23 EP62A-1 to EP47-2 (Potrero)
- PMR24 EP47-2 to P39-1 (Barrett Lake)
- PMR25 EP39-1 to EP22-1 (Hermes)
- PMR26 EP22-1 to EP12-3 (Gaskill Peak North)
- PMR27 EP12-3 to EP9-1 (Cedar Ranch)
- PMR28 EP9-1 to EP1-3 (Just)
- PMR29. Suncrest Substation and Access Road (Suncrest Substation)
- PMR30. CP109 to CP106-1 (Bell Bluff)
- PMR31 CP106-1 to CP98-1 (Jerney)
- PMR32. CP98-1 to CP95-1 (230 kV UG Including Loritz Driveway)

Approved Components on Private Lands (CPUC Jurisdiction)

Interstate 8 Alternative installed underground in Alpine Boulevard, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR33. 230 kV Underground from Alpine Blvd/Loritz Driveway to CP88-1/CP87-1 (230 kV UG)

Chocolate Canyon Option Revision, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR34. CP88-1/CP87-1 to CP64-2 (Chocolate Canyon)

Interstate 8 Alternative from the end of the Chocolate Canyon Option Revision to where it joins the Proposed Action/Project route at MP 130, incorporating the High Meadows Reroute and the Highway 67 Hansen Quarry Reroute, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR35 CP64-2 to CP53-1 (Morgan)
- PMR36 CP53-1 to CP44-1 (High Meadow Ranch)
- PMR37 CP44-1 to CP37-2 (County Aqueduct)
- PMR38. CP37-2 to CP31-2 (Schmidt)

Table 1. Approved Components of the Sunrise Powerlink Project

Proposed Action/Project from MP 130 to the Sycamore Canyon Substation, as modified to incorporate the following modifications from the PMR (May, 2010):

- PMR39. CP31-2 to CP12-1 (Sycamore Preserve)
- PMR40. CP12-1 to CP3 (Stonebridge)
- PMR 41. CP3 to SSDE-1

Coastal Link System Upgrades Alternative Revision, which includes, as modified to incorporate the following modifications from the PMR (May, 2010):

- Reconductoring of existing transmission segments: Sycamore Canyon–Pomerado double-circuit 69 kV; Sycamore Canyon–Scripps 69 kV transmission line; and the existing Sycamore–Elliott 69 kV transmission line.
- Installation of a third 230/69 kV transformer at the existing Sycamore Canyon Substation and a new 230/138 kV transformer at the existing Encina Substation
- PMR42. Sycamore Canyon to Pomerado Substation (TL6915/6924) Reconductoring
- PMR 43 Sycamore Canyon to Elliot Substation (TL639) Reconductoring
- PMR44. Sycamore Canyon to Scripps Substation (TL6916) Reconductoring (Scripps)

Additional Project Modifications Requested

A number of mitigation measures incorporated as right-of-way terms and conditions required SDG&E to continue to attempt to avoid resources and minimize environmental impacts in the final engineering and design for the approved project. Implementation of these mitigation measures have resulted in further proposed changes, beyond those approved in the PMR. The measures resulting in additional changes include the following:

Mitigation Measures for Biological Resources

B-1a: Provide restoration/compensation for impacted sensitive vegetation communities

B-2a: Provide restoration/compensation for impacted jurisdictional areas

BIO-APM-1: SDG&E would perform any detailed on-the-ground protocol surveys with regard to specific sensitive plant or wildlife species whose habitat would be impacted by the project based on final design in accordance with federal or State regulations or statutes

Mitigation Measure for Cultural Resources

C-1a: Inventory and evaluate cultural resources in Final Area of Potential Effect (APE). (pg. E.1.7-5, FEIR/EIS 2008)

C-1b: Avoid and protect potentially significant resources (pg. E.1.7-5, FEIR/EIS 2008)

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C-6a Reduce adverse visual intrusions to historic built environment properties (pg. E.1.7-8, FEIR/EIS 2008)

CR-APM-2: Archaeological sites that are eligible or potentially eligible for the National Register will be flagged in the field and spanned or otherwise avoided through routing during construction activities to the extent feasible (pg. D.7-23, FEIR/EIS 2008)

Mitigation Measures for Visual Resources

V-1a: Reduce visibility of construction activities and equipment (pg. E.2.3-12, FEIR/EIS 2008)

V-2d: Construction by helicopter (pg. E.2.3-14; FEIR/EIS 2008)

V-3a: Reduce visual contrast of towers and conductors (pg. E.2.3-5; FEIR/EIS 2008)

In compliance with these mitigation measures, in responses to requests by agencies and interested parties to avoid sensitive resources, and based on final engineering and design, SDG&E has identified proposed changes to the approved project. These changes are described in Table 2. These include minor changes in structure, maintenance pads, and roads to avoid sensitive biological resources, use of a new pullsite, use of existing unimproved roads, and relocation/use of tower access staging pads to eliminate access roads and maintenance pads. The proposed changes to the approved project are tabulated in a spreadsheet titled 'BLM Table of Changes since PMR' dated January 31, 2011 and are shown in 'BLM-Mapbook of Changes' pages 1-40. Table 1 describes the approved project (FESSR as modified by the PMR) as well as each of the specific proposed changes by segment. Because each change is minor and occurs at a specific tower location, they have been identified by the tower number. Table 2 also defines the mitigation measure (by number only) that required each change to be made.

Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
Interstate 8 Alternative between the Imperial Valley Substation and MP 18- 40 (where the BCD Alternative diverges)	• B-1a: pg. E.1.2-7, FEIR/EIS 2008	Segment 1: IV Sub Const. Yard	Small location change to IV Sub CY access road
	• B-2a: pg. E.1.2-20, FEIR/EIS 2008 • BIO-APM-1: pg. E.1.2-13, FEIR/EIS 2008 • C-1a: pg. E.1.7-5, FEIR/EIS 2008 • C-1b: pg. E.1.7-5, FEIR/EIS 2008 • C-6a: pg. E.1.7-8, FEIR/EIS 2008	Segment 2	<p>EP347: Structure maintenance access road entrance widened</p> <p>EP342: Structure maintenance road re-aligned northward to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP 336: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP331: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP330-1: Pulisite P330-1-PS-A northwest portion outside of corridor boundary included to achieve proper pulisite operation set-backs. Plaster City yard boundary change to encompass maintenance pads since yard access road was deleted due to steep terrain.</p> <p>EP324: Small TSAP relocation to reduce grading</p> <p>EP323-1: TSAP relocated to avoid dry-wash area impacts per Army Corps request</p> <p>EP322-1: Pulisite road relocated to avoid dry-wash area impacts per Army Corps request</p> <p>EP316-2: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP313: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP307-1: Structure access road was re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP303-2: Guard structure re-located</p> <p>EP302-1: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP301: Structure maintenance pad and road slightly re-aligned to accommodate quarry operations</p>

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)			
Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)	<ul style="list-style-type: none"> B-1a: pg. E.1.2-7, FEIR/EIS 2008 B-2a: pg. E.1.2-20, FEIR/EIS 2008 BIO-APM-1: pg. E.1.2-13, FEIR/EIS 2008 C-1a: pg. E.1.7-5, FEIR/EIS 2008 C-1b: pg. E.1.7-5, FEIR/EIS 2008 C-6a: pg. E.1.7-8, FEIR/EIS 2008 	Segment 3	<p>EP300-1: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP298: Structure maintenance pad and road were re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>EP292-1: Pullsite road re-aligned to avoid/reduce dry-wash area impacts per Army Corps request</p> <p>Dunway Const. Yard: Existing unimproved road use added to provide access to construction yard</p> <p>S2 Const. Yard: Existing unimproved road use added to provide access to construction yard</p> <p>EP280-3: Tower structure moved 40' north to reduce impacts to cultural resources</p>
		Segment 5	<p>EP250: Structure access road re-aligned to avoid/reduce cultural area impacts</p> <p>EP249: TSAP located to eliminate/reduce cultural impacts caused by structure access road and maintenance pad which have been removed</p> <p>EP248-1: Tower structure relocated approximately 40 feet northeast to eliminate/reduce cultural impacts</p> <p>EP246: TSAP located to eliminate/reduce cultural impacts caused by structure access road and maintenance pad which have been removed</p>

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
BCD Alternative and BCD South Option Revisions	<ul style="list-style-type: none"> • V-1a: pg. E.2.3-12, FEIR/EIS 2008 • V-2d: pg. E.2.3-14, FEIR/EIS 2008 • V-3a: pg. E.2.3-5, FEIR/EIS 2008 • C-1a: pg. E.2.7-2, FEIR/EIS 2008 • C-1b: pg. E.2.7-2, FEIR/EIS 2008 • CR-APM-2: pg. D.7-23, FEIR/EIS 2008 	Segment 6	EP205-2: Small revision in road location
			EP200A-1: Structure maintenance pad and road were re-aligned due to tower move
			EP200-3: Structure maintenance pad and road were re-aligned to provide a smaller impact area. Pullsites added to structure
			EP197-3: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 75 feet southwest
			EP196-2: TSAP located to eliminate cultural impacts and due to tower move approximately 150 feet south
			EP195-2: TSAP footprint relocated due to tower move approximately 140 feet south
Modified Route D Alternative, including the Modified Route D Alternative Substation	<ul style="list-style-type: none"> • B-1a: pg. E.4.2-9, FEIR/EIS 2008 • V-2d: pg. E.4.3-9, FEIR/EIS 2008 • L-2b: pg. E.4.47, FEIR/EIS 2008 • C-1a: pg. E.4.7-3, FEIR/EIS 2008 • C-1b: pg. E.4.7-3, FEIR/EIS 2008 	Segment 7	EP194-3: TSAP located to eliminate cultural impacts and due to tower move approximately 50 feet west
			EP193-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 75 feet south
			EP192-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 125 feet south
			EP191-2: Structure maintenance pad and road were re-aligned to avoid cultural area impacts and due to tower move approximately 25 feet south
		Segment 8	EP190-2: Guard structure re-located
			EP189-3: Final engineering: small change to grading limits
			EP186-1: Final engineering: small change to grading limits
			EP180: Final engineering: small change to grading limits
		Segment 9	EP175: Structure maintenance pad and access road re-aligned to a hook per CPUC visual consultants request
			EP170: Final engineering: small change to pull site grading limits
			EP147: TSAP relocated to flatter terrain to eliminate the need for a helicopter platform
			EP103A: Final engineering: small change to grading limits
			EP99-2: Final engineering: small change to grading limits
		Segment 9	EP98-1: Final engineering: small change to grading limits
			EP97: Final engineering: small change to grading limits
			EP96: Final engineering: small change to grading limits
			EP95: Final engineering: small change to grading limits
			EP75-2: Existing Road rehab: Access road needs to be graded around tower leg foundation

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Table 2. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)			
Modified Route D	• B-1a: pg. E.4.2-9, FEIR/EIS 2008	Segment 10	EP56-4: Tower structure moved approximately 50 feet east to avoid/minimize cultural impacts
Alternative, including the Modified Route D	• V-2d: pg. E.4.3-9, FEIR/EIS 2008		EP53-3: Tower structure moved approximately 200 feet northwest and TSAP relocated due to cultural impacts
Alternative Substation	• L-2b: pg. E.4.47, FEIR/EIS 2008		EP51-1: Final engineering: small change to grading limits
	• C-1a: pg. E.4.7-3, FEIR/EIS 2008		EP50: Final engineering: small change to grading limits
	• C-1b: pg. E.4.7-3, FEIR/EIS 2008	Segment 11	EP49: Final engineering: small change to grading limits
			EP47-2: Pullsite: Revised per CPUC comment to avoid notch in ridge line
			EP45-1: TSAP relocated to flatter terrain to eliminate the need for a helicopter platform
			EP42: Final engineering: small change to grading limits

The majority of the changes are located on land previously surveyed for the approved project as modified by the PMR. Where the proposed change does not occur on previously surveyed land, additional biological surveys were conducted in December, 2010. Additional biological surveys will be conducted for rare plant species during the appropriate season and for the Quino Checkerspot butterfly where the habitat is appropriate.

This DNA also considers a minor change in the Sunrise Plan of Development (POD). The Sunrise Plan of Development originally submitted to the BLM in November 2008, did not address the need to temporarily store hazardous materials such as petroleum products (gasoline, diesel fuel, crankcase oil, lubricants, and cleaning solvents) at construction yards on BLM-administered land. SDG&E has submitted a revised POD to include the storage of hazardous materials and has stated that if necessary, secondary containment systems would be installed around material storage areas to prevent contaminated run-off from leaving storage areas or to capture product from a leaking container. Similar language was included in the Public Health and Safety Sections (Section 1.10, 2.10, and 4.10 for the approved project) the Final EIR/EIS.

B. Land Use Plan (LUP) Conformance

LUP Name* California Desert Conservation Area Plan Date Approved 1980, as amended

LUP Name Eastern San Diego County RMP Date Approved 2008, as amended

Other Document Yuha Basin ACEC Management Plan Date Approved 1981

LUP Name Cleveland National Forest Management Plan Date Approved 2006, as amended

- *List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

California Desert Conservation Area Plan, 1980 as amended. BLM lands in the California Desert District are managed pursuant to the *California Desert Conservation Area Plan (CDCA Plan, 1980 as amended)*. The Energy Production and Utility Corridor Element of the CDCA Plan established a network of joint-use planning corridors intended to meet the projected utility service needs at the time the Plan was written. The CDCA Plan, 1980 as amended applies to that portion of the approved project (as amended by the PMR) and the current proposed changes to the approved project situated on public lands administered by the BLM in Imperial County.

Within Imperial County, the proposed changes to the approved project (as revised by the PMR) are in conformance with the CDCA Plan, 1980 as amended because they would remain within the same BLM CDCA-designated utility corridor as the approved project. Thus, a CDCA Plan amendment is not required for the proposed changes to the approved project.

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Eastern San Diego County Resource Management Plan (2008). Like the approved project (the FESSR as revised by the PMR), the proposed changes to the approved project traverse the BLM El Centro Field Office's Eastern San Diego County Management Area. New transmission line towers and cables 161 kV and above are required to be located within a single designated utility ROW (the SWPL corridor) one mile wide and between one and 1.5 miles in length encompassing 960 acres of BLM-administered land within the planning area. Since the FESSR would be partially located on public lands outside of the designated utility corridor, it required a Plan Amendment. The ROD for the project amended the Eastern San Diego County RMP to allow for a one-time exemption for the Sunrise Powerlink Project (as approved and defined as the FESSR).

One proposed change to the approved project on BLM-administered land in Eastern San Diego County (EP 200-3) would involve pullsites added to structure EP200-3 and would go outside (150 feet) of the right-of-way along same alignment. The pullsites would be temporary. These changes are in conformance with the land use plan because they are clearly consistent with the 2009 plan amendment for the Sunrise Powerlink and are proposed as in accordance with the mitigation measures listed above and included in the ROD that approved both the plan amendment and the project.

Four additional changes to the approved project on BLM-administered land in Eastern San Diego County, would involve minor shifts in tower staging access pads (TSAPs) and access roads up to 200 feet outside of the right-of-way. The proposed changes are in conformance with the land use plan because they were designed to further avoid cultural resources as provided for in the FESSR under C-1b: Avoid and protect potentially significant resources (pg. E.1.7-5, FEIR/EIS 2008) and required in the ROD.

Yuha Basin Area of Critical Environmental Concern (ACEC) Management Plan, June 1981. The proposed changes to the approved project, like the FESSR, would pass through the Yuha Basin ACEC south of I-8 in Imperial County. The Yuha Basin ACEC Management Plan has been prepared to give additional protection to unique cultural resource and wildlife values within portions of the Yuha Basin. This ACEC contains high density and diversity of cultural resource values, including intaglios, temporary camps, lithic scatters, cremation loci, pottery loci, trails, and shrines. The ACEC also includes 11 sections containing high relative densities of the flat-tailed horned lizard (FTHL). Mitigation Measures C1b (Avoid and protect potentially significant resources) and C2a (Consult with agencies and Native Americans) were required for the FESSR within the Yuha Basin ACEC and resulted in proposed changes to the approved project to reduce impacts to the resources that exist in the ACEC. Impacts to public land resources within the ACEC were fully analyzed and disclosed in the Final EIR/EIS. In addition, adverse effects to cultural resources would be reduced through implementation of mitigation measures

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such as C1e (Monitor construction) and C1f (Train construction personnel). These mitigation measures apply to the approved project and would likewise apply to the proposed changes to the approved project.

As described on page D.16-13 of the Final EIR/EIS, the proposed changes conform to the proposed ACEC management plan because:

- The proposed changes to the approved project within the ACEC would be limited to a geographic area in close proximity to the existing SWPL transmission line, which is located within the VRM Class III area. While the new line would not repeat the basic elements of the existing natural features in the landscape, it would repeat the characteristics of the existing line. Although the project would be visible, it would not dominate the view of the casual observer. The moderate level of change that would result from the new line (structures and conductors) would meet the VRM Class III objective of moderate (or lower) visual change,
- The proposed changes to the approved project would not impact any historic properties within the Yuha Basin ACEC that are listed on the National Register of Historic Places, and
- The proposed changes to the approved project would decrease the ground disturbance within the Yuha ACEC reducing impacts to wildlife (FTHL).

Cleveland National Forest Land Management Plan. The approved project, as revised by the PMR, would pass through the Cleveland National Forest. The Forest Service amended the Cleveland National Forest Land Management Plan in the Record of Decision (July 2010) to permit an exception to standards for scenic integrity along the proposed modifications to the approved project alignment in the Morena, Sweetwater, and Pine Creek places; permit an exception to Riparian Condition and Biological Resource Condition goals for project activities in Riparian Conservation Areas, and to permit construction of a transmission line tower in a Back Country Non-motorized (BCNM) land use zone. The record of decision amended the Cleveland National Forest Land Management Plan to provide the exceptions which apply only to the proposed modifications to the approved project. Because none of the proposed changes considered herein would occur on the Cleveland National Forest, conformance with the Cleveland National Forest Land Management Plan is not applicable.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- *Draft Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (January 2008).
- *Recirculated Draft Environmental Impact Report/Supplemental Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (July 2008).

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- *Final Environmental Impact Report/Environmental Impact Statement and Proposed Land Use Amendment*, San Diego Gas & Electric Company Application for the Sunrise Powerlink Project, SCH No. 2006091071, DOI Control No. DES-07-58, CPUC and BLM (October 2008).
- *Record of Decision for the Sunrise Powerlink Transmission Project and Associated Amendment to the Eastern San Diego County Resource Management Plan*, CACA 47658, BLM (January 2009)
- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Project Modifications (September, 2010).

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- *Biological Assessment for the Sunrise Powerlink Project*. Prepared by San Diego Gas and Electric Company, Ebbin Moser + Skaggs LLP, ICF Jones & Stokes, KP Environmental, John Messina, TRC Companies, Inc., Wildlife International, (November 2008)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2009*, Carlsbad Fish and Wildlife Office (January 2009)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010*, Carlsbad Fish and Wildlife Office (November 2010)
- *Programmatic Agreement Among the Department of the Interior, Bureau of Land Management, the Department of Agriculture, Forest Service, the Marine Corps Air Station Miramar, the U.S. Army Corps of Engineers, the California Public Utilities Commission, San Diego Gas and Electric Company, and the California State Historic Preservation Officer Regarding the Proposed San Diego Gas and Electric Power Company's Sunrise Powerlink Transmission Line Project, Imperial and San Diego Counties, California* (December 2008)
- *Final Mitigation Monitoring Compliance and Reporting Plan San Diego Gas & Electric Company's Sunrise Powerlink Project*. (April, 2010). A number of pre-compliance reports, permit applications, and other documents are available at the CPUC website that are part of the construction progress and mitigation monitoring at <http://www.cpuc.ca.gov/environment/info/aspen/sunrise/otherdocs.htm>
- *Project Modification Report*. Prepared by San Diego Gas and Electric Company (May 2010).
- *Sunrise Powerlink Project Modifications Report Memorandum*. Prepared by the CPUC and BLM (September, 2010).

D. NEPA Adequacy Criteria

1A. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)?

YES. As stated above, the proposed changes to the approved project as revised by the PMR are minor changes in structure, maintenance pads, and roads to avoid sensitive biological

resources, use of a new pullsite, use of existing unimproved roads, and relocation/use of TSAPs to eliminate access roads and maintenance pads which are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1, E.2, and E.4) as modified by the PMR. The changes detailed in Table 2 would function the same way as the FESSR and its associated equipment as evaluated in the Final EIR/EIS. The minor structure shifts and relocation of TSAPs and roads would not materially change the overall alignment of this transmission line, the location of the line or the analysis area. All are within 200 feet of the approved project ROW and were required due to final engineering or were proposed at the request of reviewing agencies or interested parties and would further avoid biological, visual, and cultural resources.

New language was included in the Sunrise Powerlink Project POD addressing the need to temporarily store hazardous materials at the construction yards on BLM-administered land. The original POD submitted to the BLM did not address storage of hazardous materials at construction yards; however, the Final EIR/EIS did address this potential impact. Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS addressed handling and storage of hazardous materials (see Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5). Impact P-1 noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage of hazardous materials. Including a similar description of the hazardous materials to be stored at construction sites along the approved project ROW in the POD including the potential need for secondary containment systems, does not change the analysis in the Final EIR/EIS and instead validates the analysis currently found in the Final EIR/EIS.

1B. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)?

The proposed changes to the approved project are within the same geographic area as the approved project as modified by the PMR and the resource conditions are substantially the same as those analyzed in the Final EIR/EIS. This fact is confirmed by the close proximity of the proposed changes and the approved route. The proposed changes on public lands requiring relocation of transmission structures and access roads are within the same CDCA utility corridor as those of the approved project and shift less than two hundred feet west in Thing Valley. The tower staging access pads are within 150 feet of the approved route. While some of the revised tower staging access pads, such as the pad associated with EP249-1 is approximately 50 feet

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outside the approved ROW, this access pad allows for the elimination of an access road to reduce impacts to cultural resources.

1C. If the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)?

As noted above, the proposed changes to the approved project do not substantially change the project location. To the extent that minor shifts are proposed in the locations of project structures due to the implementation of required mitigation, these changes are not substantial and would be sufficiently similar to those analyzed in the Final EIR/EIS. In particular, the geographic and resource conditions in the areas where the changes would take place are virtually the same as those of the approved project, although impacts to these resources would be reduced compared to those analyzed in the Final EIR/EIS for the approved project. This reduction in project impacts to resources was the intended consequence of the implementation of the mitigation listed above and included in the ROD.

Note: See item 4 below for a listing of impacts that would be reduced with the proposed changes as compared with the approved project.

1D. If there are differences to geographic and resource conditions, can you explain why they are not substantial?

Differences to geographic and resource conditions are not substantial because only minor shifts are proposed in the locations of project infrastructure and these shifts reduce resource impacts as required by the mitigation measures listed above and included in the ROD.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

YES. The project changes are within the range of alternatives evaluated in the Final EIR/EIS as explained below.

Transmission Line Structure Changes. As detailed in Table 1, the following proposed changes to the approved alignment as modified by the PMR are components of alternatives that were evaluated in the Final EIR/EIS:

- Proposed changes to Segments 1 through 5 are components of the I-8 Alternative (between MP-0 to MP-40), analyzed in Section E.1.2 through E.1.15.
- Proposed changes to Segment 6 are within the area defined as the BCD Alternative and BCD South Option analyzed in Section E.2.2 through E.2.15.

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- Proposed changes to Segment 7 through 11 are within the Modified Route D Alternative, including the Modified Route D Alternative Substation, the Cameron Reroute, Pacific Crest Trail (PCT) Option A, Western Modified Route D Alternative (MRDA) Reroute, and Star Valley Option Revision. Each of these alternative segments was analyzed in Section E.4.2 through E.4.15.
- No additional proposed changes would occur on land under BLM management.

Hazardous Materials Description in the POD. New language was included in the Sunrise Powerlink Project POD addressing the need to temporarily store hazardous materials at the construction yards on BLM-administered land. This is essentially the same as Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5 in Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS. Impact P-1 noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage of hazardous materials.

The resource values evaluated in the Final EIR/EIS that might be impacted by an unintended release of hazardous materials during project construction have not changed, nor have any new adverse impacts been identified as a result of the added language. This is because while the language included in the POD addresses the potential to temporarily store hazardous materials at construction yards on BLM-administered land, Applicant Proposed Measures (APM) HS-APM-1 (personnel trained in proper use and safety procedures for the chemicals used), HS-APM-2 (personnel trained in refueling of vehicles), HS-APM-3 (preparation of environmental safety plans including spill prevention and response plan), HS-APM-8 (SDG&E's and/or General Contractor environmental/health and safety personnel), and HS-APM-10 (proper storage and disposal of generated waste), would be included as part of the project in order to reduce the likelihood of spills. Mitigation Measures P-1a (Implement Environmental Monitoring Program) and P-1b (Maintain emergency spill supplies and equipment) are also required and would reduce the environmental impacts to less than considerable. Including the language in the POD does not change the analysis of the Final EIR/EIS.

3A. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)?

Since the issuance of the ROD for the Sunrise Powerlink Project, new information or circumstances includes:

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- The Bald and Golden Eagle Protection Act (September 2009) and new interim bald and golden eagle inventory and monitoring protocols and other recommendations,
- New critical habitat for arroyo toad,
- Reinstatement of the U.S. Fish and Wildlife Service proposed rule to list the flat-tailed horned lizard. (Note: On February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing for the flat-tailed horned lizard (76 Fed. Reg. 14209, March 15, 2011)), and
- New critical habitat designation for the Quino checkerspot butterfly (QCB).

The terms of the Record of Decision, the Right of Way Grant, and the Biological Opinion, for the Sunrise Powerlink Project require re-initiation of consultation if the re-initiation criteria of the regulations are met. As such some of these new biological circumstances caused the BLM to reinitiate consultation under the Federal Endangered Species Act. While Section 7(d) of the Endangered Species Act prohibits the agency and the permit applicant from making certain commitments of resources during the pendency of the consultation, the mere act of re-initiation does not require supplementation of the EIR/EIS. In November 2010, the U.S. Fish and Wildlife Service reissued the Biological Opinion on the Sunrise Powerlink Project to address these new information or circumstances.

The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the Project would not likely jeopardize the continued existence of five listed species Quino checkerspot butterfly (*Euphydryas editha quino*); arroyo toad (*Anaxyrus californicus*); least Bell's vireo (*Vireo bellii pusillus*); coastal California gnatcatcher (*Poliophtila californica californica*); and Peninsular bighorn sheep (*Ovis canadensis nelsoni*) or adversely modify designated or proposed critical habitat of four species (coastal California gnatcatcher, Quino checkerspot butterfly, arroyo toad and Peninsular bighorn sheep). Additionally, the Biological Opinion concluded that the Project would not likely jeopardize the continued existence of one species which, at that time, was proposed to be listed, flat-tailed horned lizard (*Phrynosoma mcallii*).

Although addressed in the 2009 biological and conference opinion, the San Diego thornmint (*Acanthomintha ilicifolia*) was excluded from evaluation in the revised biological and conference opinion (2010) due to the current determination that the Sunrise Powerlink Project is "not likely to adversely affect" the San Diego thornmint based on updated survey information.

As discussed below, none of these new biological circumstances affect the validity of the EIR/EIS as it relates to the proposed changes to the approved project as modified by the PMR.

Peninsular bighorn sheep. The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the Project would not likely jeopardize the continued existence of the PBS. Additionally, it concluded that the level of bio-monitoring will enable expanding the annual construction period in bighorn sheep habitat to include July 1 through

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December 31. This is consistent with SDG&E's proposal to reduce the construction time from three years to two years in PBS habitat of the Jacumba Mountains, including the I-8 Island. The following changes detailed in Table 2 have the potential to impact PBS:

- EP-313 (PBS were seen outside the 500 foot buffer zone for this species),
- EP-307-1 (within PBS habitat), and
- EP265-2 (within PBS critical habitat).

Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat) adopted from the Final EIR/EIS as well as the measures required in the biological opinion requires SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species consistent with the Final EIR/EIS and would be required at the identified locations. No additional NEPA review is required.

Bald and Golden Eagles. The Bald and Golden Eagle Protection Act (September 2009) rule published by USFWS was not in place at the time the Final EIR/EIS was published. However, the potential impacts of the project on eagles were fully analyzed in the Final EIR/EIS (Impact B-7h, Direct or indirect loss of golden eagle or direct loss of habitat). Impacts to golden eagles were considered adverse according to Significance Criteria 1.e. (substantial adverse effect on the breeding success of the golden eagle), 1.f. (project would directly or indirectly cause the mortality of a special status species), 1.g. (project would result in the abandonment of migratory bird nests and/or eggs), and 1.h. (project would take golden eagles, eagle eggs, or any part of an eagle). (EIR/EIS Section D.2.4.1, Significance Criteria.) Impacts to golden eagles were considered adverse because construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Mitigation was adopted in the Final EIR/EIS to minimize effects on nesting eagles.

Four golden eagle nest sites occur within 4,000 feet of the FESSR and the EIR/EIS concluded that each of the 4 nest sites would be adversely affected by the project. The new Bald and Golden Eagle Protection Act would not change the EIR/EIS analysis; had the analysis been completed after the Act was passed, the effects of the FESSR as modified by the PMR and the proposed changes to the approved project would remain adverse. The number of nest sites potentially affected by the project as modified by the PMR or the proposed changes has not increased since the EIR/EIS. No additional NEPA review is required.

Arroyo Toad. No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was published and the ROD issued. Impacts to the arroyo toad were analyzed based on identification of "suitable habitat" which allowed appropriate

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assessment of effects to the species. The analysis is presented under Impact B-7K: Direct or indirect loss of arroyo toad or direct loss of habitat in Section E 1.2, E.2.2, and E 4.2. Impacts to the arroyo toad and its habitat were assessed in the EIR/EIS, were determined to be adverse and mitigation was required to avoid or minimize the impact (Mitigation Measure B-7j Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies). This measure was identified in the Final EIR/EIS and would also apply to all proposed changes to the approved project. The following changes detailed in Table 2 have the potential to impact arroyo toad:

- EP53-2 (arroyo toad occupied habitat) and
- EP45-1 (arroyo toad occupied habitat).

The mitigation measure is adequate to ensure that impacts to arroyo toad as a result of the changes would be minimized or avoided to the greatest extent practicable. The proposed critical habitat would not result in any new adverse impacts and no additional NEPA review is required.

Flat-Tailed Horned Lizard. The Final EIR/EIS analyzed impacts to the flat-tailed horned lizard (FTHL) as a BLM sensitive species and California Species of Special Concern and determined that the approved project would have permanent impacts to 22.62 acres of FTHL Management Areas and to 52.95 acres of habitat outside of Management Areas. The approved project would have temporary impacts to 91.31 acres of FTHL Management Areas and to 141.53 acres of habitat outside of Management Areas. After the completion of the Final EIR/EIS, the U.S. Fish and Wildlife Service notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. More recently, on February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing for the flat-tailed horned lizard. Nevertheless, additional surveys along the approved route as modified by the PMR have been performed in compliance with mitigation. Analysis now shows that the approved project with the proposed modifications from the PMR would result in permanent impacts to FTHL habitat (9.54 acres of Management Areas and 26.35 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of Management Areas and 94.88 acres of habitat outside Management Areas. Mitigation adopted from the Final EIR/EIS required SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species; reduction in impacts to FTHL habitat (Management Areas as well as habitat outside Management Areas) would apply to all proposed changes.

The following changes detailed in Table 2 have the potential to impact FTHL as they are all within FTHL habitat:

- EP336,
- EP331,

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- EP330-1,
- EP323-1,
- EP322-1,
- EP313,
- EP307-1,
- EP298,
- Dunaway Yard Access Road (within an FTHL management area as designated by BLM), and
- Road to S2 Yard.

The proposed changes considered herein could result in nominal differences in the location and total acres of FTHL habitat that would be impacted. The analysis conducted in the Final EIR/EIS for FTHL concluded that impacts to the species and its habitat were a significant and unmitigable impact (Class I). The impacts of the proposed changes considered herein would be similar in nature to those disclosed in the Final EIR/EIS, just they would occur in different locations and the amount of habitat would be slightly different. Furthermore, the mitigation proposed by SDG&E greatly exceeds the amount of mitigation required by the Final EIR/EIS and Biological Opinion. As such, the impact of the proposed changes has been mitigated. Therefore, no additional NEPA analysis is required.

Quino Checkerspot Butterfly. The Final EIR/EIS determined that the approved project would have permanent impacts to 19.20 acres of 2002 critical habitat for the Quino checkerspot butterfly (QCB) and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB and required appropriate mitigation. After the completion of the Final EIR/EIS, additional surveys have been performed in compliance with mitigation, and 2009 critical habitat for QCB has been designated. Analysis now shows that the approved project as amended by the proposed modifications in the PMR would result in permanent impacts to QCB habitat (4.45 acres of 2009 critical habitat and 15.16 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.08 acres (1.59 acres of 2009 critical habitat and 17.49 acres of occupied habitat, which is former 2002 critical habitat). The following changes detailed in Table 2 have the potential to support QCB:

- EP-249,
- EP-246,
- EP196-2 and EP197-3,
- EP194-3,
- EP193-2,

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- EP192-2,
- EP 175,
- EP 147,
- EP53-3,
- EP47-2, and
- EP45-1.

The proposed changes considered herein could result in nominal differences in the location and total acres of Quino checkerspot butterfly habitat that would be impacted. The analysis conducted in the Final EIR/EIS for Quino concluded that impacts to the species and its habitat were a significant and unmitigable impact (Class I). The impacts of the proposed changes considered herein would be similar in nature to those disclosed in the Final EIR/EIS, just they would occur in different locations and the amount of habitat would be slightly different. Furthermore, the mitigation proposed by SDG&E greatly exceeds the amount of mitigation required by the Final EIR/EIS and Biological Opinion. As such, the impact of the proposed changes has been mitigated. Therefore, no additional NEPA analysis is required.

3B. Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the approved action?

YES. The analyses and conclusions in the Final EIR/EIS continue to be valid. Biological and cultural resources surveys were performed in 2009 and 2010 as required by mitigation measures in the Final EIR/EIS, and these surveys helped shape the project changes in avoidance of impacts to specific resources. There is no new information or no new guidance that would trigger the need for additional analyses of the proposed changes to the approved action, as modified by the PMR, as discussed in the following sections.

Peninsular Bighorn Sheep. The Final EIR/EIS analyzed the project's potential impacts on Peninsular bighorn sheep (Impacts B-7B). The minor structure revisions do not change the conclusions in the Final EIR/EIS (adverse) and are consistent with the Final EIR/EIS in Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat). SDG&E is required to comply with Mitigation Measure B-7c for any of the changes that occur on PBS habitat. There would be no change in the impacts to Peninsular bighorn sheep from the time the Final EIR/EIS was published as the result of the proposed changes considered herein.

Eagles. As noted above, the Final EIR/EIS analyzed the project's potential impacts on golden eagles and bald eagles (Impacts B-7h, B-7i, B-10, and B-12). The new 2009 rule does not change the conclusions in the Final EIR/EIS (adverse for Impacts B-7H and B-10, adverse but

mitigable for Impact B-12 and no impact for Impact B-7I) but rather provides a permit process that the project may need to follow if disturbance impacts to eagles cannot be avoided. As stated in the Final EIR/EIS, construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Therefore, there would be no change in the impacts to golden eagles from the time the Final EIR/EIS was published as the result of the proposed changes considered herein.

Flat-Tailed Horned Lizard. Since the publication of the Final EIR/EIS, the U.S. Fish and Wildlife Service notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. On February 25, 2011, the U.S. Fish and Wildlife Service withdrew the proposed listing of the FTHL. This does not change the analysis in the Final EIR/EIS because it considered impacts to FTHL Management Areas and habitat outside Management Areas in place at the time the Final EIR/EIS was published. The Final EIR/EIS determined that impacts to the FTHL and its habitat were adverse and the changes to the approved project as modified by the PMR considered herein would be subject to mitigation identified in the Final EIR/EIS and Biological Opinion. Therefore, the proposed changes considered herein would not substantially change the analysis of the approved action as presented in the Final EIR/EIS.

Arroyo Toad. Since the publication of the Final EIR/EIS, the U.S. Fish and Wildlife Service proposed new areas as critical habitat for arroyo toad. This does not change the analysis in the Final EIR/EIS because it considered impacts to designated critical and suitable habitat in place at the time the Final EIR/EIS was published. The Final EIR/EIS determined that impacts to the arroyo toad and its habitat were potentially adverse and mitigable and the mitigation would apply to any of the proposed changes considered herein that occur on occupied arroyo toad habitat.

Quino Checkerspot Butterfly. Since the completion of the Final EIR/EIS, additional surveys have been performed and as stated above, the 2009 critical habitat for QCB has been designated. Analysis now shows that the proposed modifications to the approved project would result in permanent impacts to a total of 19.61 acres of QCB habitat (4.45 acres of 2009 critical habitat and 15.16 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.08 acres (1.59 acres of 2009 critical habitat and 17.49 acres of occupied habitat, which is former 2002 critical habitat). In addition, some of the proposed changes occur on QCB habitat and would be mitigated accordingly. Therefore, the proposed changes considered herein would not substantially change the analysis of the approved action as presented in the Final EIR/EIS.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the modified action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

YES. The direct, indirect and cumulative effects of proposed changes to the approved project are similar to those analyzed in the Final EIR/EIS for the FESSR.

The effects of each major modified component are summarized below.

Transmission Line Structure Changes. Table 1 summarizes the approved project as modified by the PMR and Table 2 presents the proposed changes that are considered in this DNA. The effects of the approved project were identified in the Final EIR/EIS and the required mitigation measures resulted in SDG&E proposing changes to the approved project. Specifically, the following impacts would be reduced with the proposed changes as compared with the approved project:

- Impact B-1: Construction activities would result in temporary and permanent losses of native vegetation (pg. E.1.2-13, E.2.2-4, and E.4.2-5; Final EIR/EIS). The proposed changes to the approved project structures incorporated design revisions and made minor grading adjustments to reduce the impact area and grading (see EP200-3).
- Impact B-2: Construction activities would result in adverse effects to jurisdictional waters and wetlands through vegetation removal, placement of fill, erosion, sedimentation, and degradation of water quality (pg. E.1.2-19, E.2.2-9, and E.4.2-9; Final EIR/EIS). The proposed changes to the approved project incorporated minor design revisions and revise the structures to avoid dry-wash area impacts per Army Corps request. As such, the changes reduced the temporary and permanent impacts to jurisdictional waters.
- Impact V-75: Inconsistency with BLM VRM Class II objective due to introduction of structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 61 on at Carrizo Overlook (pg. E.2-5). The proposed change to the approved project would re-align the structure maintenance pad and access to a hook per CPUC visual consultants request (see EP175).
- Impact C-1: Construction of the project would cause an adverse change to known historic properties (pg. E.1.7-4, E.2.7-2, E.4.7-2). Additional cultural surveys were completed after the ROD was published. As a result of the cultural surveys, SDG&E worked with the BLM to design changes to the route alignment to avoid resources where feasible.
- Impact G-9: Construction activities would interfere with access to known mineral resources (pg. E.1.13-9, Final EIR/EIS). SDG&E continued to work with the BLM and landowners incorporate changes to slightly re-align maintenance pad and road to accommodate quarry operations (see EP 301).

Impacts to biological resources, visual resources, cultural resources, and geological resources would be reduced as a result of the proposed changes considered herein as compared with the impact levels defined in the Final EIR/EIS.

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Because some of the changes would occur on rare plant and QCB habitat, protocol level surveys would be required prior to ground disturbance in accordance with Mitigation Measure B-5a and Mitigation Measure B-7i, respectively. The changes that would occur on rare plant habitat which would require additional surveys include EP336, EP331, EP330-1, EP323-1, EP322-1, EP313, EP307-1, EP298, Dunaway Yard Access Road, Road to S2 Yard, EP265-2, EP258-3 (only a small portion of the change has not been previously surveyed), EP250, EP249, EP246, EP200-3 (only a small portion of the change has not been previously surveyed), EP197-3, EP196-2, EP194-3, EP193-2, EP192-2, EP175, EP147, EP53-3, EP47-2, and EP45-1. Surveys for rare plants was included as a condition of Mitigation Measure B-5a, Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies. As such, surveys would be required prior to ground disturbance at these locations. Should any rare plants be found, Mitigation Measure B-5a identified in the Final EIR/EIS is adequate to ensure that impacts to the rare plants as a result of the proposed changes considered herein would be minimized or avoided to the greatest extent practicable. Once the surveys have been completed and reviewed, no additional NEPA review is required.

The proposed changes that would occur on QCB habitat which would require additional surveys include EP249, EP246, EP197-3, EP196-2, EP194-3, EP193-2, EP192-2, EP175, EP147, EP53-3, EP47-2, and EP45-1. Surveys for QCB was included as a condition of Mitigation Measure B-7i, Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies. Should any QCB be identified, Mitigation Measure B-7i identified in the Final EIR/EIS is adequate to ensure that impacts to QCB as a result of the changes would be minimized or avoided to the greatest extent practicable. Once the surveys have been completed and reviewed, no additional NEPA review is required.

All other mitigation measures presented in the Final EIR/EIS would also apply to the proposed changes where appropriate, and would mitigate the impacts of the transmission line realignments on all resources as they would for the approved project.

Hazardous Materials Description in the POD. Although new language was included in the Sunrise Powerlink Project POD addressing the need to store hazardous materials at the construction yards on BLM-administered land, storage of hazardous materials was already analyzed in the Final EIR/EIS. Impact P-1, Soil or groundwater contamination could result from accidental spill or release of hazardous materials due to improper handling and or storage of hazardous materials during construction activities on pg. E.1.10-5 in Section E.1.10.2, Public Health and Safety: Environmental Impacts and Mitigation Measures, of the Final EIR/EIS noted that hazardous materials such as vehicle fuels and oils would be used and stored during construction activities for the approved project resulting in a potential for environmental contamination due to improper handling and/or storage.

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The direct, indirect, and cumulative effects of including the language in the POD would be essentially the same (both quantitatively and qualitatively) as those analyzed in the Final EIR/EIS since the same hazardous materials were already analyzed in the Final EIR/EIS. Resources that might be impacted by an unintended release of hazardous materials during project construction have not changed, nor have any new adverse impacts been identified as a result of the new language. As noted above this is because while the language included in the POD addresses the potential to store hazardous materials at construction yards on BLM-administered land, Applicant Proposed Measures (APM) HS-APM-1 (personnel trained in proper use and safety procedures for the chemicals used), HS-APM-2 (personnel trained in refueling of vehicles), HS-APM-3 (preparation of environmental safety plans including spill prevention and response plan), HS-APM-8 (SDG&E's and/or General Contractor environmental/health and safety personnel), and HS-APM-10 (proper storage and disposal of generated waste), would be included as part of the project in order to reduce the likelihood of spills. Mitigation Measures P-1a (Implement Environmental Monitoring Program) and P-1b (Maintain emergency spill supplies and equipment) are also required and would reduce the significant environmental impacts to less than considerable.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. Public review and comment on the Sunrise Powerlink Transmission Project were extensive. Public scoping, including 15 public meetings and numerous agency meetings, initiated the public review process. The combined comment periods on the Draft EIR/EIS, RDEIR/SDEIS, and BLM's proposed plan amendments occurred over five and a half months. BLM and CPUC held 14 public meetings and received approximately 3,900 pages of comments on two draft documents. All public comments received were carefully analyzed and agency responses are included in the Final EIR/EIS. Twenty protests to BLM's proposed plan amendments were considered and resolved by the Director of the BLM.

On May 14, 2010, SDG&E submitted to CPUC and BLM a final Project Modifications Report that defines changes made to the project along the entire route after publication of the Final EIR/EIS. The final PMR document explains the reason for each change, and presents the comparative environmental impacts of the project components analyzed in the Final EIR/EIS and those presented in the PMR. The CPUC and BLM accepted public comments on the Final PMR from May 14 to June 7, 2010. All changes included in the final PMR have been reviewed by the lead agencies, CPUC and BLM, along with the cooperating, responsible and resource agencies.

In January 2011, SDG&E submitted to the BLM the minor proposed changes to the project along the route on BLM-administered land. The proposed changes were submitted with

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documentation explaining the reason for each change and figures identifying each change. The BLM reviewed the changes and all associated impacts.

E. Persons/Agencies/BLM Staff Consulted

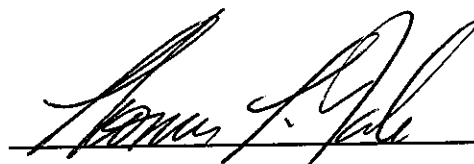
Carrie Simmons	Archaeologist	El Centro Field Office, BLM
Daniel Steward	Resources Staff Supervisor	El Centro Field Office, BLM
Thomas Zale	Associate Field Manager	El Centro Field Office, BLM
Margaret L. Goodro	Field Manager	El Centro Field Office, BLM
Susan Lee		Aspen Environmental Group
Emily Capello		Aspen Environmental Group

Note: Refer to the EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.


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Conclusion *(If you found that one or more of these criteria is not met, you will not be able to check this box.)* ☒

Based on the review documented above in this DNA, I conclude that the proposed changes to the approved project conform to the applicable land use plans inasmuch as the proposed changes are within the approved plan amendment for the Sunrise Powerlink Project. The NEPA EIS documentation fully covers the proposed action described above and constitutes BLM's compliance with the requirements of NEPA.



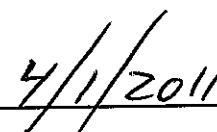
 Signature of Project Lead



 Signature of NEPA Coordinator

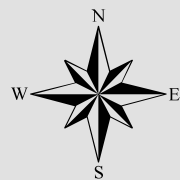
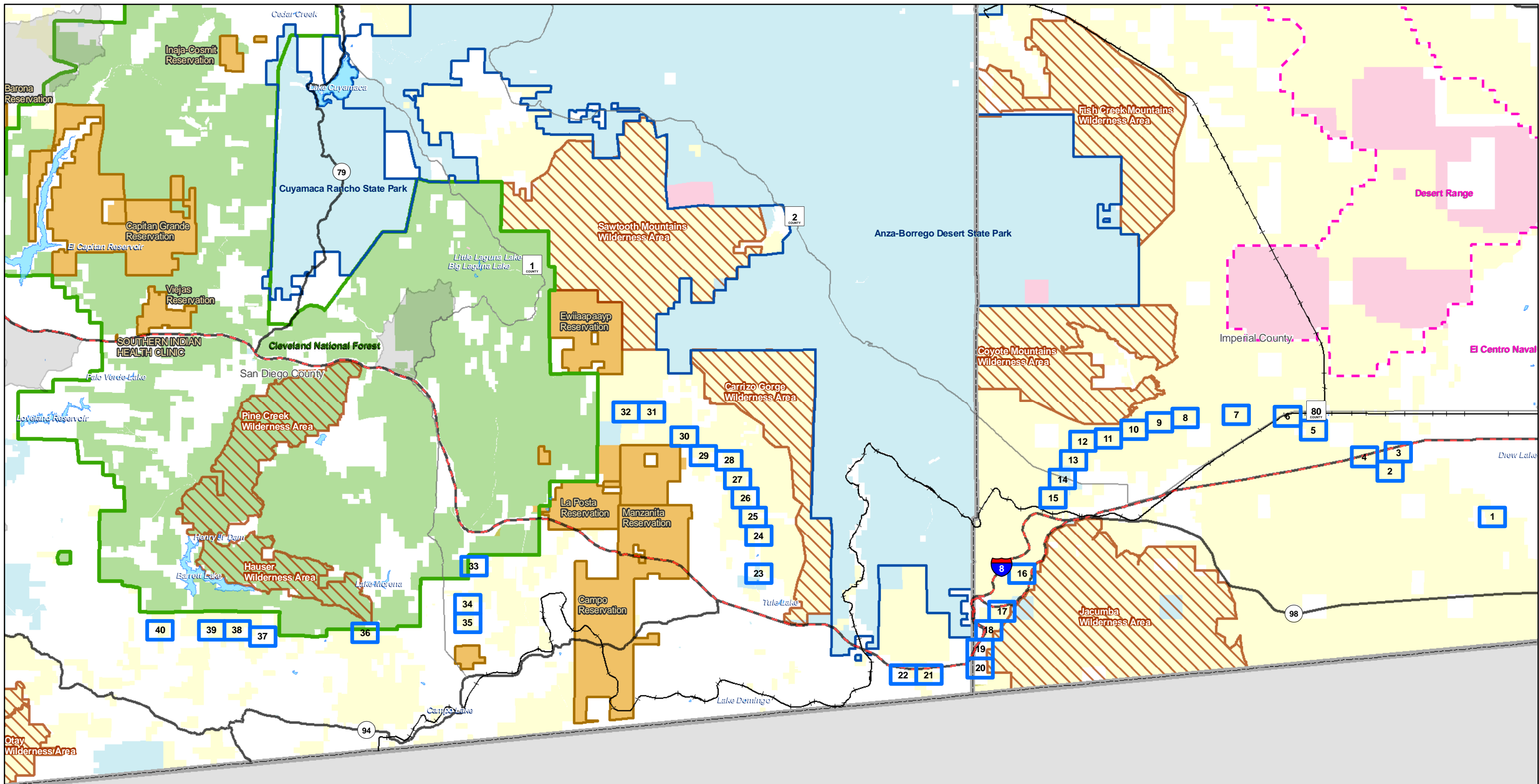


 Signature of the Responsible Official:



 Date

The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.









Sunrise Powerlink

Changes on BLM from PMR to Current Alignment

Legend

Map Page

Legend

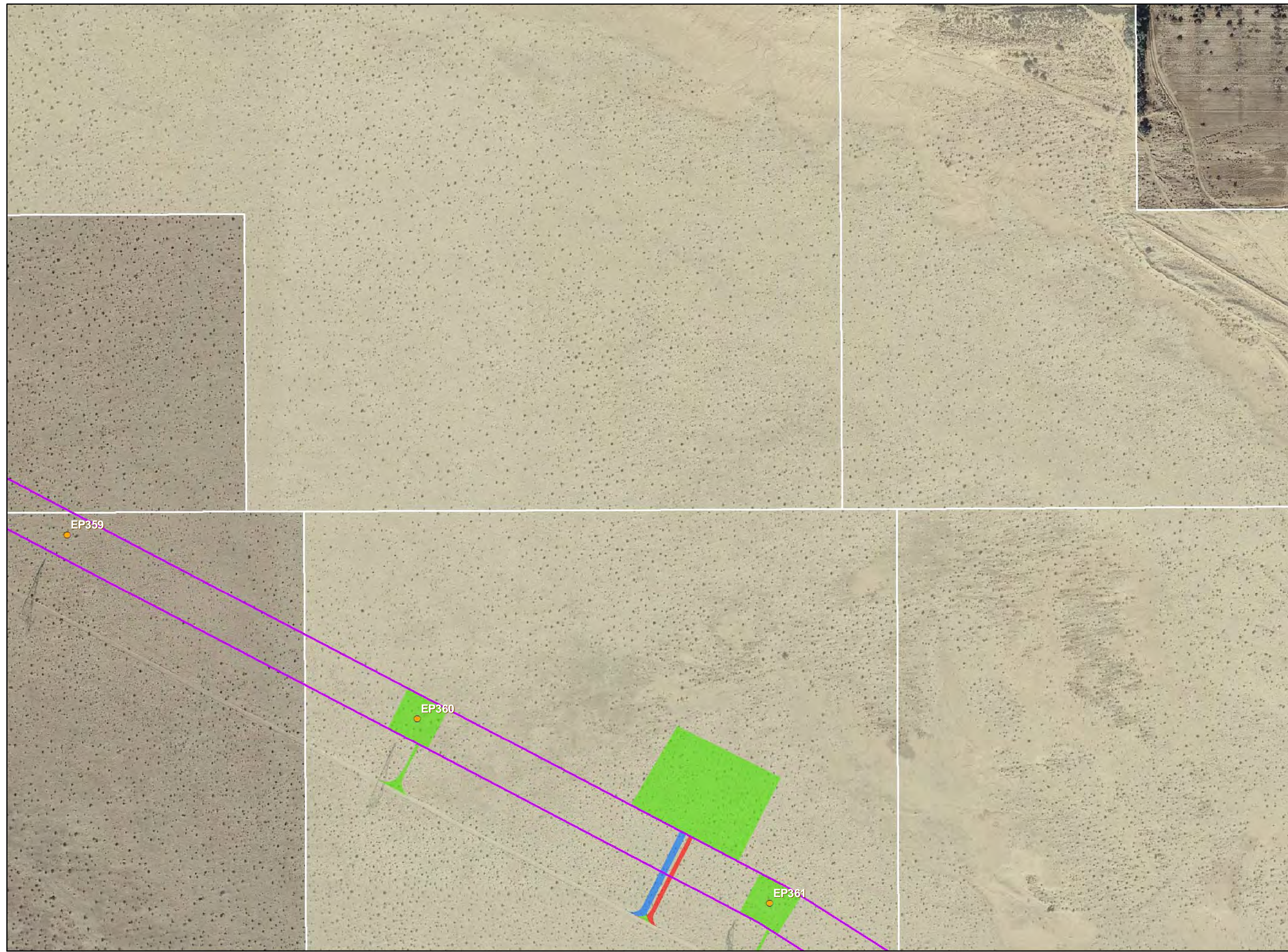
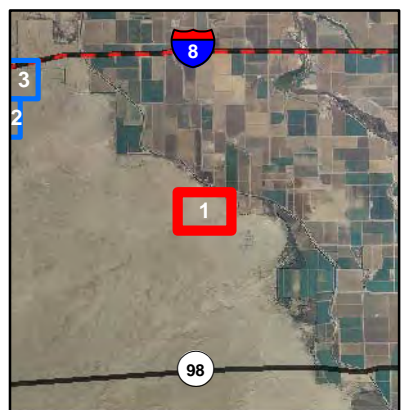
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-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current
Impact
-  Current & PMR
Impact
-  BLM owned Land

Changes on BLM land since PMR







Please note:
Only Impacts on BLM lands
are shown in this map book



0 200 400 Feet
1 inch = 400 feet



Legend

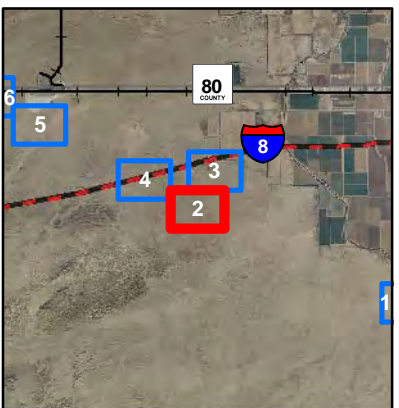
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Changes on BLM land since PMR

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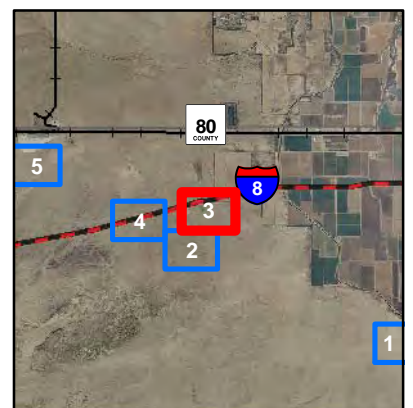
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Changes on BLM land since PMR

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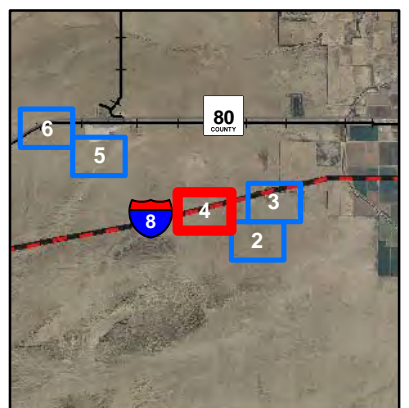
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Changes on BLM land since PMR







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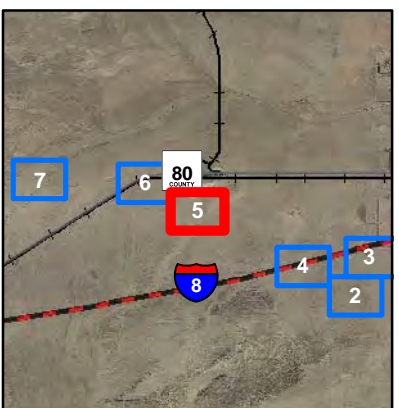
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Changes on BLM land since PMR

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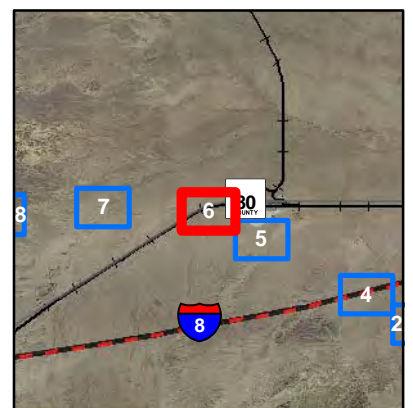
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Changes on BLM land since PMR

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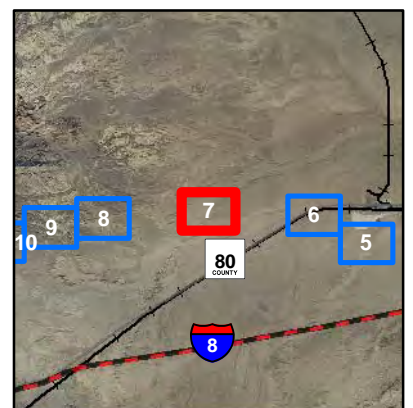
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Changes on BLM land since PMR







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Legend

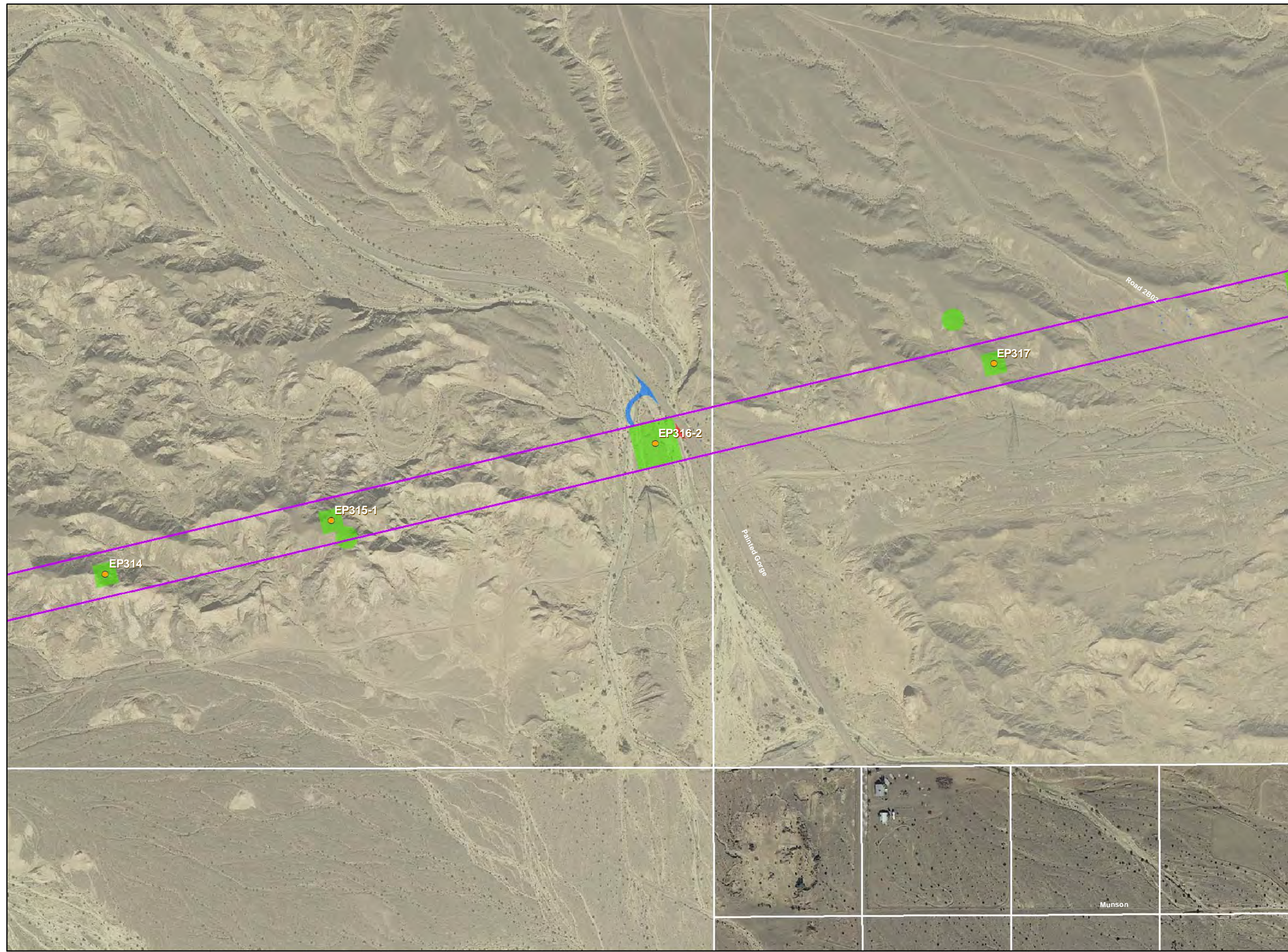
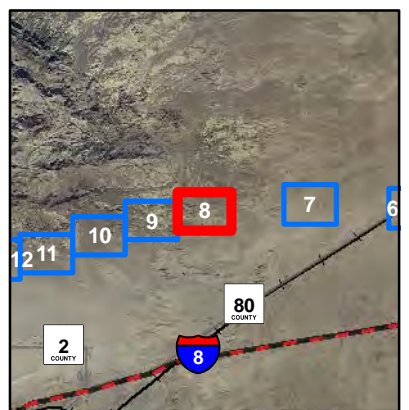
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Changes on BLM land since PMR

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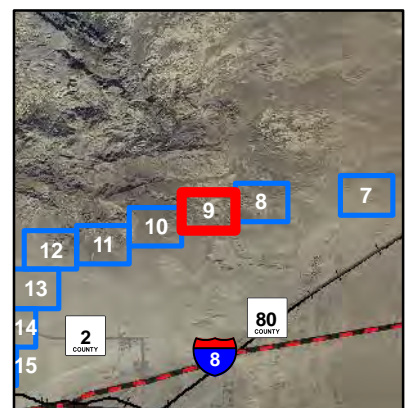
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Changes on BLM land since PMR







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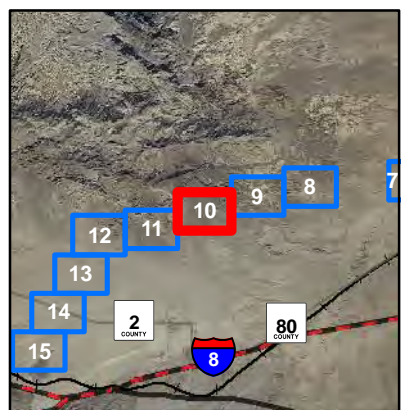
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



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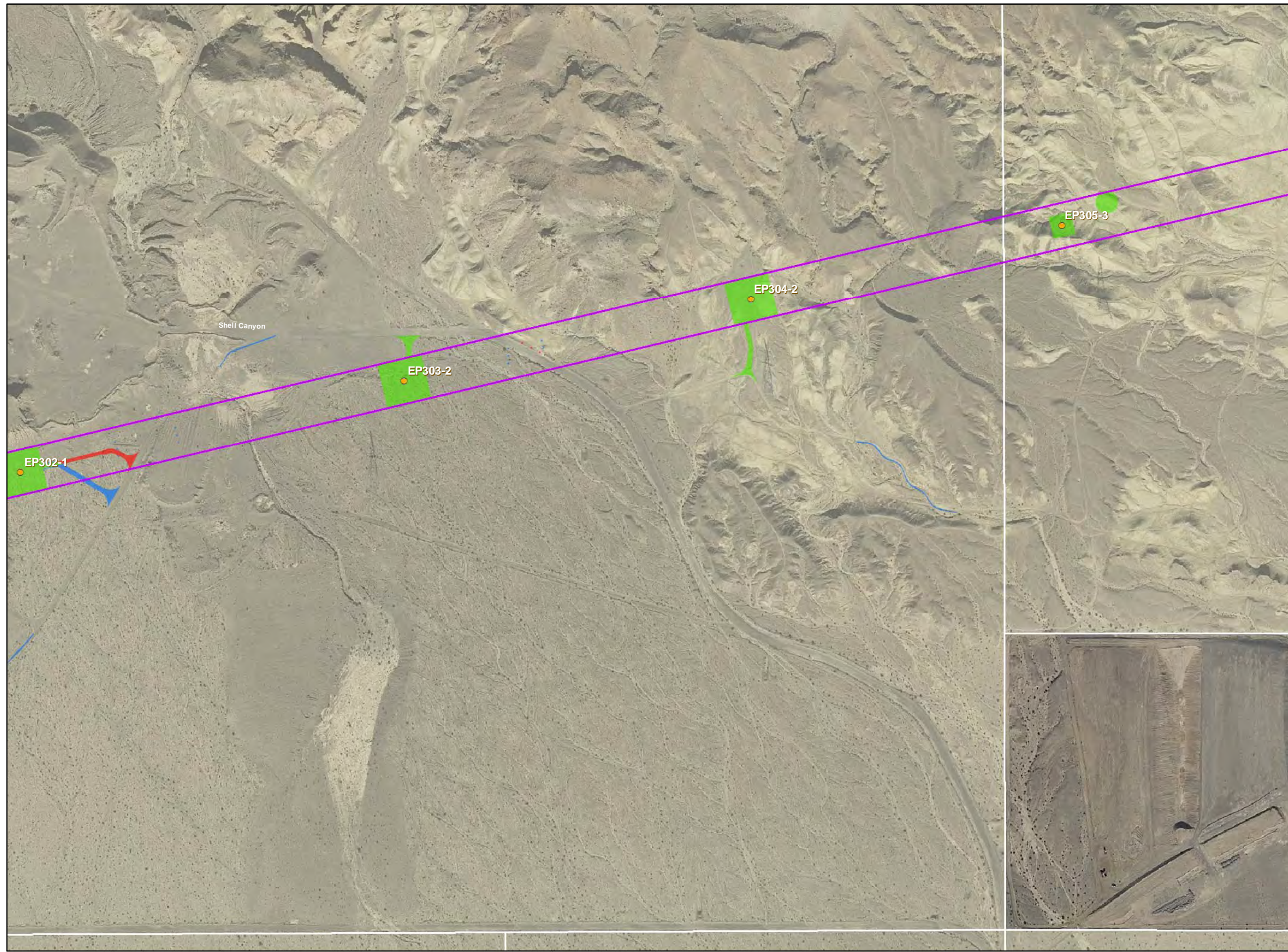
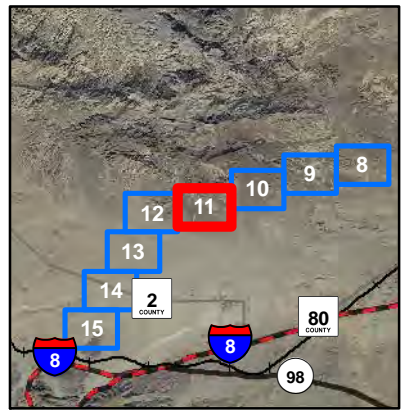
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




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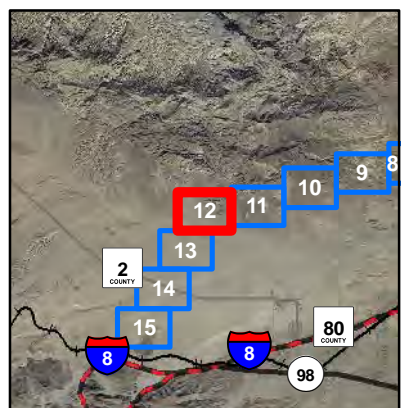
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




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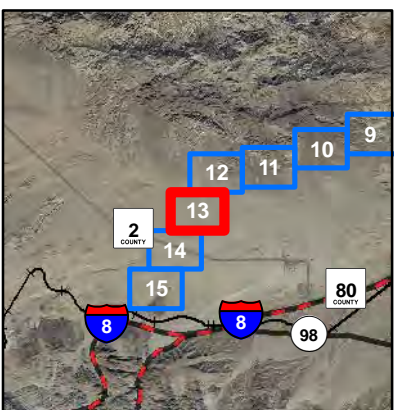
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






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Page 13 of 40

Legend

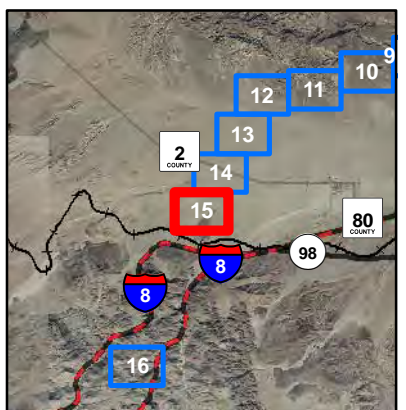
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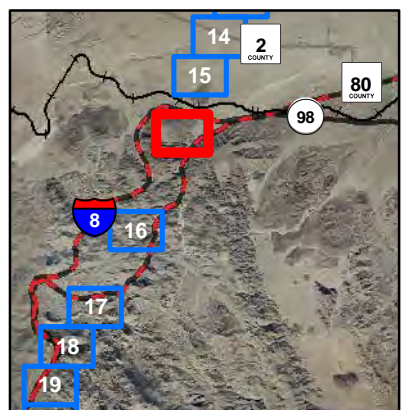
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






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Change at EP280-3

Legend

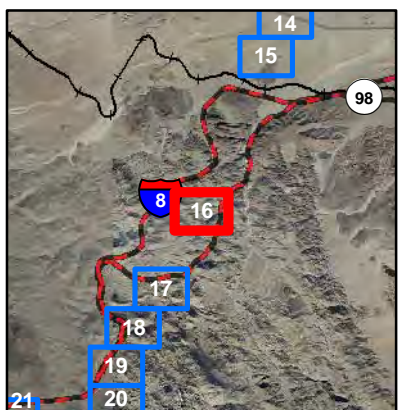
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Changes on BLM land since PMR

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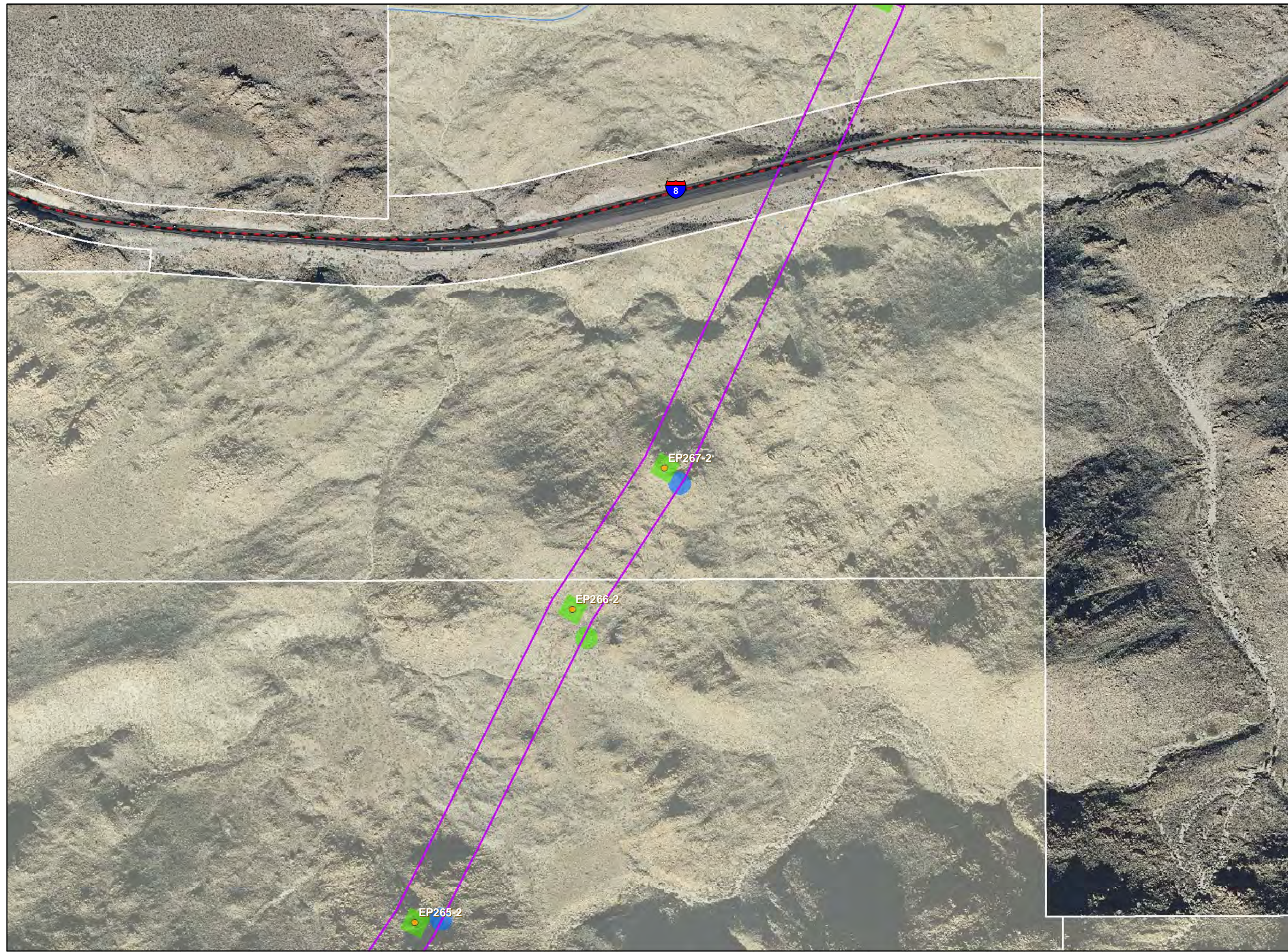
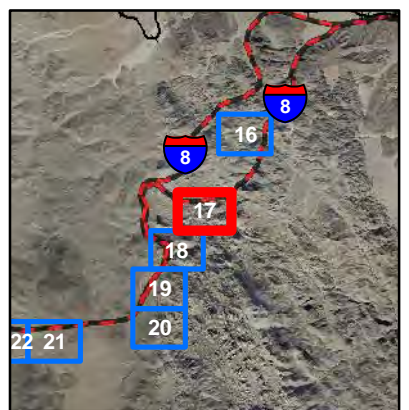
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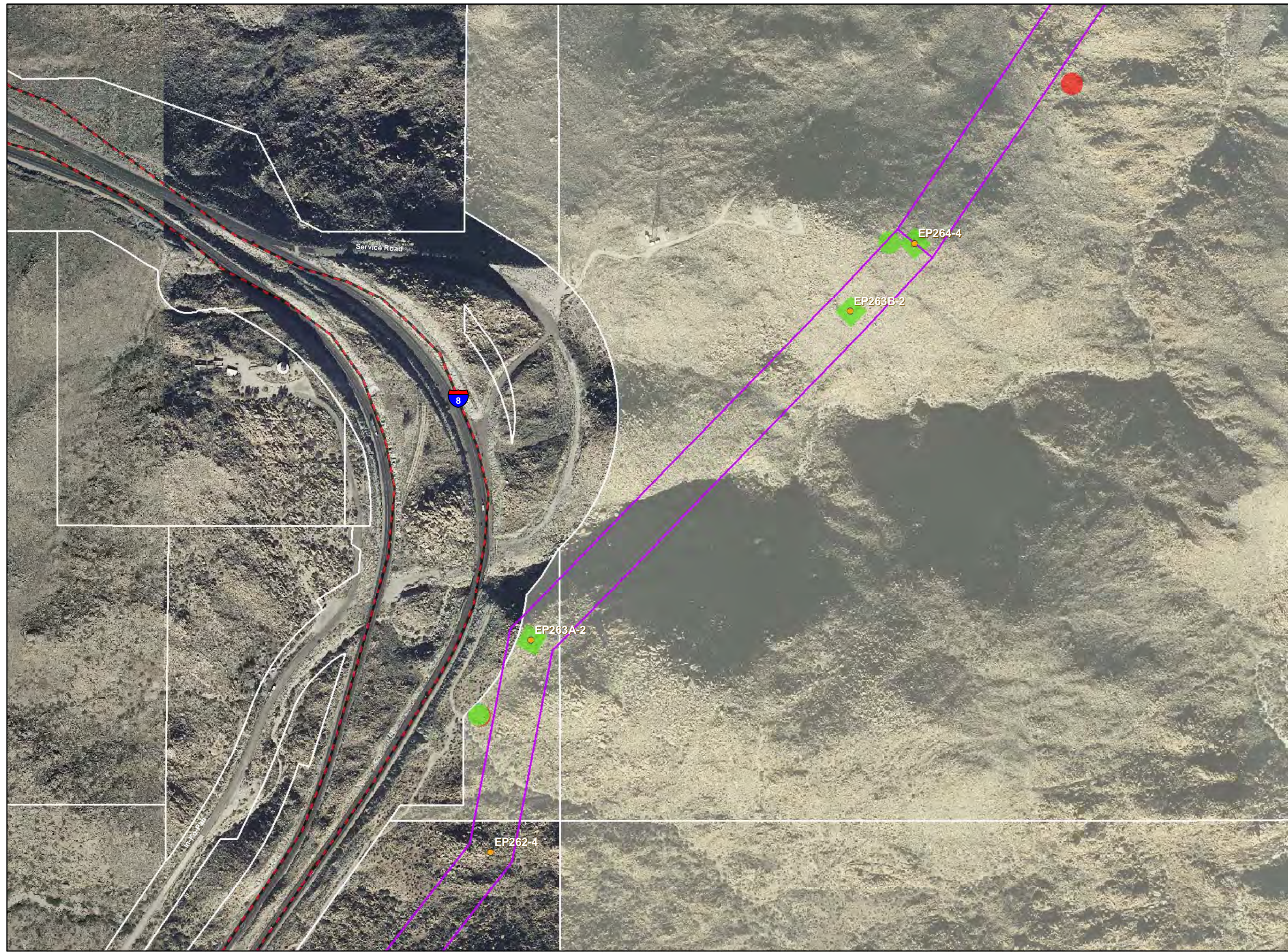
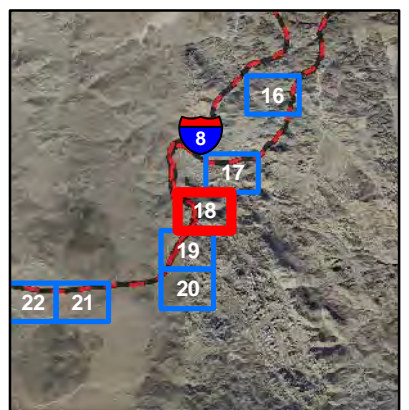
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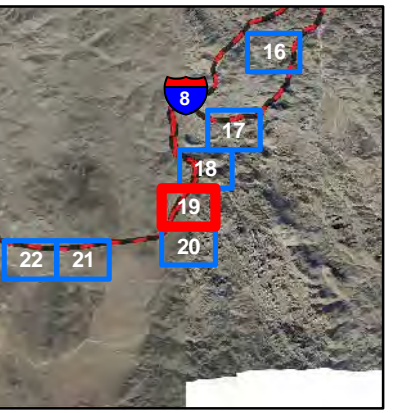
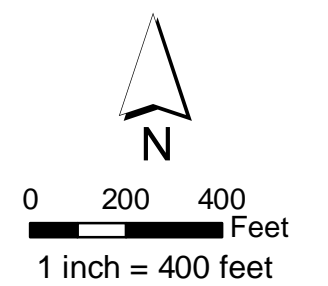


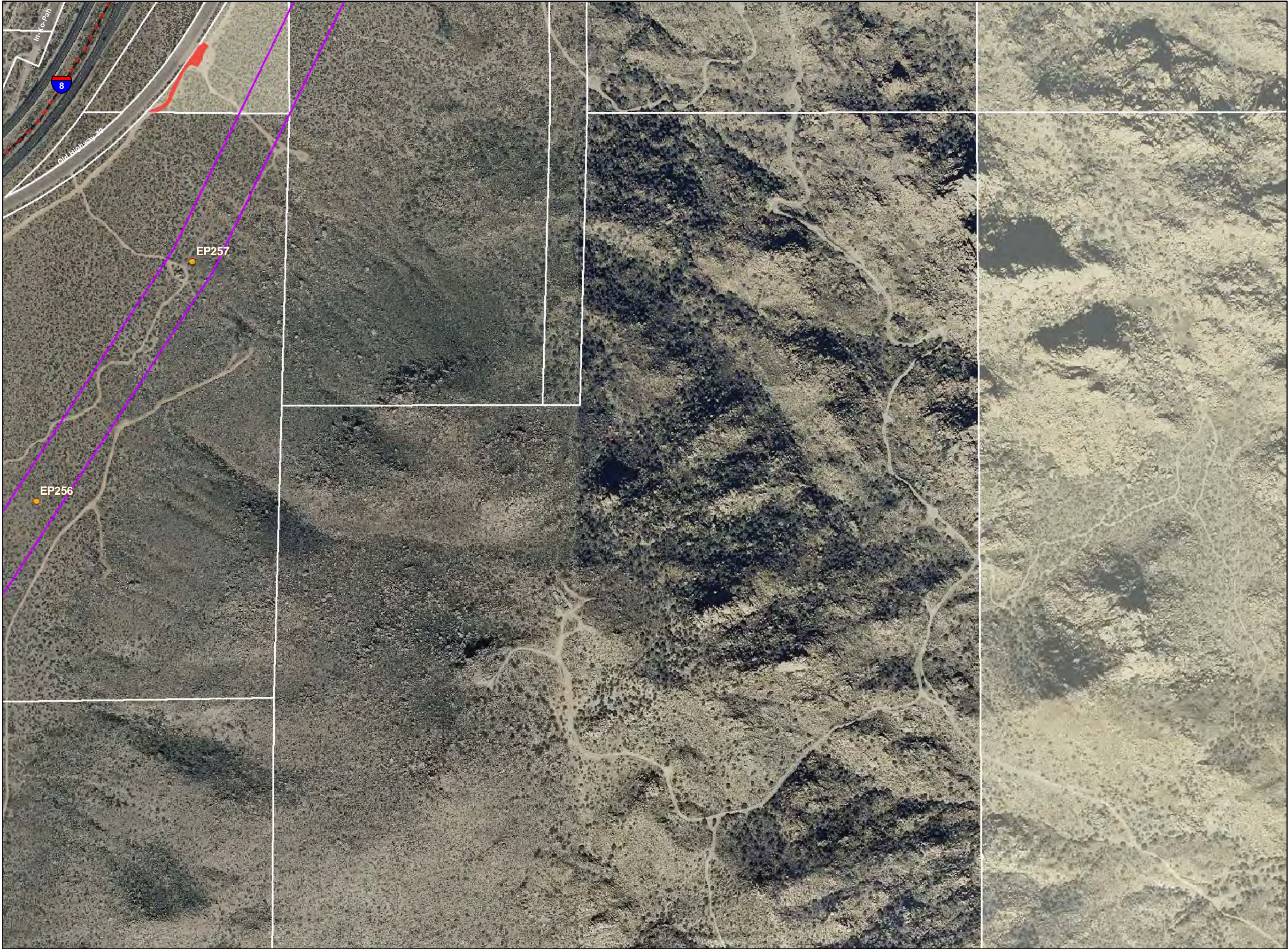
Legend

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




Changes on BLM land since PMR

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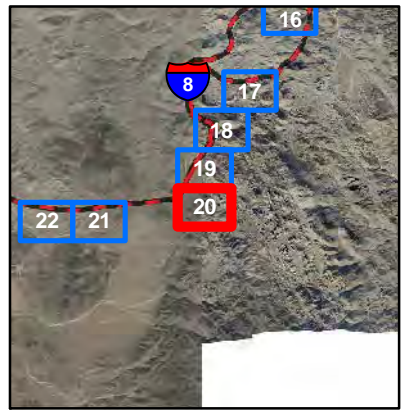
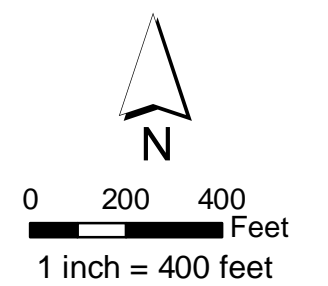


Legend

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







Changes on BLM land since PMR

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Legend

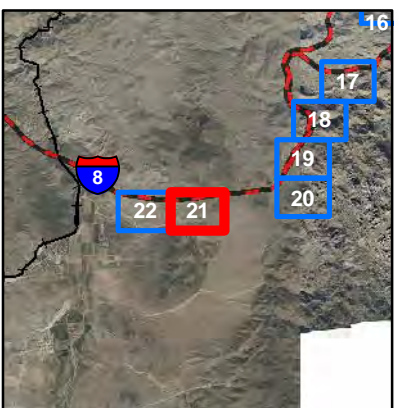
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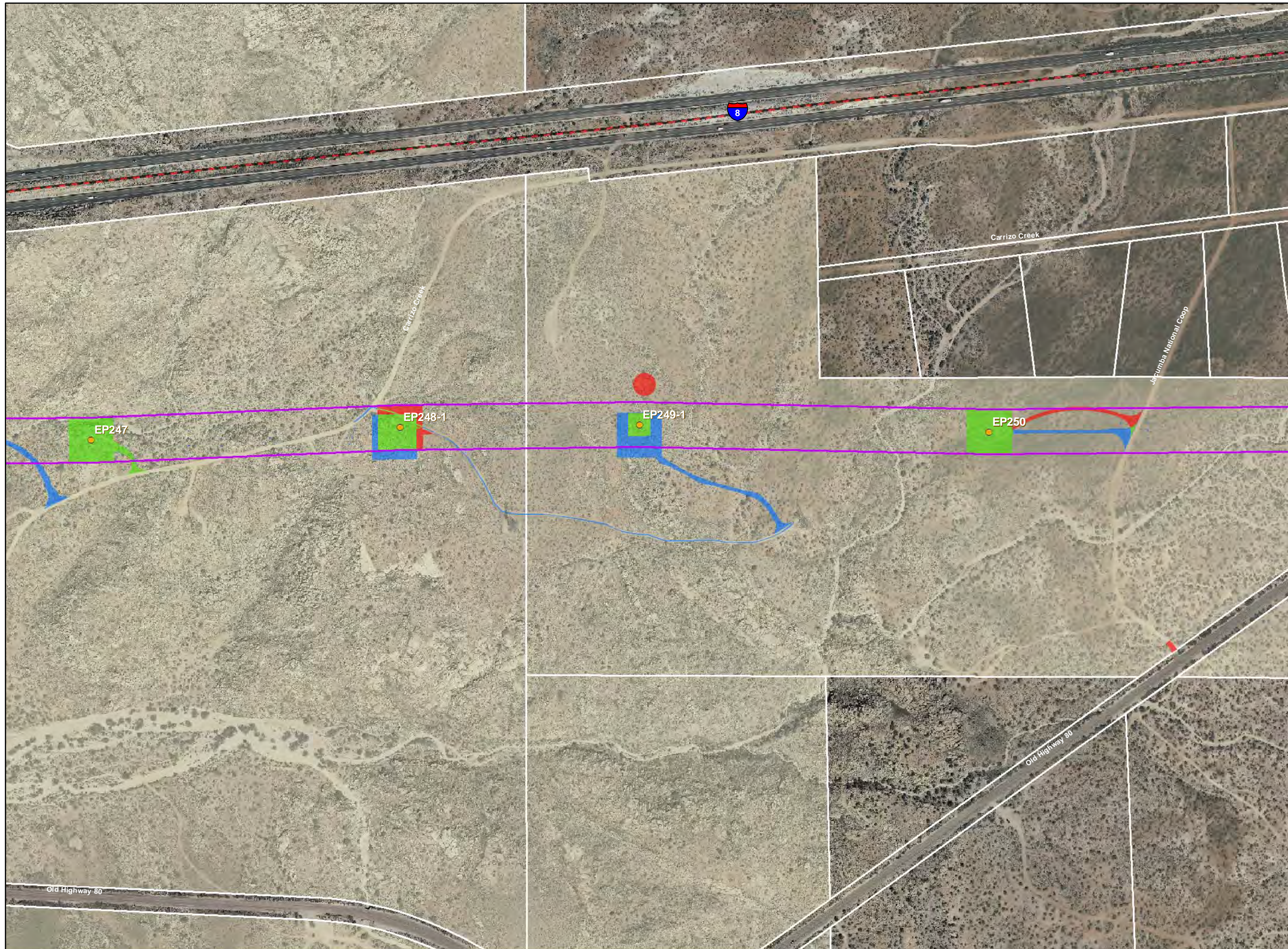
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0 200 400
 Feet
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Legend

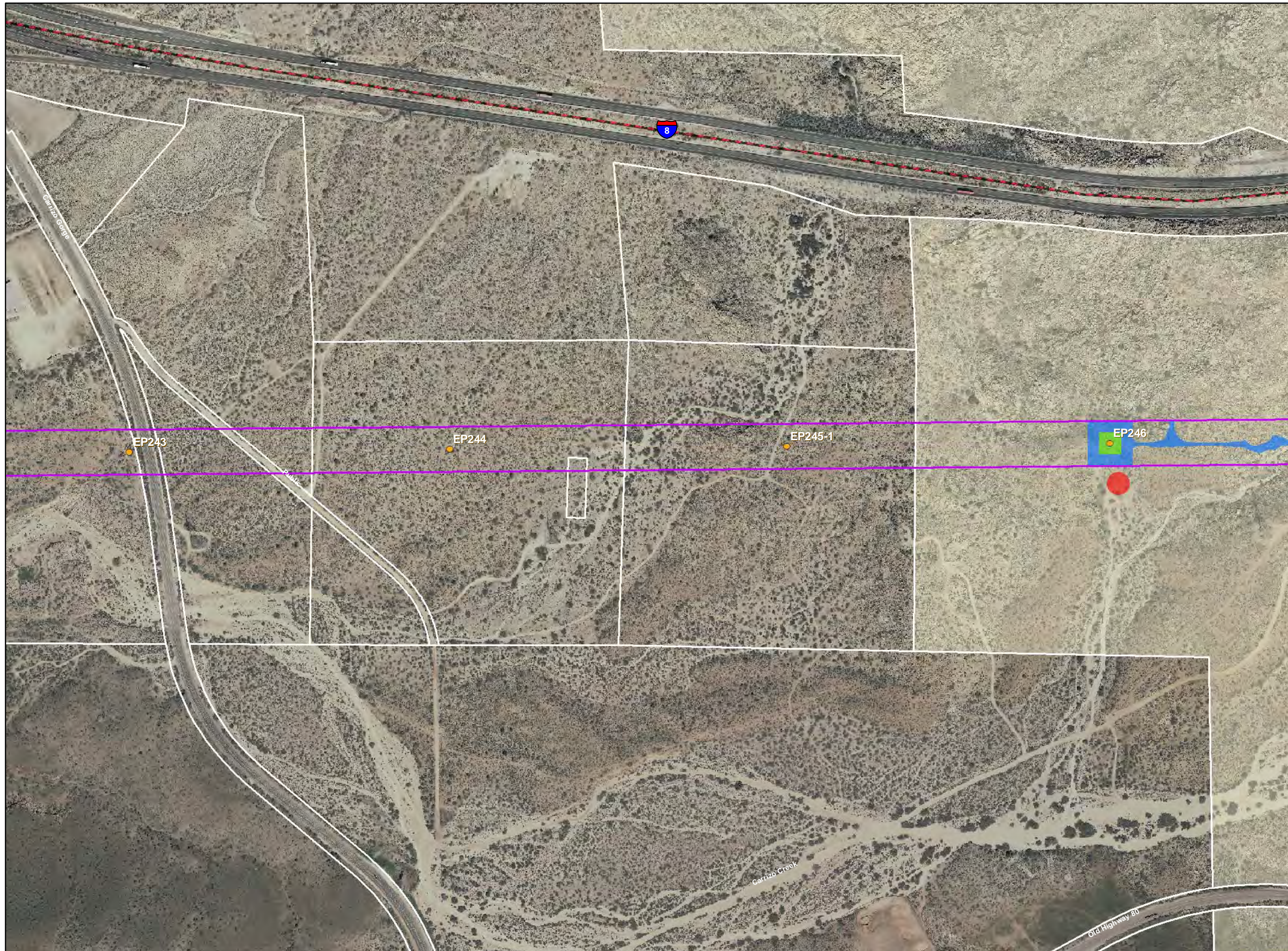
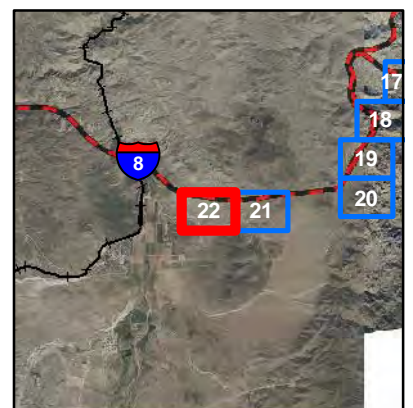
- BLM owned Land
- Current ROW
- Current Impact
Not in PMR
- PMR Impact
Not a Current Impact
- Current & PMR Impact
- BLM owned Land

Changes on BLM land since PMR







Please note:
Only Impacts on BLM lands are shown in this map book



0 200 400 Feet
1 inch = 400 feet



Legend

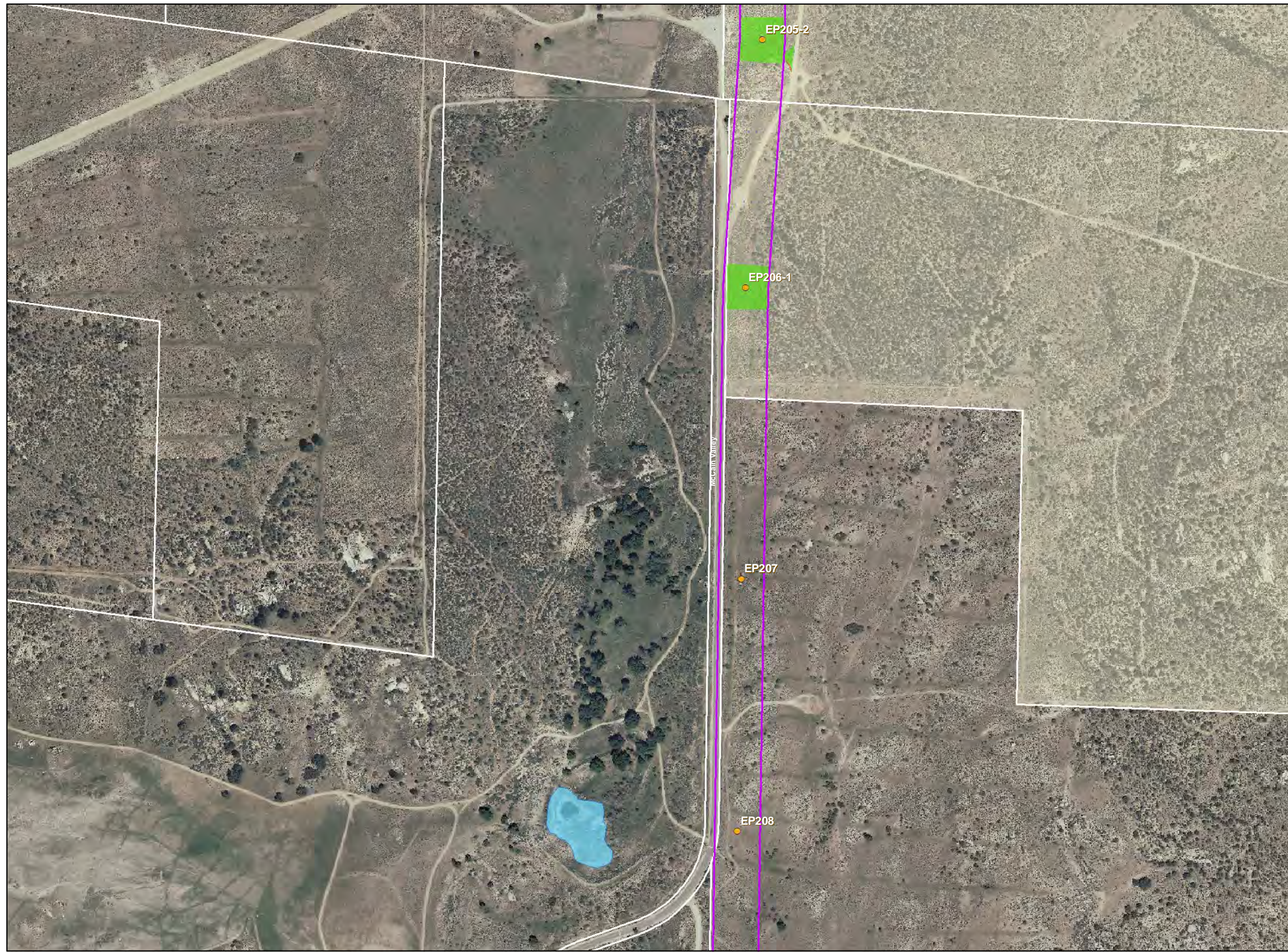
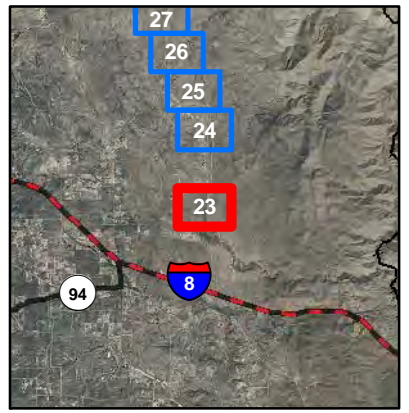
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

Please note:
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Legend

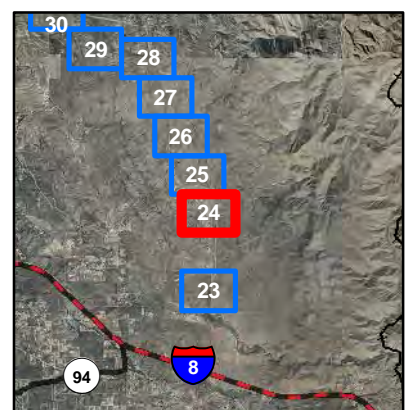
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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Legend

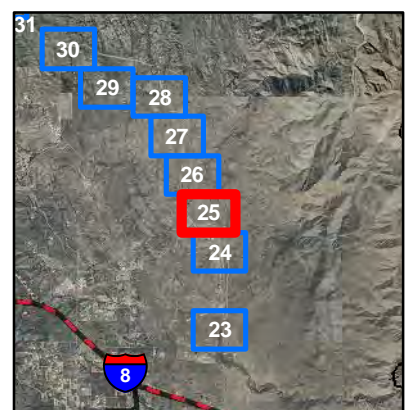
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

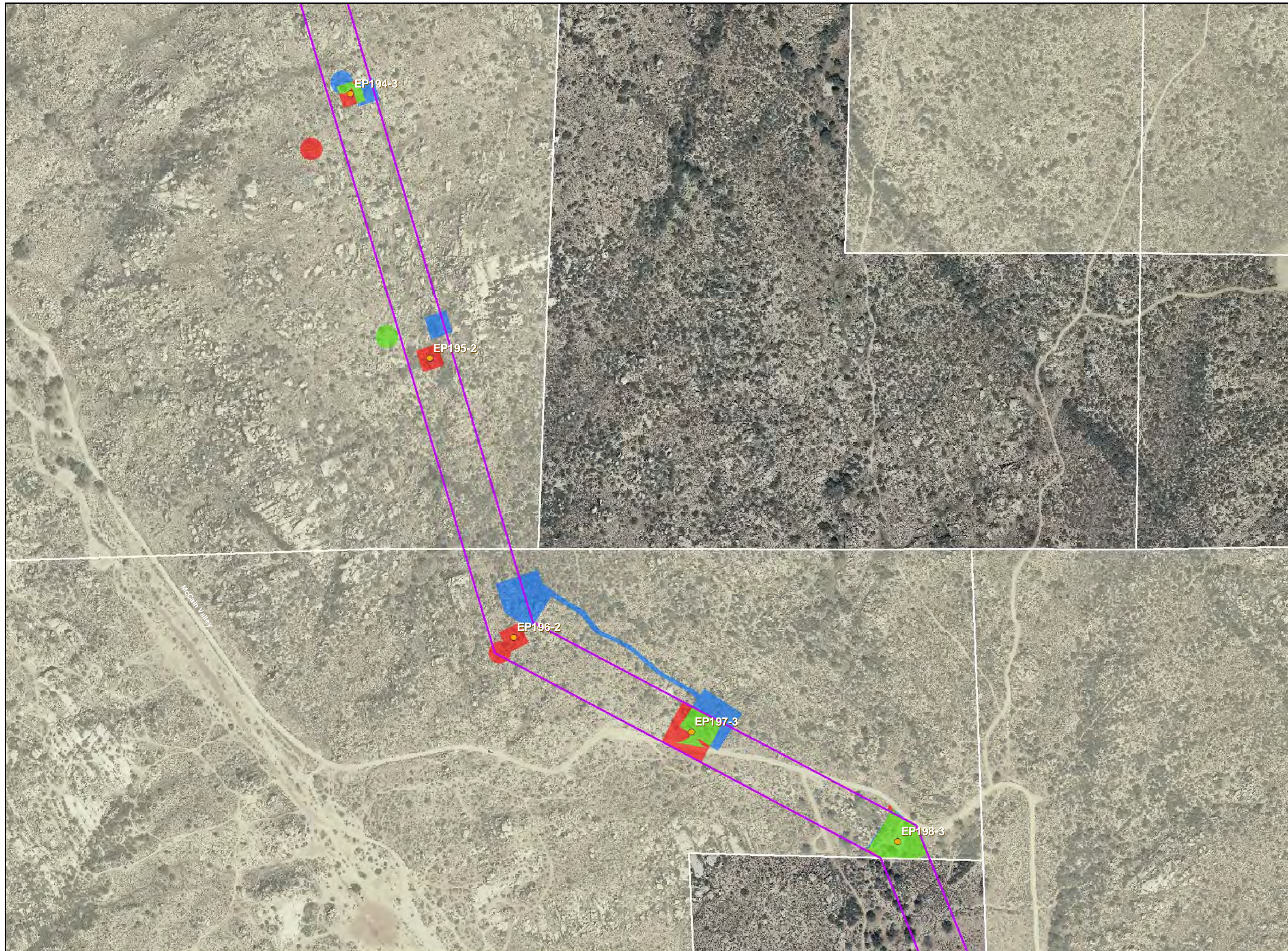
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




0 200 400 Feet
1 inch = 400 feet



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Legend

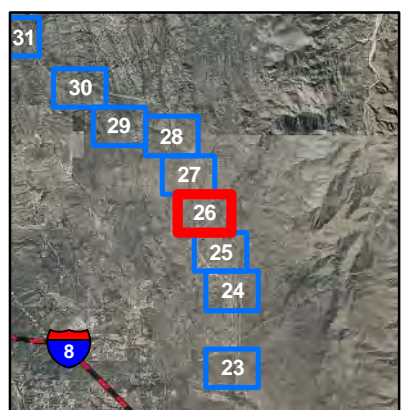
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

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0 200 400 Feet
1 inch = 400 feet



Legend

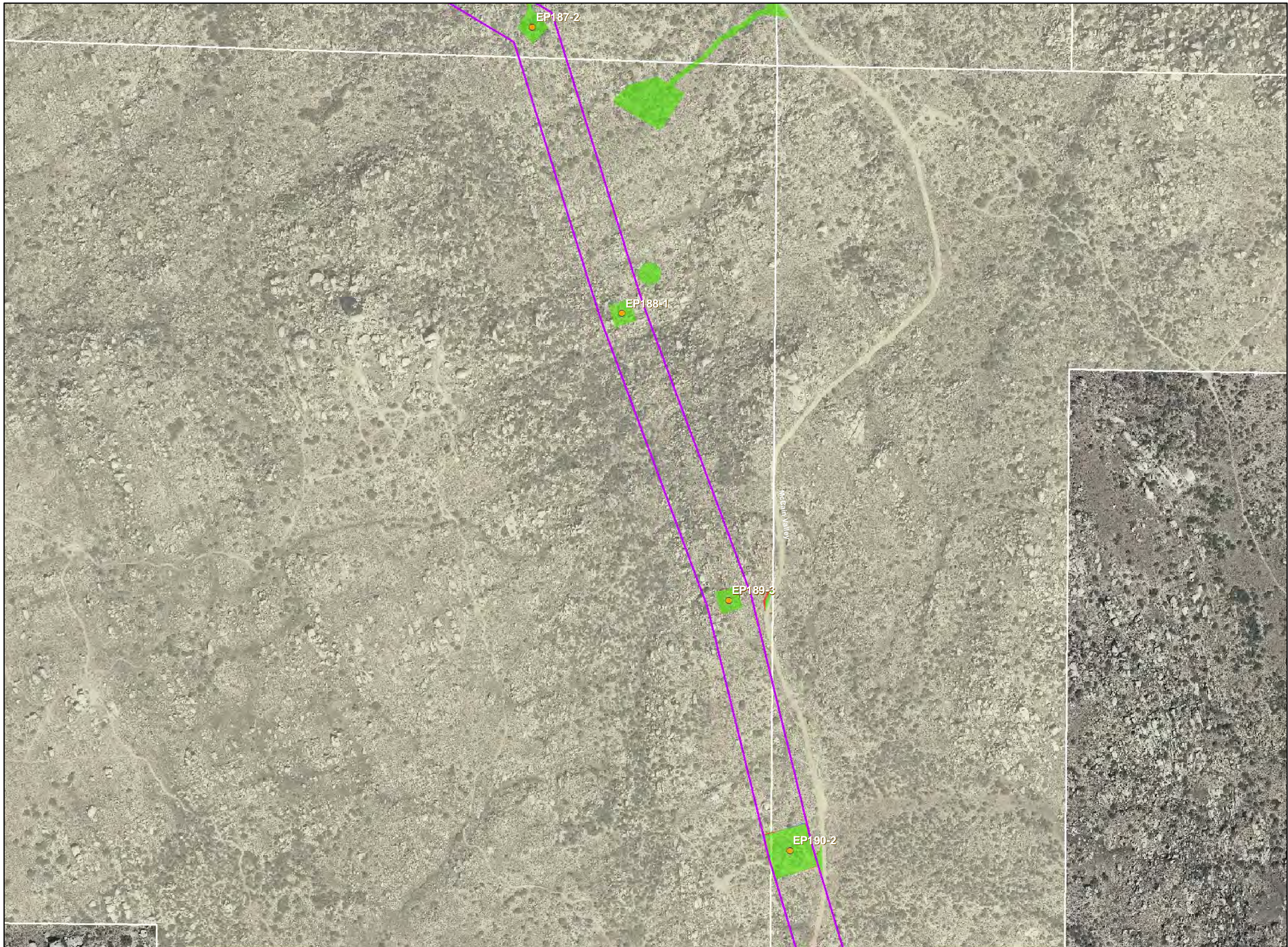
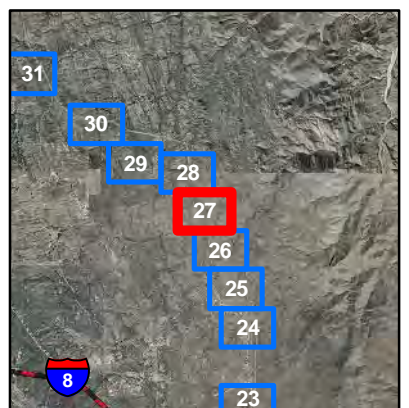
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR

Please note:
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0 200 400 Feet
1 inch = 400 feet



Legend

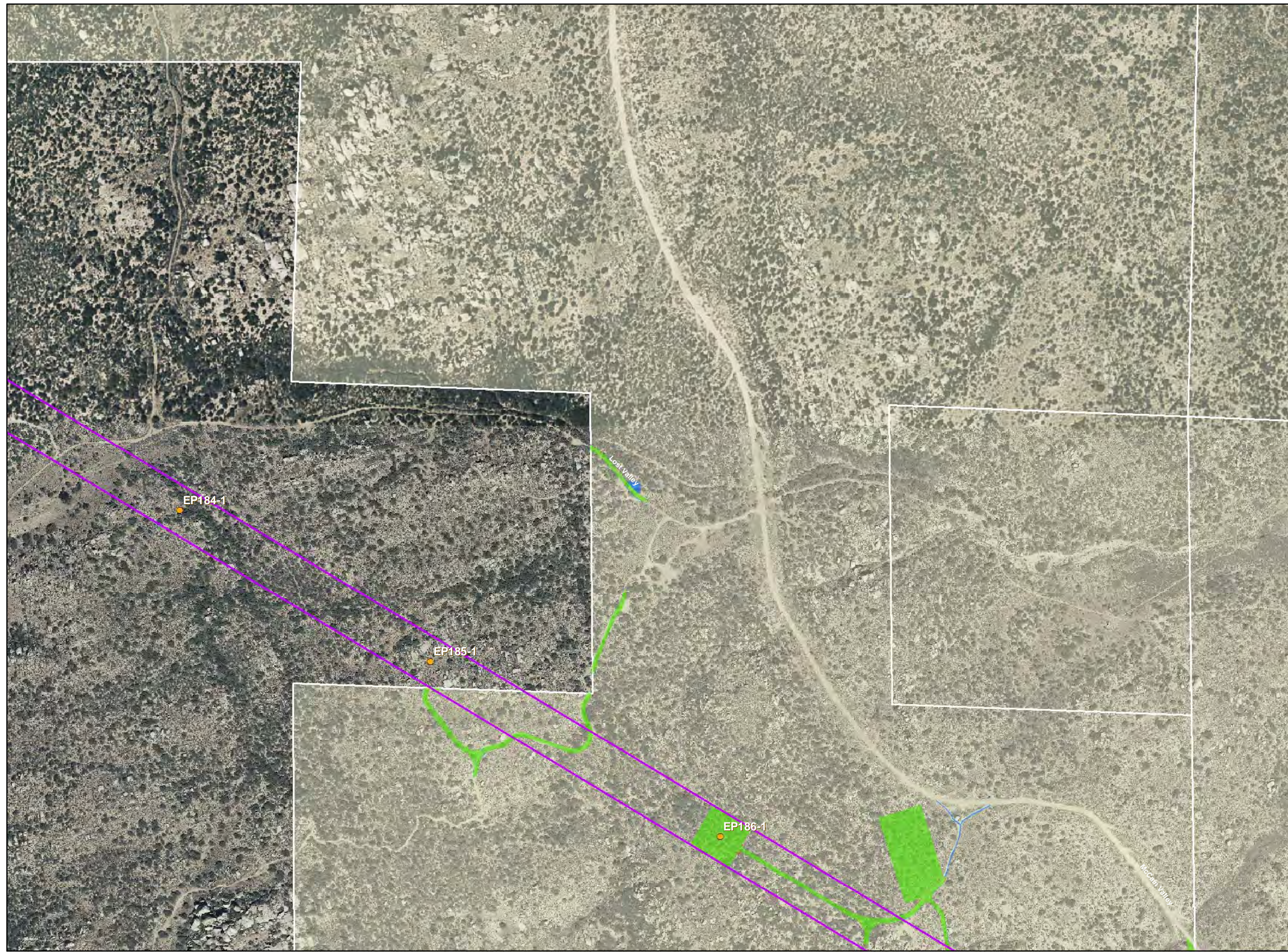
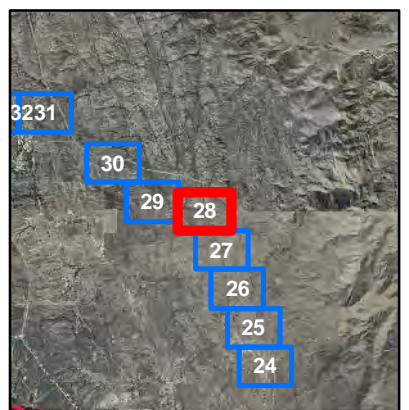
- BLM owned Land
- Current ROW
- Current Impact
Not in PMR
- PMR Impact
Not a Current Impact
- Current & PMR Impact
- BLM owned Land

Changes on BLM land since PMR







Please note:
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0 200 400 Feet
1 inch = 400 feet



Legend

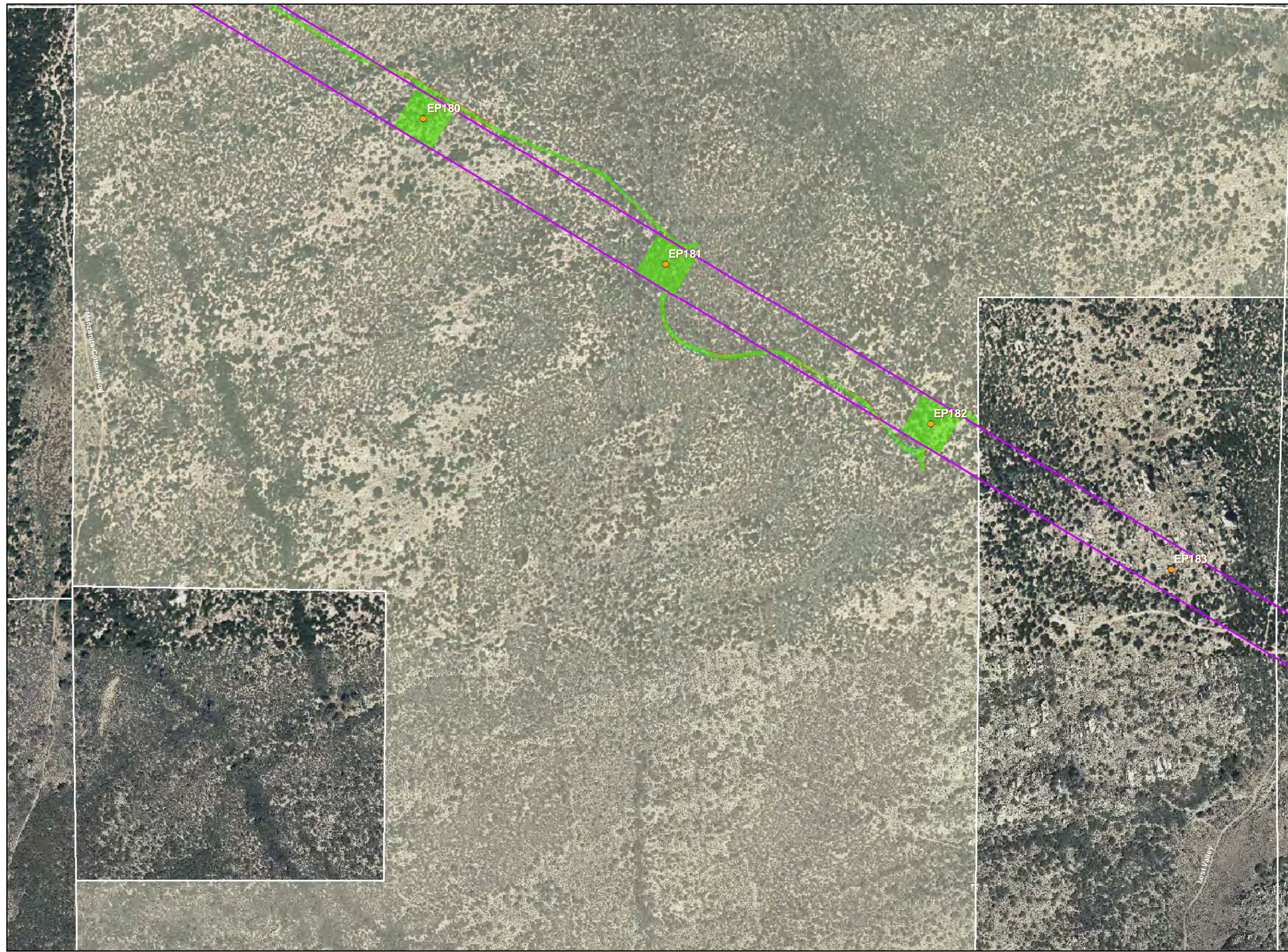
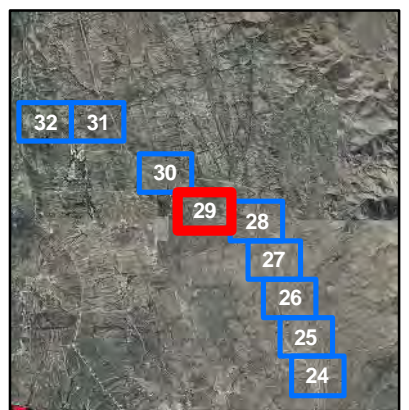
-  BLM owned Land
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-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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0 200 400 Feet
1 inch = 400 feet



Legend

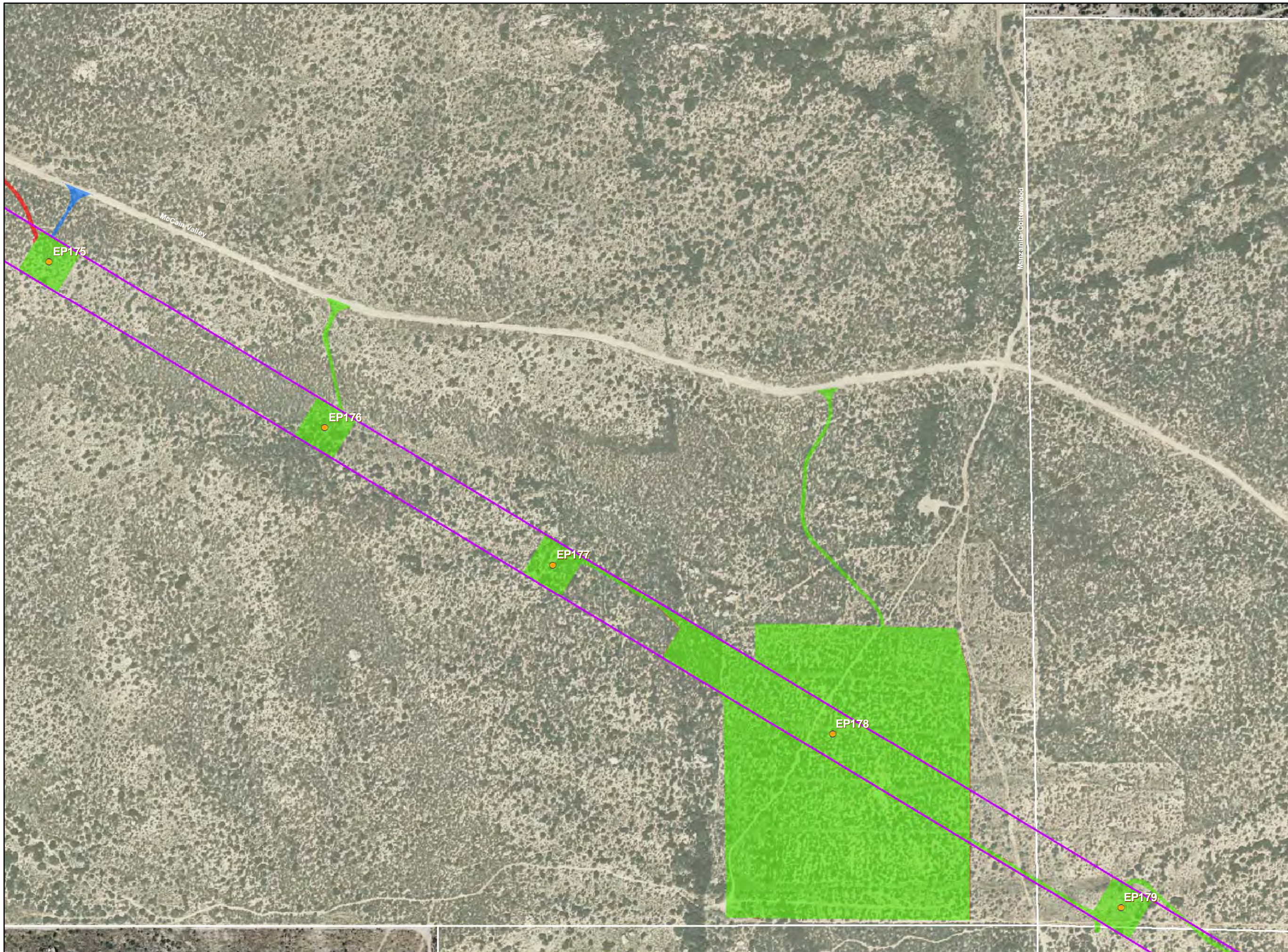
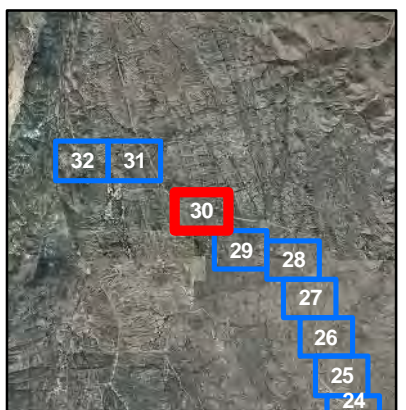
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current
Impact
-  Current & PMR
Impact
-  BLM owned Land

Changes on BLM land since PMR







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0 200 400 Feet
1 inch = 400 feet



Legend

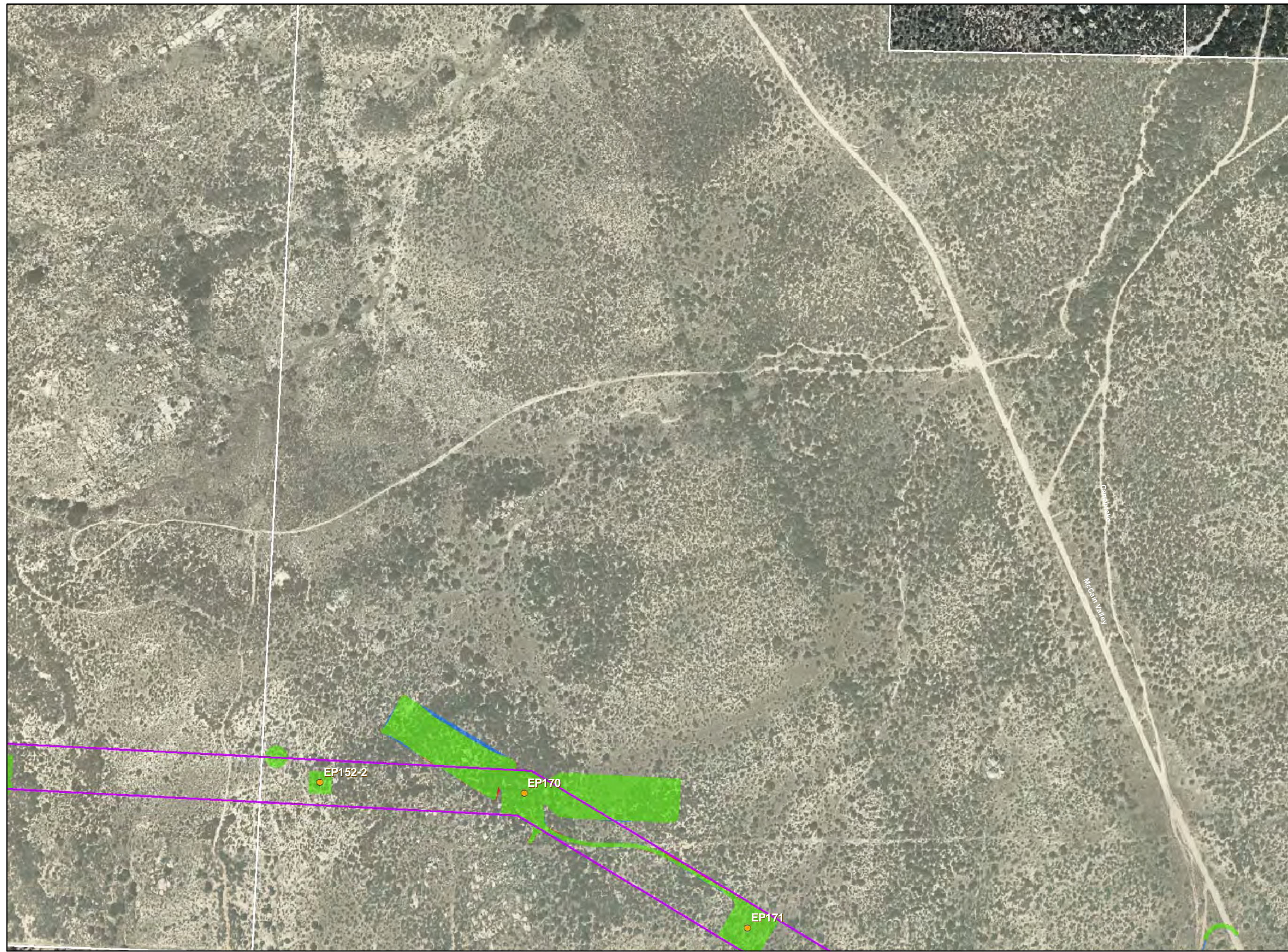
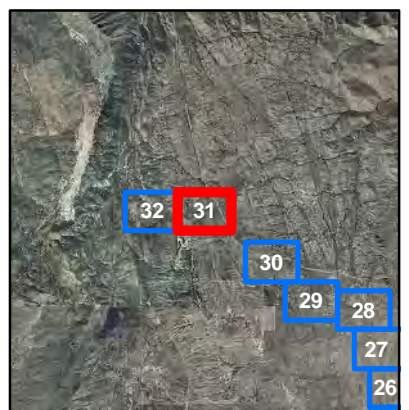
-  BLM owned Land
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-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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0 200 400 Feet
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Legend

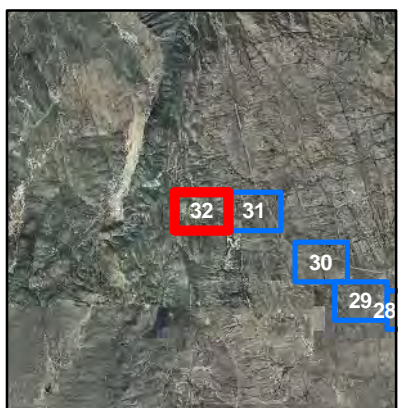
-  BLM owned Land
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-  Current Impact
Not in PMR
-  PMR Impact
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-  BLM owned Land

Changes on BLM land since PMR

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





0 200 400
Feet
1 inch = 400 feet



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Legend

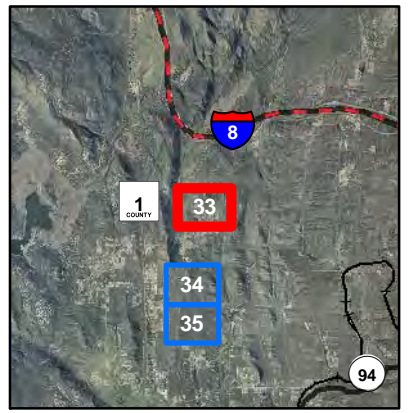
-  BLM owned Land
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-  Current Impact
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-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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Legend

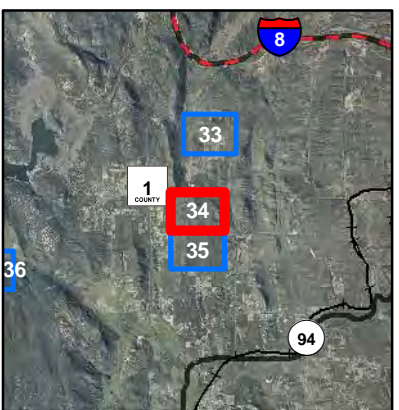
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Changes on BLM land since PMR







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Legend

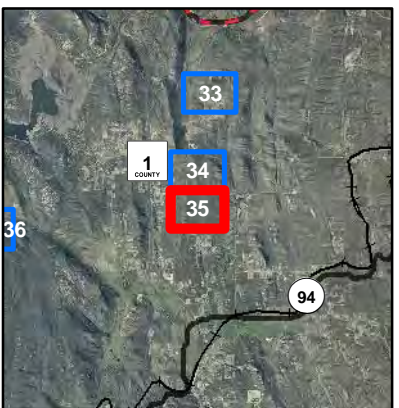
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
Not a Current Impact
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-  BLM owned Land

Changes on BLM land since PMR

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Legend

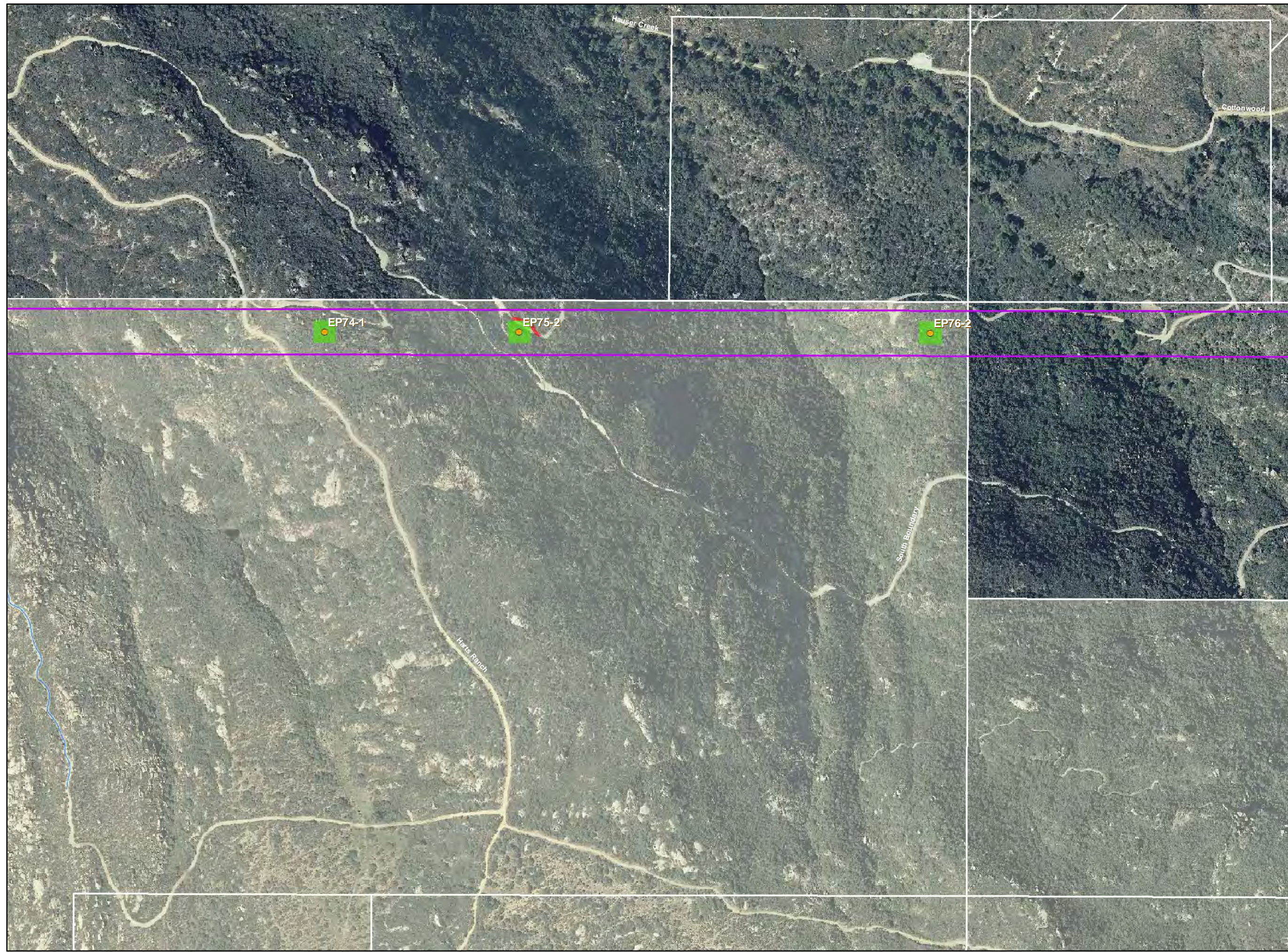
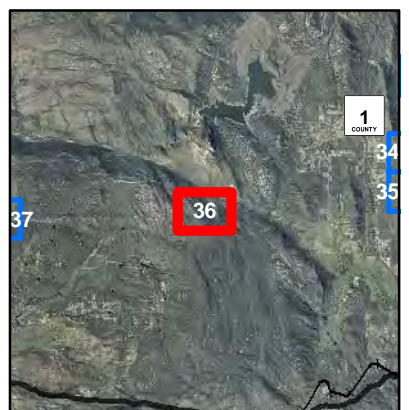
-  BLM owned Land
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Changes on BLM land since PMR

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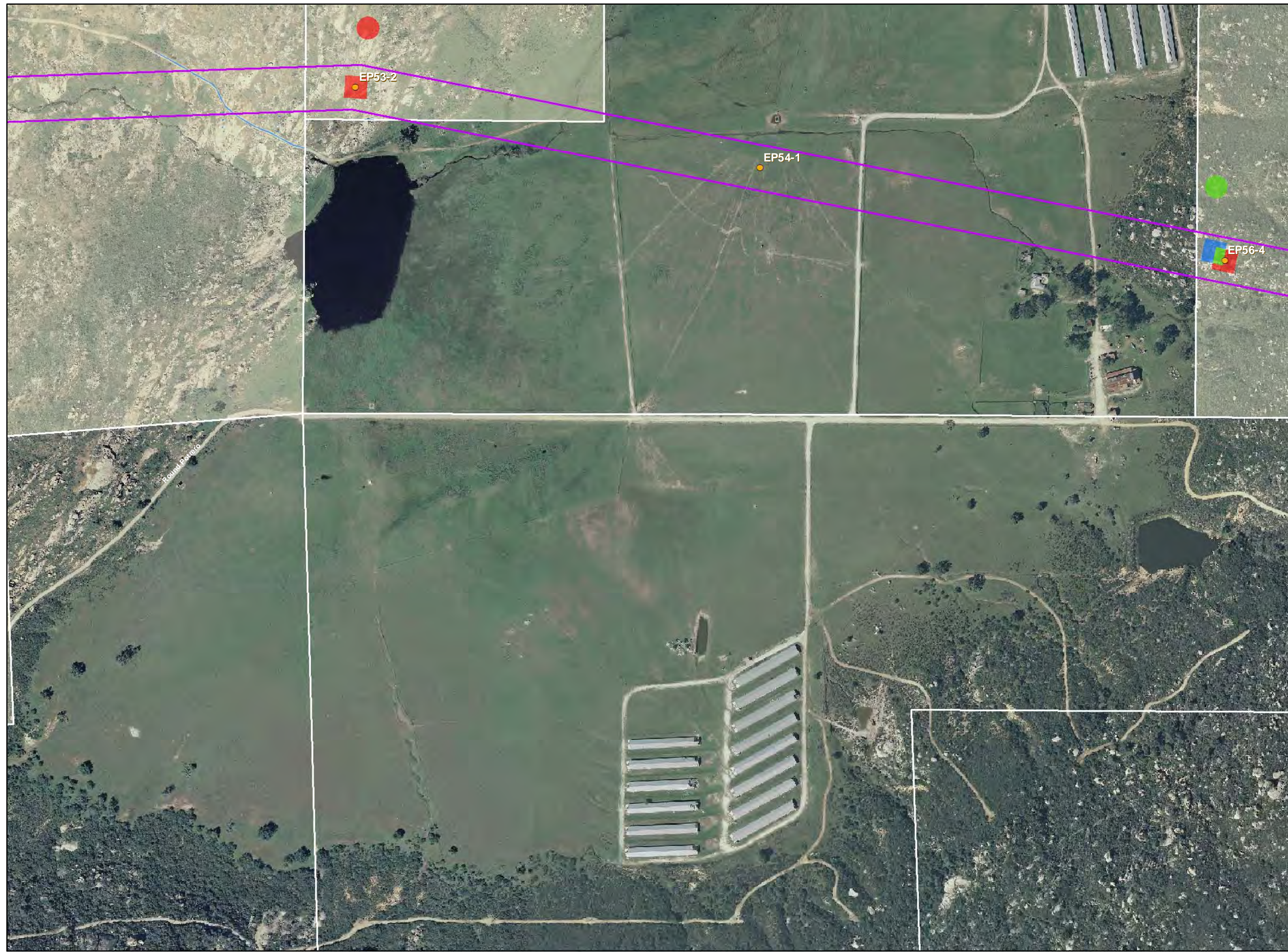
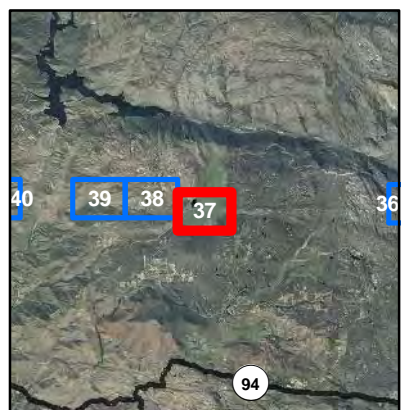
-  BLM owned Land
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Not in PMR
-  PMR Impact
Not a Current Impact
-  Current & PMR Impact
-  BLM owned Land

Changes on BLM land since PMR







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Legend

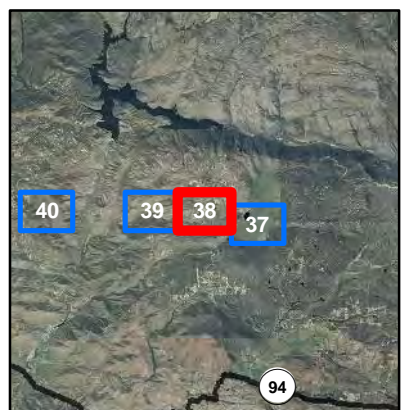
-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
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Not a Current Impact
-  Current & PMR Impact
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Changes on BLM land since PMR

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Legend

-  BLM owned Land
-  Current ROW
-  Current Impact
Not in PMR
-  PMR Impact
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Changes on BLM land since PMR

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