

Worksheet

Determination of NEPA Adequacy (DNA)

Sunrise Powerlink Project

Micrositing Changes to the Approved Project

U.S. Department of the Interior

Bureau of Land Management

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PROPOSED ACTION TITLE/TYPE: The proposed action is a set of micro-siting changes to the approved Sunrise Powerlink Transmission Project (SPTP). The SPTP is currently approved along the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project as modified in the Project Modification Report (PMR) in September 2010 and in the Changes identified in the DNA dated March 2011. The SPTP was 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. The proposed micro-siting changes include extra workspace for guarding; temporary and permanent Tower Staging Access Pads (TSAPs); micro-siting structures EP73, the TSAP at EP195-2, and the spur road to EP349; temporary access roads at EP323-1 and EP324-1; additional access road into S2 Construction Yard; and micro-siting access road/work area at EP50. These micro-siting changes are proposed as a result of efforts to further increase construction worker security, coordination with existing utility providers along the approved SPTP route, further reduce impacts to cultural resources, and due to final engineering.

LOCATION/LEGAL DESCRIPTION: The SPTP 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 SPTP), the 500 kV transmission line would be built on BLM lands

adjacent to the existing Southwest Powerlink 500 kV line. The approved SPTP 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 micro-siting changes to the approved SPTP follow the currently approved route of the SPTP and would not substantially change the location of the approved SPTP. With the exception of access roads required for the guard structures along the SD&AE Railroad and I-8, all proposed micro-siting changes would be within 900 feet of the approved SPTP alignment.

APPLICANT (if any): San Diego Gas & Electric Company

A. Description of the Action and any applicable mitigation measures

Previously Approved SPTP Components

As defined in the Final EIR/EIS and approved in the ROD, the SPTP is a combination of alternatives and route segment options. The ROD for the approved SPTP 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 modifications proposed by SDG&E in the Project Modifications Report (May 2010). The BLM determined that the modifications to the SPTP were in conformance with applicable land use plans and fully covered by Final EIR/EIS. In March 2011, the BLM published a second Determination of NEPA Adequacy for additional changes proposed by SDG&E. The BLM determined that the modifications to the SPTP were also in conformance with applicable land use plans and fully covered by the Final EIR/EIS. For copies of these documents or 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/aspensunrise/sunrise.htm>

Proposed Micrositing Changes to the Approved SPTP

A number of mitigation measures or agency requests incorporated as right-of-way terms and conditions require that SDG&E continue to attempt to avoid resources and minimize environmental impacts in the final engineering and design for the approved SPTP. Implementation of these mitigation measures have resulted in further proposed micrositing changes, beyond those approved in the PMR and DNA dated March 2011. The measures resulting in additional changes include the following:

Mitigation Measures for Biological and Hydrologic Resources

B-2a: Provide restoration/compensation for impacted Army Corps of Engineers (ACE) jurisdictional areas

Mitigation Measure for Cultural Resources

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

C-1c: Develop and implement Historic Properties Treatment Plan. (pg. E.1.7-6, FEIR/EIS 2008)

C-1d: Conduct data recovery to reduce adverse effects (pg. E.1.7-6, FEIR/EIS 2008)

C-1f: Train construction personnel (pg. E.1.7-6, FEIR/EIS 2008)

C-3a: Monitor construction in areas of high sensitivity for buried resources (pg. E.1.7-6, FEIR/EIS 2008)

Mitigation Measures for Traffic

T-9a: Prepare Construction Transportation Management Plan (pg. E1.9-7, FEIR/EIS 2008)

T-APM-4a: SDG&E shall coordinate in advance with emergency service providers to avoid restricting movements of emergency vehicles.

Mitigation Measures for Water Resources

H-6a: Scour protection to include avoidance of bank erosion and effects to adjacent property (pg. E.1.12-7, FEIR/EIS 2008)

WQ-APM-9: Storage of fuels and hazardous materials would be prohibited within 200 feet of groundwater supply wells and within 400 feet of community or municipal wells

WQ-APM-15: To the extent feasible, where the construction of access roads would disturb sensitive features such as streambeds, the route of the access road would be adjusted to avoid such impacts

Mitigation Measure for Geology, Mineral Resources, and Soils

Mitigation Measure G-9a: Coordinate with quarry operations (pg. E.1.13-10, FEIR/EIS 2008)

Mitigation Measure for Socioeconomics, Services, and Utilities

S-2a: Notify public of utility service interruption (pg. E.1.14-5, FEIR/EIS 2008)

S-2b: Protect underground utilities (pg. E.1.14-5; FEIR/EIS 2008)

PSU-APM-1: SDG&E has and will continue to coordinate with all utility providers with facilities located within or adjacent to the Proposed Project to ensure that design does not conflict with other facilities.

In compliance with these mitigation measures, in response to requests by agencies and interested parties to avoid sensitive resources, and based on final engineering and design, SDG&E has identified the additional proposed micro-siting changes to the approved SPTP considered herein. These changes are described in Table 1. These micro-siting changes include extra workspace for guarding structures, temporary and permanent Tower Staging Access Pads (TSAPs), micro-siting of structure EP73, TSAP at EP195-2, spur road to EP349, temporary access roads at EP323-1 and EP324-1, additional new access road into S2 Construction Yard, as well as the use of an existing paved access road into the S2 Construction Yard, and micro-siting access road/work area at EP50.

The proposed mitigation changes would be located on land previously surveyed for the approved SPTP. Additional biological surveys were conducted in the spring and summer of 2011. Most of the biological surveys conducted for the micro-siting requests were conducted in April/May of 2011 and native, annual plant species were observed. Therefore, it is likely that if any special status plant species were present, they also would have been observed at that time. As such, it is presumed that special status plant species are absent from most of the modification sites with the exceptions of 1) where such species were observed (i.e., GS-BLM-1a and GS-BLM-1) or 2) where the biological

surveys may have been conducted too early or too late (based on geographic location) to detect special status, annual plant species. These locations include:

- Request #D: TSAP Relocation at EP195-2 (survey conducted March 25)
- Request #E: Spur Road Shift to EP349 (survey conducted May 26)
- Request #F: Temporary Access Roads at EP323-1 and EP324-1 (survey conducted May 26)
- Request #G: Additional Access Road into S2 Construction Yard (survey conducted June 13)

Pre-construction surveys for special status plant species and implementation of appropriate avoidance/minimization/compensation measures is required in accordance with Mitigation Measure B-5a, which states, "If a survey cannot be conducted...SDG&E shall consult with the Wildlife Agencies...to determine if construction may begin in the absence of survey data and what mitigation would be required, or whether construction would not be allowed until such data is collected."

Where sensitive plant populations occur, the impact minimization and mitigation measures identified in the approved Restoration Plan for Special Status Plants (RPSP) would be implemented. For the two species observed in the work areas, the RPSP requires restoration within the temporary impact area or within undisturbed portions of the Project ROW (ROW).

Summary of Impacts

Total Impacts

The proposed micro-siting changes would result in total impacts to 19.03 acres of BLM lands, including approximately 17.39 acres of temporary impacts and approximately 1.64 acres of permanent impacts. The additional guard structure work areas account for 88 percent of the temporary impacts. The additional TSAPs account for 95 percent of the permanent impacts.

Project activities at all of the sites would be conducted in accordance with the same impact avoidance, minimization, monitoring, and mitigation measures that apply to all other Project impact areas. Such measures include those specified in the Project's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), BLM's ROD and PMR DNA, and approved plans and permits for specific types of activities

Sensitive Vegetation Communities

The proposed micro-siting changes would result in impacts to approximately 13.83 acres of sensitive vegetation communities on BLM lands, including 12.37 acres of temporary impacts and 1.46 acres of permanent impacts. Most of the impacts would be to desert scrubs, which occur in most of the guard structure work areas in Request A and would be restored when the guard structures are removed. Except for the installation of guard structures, no grading or excavation will occur within the added work areas. However, vegetation crushing and some vegetation clearing will occur in connection with vehicle and equipment use.

Temporary and permanent impacts would be minimized, monitored, and mitigated in accordance with the same measures that apply to impacts to sensitive vegetation at other sites. These measures include restoration of vegetation within temporary impact areas as per the Restoration Plan for Sensitive Vegetation (RPSP) and offsite conservation at the ratios specified per type of vegetation and impact. Offsite conservation will occur at the mitigation sites identified in the September 2010 Habitat Acquisition Plan and Habitat Management Plan (HAP/HMP). SDG&E has acquired and/or provided financial assurances for the conservation of all of the properties identified in the HAP/HMP.

Special Status Wildlife Species

The proposed micro-siting changes on BLM lands would result in impacts to habitats of three wildlife species listed under the Endangered Species Act: These species include Quino checkerspot butterfly (QCB), arroyo toad (ARTO), and peninsular bighorn sheep (PBS).

In addition, other special status species that would be impacted by project modifications include the golden eagle, Flat-tailed horned lizard (FTHL), and Barefoot banded gecko (BBG). One site (TSAP at CP60) is in the vicinity of a historic golden eagle nest area (U.S. Forest Service records). The majority of the new project related impacts would be within the species range of suitable FTHL habitat (approximately 12 acres). Temporary and permanent impacts to the special status species would be minimized, monitored, and mitigated in accordance with the same measures that apply to impacts at other sites.

Jurisdictional Waters

Four of the proposed micro-siting changes entail temporary activities that would occur within dry washes. Combined, the changes would impact areas totaling 0.72 acre within jurisdictional waters.

Ground-disturbing activities would be limited to the estimated 0.01 acre for the guard structure poles at GS-BLM-5, the 0.02 acre for the temporary road at GS-NF-39 (if built), and potential ground-smoothing (by skid hoe and hand grading) of 0.18 acres for the temporary roads to EP323-1 and EP324-1. Vegetation clearing and crushing would occur in connection with the guard structure, roads, and vehicle and equipment use within the work areas. No permanent impacts to jurisdictional waters would occur.

The temporary impacts would be minimized, monitored, and mitigated in accordance with the terms and conditions of the Project's 404 permit, 401 certification, and the Lake or Streambed Alteration Agreement (LSAA) and the compensatory measures identified in the Habitat Mitigation and Monitoring Plan (HMMP). Disturbed areas resulting from the proposed micro-siting changes would be restored to pre-impact conditions through the measures identified in both the HMMP and RPSV. Offsite mitigation would occur at the sites specified in the HMMP and HAP/HMP (SDG&E has acquired and/or provided the financial assurances for the conservation of all the specified mitigation lands).

Jurisdictional Waters as Regulated under the Clean Water Act and Refueling and Equipment Storage in or within 200 feet

Clean Water Act authorizations, including the Federal Section 404 permit, 401 certification, and – to a lesser degree – LSAA include provisions that prohibit refueling or equipment storage within jurisdictional waters. The Department of the Army, ACE 404 Nationwide Permit includes conditions that prohibit potential pollutants within 200 feet ACE jurisdictional waters. These restrictions in effect would preclude the refueling and “storage” of stationary equipment required at structure and wire stringing locations; they also affect the use of TSAPs and yards.

Based on a preliminary analysis:

- 33 structure and wire stringing sites on BLM lands would be in ACE or State jurisdictional waters
- 46 structure and wire stringing sites on BLM lands would be within 200 feet of ACE or State jurisdictional waters;
- 12 maintenance pads on BLM lands would be in ACE or State jurisdictional waters

- 72 maintenance pads on BLM lands would be within 200 feet of ACE or State jurisdictional waters
- 2 TSAPs on BLM lands would be in ACE or State jurisdictional waters
- 14 TSAPs on BLM lands would be within 200 feet of jurisdictional riparian areas.

None of the proposed micrositing changes under consideration involve moving or adding a structure or wire stringing site into or within 200 feet of jurisdictional waters. However, the TSAPs added near CP60, EP69, and EP314 would be within 200 feet of jurisdictional waters. In addition, the proposed road changes under Requests C and E are connected to structure sites (EP323-1, EP324-1, and EP349) that are subject to the restrictions, as is the S2 yard accessed under Request H. SDG&E has submitted a request to SWRCB for a 401 exception for the S2 yard. Action by the SWRB is pending.

GS-BLM-5 and GS-NF-39. SDG&E is preparing an amendment request to the Corps, SWRCB, and CDFG to authorize the additional temporary impacts at EP323-1 and EP324-1. In connection with that request, the work area for EP322-1 was modified to eliminate impacts to 0.08 acre in 12-DW-2. SDG&E also proposes to use Douglas-fir mats on the portions of the roads within the dry wash to further reduce the temporary impacts. The Corps has issued a reverification letter approving the amendment. Action by the SWRCB and CDFG is pending.

SDG&E has been and will continue to coordinate with the State Water Resources Control Board regarding condition 19 of the 401 permit that prohibits refueling in or within 200 feet of waters of the State. SDG&E has looked at the types of construction activities that will occur and where these activities would require refueling in or within 200 feet of waters of the State.

The proposed micrositing changes are described in Micrositing Request Form dated July 19, 2011 and are shown in the Micrositing Modification Mapbook of the Micrositing Request Form. Table 1 describes each of the specific proposed changes by segment. As each change is minor and occurs at a specific tower location, they have been identified by the tower number. Table 1 also defines the mitigation measure (by number only) that required each change to be made.

Table 1. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
<p>Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)</p>	<ul style="list-style-type: none"> - S-2a: pg. E.1.14-5, FEIR/EIS 2008 - S-2b: pg. E.1.14-5, FEIR/EIS 2008 - PSU-APM-1: E.1.14-4, FEIR/EIS 2008 - C-1c: pg. E.1.7-6, FEIR/EIS 2008 - C-1d: pg. E.1.7-6, FEIR/EIS 2008 - C-1f: pg. E.1.7-6, FEIR/EIS 2008 - C-3a: pg. E.1.7-6, FEIR/EIS 2008 	<p>Segment 2</p>	<p>Extra workspace for Guarding SDG&E is requesting use of work space and access to various transmission line crossings to allow for guarding of facilities such as roads, highways, freeways, railroads, communication lines, electric distribution lines and electric transmission lines where the Sunrise Powerlink overhead transmission line crosses over these features. This would occur at the following locations:</p> <ul style="list-style-type: none"> - GS-BLM-9/GS-NF-44: The proposed guard structure is situated within the project right-of-way, where the proposed alignment crosses Interstate 8 (I-8) between EP341 and EP342. Work at this location includes the setting of eight guard poles and twelve anchors. The proposed guard structures located on the south side of I-8 would be accessed from the proposed permanent road to EP342, then north approximately 140 feet to the site. Guard structure work at this location includes the setting of four poles and six anchors. The proposed guard structure located on the north side of I-8 would be accessed from the permanent project access road starting near EP 341, heading east approximately 2,000 feet, south approximately 380 feet, then west approximately 900 feet to the site. - GS-BLM-8/GS-NF-43: The proposed guard structures are situated within the project right-of-way, where the proposed alignment crosses a 12 kV distribution line and the nearby San Diego & Arizona Eastern (SD&AE) railroad, both between EP 330-1 and EP331. Two proposed guard structures, one for the 12 kV line (Figures 1 and 2) and one for the SD&AE railroad (Figures 3 and 4), are located with 200 feet of each other immediately south of County road S80 (Evan Hewes Highway). Both structures consist of two sets of four poles on either side of the 12 kV line and railroad. - GS-BLM-7: The proposed guard structure is situated within the project right-of-way where the alignment crosses a rocky outcrop between EP322-1 and EP323-1. The proposed guard structure consists of three poles installed east of the rocky outcrop, between EP322-1 and a proposed project pull site. A temporary access road will lead from EP322-1 to the guard structure by way of the pull site east of the guard structure. The total length of the proposed access road is approximately 85 feet from the guard structure work area east to the approved temporary pull site. - GS-BLM-6/GS-NF-42: The proposed guard structure site is situated within the right-of-way, where the proposed alignment crosses Shell Canyon Road (structures to be placed on north side of road), between EP303-2 and EP304-2 in Imperial County. The proposed guard structure consists of a set of four poles which would be located approximately 15 feet north of the shoulder of Shell Canyon Road. Access to this site would be directly from Shell Canyon Road.

Table 1. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
<p>(continued) Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)</p>	<ul style="list-style-type: none"> H-6a: pg. E.1.12-7, FEIR/EIS 	<p>Segment 2 (continued)</p>	<p>Permanent TSAP: a permanent TSAP is required to assist with personnel transport to the structure site at EP314, where the nearest approved access road is over 460' feet away from the tower site in steep, rugged terrain. In addition to alleviating the distance traveled by personnel, a TSAP will also aid in quick evacuation in emergency situations, such as a medical emergency for a crew member working on site. This site will utilize a temporary landing platform that will not require grading and would be restored post-construction.</p> <p>Spur Road shift to EP349: Shift the access road approximately 40 feet south of the previous access road to avoid archaeological discoveries.</p> <p>Temporary Access Roads at EP323-1 and EP324-1 SDG&E will build structures EP323-1 and EP324-1 using conventional methods and therefore proposes to construct new temporary roads to both structure sites. Because of the proximity of EP323-1 and EP324-1 to a dry wash, these two particular sites have a high potential for scour. Micropile foundations are more impacted by the potential for scour than traditional conventional (drilled-shaft) foundations. The proposed access to EP323-1 is via a new road for approximately 200 feet from the easternmost edge of the wire pulling site at EP322-1/323-1 to EP323-1. This path would be matted to protect a dry wash. The proposed access to EP 324 is via a new road located outside of the Middle Coyote Dry Wash. This road will travel for approximately 715 feet to the edge of the wash in the direction of EP 324. From there it will travel approximately 335 feet to the tower site through the wash. The 335 feet would be matted with timber matting to protect the wash.</p>

Table 1. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)		Segment 3	Extra workspace for Guarding This would occur at the following locations:
Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)	• G-9a: pg. E.1.13-10, FEIR/EIS 2008		• GS-BLM-5: The proposed temporary guard structure is situated within the project right-of-way, where the proposed alignment crosses an existing quarry haul road between EP299 and EP300-1. The site is located approximately 245 feet southwest of EP300-1 and adjacent to both the north and south sides of the quarry haul road in Imperial County.
	• S-2a: pg. E.1.14-5, FEIR/EIS 2008		• GS-BLM-3/GS-NF-40: The proposed temporary mobile guard structure would be situated within the project right-of-way where the alignment crosses the San Diego & Arizona Eastern (SD&AE) railroad between proposed structures EP290 and EP281.
	• S-2b: pg. E.1.14-5, FEIR/EIS 2008		The mobile structure site would be located approximately 675 feet southwest of EP290 and adjacent to the south side of the SD&AE railroad in Imperial County. Access to the mobile guard structure site would be by an existing dirt access road which leaves the approved SPTP access road (existing Southwest Powerlink road) approximately 500 feet northeast of EP291-1.
	• PSU-APM-1: pg. E.1.14-4, FEIR/EIS 2008		• GS-NF-39: The proposed guard structure is situated within the project right-of-way, where the proposed alignment crosses I-8 between EP290 and EP281. The site is composed of two guard structure segments, one north of the westbound I-8 lanes, and one south of the westbound I-8 lanes. The proposed structure located on the north will extend from a flat berm, northward downslope on an approximate 40% grade of cobbled sand to a culverted, sandy wash to the location of the four proposed anchors. The associated access road will originate from I-8 and follow a pre-existing and unvegetated road east. This area also includes a paved, road drainage. The proposed structure located on the south side of I-8 would be accessed directly off I-8.
	• B-2a: pg. E.1.2-20, FEIR/EIS 2008		• GS-NF-38: The proposed guard structure is situated within the project right-of-way where the alignment crosses the eastbound lanes of I-8 between proposed structures EP267-2 and EP269-1. The site is composed of two guard structure segments, one north of the eastbound lanes of I-8 and one south of the eastbound lanes. The north guard structure segment site would be located approximately 590 feet south of EP269-1 and adjacent to the eastbound lanes of I-8. The south guard structure segment site would be approximately 1,200 feet north of EP 267-2 and adjacent to the eastbound lanes of Highway 8, in Imperial County.
• WQ-APM-9: pg. E.1.12-8, FEIR/EIS 2008			Permanent TSAPs: At EP267-2, 265-2 and 263-2, hiking distances to the nearest TSAP or road are between 550' and 1000' away. A nearby permanent TSAP would increase worker safety by allowing for quicker emergency evacuations and limiting the amount of strenuous physical activity while exposed to the elements.
• WQ-APM-15: pg. E.1.12, FEIR/EIS 2008			

Table 1. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
(continued)	<ul style="list-style-type: none"> • S-2a: pg. E.1.14-5, FEIR/EIS 2008 	Segment 3 (continued)	<p>Additional Access Road into S2 Const. Yard: Per the State Water Resources Control Board (SWRCB) 401 permit, several jurisdictional waters cross the S2 Construction Yard, greatly restricting the area where equipment such as water tanks and fueling of vehicles and equipment can be set up. One location that would allow for refueling within the yard boundaries is located at the extreme northwest corner of the yard. As the approved entrance for the yard is at the southwest corner, this would require water trucks to travel the entire length of the yard to the north end through several jurisdictional waters to refill. Soils at the site are primarily soft sand, so a graveled driveway would be needed should the water trucks need to access the water tanks from the southern entrance, crossing several of the washes. SDG&E would like to add a secondary access to the yard on the northwest corner and is requesting the utilization of the access road along the west boundary of the construction yard. By installing a new gate at the northwest corner, within the previously approved construction limits, and accessing site from the BLM road at that point, only a short driveway would be needed and it would not be necessary to cross jurisdictional waters. The proposed access road is an existing paved road located adjacent to and west of the S-2 construction yard.</p>
<p>Interstate 8 Alternative between the Imperial Valley Substation and MP 18-40 (where the BCD Alternative diverges)</p>	<ul style="list-style-type: none"> • S-2b: pg. E.1.14-5, FEIR/EIS 2008 • PSU-APM-1: pg. E.1.14-4, FEIR/EIS 2008 • B-2a: pg. E.1.2-20, FEIR/EIS 2008 • WQ-APM-9: pg. E.1.12-8, FEIR/EIS 2008 • WQ-APM-15: pg. E.1.12, FEIR/EIS 2008 		<p>Additional Paved Access Road into S2 Const. Yard: SDG&E additionally requests the use of an existing private paved road that runs north-south from Imperial Highway, providing access to the S2 yard, until it connects with the paved, public road that runs east-west towards Shell Canyon Rd. Because this is an existing paved road, no adverse impacts are anticipated due to the use of this road. The use of this road aids in reducing the amount of vehicular traffic on nearby approved dirt project access roads. Reducing travel on dirt roads reduces the potential for dust generation, reduces the amount of water used to control dust, and helps reduce the instances of wear and tear on public or private access dirt roads. The requested road connects the S2 yard to Shell Canyon Rd, which provides access to EP 296-299 and EP 300-315. The local residents of Ocotillo have requested that Shell Canyon Rd be used as an alternate route, when feasible, to minimize traffic through the main thoroughfare of the community. The ability to access Shell Canyon road through this northern route will assist in minimizing construction-related traffic instruction on the local residents. The ability to access EP 300-315 via the existing paved road from S2 yard eliminates an excess 30 minutes of travel for water trucks and steel deliveries, amongst other traffic, to travel a more circuitous route to reach their destination. Reducing the amount of travel time will reduce emissions and fuel consumption.</p>

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BCD Alternative and BCD South Option Revisions	<ul style="list-style-type: none"> S-2a: pg. E.1.14-5, FEIR/EIS 2008 S-2b: pg. E.1.14-5, FEIR/EIS 2008 PSU-APM-1: E.1.14-4, FEIR/EIS 2008 	Segment 5	<p>Extra workspace for Guarding This would occur at the following location:</p> <ul style="list-style-type: none"> GS-BLM-2: The proposed mobile guard structure is located within the project right-of-way, along an existing dirt access road (Carrizo Creek Road) where the alignment crosses an existing distribution line between EP247 and EP248-1. A telephone line lowering is also proposed approximately 850 feet west of the mobile guard structure. Access to the two locations is from Carrizo Creek Road. During wire pulling activities through this area, SDGE will contact AT&T to lower the existing communications line and will coordinate with them throughout the stringing operations process.
	<ul style="list-style-type: none"> S-2a: pg. E.1.14-5, FEIR/EIS 2008 S-2b: pg. E.1.14-5, FEIR/EIS 2008 PSU-APM-1: E.1.14-4, FEIR/EIS 2008 C-1b: E.1.7-5, FEIR/EIS 2008 	Segment 6	<p>Extra workspace for Guarding This would occur at the following locations:</p> <ul style="list-style-type: none"> GS-BLM-1: The proposed guard structure is situated within the project right-of-way, where the proposed alignment crosses McCain Valley road between EP191-1 and EP190-2. The site is composed of one guard structure segment. The proposed guard structure is located on both sides of McCain Valley Road, starting approximately 300 feet southeast of EP190-2, and continuing south along the road. Site access is along McCain Valley Road. GS-BLM-1a: The proposed temporary guard structure would be situated within the project right-of-way where the alignment crosses McCain Valley Road between proposed structures EP198-3 and EP197-3. The guard structure site will run from approximately 600 feet northwest of EP198-3 center to approximately 60 feet west of EP197-3, on both sides of McCain Valley Road. Access to the guard structure site would be by existing dirt, two-track McCain Valley Road. <p>Secondary Temporary TSAP: The proposed TSAP at EP146 was identified as viable to use as a radio vault facility. Therefore, the proposed TSAP is unable to be used for staging and helicopter access during construction due to the placement of the radio equipment on the site. A temporary TSAP site at EP 146 has been identified to provide access to these structure locations.</p> <p>TSAP Relocation at EP195-2: SDG&E is requesting to relocate a Tower Staging Access Pad (TSAP) approximately 100 feet northwest to avoid an environmentally sensitive area.</p>

Table 1. Proposed Changes Resulting From Implementation of Mitigation

Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
Modified Route D Alternative, including the Modified Route D Alternative Substation	<ul style="list-style-type: none"> • T-9a: pg. E1.9-7, FEIR/EIS 2008 • T-APM-4a: E.1.9-6, FEIR/EIS 2008 	Segment 9	<p>Permanent TSAPs: At EP74-1 and EP70, these sites are relatively flat and would require permanent TSAPs. EP69 requires a platform. For those sites located within proximity to existing roadways, a helicopter landing zone was not originally identified due to the nearby road. However, construction of the site requires multiple support vehicles and equipment, in addition to crew members, monitors, and inspectors. Due to the remote nature of this site, access would require long vehicle trips, and even with the implementation of employee carpooling, would result in increased vehicular traffic than if crew and employees could be shuttled to the site via helicopter. Sites EP69 and EP70, whose disturbance area can be accessed via approved roads, have the option of the tower disturbance area being utilized for support vehicles, but will have limited availability for this option, as most space would be utilized by essential construction equipment which will leave little to no room for parking. Additionally, due to the terrain at the site additional grading and leveling would be required to obtain safe parking. Helicopter access alleviates the need to create graded parking areas within the approved workspace. Due to the remote nature and narrow width of many of the Project access roads, the ability to use existing approved roadways as pull-outs and parking areas is very limited. Because portions of the Project roads are too narrow to allow two vehicles travelling in opposite directions to safely pass, the ability to reduce vehicular traffic by shuttling crews and support personnel via helicopter is a safer alternative to having one of the parties travel backwards for long distances until an approved SPTP turnout or disturbance area is available.</p> <p>Structure move at EP73: EP73 was located on the east side of the existing maintenance road for the 69kV circuit. One leg (Leg A) is on top of several large boulders and a leg on the opposite corner (Leg C) is on the edge of the existing maintenance road. Due to the impact of removing boulders and reroute of the existing maintenance road, it is suggested to relocate EP73 80 feet back along the alignment as EP73-1. EP73-1 is now located on the west side of the existing road and no road reroute is required with the proposed structure relocation.</p>

Table 1. 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 Chocolate Canyon Option Revision and where it joins the Proposed Action/Project route.		Segment 10	<p>Transposition Access Road/Work Area at EP50: Due to the electrical influences which conductors have on each other, the loading on lines can become unbalanced. To avoid this unbalance, the lines are periodically transposed (the lines switch positions at the tower connection points among the three phases). In addition, transposition equalizes impedance relative to ground, avoiding one sided loading. During wire installation, a line truck is set up on a transposition site to "hold down" a particular phase to allow the other lines to crossover it. This is done several times over the entire alignment. All the transposition sites are located within previously approved stringing sites except for one which is located between EP50 and EP51. For this effort, a work area would be required. The proposed transposition utilizes an existing spur road that runs north-south and is located within the right-of-way approximately 500 feet east of tower structure EP50. Access is from the main project dirt two-track access road. SDG&E would use 50 feet in the center of the ROW to set-up equipment for transposition work. Impacts at the transposition site include drive and crush vegetation within 10 feet on either side of this portion of the existing road in order to set out outriggers for a total of 30 feet of work area (including the 10 feet width of the existing road). It may be necessary for crews to walk within this 30 feet work area, however no grading or other vegetation clearing will occur.</p>
		Segment 17	<p>Secondary Temporary TSAP: The proposed TSAP at CP60 was identified as viable to use as a radio vault facility. Therefore, the proposed TSAP is unable to be used for staging and helicopter access during construction due to the placement of the radio equipment on the site. A temporary TSAP site at CP60 has been identified to provide access to structure CP60 and CP61-1.</p>

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, 1980, as amended (CDCA Plan)*. 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 applies to the proposed micro-siting changes that are situated on public lands administered by the BLM in Imperial County.

Within Imperial County, the proposed micro-siting changes 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 SPTP. Thus, a CDCA Plan amendment is not required for the proposed micro-siting changes to the approved SPTP.

Eastern San Diego County Resource Management Plan (2008). Like the approved SPTP, the proposed micro-siting changes to the approved SPTP 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 Southwest Powerlink 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 approved SPTP is partially located on public lands outside of the designated utility corridor, it required a Plan Amendment. The ROD for the approved SPTP amended the Eastern San Diego County RMP to allow for a one-time exemption for the SPTP

The proposed micrositing changes to the approved SPTP 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 micrositing changes on BLM-administered land in Eastern San Diego County are in conformance with the land use plan because they were designed to further avoid sensitive resources as provided under the mitigation listed in Table 1 and required in the ROD.

Yuha Basin Area of Critical Environmental Concern (ACEC) Management Plan, June 1981

Like a portion of the approved SPTP, some of the proposed micrositing changes are within the Yuha Basin ACEC 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). In addition to the ACEC designation, a large percentage of the Yuha Basin has been conserved as the Yuha Desert FTHL management Area. Mitigation Measures C1b (Avoid and protect potentially significant resources) and C2a (Consult with agencies and Native Americans) were required for that portion of the approved SPTP within the Yuha Basin ACEC. Compliance with these measures resulted in proposed micrositing changes to the approved SPTP 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 such as C1e (Monitor construction) and C1f (Train construction personnel). These mitigation measures apply to the approved SPTP and would likewise apply to the proposed micrositing changes.

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

- The proposed micrositing changes to the approved SPTP 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 micrositing changes to the approved SPTP would not impact any historic properties within the Yuha Basin ACEC that are listed on the National Register of Historic Places, and
- The proposed micrositing changes to the approved SPTP would decrease the ground disturbance within the Yuha ACEC reducing impacts to wildlife (FTHL).

Cleveland National Forest Land Management Plan. Portions of the approved SPTP 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 SPTP 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 SPTP. None of the proposed micrositing changes considered herein would occur on the Cleveland National Forest.

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).

- *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 DOI-BLM-CA-D070-2010-0124-DNA*. Prepared by the BLM for the Sunrise Powerlink Project, Project Modifications (September 2010).
- *Determination of NEPA Adequacy DOI-BLM-CA-D070-2011-0056-DNA*. Prepared by the BLM for the Sunrise Powerlink Project, Changes (March 2011).

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) (Programmatic Agreement)

- *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).
- Amendment to Corps 404 NWP12 (SPL-2007-00704-SAS,
- Sunrise Powerlink Nest Survey Protocol, April 2011

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 micrositing changes to the approved SPTP would be minor changes including extra workspace for guarding, TSAPs, micrositing of structures, and micrositing of access roads/work area which are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1, E.2, and E.4). The changes detailed in Table 1 would function the same way as the approved SPTP 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 would be within 900 feet of the approved SPTP ROW except for the access roads required for the guard structures along the SD&AE Railroad and I-8. The micrositing changes are proposed as the result of final engineering and safety features or are

proposed at the request of reviewing agencies or interested parties to further avoid impacts to biological and cultural resources and traffic.

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 microsites changes to the approved SPTP would be within the same geographic area as the approved SPTP and the resource conditions would be substantially the same as those analyzed in the Final EIR/EIS. This fact is confirmed by the close proximity of the proposed microsites changes and the approved route and because the habitat of the microsites changes and the approved route is essentially the same. The proposed changes on public lands requiring relocation of structures and access roads are within the same CDCA utility corridor as those of the approved SPTP. All of the proposed microsites changes would be within the approved SPTP ROW except for the following:

- Guard Structure Work Area GS-BLM-2 extends beyond the approved SPTP ROW to the north and south by approximately 50 feet.
- Access road to GS-BLM-3/GS-NF-40, GS-BLM-8/GS-NF-43, GS-BLM-9/GS-NF-44 which extend beyond approved SPTP ROW to avoid impacting SD&AE railroad and I-8.
- The tower staging access pads associated with CP60, EP69, EP70, EP74-1, EP263B-2, EP267-2, and EP314, are located partially within and partially outside the ROW, extending up to 50 feet outside the ROW. The pad associated with EP146 is located approximately 125 feet outside the approved ROW; the proposed TSAP associated with EP146 is required for use to provide proper radio communications for safe communications of the crew and project personnel.
- The tower staging access pad associated with EP195-2 would be located approximately 125 feet outside the ROW and approximately 100 feet north of the approved location. The pad would be relocated to avoid an environmentally sensitive area.

- Spur road to EP349 is located approximately 200 feet outside of the ROW, as was the spur road in the approved SPTP. The realignment of the spur road was to avoid environmentally sensitive areas.
- Access road to EP324-1 would require a temporary access road of approximately 875 feet outside the approved SPTP ROW. This road would allow for use of conventional construction methods at EP324-1 which would provide additional scour protection as required by MM H-6a.

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 micro-siting changes to the approved SPTP 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 would not be 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 SPTP, although impacts to these resources would be reduced compared to those analyzed in the Final EIR/EIS for the approved SPTP. 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 micro-siting changes as compared with the approved SPTP.

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 proposed micro-siting changes would be within the range of alternatives evaluated in the Final EIR/EIS as explained below.

TSAPs and Transmission Line/Access Road Changes. As detailed in Table 1, the following proposed micro-siting changes to the approved SPTP alignment involve components of alternatives that were evaluated in the Final EIR/EIS:

- Proposed micro-siting changes to Segments 2 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 micro-siting 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.
- Proposed micro-siting changes to Segment 9 and 10 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.
- Proposed micro-siting changes to Segment 17 are within the Interstate 8 Alternative between Chocolate Canyon Option Revision and where it joins the Proposed Action/Project route, analyzed in Section E.1.2 through E.1.15.
- No additional proposed micro-siting changes would occur on land under BLM management.

Extra workspace for guarding. SDG&E is requesting use of work space and access to various transmission line crossings to allow for guarding of facilities such as roads, highways, freeways, railroads, communication lines, electric distribution lines and electric transmission lines where the Sunrise Powerlink overhead transmission line crosses over these features. As noted in Section B.4.1.1, Overhead Construction, of the Project Description (pg. B-52), temporary clearance structures would be erected where required prior to stringing any transmission lines. The temporary clearance structures are typically vertical wood poles with cross arms and are

erected at road crossings or crossings with other energized electric and communication lines to prevent contact during stringing activities. The use of guard structures was included in the Project Description for the approved SPTP and considered in the impact analysis in Sections E.1, E.2, and E.4 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 SPTP, new information or circumstances include:

- 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,
- 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 approved SPTP require reinitiation of consultation if the reinitiation criteria of the regulations are met. New regulatory circumstances caused the BLM to reinitiate consultation under the Federal Endangered Species Act of 2010. 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 reinitiation does not require supplementation of the Final EIR/EIS. In November 2010, the U.S. Fish and Wildlife Service reissued the Biological Opinion on the SPTP to address this new information or circumstances.

The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the approved SPTP is within stipulated thresholds 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 (*Polioptila 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 approved SPTP would not likely jeopardize the continued existence of one species that was at the time 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 approved SPTP is “not likely to adversely affect” the San Diego thornmint based on updated survey information.

As discussed below, none of these new regulatory circumstances affect the validity of the Final EIR/EIS as it relates to the proposed micro-siting changes to the approved SPTP.

Quino Checkerspot Butterfly (QCB). The Final EIR/EIS determined that the approved SPTP would have permanent impacts to 19.20 acres of 2002 critical habitat for the Quino checkerspot butterfly and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB and required appropriate mitigation. Since the completion of the Final EIR/EIS, additional surveys have been performed in compliance with mitigation and 2009 critical habitat for QCB was revised and redesignated in 2009. As of 2009, the approved SPTP would have permanent impacts to 47.62 acres (11.46 critical habitat, 36.16 occupied habitat) and temporary impacts to 101.69 acres (16.93 critical habitat, 84.76 occupied habitat.) Analysis shows that the approved SPTP would result in 19.61 acres of 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 proposed micro-siting changes detailed in Table 1 have the potential to impact QCB:

- TSAPs: approximately 0.35 acres of permanent impacts to (USFWS designated) QCB Occupied Habitat
- EP50: approximately 0.3 acres of temporary impacts to (USFWS designated) QCB Occupied Habitat

The approved SPTP along with the proposed micro-siting changes would result in permanent impacts to 19.96 acres of QCB habitat (4.45 acres of 2009 critical habitat and 15.51 acres of

occupied habitat, which is former 2002 critical habitat) Temporary impacts would occur to 19.38 acres (1.59 acres of 2009 critical habitat and 17.79 acres of occupied habitat, which is former 2002 critical habitat). Permanent Impacts would be less than those presented in the Final EIR/EIS and temporary impacts would be less than impacts presented in the Final EIR/EIS.

Mitigation adopted from the Final EIR/EIS requires SDG&E reduce impacts both to sensitive habitats and sensitive wildlife species consistent with the Final EIR/EIS and no additional NEPA review is required.

Arroyo Toad (ARTO). 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 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 Final 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 SPTP. Project impacts to arroyo toad as defined by the 2008 Final EIR/EIS included 33.09 acres of permanent impacts to suitable habitat and 154.97 acres of temporary impacts to suitable habitat. The May 2010 PMR reduced arroyo toad impacts to 11.92 acres of permanent impacts to suitable habitat and 63 acres of temporary impacts to suitable habitat.

The following changes detailed in Table 1 have the potential to impact arroyo toad:

- TSAPs: approximately 0.2 acres of permanent impact to USFWS Occupied Habitat
- EP50: approximately 0.3 acres of temporary impact to USFWS Occupied Habitat

If the 0.2 acres of permanent impacts and 0.3 acres of temporary impacts to arroyo toad proposed under the micro-siting request would be added to the approved SPTP impacts, the total of 12.12 permanent impacts and 63.3 acres of temporary impacts is still far below impacts defined in the 2008 Final EIR/EIS.

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

Peninsular Bighorn Sheep (PBS). The U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010 concluded that the approved SPTP 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 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 median. Project impacts to PBS as defined by the 2008 Final EIR/EIS included 30.41 acres of permanent impacts to critical habitat/occupied habitat and 34.64 acres of temporary impacts to critical habitat/occupied habitat. The May 2010 PMR reduced these PBS impacts to 10.36 acres of permanent impacts to critical habitat/occupied habitat and 20.24 acres of temporary impacts to critical habitat/occupied habitat.

The following changes detailed in Table 1 have the potential to impact PBS:

- Guard structure work areas: approximately 2.3 acres of temporary impacts to USFWS Critical Habitat and 2.2 acres of temporary impacts to USFWS Occupied Habitat.
- TSAPs: approximately 0.35 acres of permanent impacts to USFWS Critical Habitat and 0.18 acres of permanent impacts to USFWS Occupied Habitat.

When the impacts to PBS proposed under the micrositing changes are added to the approved SPTP impacts, the total 10.89 acres of permanent impacts and 24.74 acres of temporary impacts is still far below impacts defined in the 2008 Final EIR/EIS.

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. These proposed micrositing changes do not increase the

level of impact or exceed the thresholds authorized in the Biological Opinion therefore no additional NEPA review is required.

Bald and Golden Eagles (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 SPTP on eagles was 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). (Final 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 areas 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 areas occur within 4,000 feet of the approved SPTP and the Final EIR/EIS concluded that each of the four nest areas would be adversely affected by the project. Please note that a nest area may contain more than one nest site used by a breeding pair. The new Bald and Golden Eagle Protection Act would not change the Final EIR/EIS analysis; had the analysis been completed after the Act was passed, the effects of the approved SPTP and the proposed micro-siting changes to the approved SPTP would remain adverse. Since the 2008 Final EIR/EIS and 2010 PMR, SDG&E has started reporting historic nest sites in addition to active nests. One historic nest site was reported with 4000 feet of a proposed micro-siting changes. This historic nest site is considered an alternate nest site within an existing nest area which was previously defined in the Final EIR/EIS therefore no net increase in nest areas or impacts to eagles would occur as the result of the proposed micro-siting changes.

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. Therefore no additional NEPA review is required.

Barefoot Banded Gecko (BBG). The Final EIR/EIS determined that the approved SPTP would have permanent impacts to 20.6 acres of habitat for the barefoot banded gecko (BBG) and temporary impacts to 17.16 acres of habitat for the BBG and required appropriate mitigation. Analysis now shows that the approved SPTP would result in permanent impacts to 10.84 acres of habitat. Temporary impacts would occur to 4.53 acres. The following changes detailed in Table 1 have the potential to impact BBG:

- Guard structure work areas: approximately 2.6 acres of temporary impacts to BBG habitat
- TSAPs: approximately 0.35 acres of permanent impacts to BBG habitat.

When the 0.35 acres of permanent impacts and 2.6 acres of temporary impacts to BBG proposed under the micrositing changes request are added to the PMR impacts, the total of 11.19 acres of permanent impacts and 7.13 acres of temporary impacts is still far below impacts defined in the 2008 Final EIR/EIS.

The addition of the changes detailed in Table 1 and above which have the potential to impact BBG habitat will be covered under incidental take permit (ITP 2081-2010-022-05). SDG&E has sought written concurrence from CDFG for an amendment to the approved SPTP's incidental take permit.

Mitigation adopted from the Final EIR/EIS requires SDG&E reduce impacts both to sensitive habitats and sensitive wildlife species consistent with the Final EIR/EIS and no additional NEPA review is required.

Flat-Tailed Horned Lizard (FTHL). 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 March 15, 2011, the U.S. Fish and Wildlife Service (Service) determined that the listing of the Flat-tailed horned lizard (*Phrynosoma mcallii*) as a threatened species under the Endangered Species Act of 1973, (Act), was not warranted, and withdrew the November 29, 1993, proposed rule to list it under the Act (76 FR 14210). 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 approved SPTP would be subject to mitigation identified in the Final EIR/EIS and Biological Opinion.

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 SPTP would have permanent impacts to 22.62 acres of the Yuha Desert FTHL Management Area and to 52.95 acres of suitable habitat outside of the five FTHL Management Areas. The approved SPTP will have temporary impacts to 91.31 acres of the Yuha Desert FTHL Management Area and to 141.53 acres of habitat outside of FTHL Management Areas. Additional surveys along the approved route have been performed in compliance with mitigation. Analysis now shows that the approved SPTP with the proposed micro-siting changes from the PMR would result in permanent impacts to FTHL habitat (9.54 acres of Yuha Desert FTHL Management Area and 26.35 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of Yuha Desert FTHL Management Area 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 would apply to all proposed changes.

The following changes detailed in Table 1 have the potential to impact FTHL as they are all within the FTHL known range:

- Guard structure work areas: approximately 13.35 acres of temporary impact to FTHL habitat. TSAPs: approximately 0.12 acres of permanent impact to FTHL habitat.
- EP349: approximately 0.1 acres of permanent impact to Yuha Desert FTHL Management Area
- Temporary access road to EP323-1 and EP324-1: approximately 0.4 acres of temporary impact to habitat areas.

The approved SPTP along with the proposed micro-siting changes would result in permanent impacts to FTHL habitat (9.64 acres of Yuha Desert FTHL Management Area and 26.47 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of

Yuha Desert FTHL Management Area and 108.63 acres of habitat outside Management Areas. These impacts remain less than those defined under the Final EIR/EIS.

These impacts to FTHL habitat resulting from proposed micro-siting changes would be compensated in accordance with the Flat-tailed Horned Lizard Management Strategy. Mitigation measures identified in the Final EIR/EIS are adequate to ensure that impacts to the FTHL as a result of the proposed micro-siting changes would be minimized or avoided to the greatest extent practicable.

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 are valid as of November 2010. Biological and cultural resources surveys were performed in 2009, 2010, and 2011 as required by mitigation measures in the Final EIR/EIS and these surveys helped shape the project micro-siting changes in avoidance of impacts to specific resources. There is no new information and no new guidance that would trigger the need for additional analyses of the proposed micro-siting changes to the approved SPTP, as discussed in the following sections.

Quino Checkerspot Butterfly. Please see the QCB discussion under Section 3A. Since the completion of the Final EIR/EIS, additional surveys have been performed and as stated above, the critical habitat for QCB was revised and re-designated in 2009. The Final EIR/EIS determined that the approved SPTP would have permanent impacts to 19.20 acres of 2002 critical habitat for the QCB and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB. The approved SPTP would have permanent impacts to 47.62 acres (11.46 critical habitat, 36.16 occupied habitat) and temporary impacts to 101.69 acres (16.93 critical habitat, 84.76 occupied habitat.) The approved SPTP along with the proposed micro-siting changes would result in 19.86 acres of permanent impacts to QCB habitat (4.45 acres of 2009 critical habitat and 15.51 acres of occupied habitat, which is former 2002 critical habitat). Temporary impacts would occur to 19.38 acres (1.59 acres of 2009 critical habitat and 17.79 acres of occupied habitat, which is former 2002 critical habitat). Permanent Impacts would be less than those presented in the Final EIR/EIS and temporary impacts would be less than the impacts

presented in the Final EIR/EIS. These proposed micro-siting changes would not substantially change the analysis of the approved SPTP.

Arroyo Toad. Please see ARTO discussion under Section 3A. 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 the approved SPTP would have 33.09 acres of permanent impacts and 11.92 acres of temporary impacts. The approved SPTP along with the impacts for areas of the proposed micro-siting changes would result in permanent impacts to 12.2 acres of habitat. Temporary impacts would occur to 1.84 acres. These impacts would be less than those provided in the EIR/EIS. 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 micro-siting changes that occur on occupied arroyo toad habitat.

Peninsular Bighorn Sheep. Please see the discussion of PBS under Section 3A. The Final EIR/EIS analyzed the approved SPTP's potential impacts on Peninsular bighorn sheep (Impacts B-7B) and included 30.41 acres of permanent impacts to critical habitat/occupied habitat and 34.64 acres of temporary impacts to critical habitat/occupied habitat. When the impacts to PBS proposed under the proposed micro-siting changes would be added to the approved SPTP impacts, the total of 10.89 acres of permanent impacts and 24.74 acres of temporary impacts is still far below impacts defined in the 2008 Final EIR/EIS.

The minor structure revisions do not change the conclusions in the Final EIR/EIS (adverse) and is 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 have been no changes in the impacts to Peninsular bighorn sheep from the time the Final EIR/EIS was published.

Bald and Golden Eagles. Please see Eagle discussion on Section 3A. The Final EIR/EIS analyzed the approved SPTP's potential impacts on golden eagles and bald eagles (Impacts B-7h, B-7i, B-10, and B-12). Four (active) golden eagle nest areas occur within 4,000 feet of the SPTP and the Final EIR/EIS concluded that each of the 4 nest areas would be adversely

affected by the proposed micro-siting changes. No increase in active areas has resulted by the addition of the areas under the proposed micro-siting changes. Therefore, there would be no increase in the level of impact to golden eagles from the time the Final EIR/EIS was published.

Barefoot Banded Gecko. Please see the BBG discussion under Section 3A. The Final EIR/EIS determined that the approved SPTP would have permanent impacts to 20.6 acres of habitat for the barefoot banded gecko (BBG) and temporary impacts to 17.16 acres of habitat for the BBG and required appropriate mitigation. The approved SPTP along with the impacts for areas of the proposed micro-siting changes would result in permanent impacts to 11.19 acres of habitat. Temporary impacts would occur to 7.13 acres. These impacts remain less than those outlined in the 2008 EIR/EIS.

Flat-Tailed Horned Lizard. Please see FTHL discussion under Section 3A. 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 SPTP would have permanent impacts to 22.62 acres of the Yuha Desert FTHL Management Area and to 52.95 acres of suitable habitat outside of the five FTHL Management Areas. The project would have temporary impacts to 91.31 acres of the Yuha Desert FTHL Management Area and to 141.53 acres of habitat outside of FTHL Management Areas. The approved SPTP along with the proposed micro-siting changes would result in permanent impacts to FTHL habitat (9.64 acres of Yuha Desert FTHL Management Area and 26.47 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of Yuha Desert FTHL Management Area and 108.63 acres of habitat outside Management Areas. These impacts remain less than those defined under 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 micro-siting changes to the approved SPTP would be similar to those analyzed in the Final EIR/EIS for the approved SPTP.

The effects of each major modified component are summarized below.

Guard Structures. SDG&E is requesting use of work space and access to various transmission line crossings to allow for guarding of facilities such as roads, highways, freeways, railroads, communication lines, electric distribution lines and electric transmission lines where the Sunrise Powerlink overhead transmission line crosses over these features. As noted in Section B.4.1.1, Overhead Construction, of the Project Description (pg. B-52), temporary clearance structures would be erected where required prior to stringing any transmission lines. Because the guard structures were included in the Project Description for the proposed project, they have been considered in the analysis for the alternatives to the proposed project in Sections E.1, E.2, and E.4. The guard structures and workspace required for guarding are a result of the coordination between SDG&E and other utility providers to protect utilities or infrastructure adjacent to the approved SPTP ROW as required by PSU-APM-1. SDG&E has submitted coordination documentation with CalTrans, the Metropolitan Transit System (MTS), the San Diego and Arizona Railway Company (SD&AE), Imperial Irrigation District, and AT&T Communications see Attachment 3 of the Micrositing Request Form. SDG&E Sunrise Powerlink Project coordinated with SDG&E Operations and Distribution groups on April 29, 2011, and May 2 and 4, 2011 regarding guarding of existing utility lines. In compliance with Mitigation Measure G-9a, SDG&E has and will continue to coordinate with the Pyramid Mining Company for any guarding locations they may require when stringing on or near their property.

The presence of the guy wires and guard nets could result in bird and/or bat collisions with these features. As identified in the FEIR/FEIS, such collision impacts with project features would be significant and not mitigable to less than significant levels for listed species and significant but mitigable to less than significant levels for non-sensitive species or daytime migration. Mitigation Measure B-10a (utilize collision-reducing techniques in installation of transmission lines) is required to minimize the impact. As these wires and nets would only be in place for approximately one month, the potential for collision is limited. The impact to birds and/or bats with the use of the guy wires and guard nets would be similar as that listed in the Final EIR/EIS and no new mitigation would be required. The acreage of the temporary disturbance at the guard structure work areas would be approximately 18 acres and would be similar in nature to the temporary disturbance identified for the approved SPTP in the Final EIR/EIS, PMR, and DNA dated March 2011. No additional mitigation would be required for impacts to sensitive vegetation or special status species because the acreages of off-site mitigation lands provided

by the Habitat Acquisition Plan are well in excess of those required as mitigation for the impacts analyzed in the Final EIR/FEIS and approved PMR. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required. The areas must be restored in accordance with the Restoration Plan for Sensitive Vegetation in Temporary Impact Areas (RPSV). Additionally, all other mitigation measures applicable to these areas (e.g., for special status species) must be implemented.

Each proposed work area was surveyed for archaeological resources during both preconstruction fielding activities and cultural resources inventory work for the Sunrise Powerlink Final Environmentally Superior Southern Route (Garcia-Herbst, et al 2010). Appropriate mitigation would be required to reduce any impact to any cultural resources including construction of Environmentally Sensitive Areas or use of a temporary guard structure (boom) to avoid directly impacting any NRHP/CRHR eligible sites as required by Mitigation Measure C-1b: Avoid and protect potentially significant resources (full text on pg. D.7-29). ESA buffers around each site would be established and these sites would be protected as exclusionary zones. In addition, to avoid impacts to any as yet unidentified cultural material, an archaeological and Native American monitor would be required for ground disturbance activities at these locations, in accordance with Mitigation Measure C-1e, Monitor construction at known ESAs (full text on page D.7-323). Lastly, Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) would be implemented during construction, as required (Iversen et al. 2010).

In regard to GS-BLM-5 the Project ROW, the guard structure work areas, and the haul road would be located within and surrounded by an extensive dry wash (18-DW-1). The work area includes approximately 0.5 acre within the dry wash; the guard structures would directly affect approximate 0.01 acre.

In regard to GS-NF-39 There are no jurisdictional waters within the proposed work areas. However, a proposed access road would cut into the southern edge of 25-DW-2.

Per the proposed micro-siting changes request, paleontological monitors shall be present for any ground disturbance from the Imperial Valley Substation to Structure EP290. This is an area of paleontological sensitivity and a qualified paleontological monitor shall observe ground

disturbing activities at all work areas at the following sites: GS-BLM-3/GS-NF-40, GS-BLM-5, GS-BLM-6/GS-NF-42, GS-BLM-7, GS-BLM-8/GS-NF-43, GS-BLM-9/GS-NF-44, and GS-NF-39.

Permanent Tower Staging Access Pads. SDG&E is requesting use of additional TSAPs at structures EP 314, EP267-2, EP265-2, and EP263-2 to reduce the distance traveled by personnel (up to 1,000 feet) and to aid in quick evacuation in emergency situations. TSAPs were considered in the Final EIR/EIS for locations where the approved SPTP would require helicopter construction. As noted in Section B.5.2, Emergency Response, of the Project Description (pg. B-82), in areas without vehicle access, helicopters may be used to respond quickly to emergencies. As such, the use of helicopters to aid in quick evacuation during emergencies was included in the analysis of the approved SPTP.

Additionally, for some sites, EP74-1, EP70, and EP69, although the TSAP is near an existing roadway the distance between the towers and the staging areas would require multiple support vehicles and equipment, long vehicle trips. Use of helicopters at this site would reduce traffic in this area and parking constraints.

The acreage of impact at the TSAPs would be approximately 2 acres. No additional mitigation would be required for impacts to sensitive vegetation or special status species because the acreages of off-site mitigation lands provided by the Habitat Acquisition Plan are well in excess of those required as mitigation for the impacts analyzed in the Final EIR/FEIS and approved PMR. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required and the areas must be restored in accordance with the Restoration Plan for Sensitive Vegetation in Temporary Impact Areas (RPSV). For example, the TSAP at EP265-2 is located within barefoot banded gecko habitat and Peninsular bighorn sheep (PBS) habitat. Therefore, compliance with the mitigation measures for impacts to the barefoot banded gecko (Impact B-7O) would be required as would compliance with the PBS Construction Monitoring Plan. Because of the small area of disturbance associated with the TSAPs, the impact of the TSAPs would be similar in nature as to the TSAPs identified and analyzed in the Final EIR/EIS as modified by the PMR and Changes described in the DNA dated March 2011.

Each proposed TSAP was surveyed for archaeological resources during both preconstruction fielding activities and cultural resources inventory work for the Sunrise Powerlink Final Environmentally Superior Southern Route (Garcia-Herbst, et al 2010). The proposed additional

TSAPs would not create a significant impact on any potential buried site resources nor would it directly impact any NRHP/CRHR eligible sites; however, any site located within 50 ft of a proposed TSAP would require construction of ESAs in accordance with Mitigation Measure C-1b, Avoid and protect potentially significant resources (full text on pg. D.7-29). Per the micro-siting changes request, cultural monitoring shall occur at these locations. Mitigation Measure C-01e: Implement archaeological monitoring at cultural ESAs, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESAs would be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) would be implemented during construction, as required (Iversen et al. 2010).

Secondary Temporary TSAP. During evaluation of the project communications it was identified that additional radio vault facilities were necessary at CP60 and EP146 to provide proper radio communications of crew and project personnel during construction. As such, they would not be available during construction for use for staging and helicopter access. A temporary TSAP would be located at these structures to provide access to the locations. The need for appropriate project communications during construction was addressed for the approved SPTP in Section 2 of the RDEIR/SDEIS as modified in the Final EIR/EIS, and in Section 1.1.4 of the CEQA Determination on the PMR. As with the Permanent TSAPs, the nature of the impact of the two secondary temporary TSAPs is substantially similar to the TSAPs approved at this location; however, the secondary temporary TSAPs would increase the safety of the construction crew at this location.

Structure Move at EP73. SDG&E proposed relocating structure EP73 80 feet to the west of the approved location to avoid several large boulders, and the rerouting of an existing maintenance road. No road would be required at the new location. The tower would be 1.5 feet higher than the approved tower to accommodate for elevation differences. While it would increase the tower height slightly, an increase in 1.5 feet would not be noticeable given the overall size of the tower.

Movement of the structure at EP73 would create similar permanent impacts to those of the approved placement analyzed in the Final EIR/FEIS and/or the approved PMR. The acreage

impacted by the proposed micrositing change, 0.23 acres, is the same acreage as at the approved location. No new mitigation would be required for impacts to sensitive vegetation or special status species. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required.

TSAP Relocation at EP195-2. TSAP located at structure EP195-2 would be relocated approximately 100 feet northward to avoid an environmentally sensitive area. The TSAP was surveyed during preconstruction fielding activities and cultural resources evaluations work for the Sunrise Powerlink Project as required by Mitigation Measure C-1a: Inventory and evaluate cultural resources in Final APE (full text on page D.7-29). The TSAP, as changed by the micrositing would not directly impact an NRHP/CRHR eligible site, in accordance with Mitigation Measure C-1b: Avoid and protect potentially significant resources (full text on pg. D.7-29). In addition, to avoid impacts to any as yet unidentified cultural material, an archaeological monitor would be required for ground disturbance activities at that location and a footpath should be delineated from the TSAP to the EP195-2 tower location, avoiding any ESA's between the two facilities, in accordance with Mitigation Measure C-1e: Monitor construction at known ESAs (full text on page D.7-323) With the proposed micrositing change, Impact C-1: Construction of the project which would cause an adverse change to known historic properties would be reduced.

After reviewing the relocation of the TSAP at EP195-2 it was determined that any biological impacts of the proposed micrositing change would create similar permanent impacts to those for the placement of these permanent project features analyzed in the Final EIR/EIS and/or the approved PMR and DNA dated March 2011. The acreage impacted by the proposed micrositing change, approximately 0.2 acres, is the same acreage as at the approved location. No additional mitigation would be required for impacts to sensitive vegetation or special status species. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required.

An ephemeral drainage with flowing water runs east-west near the tower pad; however, the tower itself is not expected to directly impact the drainage. Compliance with the approved Stormwater Pollution Prevention Plan (SWPPP) required for the approved SPTP would avoid indirect impacts to this drainage (see Section E.1.12, E.2.12, and E.4.12) Impacts to hydrology and water quality would be similar to those identified for the approved SPTP

Spur Road Shift to EP349. During construction monitoring for cultural resources for the approved SPTP as required by Mitigation Measure C-1a: Inventory and evaluate cultural resources in Final APE (full text on page D.7-29), environmentally sensitive resources were discovered at an approved spur road location. SDG&E has requested a shift of the spur road south of the approved location to avoid the sensitive resources as required by Mitigation Measure C-1b: Avoid and protect potentially significant resources (full text on pg. D.7-29). In addition, an archaeological and Native American monitor would be required for ground disturbance activities at the revised location, in accordance with Mitigation Measure C-1e: Monitor construction at known ESAs (full text on page D.7-323). With the proposed micro-siting change, Impact C-1: Construction of the project would cause an adverse change to known historic properties would be reduced.

Shifting the spur road to EP349 (Request #E) would create similar permanent impacts to those for the placement of these permanent project features analyzed in the Final EIR/FEIS and/or the approved PMR and DNA dated March 2011. The acreage impacted by the micro-siting change, approximately 0.2 acres, is slightly less acreage than at the approved location. No additional mitigation would be required for impacts to sensitive vegetation or special status species. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required. The shifted spur road to EP349 occurs in Flat-tailed horned lizard (FTHL) Management Area, so Mitigation Measure B-7b for the FTHL (i.e., delineating work limits, using existing roads, and biological monitoring, etc.) would also be required.

The relocated access road would cross a dry wash (Yuha Wash) which the proposed access road also crosses, north of the new crossing. The nature and magnitude of potential impacts to the wash does not change with the relocated access road.

A dry wash listed as Yuha Wash (5-DW-1) crosses the original and realigned road approximately 130 feet southwest of the center of EP349. The modification does not increase the impact to jurisdictional waters, which is covered by the already approved 404 permit, 401 certification, and LSAA.

Temporary Access Roads to EP323-1 and EP324-1. As noted in Impact H-6, Transmission towers or other aboveground project features located in a floodplain or watercourse could result in flooding, flood diversions, or erosion (Section E.1.12, pg. E.1.12-7 Final EIR/EIS). Due to the

proximity of EP323-1 and EP324-1 to a dry wash, the sites have a high potential for scour. SDG&E had planned to build these towers using helicopters and micropile foundations. However, micropile foundations are more impacted by the potential for scour than traditional conventional (drilled-shaft) foundations and SDG&E has requested use of a temporary access road to the towers such that they can be built using conventional means. As SDG&E notes a drilled shaft is a large diameter stiff concrete element. A micropile foundation is a network of small diameter elements which, without the presence of soil between them, become flexible and susceptible to deflection or buckling with a long unsupported length. Therefore, with the possibility of loss of soil support, the micropile foundation must be significantly bolstered in comparison to a drilled shaft, causing significantly more labor for the micropile foundations in this circumstance. This means that in this particular area of sandy soils, the micropile foundations would need to be scaled up in size to handle this potential for scour and would take almost twice as long to build. This would reduce Impact H-6 as required by Mitigation Measure H-6a, Scour protection to include avoidance of bank erosion and effects to adjacent property (full text on pg. D.12-30).

Using temporary access roads to EP323-1 and EP324-1 would create similar temporary impacts to the use of helicopters to construct these project features as analyzed in the Final EIR/FEIS and/or the approved PMR and DNA dated March 2011. The acreage impacted by the micrositing change is approximately 0.4 acres, is small. No additional mitigation would be required for impacts to sensitive vegetation or special status species because the acreages of off-site mitigation lands provided by the Habitat Acquisition Plan are well in excess of those required as mitigation for the impacts analyzed in the Final EIR/FEIS and approved PMR. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required.

Regarding the hydrological and water quality impacts of the micrositing changes, the location of these two towers within Middle Coyote Dry Wash has not changed. Use of vehicles to access the tower rather than helicopters would result in a similar risk of a spill at the proposed location. Compliance with the approved SWPPP would ensure that BMPs to minimize/avoid such impacts would be implemented and the impacts of using access roads/vehicles would be similar in nature to the use of a helicopter. Additionally, as described in the modification request these access roads would be temporary and would be matted with timber matting within the dry wash.

In order to build structures EP323-1 and EP324-1, new temporary access roads will need to be constructed. The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010 (Garcia-Herst et al. 2010). Environmentally sensitive sites, in accordance with Mitigation Measure C-01b: Avoid and protect potentially significant resources; would be flagged off with temporary fencing and designated as Environmentally Sensitive Areas (ESA). ESA buffers around the site would be established and protected as an exclusionary zone. Mitigation Measure C-01e: Monitor construction at known ESA's, states that Project-wide archaeological and Native American monitors are to be on-site during the temporary fencing of ESAs. In addition, any ground disturbing activities near the designated ESA would be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) would be implemented during construction, as required (Iversen et al. 2010).

EP323-1 and EP324-1 would be located in an extensive dry wash and were originally planned for micropile foundations and helicopter construction. However, because there is a high potential for scouring at both sites because of their location within a dry wash, SDG&E opted to change the type of foundation to traditional drill-shaft. This change was made because traditional foundations have less potential than micropiles to be affected by scouring. Upgrading the micropile foundations to handle the scouring also would substantially increase the duration of construction activities and the amount of materials required at the sites.

As construction of traditional foundations requires different and additional equipment than required for micropiles, the method of construction also was changed (from helicopter to conventional). This, in turn, necessitated the need for temporary access roads to each site. Except for the access roads, the impact areas for construction activities at the sites would remain as planned (i.e., the structure sites and work areas would not increase in size). See Attachment 1(f) for photographs of the two areas.

- The access road to EP323-1 would extend approximately 240 linear feet (lf) from the temporary wire stringing site to the structure work area. Douglas-fir mats would be placed on the entire length of the road. An existing, graded road which travels to the wire pulling site at EP322-1/323-1 that is currently being utilized by Border Patrol and

members of the public, would also be used for light traffic only (pickup trucks and monitor vehicles), with no mats added.

- The proposed access to EP 324 is via a new road that would extend approximately 993 linear feet (lf) from an existing SWPL access road to the structure work area (see Map-4). Douglas-fir mats would be placed on the portion of the road within 12-DW-2 (approximately 280 lf).

The purpose of the Douglas-fir mats is to reduce the ground disturbance in the dry wash that otherwise would occur in connection with construction and use of the temporary access roads. The mats that the contractor would use are 8 inches thick by 4 feet wide by 16 feet long. To safely set down the mats and have them remain securely in place, a minimum width of 12 feet of relatively flat ground is required. Where present, vegetation would be cleared or crushed. On the access road to EP323-1, uneven terrain would be smoothed using a skid steer. Where mats are used on the access road to EP324-1, uneven terrain would be smoothed by hand grading crews. During smoothing operations on both access roads, fiber rolls would be placed as needed on the downslope side to protect the dry wash from displaced soils. Once the mats are in place, the fiber rolls would be removed. It is estimated that the Douglas-fir mats would remain in place on both roads for approximately 4 months.

After construction at EP323-1 and EP324-1 is complete, the Douglas-fir mats would be removed and the entire length of both temporary roads would be restored to pre-construction conditions. Maintenance of both structures would occur by helicopter as originally planned.

As noted, all of the access road to EP323-1 and a portion of the road to EP324-1 would be within jurisdictional waters. SDG&E has submitted an amendment request to the Corps, SWRCB, and CDFG to authorize the additional impacts. The Corps has approved the request. Action by the SWRCB and CDFG is still pending.

Additional Access Road to S2 Construction Yard.

This proposed micro-siting change is required in order to avoid impacts to jurisdictional waters (associated with drainage crossings) that would occur as a result of complying with the project's Clean Water Act Section 401 permit (Water Quality Certification).

Request "G" for an access gate off of an existing paved road and into the S2 Construction Yard within previously approved construction limits would not create new impacts to biological resources since the entire yard was already considered impacted during the PMR analysis.

Transposition Access Road/Work Area at EP50.

This proposed micro-siting change is required due to the electro-magnetic influences which conductors have on each other, causing the loading on lines to become unbalanced. The transposition site at EP50 would require an additional work area of 0.3 acres. These impacts would be similar to temporary impacts at EP50 that were analyzed in the Final EIR/EIS and/or the approved PMR and DNA dated March 2011. The acreage impacted by the proposed micro-siting change is small. No additional mitigation would be required for impacts to sensitive vegetation or special status species because the acreages of off-site mitigation lands provided by the Habitat Acquisition Plan are well in excess of those required as mitigation for the impacts analyzed in the FEIR/FEIS and approved PMR. Any applicable mitigation for special status species, other than mitigation for habitat loss, would still be required.

Summary of Cultural Resource Findings

Pursuant to the Sunrise Powerlink Programmatic Agreement executed in December 2008 and Chapter 7 of the *Final Historic Properties Management Plan for the Approved San Diego Gas and Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* (HPMP) which provides for issuance of clearances to begin construction and documentation of compliance with Section 106, BLM professional cultural resources staff have reviewed this undertaking and have made the following recommendations regarding historic properties that may be affected.

Based on the the Programmatic Agreement, the HPMP and the BLM Record of Decision, the following actions are required as part of issuance of a NTP for the above micro-siting requests:

- **C-1b: Avoid and protect potentially significant resources**
- **C-1e: Monitor construction at known Environmentally Sensitive Areas (ESAs)**- The HPMP provides additional procedures and requirements.
- **C-2a: Properly treat human remains** - The HPMP provides additional procedures and requirements.

- **C-3a: Monitor construction in areas of high sensitivity for buried resources** - The HPMP provides additional procedures and requirements.
- **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties-** The HPMP provides additional procedures and requirements.
- **CR-APM-05: Follow procedures for inadvertent discoveries** – The HPMP and the Historic Properties Treatment Plan document these procedures and requirements.
- SDG&E will also continue to comply with Cultural resources mitigation measures as outlined in the MMCRP.

Specifically, there were no archaeological sites located within the proposed action's direct impact areas however the following sites are located within 50ft of certain microsites and will need to be designated as ESAs:

CA-IMP-3747
 CA-IMP-4350
 CA-IMP-7820
 CA-SDI-6776
 CA-SDI-19851
 CA-SDI-19301

ESA buffers around each site will need to be established and these sites protected as exclusionary zones. Archaeological and Native American monitors are to be on-site during the temporary fencing and during any ground disturbing activities near the designated ESAs.

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 a number of changes to the project along the route on BLM-administered land. The changes were submitted with 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

Margaret L. Goodro	Field Manager	El Centro Field Office, BLM
Thomas Zale	Associate Field Manager	El Centro Field Office, BLM
Sandra McGinnis	Planning & Environmental Coordinator	California State Office, BLM
Nicollee Gaddis	Planning & Environmental Coordinator	El Centro Field Office, BLM
Carrie Simmons	Archaeologist	El Centro Field Office, BLM
Sharon Tyson	Wildlife Biologist	El Centro Field Office, BLM
Andrew Trouette	Natural Resource Specialist	El Centro Field Office, BLM
Susan Lee		Aspen Environmental Group
Emily Capello		Aspen Environmental Group

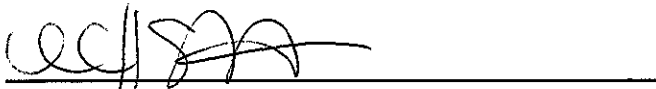
Note: Refer to the EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

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

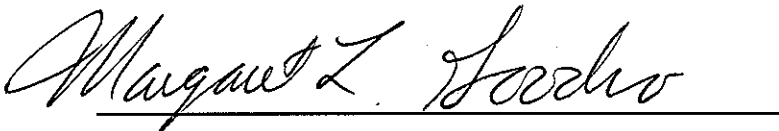
Based on the review documented above in this DNA, I conclude that the proposed changes to the approved SPTP conform to the applicable land use plans inasmuch as the proposed changes are within the approved plan amendment for the Sunrise Powerlink Project. The NEPA EIS documentation fully covers the proposed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



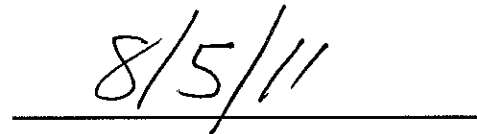
Signature of Project Lead



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

United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
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El Centro, CA 92243
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In Reply Refer To:

CA-670-06-28/CA-47658/ EIS CA-670-2006-31/DOI-BLM-CA-D070-2011-0086-DNA
(8100)P

Memorandum

To: Field Manager, El Centro Field Office (CA-670)

From: Archaeologist, El Centro Field Office (CA-670)

Subject: Agency Findings and Determinations under Section 106 of the National Historic Preservation Act

Project: Sunrise Powerlink: Micrositing Changes to the Approved Project as modified by the PMR, Imperial and San Diego Counties, California

The Bureau of Land Management (BLM) El Centro Field Office has received a request from San Diego Gas and Electric to approve a set of micrositing changes to the approved the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project as modified in the Project Modification Report (PMR), the DNA dated March 2011, and as analyzed in the Final EIR/EIS. These changes include the following:

Extra workspace for guarding

New proposed guard structures at: GS-BLM-1A, GS-BLM-1, GS-BLM-2, GS-BLM-3/GS-NF-40, GS-BLM-5, GS-BLM-6/GS-NF-42, GS-BLM-7, GS-BLM-8/GS-NF-43, GS-BLM-9/GS-NF-44, GS-NF-38, GS-NF-39

Temporary and permanent Tower Staging Access Pads (TSAPs)

New proposed TSAPs at EP314, EP267-2, EP265-2, EP263B-2, EP146, EP74-1, EP70, EP60

Micrositing movements at structure EP73

Relocation of the TSAP at EP195-2

Spur road shift at EP349

New temporary access roads at EP323-1 and EP324-1

An additional access road into S2 Construction Yard

A new access road and work area at EP50

Pursuant to the Sunrise Powerlink Programmatic Agreement (PA)* executed in December 2008 and Chapter 7 of the *Final Historic Properties Management Plan for the Approved San Diego Gas and Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* (HPMP) which provides for issuance of clearances to begin

construction and documentation of compliance with Section 106, BLM professional cultural resources staff have reviewed this undertaking and have made the following recommendations regarding historic properties that may be affected.

Identification and evaluation efforts for the Sunrise Powerlink project are described in the report titled *Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California* prepared by ASM Affiliates (Arlene Garcia-Herbst et al, June 2010). Based on the above documentation, the PA, the HPMP and the BLM Record of Decision, the following actions are required as part of issuance of a NTP for the above micro-siting requests:

- **C-1b: Avoid and protect potentially significant resources**
- **C-1e: Monitor construction at known Environmentally Sensitive Areas (ESAs)**- The HPMP provides additional procedures and requirements.
- **C-2a: Properly treat human remains** - The HPMP provides additional procedures and requirements.
- **C-3a: Monitor construction in areas of high sensitivity for buried resources** - The HPMP provides additional procedures and requirements.
- **C-5a: Protect and monitor NRHP- and/or CRHR-eligible properties**- The HPMP provides additional procedures and requirements.
- **CR-APM-05: Follow procedures for inadvertent discoveries** – The HPMP and the Historic Properties Treatment Plan document these procedures and requirements.
- SDG&E will also continue to comply with Cultural resources mitigation measures as outlined in the MMCRP.

Specifically, there were no archaeological sites located within the proposed action's direct impact areas however the following sites are located within 50ft of certain micro-siting components and will need to be designated as ESAs:

**CA-IMP-3747
CA-IMP-4350
CA-IMP-7820
CA-SDI-6776
CA-SDI-19851
CA-SDI-19301**

ESA buffers around each site will need to be established and these sites protected as exclusionary zones. Archaeological and Native American monitors are to be on-site during the temporary fencing and during any ground disturbing activities near the designated ESAs.

The BLM has determined that the previous inventory efforts and required mitigation measures are adequate to identify and protect historic properties on public lands that might be affected by this project modification. Therefore, the BLM staff archaeologist has recommended that the

proposed micro siting changes would have no effect on historic properties if the above measures are implemented.

The BLM makes the following finding for this undertaking

The BLM finds that there will be *no historic properties affected* by this undertaking provided the above mitigation measures are implemented.

This memorandum documents the recommendations of the cultural resources staff, the acceptance of these recommendations by the Agency Official (as defined in 36 CFR §800.2(a), Protection of Historic Properties), and constitutes the formal statement of Agency findings and determinations for Section 106 of the National Historic Preservation Act. For this NTP, the BLM has satisfied its responsibilities to take into account the effects of this undertaking on historic properties that may be included or eligible for inclusion on the National Register of Historic Places.

Recommended by:



Archaeologist, El Centro Field Office

8/2/11

Date

Acceptance by the Agency Official:



Field Manager, El Centro Field Office

8/2/2011

Date

* 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.

References:

Garcia-Herbst, Arleen, David R. Iversen, Don Laylander, and Brian Williams

2010, Class III Inventory of the Cultural Resources within the Approved San Diego Gas & Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San Diego and Imperial Counties, California. ASM Affiliates, Inc. Submitted to Bureau of Land Management, El Centro Field Office and San Diego Gas & Electric.