Worksheet

Determination of NEPA Adequacy (DNA)

Sunrise Powerlink Project

Project Modifications

U.S. Department of the Interior

Bureau of Land Management

September 2010

Worksheet

Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior

Bureau of Land Management

OFFICE: El Centro Field Office

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

CASE FILE/PROJECT NUMBER: CACA-47658

PROPOSED ACTION TITLE/TYPE: The proposed action is a set of modifications to the approved project, the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project, as analyzed in the Final EIR/EIS and Associated Amendment to the Eastern San Diego County Resource Management Plan (RMP) for a single utility crossing in the McCain Valley. These modifications include minor transmission line route alignments, revised construction yard locations, specific locations of marker balls, and installation of infrared lights and microwave equipment on certain transmission towers.

LOCATION/LEGAL DESCRIPTION: The Sunrise Powerlink Transmission Project is a 500 kV electrical transmission line from Imperial Valley Substation to a newly-constructed 500/230 kV Suncrest Substation that was identified in the Final EIR/EIS (called Modified Route D Alternative Substation in the Final EIR/EIS), a distance of approximately 92.53 miles. The right-of-way also granted SDG&E the right to use the described public lands to construct, operate, maintain and terminate a 230 kV electrical transmission line from the Suncrest Substation to Sycamore Canyon Substation, located in San Diego. For the first 36 miles of the Selected Alternative (approved project), the 500 kV transmission line will be built on BLM lands adjacent to the existing Southwest Powerlink 500 kV line. The approved project crosses approximately 49 miles of BLM land, 19 miles of Forest Service land, two miles of Department of Defense land, and 0.4 miles of state land. The remainder of the line crosses lands in various ownerships, including private and local agencies.

The proposed modifications to the approved project generally follow the approved route of the Sunrise Powerlink Transmission Project, as defined in the Final EIR/EIS and would not substantially change the location of the approved project. Most are within 1000 feet of the approved project alignment. The proposed modifications to the approved project also include some additional hardware required for the project.

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

A. Description of the Action and any applicable mitigation measures

Proposed Modifications to the approved Sunrise Powerlink Transmission Project

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

A number of mitigation measures incorporated as right-of-way terms and conditions required SDG&E to avoid resources, minimize environmental impacts, and/or accommodate landowner requests into the final engineering and design for the approved project. Mitigation measures that have resulted in proposed project modifications include the following:

Mitigation Measures for Biological Resources

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

B-7b: Implement avoidance/mitigation/compensation according to the Flat-Tailed Horned Lizard Rangewide Management Strategy

B 7i: Conduct Quino checkerspot butterfly surveys, and implement appropriate avoidance/minimization/compensation strategies

B-1l: SDG&E shall continue to work with the USDA Forest Service to minimize impacts to the RCA between Structures 184 and 187

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

Mitigation Measure for Land Use

L-2b: Revise project elements to minimize land use conflicts (pg. E.1.413, FEIR/EIS 2008)

Mitigation Measure for Agriculture

AG 1a: Avoid interference with agricultural operations (pg. E.1.6-4, FEIR/EIS 2008)

Mitigation Measure for Cultural Resources

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

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

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

C-6e: Reduce adverse visual intrusions to portions of Old Highway 80 (pg. E.1.7-8, FEIR/EIS 2008)

C-6f: Reduce adverse visual intrusions to the Desert View Tower viewshed (pg. E.1.7-8, FEIR/EIS 2008)

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

Mitigation Measure for Geology and Minerals

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

GEO-APM-4: Structures will be placed in geologically stable areas, avoiding fault lines, brittle surface rock and bedrock, etc. to the extent feasible (pg. E.1.13-9, FEIR/EIS 2008)

GEO-APM-5: Project construction activities will be designed and implemented to avoid or minimize new disturbance, erosion on manufactured slopes, and off-site degradation from accelerated sedimentation (pg. D.13-34, FEIR/EIS 2008)

Mitigation Measure for Public Services, Utilities, and Socioeconomics

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 the event of a conflict, the project will be aligned vertically and/or horizontally as appropriate to avoid other utilities and provide adequate operational and safety buffering.

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

Mitigation Measure for Visual Resources

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

V-2d: Construction by helicopter (pg. E.2.3-14; FEIR/EIS 2008)V-3a: Reduce visual contrast of towers and conductors (pg. E.2.3-5; FEIR/EIS 2008)

V-66a: Reduce structural prominence and visual contrast associated with the Interstate 8/Chocolate Canyon transition structures (pg. E.1.3-24, FEIR/EIS 2008)

V-68a: Eliminate skylining of ridgeline towers and conductors (pg. E.1.3-25, FEIR/EIS 2008)

Mitigation Measure for Wilderness and Recreation

WR-2a. Develop a reroute for the BCD Alternative Revision to reduce effects on recreation (pg. 3-26 SDEIS)

Mitigation Measure for Traffic

T-1a: Restrict lane closures (pg. E.2.9-3; FIER/EIS 2008)

Mitigation Measure for Fire

F2b: Install existing conductors on steel poles (pg. E.1.15-25, FEIR/EIS 2008)

In compliance with these mitigation measures, SDG&E has identified 44 proposed modifications to the approved project based on final engineering and design. These include minor changes in transmission line route alignments, placement of towers and poles, size and location of temporary work areas, number and length of new access roads, and construction methods (conventional or helicopter). The proposed modifications to the approved project are described in detail in the Sunrise Powerlink Project Modification Report dated May 14, 2010. The proposed modifications are also listed below in Table 1 which describes the approved project (FESSR) as well as each of the 44 specific proposed modifications (PMR1 through PMR44).

Table 1 also defines the mitigation measure (by number only) that required each modification to be made.

Table 1. Approved Project and Proposed Modifications Resulting From Implementation of Mitigation

Approved Project	Mitigation Measures Requiring Proposed Modifications	Proposed Modification Subunit	Description of Proposed Modification
Interstate 8 Alternative between the Imperial Valley Substation and MP I8-40 (where the BCD Alternative diverges), including the following reroutes: • Southwest Powerlink (SWPL) Archaeological Site Reroute; and • Jacumba SWPL Breakaway Point Revision	• B-1a: pg. E 1 2-7, FEIR/EIS 2008 • B-7b: pg. E.1.2-25, FEIR/EIS 2008 • B 7i: pg E 1 2-31, FEIR/EIS 2008 • BIO-APM-1: pg E.1.2-13, FEIR/EIS 2008 • L-2b: E 1 413, FEIR/EIS 2008 • AG 1a: pg E.1.6-4, FEIR/EIS 2008 • C-1a: pg E.1.7-5, FEIR/EIS 2008 • C-1b: pg. E 1.7-5, FEIR/EIS 2008 • C-6a: pg E 1.7-8, FEIR/EIS 2008 • C-6e: pg E.1 7-8, FEIR/EIS 2008 • C-6f: pg E 1.7-8, FEIR/EIS 2008 • G 9a: pg E 1.13-10, FEIR/EIS 2008 • GEO-APM-4: pg. E.1.13-9, FEIR/EIS 2008 • PSU-APM-1	PMR1. Imperial Valley Substation	Construction of a steel building on the southeastern portion of the existing substation site.
		PMR2. EP363-1 to P333 (Dunaway Road)	Shift approximately 10 miles of the transmission alignment approximately 140 feet southwest to accommodate the Imperial Valley transmission line crossing and avoid cultural sites.
		PMR3. EP333 to EP324 (Plaster City)	Shift 2 2 miles of the alignment approximately 450 feet to the northeast to avoid cultural resources, a wetland, and a dry wash.
		PMR4 EP324 to EP301 (Pyramid Mining)	Shift the alignment approximately 25 feet to the south between EP 318-1 and EP314 and approximately 50 feet south between EP303-2 and EP301 to reduce impacts to biological and cultural resources and improve construction.
		PMR5. EP301 to EP276-1 (Sugarloaf)	Shifts structures within the FESSR ROW to avoid a major cultural resource site and reduce dry wash impacts
		PMR6. EP276 to EP255-1 (Desert View Tower)	Shift the alignment approximately 500 feet to the west placing the transmission line closer to Interstate 8, but at lower elevation This would reduce visual impacts as viewed from Desert View Tower.
		PMR7. EP255 to EP252-1 (Jade Mountain)	Relocate two towers on the slopes of Jade Mountain to approximately 250 feet south; one new tower and tower staging/access pad to reduce visual impacts of structures on Jade Mountain.
		PMR8. EP252-1 to EP239-1 (Jacumba)	Shift the alignment approximately 25 feet north and eliminate one wire pull site and reduce temporary construction pads at all structures to avoid Quino checkerspot butterfly (QCB) occupied habitat and avoid an underground irrigation system.

Table 1. Approved Project and Proposed Modifications Resulting From Implementation of Mitigation

Approved Project	Mitigation Measures Requiring Proposed Modifications	Proposed Modification Subunit	Description of Proposed Modification
		PMR9. P239-1 to EP229-1 (Quino)	Shift the alignment approximately 2,400 feet to the north to avoid Quino checkerspot butterfly (QCB) occupied habitat.
Continued: **Interstate 8 Alternative** between the Imperial Valley Substation and MP I8-40 (where the BCD Alternative diverges)		PMR10 EP229 to EP221-A (Bankhead Springs)	Shift the alignment approximately 400 feet to the north at P223-1 and use helicopter construction to avoid steep mountainsides and reduce impacts to sensitive vegetation communities.
		PMR11. EP221-A to EP219-1 (Jackson-Gatlin)	Shift the alignment approximately 800 feet to the south to avoid coast live oak trees, existing structures on private property, and herbaceous wetlands.
BCD Alternative and BCD South Option Revisions	• B-1a: pg. E 2 2-8; FEIR/EIS 2008 • B-1l: pg. E 2 7-25; FEIR/EIS 2008 • V-1a: pg. E 2 3-12, FEIR/EIS 2008 • V-2d: pg E 2 3-14; FEIR/EIS 2008 • V-3a: pg. E 2 3-5; FEIR/EIS 2008 • WR-2a pg. 3-26 SDEIS • C-1a: pg E 2 7-2, FEIR/EIS 2008 • C-1b: pg. E 2 7-2; FEIR/EIS 2008 • CR-APM-2: pg D 7-23, FEIR/EIS 2008 • GEO-APM-5: pg. D 13-34, FEIR/EIS 2008 • T-1a: pg E 2 9-3; FIER/EIS 2008	PMR12. EP219-1 to EP206-1 (State Corrections)	Shift the alignment approximately 75 feet to the north where it parallels I-8 and 75 feet to the east between Structures EP213 and EP211 to improve engineering design and reduce impacts to jurisdictional waters.
		PMR13. EP206-1 to EP196-1 (Rough Acres)	Shift the alignment approximately 150 feet to the west, west of McCain Valley Road, and would eliminate two previously-proposed structures to accommodate a request from a property owner.
		PMR14. EP196-1 to EP170 (McCain Valley)	Shift the alignment approximately 150 feet to the east and add temporary work areas adjacent to each transmission structure to facilitate construction. Eliminate a long new access road by instead grading existing roads and building a new spur road. It would reduce structure skylining.
		PMR15. EP170 to EP141 (JAM)	Shift the alignment 4,650 feet to the south to avoid private property and comply with Mitigation Measure WR-2a. It would reduce the length of the ROW by 3,600 feet and by approximately five towers. Construction of the remaining 11 towers would be by helicopter.
		PMR16. EP141 to EP122 (Thing Valley)	Shift the alignment 750 feet to the west and add two structures, spur roads, and larger temporary work areas to avoid steep hillside and accommodate US Forest Service requests, primarily to avoid skylining.

Table 1. Approved Project and Proposed Modifications Resulting From Implementation of Mitigation

Approved Project	Mitigation Measures Requiring Proposed Modifications	Proposed Modification Subunit	Description of Proposed Modification
Modified Route D Alternative, including the Modified Route D Alternative Substation, as modified to incorporate the following SDG&E reroutes: • Cameron Reroute • Pacific Crest Trail (PCT) Option A, which follows the existing SDG&E 69 kV line, is approved. BLM worked with the Forest Service to develop additional mitigation (WR-2c, PCT Route Impact Mitigation) for the PCT crossing • Western Modified Route D Alternative (MRDA) Reroute • Star Valley Option Revision was identified by, the Forest Service as its preferred segment in eastern Alpine	• B-1a: pg E.4.2-9, FEIR/EIS 2008 • B 7i: pg. E.4 2-17, FEIR/EIS 2008 • V-2d: pg E 4 3-9, FEIR/EIS 2008 • L-2b: pg E.4.47, FEIR/EIS 2008 • C-1a: pg E 4 7-3, FEIR/EIS 2008 • C-1b: pg E 4 7-3, FEIR/EIS 2008 • F-2b: pg E.4.15-14, FEIR/EIS 2008	PMR17. EP122 to EP108-2 (La Posta)	Shift the alignment approximately 300 feet to the east until the I-8 crossing and then the modification shift the alignment up to 1,400 feet northwesterly to accommodate US Forest Service requests, primarily to avoid skylining.
		PMR18. EP108-2 to EP99-2 (Lenac)	Shift the alignment as much as 650 feet to the east at the request of a landowner and reduce structure height, as requested by the Department of Defense.
		PMR19. EP105-2 (Rees)	Relocate the access road to EP105-2 west of the structure to spur off of Cameron Truck Trail to accommodate a landowner request.
		PMR20. EP99-2 to EP79 (Bartlett)	Shift the alignment approximately 50 feet to the east and add temporary construction pads to some of the structures. Reduce size of construction yard to reduce impacts to biological resources.
		PMR21. EP79 to EP67 (Pacific Crest Trail)	Shift the ROW approximately 50 feet south to reduce impacts to the CNF.
		PMR22. EP67 to EP62A-1 (Long Potrero)	Shift the structures east within the FESSR alignment and would remove some structures to improve constructability and maximize use of existing roads.
		PMR23. EP62A-1 to EP47-2 (Potrero)	Shift the alignment approximately 2,000 to 4,000 feet north to straighten and shorten the FESSR alignment by 0.34 miles to improve constructability and reduce ground disturbance.
		PMR24. EP47-2 to P39-1 (Barrett Lake)	Eliminate eight structures by increasing the span length between structures to improve constructability and reduce visual impacts. Access roads would be removed and replaced with tower staging/access pads and two temporary work areas would increase in size.
		PMR25. EP39-1 to EP22-1 (Hermes)	Shift the alignment up to 4,300 feet east to a straight northerly route, reducing impacts to the Hermes copper butterfly habitat and occupied Quino checkerspot butterfly habitat.

Table 1. Approved Project and Proposed Modifications Resulting From Implementation of Mitigation

Approved Project	Mitigation Measures Requiring Proposed Modifications	Proposed Modification Subunit	Description of Proposed Modification
***Continued*:** **Modified Route D Alternative, including the Modified Route D Alternative Substation**, as modified to incorporate the following SDG&E reroutes: • Cameron Reroute • Pacific Crest Trail (PCT) Option A, which follows the existing SDG&E 69 kV line, is approved. BLM worked with the Forest Service to develop additional mitigation (WR-2c, PCT Route Impact Mitigation) for the PCT crossing • Western Modified Route D Alternative (MRDA) Reroute • Star Valley Option Revision was identified by, the Forest Service as its preferred segment in eastern Alpine	• B-1a: pg E 4.2-9, FEIR/EIS 2008 • B 7i: pg E 4.2-17, FEIR/EIS 2008 • V-2d: pg. E 4 3-9, FEIR/EIS 2008 • L-2b: pg E 4.47, FEIR/EIS 2008 • C-1a: pg E 1.7-5, FEIR/EIS 2008 • C-1b: pg E 1.7-5, FEIR/EIS 2008	PMR26 EP22-1 to EP12-3 (Gaskill Peak North)	Shift the alignment up to 800 feet to the east and eliminate two structures and most access roads to improve engineering and reduce ground disturbance.
		PMR27. EP12-3 to EP9-1 (Cedar Ranch)	Shift the alignment up to 180 feet to the southeast to improve engineering and would reduce the number of structures to reduce ground disturbance.
		PMR28. EP9-1 to EP1-3 (Just)	Shift the alignment up to 400 feet northwest and reduce the number of access roads to accommodate a landowner request.
		PMR29. Suncrest Substation and Access Road (Suncrest Substation)	Reduce grading around the Suncrest Substation (formerly called the Modified Route D Substation in the Final EIR/EIS), and move the Bell Bluff Truck Trail (access road) to reduce impacts to biological resources.
		PMR30 CP109 to CP106-1 (Bell Bluff)	Shift the alignment up to 300 feet to the north and eliminate five wire stringing sites to avoid cultural sites.
		PMR31. CP106-1 to CP98-1 (Jerney)	Shift the alignment up to 400 feet to the south at the western end, eliminate three towers on USFS land, and change two towers, CP99-2 and CP98-1, from lattice to steel poles to accommodate landowner requests.
		PMR32. CP98-1 to CP95-1 (230 kV UG Including Loritz Driveway)	Shift the alignment approximately 50 feet to the west, relocate an access road through a driveway on the Loritz property, and revise the 230 kV overhead-to-underground transition location to accommodate landowner requests.
Interstate 8 Alternative installed underground in Alpine Boulevard	• V-66a: pg E 1.3-24, FEIR/EIS 2008 • L-2b: pg E.1.413, FEIR/EIS 2008 • S-2b: pg. E.1 14-5, FEIR/EIS 2008)	PMR33 230 kV Underground from Alpine Blvd/Loritz Driveway to CP88-1/CP87-1 (230 kV UG)	Include an additional access road on the Bauer property to accommodate a Caltrans request to avoid a drainage easement
Chocolate Canyon Option Revision	• B-1a: pg E.1 2-7, FEIR/EIS 2008 • C-1a: pg. E 1 7-5, FEIR/EIS 2008 • C-1b: pg. E 1.7-5, FEIR/EIS 2008	PMR34. CP88-1/CP87-1 to CP64-2 (Chocolate Canyon)	Shift the alignment west, eliminate six structures, reduce the ROW by nearly 0.5 miles and modify the access roads to reduce ground disturbance.

Table 1. Approved Project and Proposed Modifications Resulting From Implementation of Mitigation

Approved Project	Mitigation Measures Requiring Proposed Modifications	Proposed Modification Subunit	Description of Proposed Modification
Interstate 8 Alternative from the end of the Chocolate Canyon Option Revision to where it joins the Proposed Action/Project route at MP 130, incorporating the High Meadows Reroute and the Highway 67 Hansen Quarry Reroute	• B-1a: pg. E 1 2-x, FEIR/EIS 2008 • V-68a: pg. E 1.3-25, FEIR/EIS 2008) • C-1a: pg. E 1.7-5, FEIR/EIS 2008 • C-1b: pg. E 1 7-5, FEIR/EIS 2008 • L-2b: pg. E 1 413, FEIR/EIS 2008 • S-2b: pg. E 1.14-5, FEIR/EIS 2008	PMR35. CP64-2 to CP53-1 (Morgan)	Shift the ROW upslope locally, increase helicopter construction, eliminate two pull sites, reduce work area size, and remove approximately 2,000 feet of access road to accommodate landowner requests.
		PMR36. CP53-1 to CP44-1 (High Meadow Ranch)	Straighten the FESSR ROW, replace the access road with small/shorter spur roads off of existing roads, and eliminate one structure to accommodate landowner requests.
		PMR37. CP44-1 to CP37-2 (County Aqueduct)	Straighten the FESSR ROW and reduce the length and number of access roads to avoid the San Diego County Aqueduct ROW.
		PMR38. CP37-2 to CP31-2 (Schmidt)	Move the FESSR ROW up to 1,000 feet west, straighten the ROW, eliminate two structures, and reduce the number and length of access roads to accommodate a landowner request.
Proposed Action/Project from MP 130 to the Sycamore Canyon Substation	• B-1a: pg. D 2-87, FEIR/EIS 2008 • L-2b: pg. D 4-30, FEIR/EIS 2008 • C-1a: pg. D 7-50, FEIR/EIS 2008 • C-1b: pg. D 7-50, FEIR/EIS 2008 • PSU-APM-1: pg. D 14-15, FEIR/EIS 2008	PMR39. CP31-2 to CP12-1 (Sycamore Preserve)	Move structures within the proposed ROW slightly, change access road locations, and reduce the length and number of access roads to reduce ground disturbance.
		PMR40. CP12-1 to CP3 (Stonebridge)	Shift structures within the FESSR ROW, eliminates two structures and change from lattice to steel-pole structures along the route segment to accommodate landowner requests.
		PMR 41. CP3 to SSDE-1	Add a temporary work area around one structure (CP3) without changing access, add three wire stringing sites along the borders of the Sycamore Canyon Substation, and add three structures within the existing substation to ensure reliability.

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Approved Project	**Mitigation Measures Requiring Proposed Modifications**	**Proposed Modification Subunit**	**Description of Proposed Modification**
Coastal Link System Upgrades Alternative Revision, which includes: • Reconductoring of existing transmission segments: Sycamore Canyon–Pomerado double-circuit 69 kV; Sycamore Canyon–Scripps 69 kV transmission line; and the existing Sycamore-Elliott 69 kV transmission line • Installation of a third 230/69 kV transformer at the existing Sycamore Canyon Substation and a new 230/138 kV transformer at the existing Encina Substation		PMR42 Sycamore Canyon to Pomerado Substation (TL6915/6924) Reconductoring	Replace an existing conductor with a higher capacity conductor, replace equipment within Pomerado Substation, replace 4 existing transmission poles.
		PMR 43 Sycamore Canyon to Elliot Substation (TL639) Reconductoring	Replace transmission conductors on 84 poles in an 8 2-mile ROW, replace 7 wooden poles in addition to the 10 wooden poles identified in the Final EIR/EIS for a total of with 17 wooden poles, replace an existing underground cable.
		PMR44 Sycamore Canyon to Scripps Substation (TL6916) Reconductoring (Scripps)	Replace transmission conductors on 48 poles in a 6.4 mile ROW, require two underground upgrades, upgrade work within the Scripps Substation.

As the result of the proposed modifications to the approved project:

- The length of the project was shortened by 2 miles
- The number of structures were lessened from 481 to 443
- The number of wire stringing sites were lessened from 129 to 78
- The miles of new access roads decreased from 125.23 to 51.12
- Total permanent ground disturbance as a result of the project decreased from 555.20 acres to 298.41 acres.
- Total temporary ground disturbance as a result of the project decreased from 1,261.59 acres to 685.12 acres.

In addition to the proposed modifications described in Table 1, SDG&E proposes to incorporate additional modifications to the following project components:

- Infrared Lighting: Infrared lighting at specific towers would be added in response to aircraft safety requests from the Department of Defense and the Department of Homeland Security (Border Patrol). This change is the result of SDG&E's compliance with mitigation measure T-11b: Consult with and inform U.S. Customs and Border Protection (pg. E.4.9-5; FEIR/EIS 2008).
- Marker Balls: The specific locations of over 1,300 markers balls on 134 project spans are identified in response to aircraft safety requests from the Department of Defense and the Department of Homeland Security (Border Patrol) based on the location of each span (near airports, at road crossings, and at canyon crossings). This change is the result of SDG&E's compliance with mitigation measure T-11b: Consult with and inform U.S. Customs and Border

Protection (pg. E.4.9-5; FEIR/EIS 2008). The requirement for marker balls is stated in Section B.3.2.4 of the Final EIR/EIS as determined by FAA regulations, and their presence is assumed in the impact analysis, (see Final EIR/EIS Figure E.1 3-10B).

- Construction Yards: Eleven of the nineteen construction yards identified for the modified project have changed in size and location from size and location from those identified in the FESSR reducing temporary disturbance by approximately 46 percent. These changes are refinements of the construction yard locations identified in the Final EIR/EIS or the result of SDG&E's compliance with the mitigation measures listed above.

- Telecommunications Equipment: Microwave communications equipment would be installed within the lattice structure of six transmission towers along the modified project route to increase worker safety by establishing a reliable communications system during project construction and operation. This equipment is a necessary component of and would operate in conjunction with the telecommunication facility upgrades to the Tierra del Sol/White Star described in the Recirculated DEIR/Supplemental DEIS 2008 (pg. 2-13 to 2-14).

B. Land Use Plan (LUP) Conformance

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

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

Other Document Yuha Basin ACEC Management Plan Date Approved 1981

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

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

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

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

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

Two of the proposed modifications to the approved project on BLM-administered land in Eastern San Diego County (PMR13 and PMR14) would involve slight shifts (150 feet) of the right-of-way along same alignment. These modifications are in conformance with the land use plan because they are clearly consistent with the 1989 plan amendment for the Sunrise Powerlink and are proposed as in accordance with the mitigation measures listed above and included in the ROD that approved both the plan amendment and the project.

The third proposed modification to the approved project on BLM-administered land in Eastern San Diego County, the JAM property reroute (PMR15) would involve a greater shift (4650 feet) of the right-of-way. This proposed modification is in conformance with the land use plan because it is specifically provided for in the FESSR and required by Mitigation Measure WR-2a in the ROD.

Yuha Basin Area of Critical Environmental Concern (ACEC) Management Plan, June 1981 The proposed modifications to the approved project, like the FESSR, would pass through the Yuha Basin ACEC south of I-8 in Imperial County. The Yuha Basin ACEC Management Plan has been prepared to give additional protection to unique cultural resource and wildlife values within portions of the Yuha Basin. This ACEC contains high density and diversity of cultural resource values, including intaglios, temporary camps, lithic scatters, cremation loci, pottery loci, trails, and shrines. The ACEC also includes 11 sections containing high relative densities of the flat-tailed horned lizard (FTHL). Mitigation Measures C1b (Avoid and protect potentially significant resources) and C2a (Consult with agencies and Native Americans) were required for the FESSR within the Yuha Basin ACEC and resulted in proposed modifications to the approved project to reduce impacts to the resources that exist in the ACEC. Impacts to public land resources within the ACEC were fully analyzed and disclosed in the Final EIR/EIS. In addition, adverse effects to cultural resources would be reduced through implementation of mitigation measures such as C1e (Monitor construction) and C1f (Train construction personnel). These mitigation measures apply to the approved project and would likewise apply to the proposed modifications to the approved project.

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

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

Cleveland National Forest Land Management Plan. The proposed modifications to the approved project, like the FESSR, would pass through the Cleveland National Forest. The Forest Service amended the Cleveland National Forest Land Management Plan in the Record of Decision (July 2010) to permit an exception to standards for scenic integrity along the proposed modifications to the approved project alignment in the Morena, Sweetwater, and Pine Creek places; permit an exception to Riparian Condition and Biological Resource Condition goals for project activities in Riparian Conservation Areas, and to permit construction of a transmission line tower in a Back Country Non-motorized (BCNM) land use zone. The record of decision amended the Cleveland National Forest Land Management Plan to provide the exceptions which apply only to the proposed modifications to the approved project. As such, the proposed modifications to the approved project are consistent with the Cleveland National Forest Land Management Plan.

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)

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)
- *Programmatic Agreement Among the Department of the Interior, Bureau of Land Management, the Department of Agriculture, Forest Service, the Marine Corps Air Station Miramar, the U.S. Army Corps of Engineers, the California Public Utilities Commission, San Diego Gas and Electric Company, and the California State Historic Preservation Officer Regarding the Proposed San Diego Gas and Electric Power Company's Sunrise Powerlink Transmission Line Project, Imperial and San Diego Counties, California* (December 2008)
- *Final Mitigation Monitoring Compliance and Reporting Plan San Diego Gas & Electric Company's Sunrise Powerlink Project* (April, 2010). A number of pre-compliance reports, permit applications, and other documents are available at the CPUC website that are part of the construction progress and mitigation monitoring at <http://www.cpuc.ca.gov/environment/info/aspen/sunrise/otherdocs.htm>
- *Project Modification Report*. Prepared by San Diego Gas and Electric Company, (May 2010).

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 modifications to the approved project are primarily minor alignment shifts which are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1, E.2, and E.4). The transmission line modifications detailed in Table 1 would function the same way as the FESSR and its associated equipment as evaluated in the Final EIR/EIS. The minor alignment shifts would not materially change the overall alignment of this transmission line, the location of the line or the analysis area. Most are within 1,000 feet of the approved project.

Additional proposed modifications to the approved project include a decrease in total size and revised locations of the construction yards, a smaller Suncrest Substation, and a revision of the reconductoring replacement poles. The project modifications would also include microwave

transmission equipment located inside the lattice structure of six transmission towers and the installation of infrared lighting and marker balls along the transmission line Finally, a new storage container would be located at the Imperial Valley Substation, on disturbed land analyzed for the FESSR

Although the use of marker balls was assumed (see pg. B-47 and Figure E.1.3-10B of the Final EIR/EIS), the number and locations of marker balls were not detailed and the proposed use of infrared lighting on some transmission towers was not explicitly described in the Final EIR/EIS. As stated in the right-of-way grant, SDG&E is required to comply with all local, state, and Federal ordinances, regulations, statues and laws in construction, operation, and maintenance of the project and to comply with all requirements of other authorizing agencies for the project, including obtaining Federal, state, and local permits, licenses and approvals. Furthermore, SDG&E was required to comply with mitigation measure T-11b: Consult with and inform U.S. Customs and Border Protection (pg. E.4.9-5; FEIR/EIS 2008).

The use of infrared lighting was requested by the U.S. Customs and Border Protection, Office of Air & Marine, San Diego Branch. The spans proposed to be marked were due to safety requirements either identified in the FAA Advisory Circular AC70/7460-1K addressing the catenary heights in these spans (e.g., those over 200 feet in height), or as a result of a request from the Air Marine Division, Customs Border Protection (CBP) regarding spans that are either located across "improved roads" or canyons where low level flight operations are likely to occur.

Similarly, after SDG&E completed final project design and defined specific tower and span heights, the Department of Defense and Homeland Security (Border Patrol) requested that marker spheres be installed on static lines (at the top of the towers, above the conductors) to ensure aircraft safety. The PMR states that over 1,300 marker balls would be required on 134 project spans (see PMR Table 2-2) based on the location of each span (near airports, at road crossings, and at crossings of canyons) as determined by FAA regulations. Like infrared lighting, marker spheres improve aircraft safety by making project components more visible to aircraft in specific flight paths.

Finally, the new storage container would be located at the Imperial Valley Substation, on disturbed land analyzed for the FESSR. Modifications to Imperial Valley Substation were analyzed in the D Sections of the Final EIR/EIS for the proposed project and included construction and storage yards. As such, the new storage container is similar to an alternative analyzed in the Final EIR/EIS. Therefore, the proposed modifications to the approved project are features of, or essentially similar to, an alternative analyzed in the existing NEPA documents.

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 modifications to the approved project are within the same geographic area as the approved project and the resource conditions are substantially the same as those analyzed in the Final EIR/EIS. This fact is confirmed by the close proximity of the proposed modifications and the approved route. The proposed modifications on public lands requiring changes to the transmission line route are within the same CDCA utility corridor as those of the approved project and shift less than five hundred feet west in Thing Valley. The proposed modification along the JAM properties would shift the alignment up to 4,650 feet south at the widest point and was incorporated into the Final EIR/EIS; this modification results from compliance with a mitigation measure requiring avoidance of the private lands. The tower staging access pads, Suncrest Substation, and reconductoring are within the approved project corridor and most are within 1,000 feet of the approved route.

Eight of the 19 construction yards are in the exact same location as those identified in the Final EIR/EIS. The other 11 construction yards have been revised slightly as explained below but are all within the same analysis area considered in Sections E.1, E.2, and E.4 of the Final EIR/EIS.

The construction yards locations that have been revised are as follows:

Dunaway Road Construction Yard: approximately 0.5 miles north of the approved construction yard, within the CDCA approved utility corridor	Plaster City Construction Yard: immediately east of the approved construction yard, within the CDCA approved utility corridor
BLM S2 Construction Yard: approximately 0.5 miles west of the approved project alignment, within the CDCA approved utility corridor	Jacumba Valley Ranch Construction Yard: immediately north of the approved project alignment
Rough Acres Construction Yard: immediately west of the approved project alignment	McCain Valley Construction Yard: immediately west of the approved construction yard
Thing Valley Construction Yard: immediately east of the approved project alignment	Barrett Canyon Construction Yard: immediately eat of the approved construction yard
Alpine Yard Construction Yard and Alpine HQ Construction Yard: less than 1,000 feet north of the approved project alignment	Helix Construction Yard: approximately 750 feet south of the approved construction yard
Stowe/Kirkham Construction Yard: approximately 1 mile north of the approved project alignment	

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

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

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

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

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

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

Transmission Line Alignment Modifications. As detailed in the first column of Table 1, the following proposed modifications to the approved alignment are components of alternatives that were evaluated in the Final EIR/EIS:

- Proposed modification subunits PMR1 through PMR 11 are components of the I-8 Alternative (between MP-0 to MP-40), analyzed in Section E.1.2 through E.1.15.
- Proposed modifications subunits PMR 12 through PMR 15 are within the area defined as the BCD Alternative and subsume the JAM revision, in compliance with Mitigation Measure WR-2a.
- Proposed modification subunits PMR 16 and 17 are components of the BCD South Option alternative analyzed in Section E.2.2 through E.2.15.

- Proposed modification subunits PMR 18 through PMR32 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 modification subunit PMR33 is substantially the same as the portion of the Interstate 8 Alternative that would be installed underground in Alpine Boulevard (analyzed in EIR/EIS Section E.1 2 through E.1.15)
- Proposed modification subunit PMR34 modifies the approved Chocolate Canyon Option Revision (Section E.4-2 through E.4-15), and proposed modification subunits PMR35 through PMR 38 are similar to the I-8 Alternative (Section E.1.2 through E.1.15).

Proposed modification subunits 39 through 41 are components of the approved segment of the Proposed Action/Project from MP 130 to the Sycamore Canyon Substation (Section D.4 through D.15), and proposed modification subunits PMR42 through PMR44 would affect components of the Coastal Link System Upgrades (Section D.2 through D.15).

Construction Yards. Construction yards (called "staging areas" in the Final EIR/EIS) are described in the Final EIR/EIS for the Sunrise Powerlink Project in Section B.4.5. The Final EIR/EIS states that construction yards would be required for storing materials, construction equipment, and vehicles. It further acknowledges that the exact locations had not yet been determined, and that the staging areas would likely be sited near the center and endpoints of the proposed route of the SRPL and at several potential locations in between. It was anticipated that the exact locations would be finalized following final engineering and negotiations with landowners. The Final EIR/EIS included analysis of 43 construction yards along the FESSR (approximately 801 acres of temporary ground disturbance). The proposed modifications present 19 construction yards (a reduction of ground disturbance by nearly half, with 430 acres of temporary ground disturbance).

The resource values evaluated in the Final EIR/EIS for the project construction yards have not changed, nor have any new adverse impacts been identified as a result of the proposed construction yard modifications. Therefore, the modifications of the yards have no effect on the range of alternatives discussed in the Final EIR/EIS, and no additional environmental review is warranted as a result of this modification. See Memorandum Section 1.1.3 for a detailed discussion regarding construction yards of the proposed modifications to the approved project.

Suncrest Substation (Modified Route D Substation) decreased in size. This proposed modification results in no change in project location; however, the substation would be located on a smaller parcel (75.66 acres instead of 128.18 acres). The resource values evaluated in the Final EIR/EIS for the project have not changed, nor have any new adverse effects been identified as a result of the decrease in substation size. Most notably, biological impacts of the

modified Suncrest Substation would substantially reduce the loss of temporary and permanent native vegetation (pg. E.4.2-5 of the Final EIR/EIS), a reduction in direct and indirect loss of listed or special status plants or habitat for listed or special status plants (pg. E.4.2-10), and a reduction in direct loss of habitat for listed or sensitive wildlife (pg. E.4.2-12)

Reconductoring Modifications. The EIR/EIS evaluated the Coastal Link Upgrade Alternative that would allow SDG&E to eliminate the proposed Coastal Link of the project; this alternative was approved. The alternative was selected because it eliminated many impacts of the proposed action by eliminating the need for one segment of new transmission. It was fully analyzed in the Final EIR/EIS and approved as part of the FESSR. The proposed modifications to the approved project require additional system upgrades to improve overall reliability of the transmission system.

These upgrades were identified by SDG&E after completion of the EIR/EIS based on power flow analysis. The approved project results in two new Sunrise 230kV transmission circuits terminating at the Sycamore Canyon Substation, and the upgrades allow the power flowing from Sunrise into Sycamore Canyon Substation to disperse to adjoining substations via the existing 69kV, 138kV and 230kV transmission lines connecting Sycamore Canyon Substation to other substations in the SDG&E grid. An SDG&E study of the operating conditions after the addition of the Sunrise 230kV lines demonstrated that some additional upgrades would be required to ensure reliability and avoid overload conditions; these upgrades are included in the proposed modifications to the approved project. The modifications to the approved reconductoring would not create new adverse impacts. The proposed modifications would be made to the same transmission segments evaluated as the Coastal Link Upgrades alternative in the EIR/EIS, so are within the range of alternatives discussed in the Final EIR/EIS No additional alternatives are warranted as a result of this modification.

Infrared Lighting. SDG&E proposes a modification that would result in the installation of infrared lighting on some of the project towers. SDG&E proposes to add these lights in response to aircraft safety requests from the Department of Defense or Homeland Security (Border Patrol). The proposed addition of infrared lights on existing transmission towers in response to aircraft safety requests would be considered by the BLM as a categorical exclusion (CX) pursuant to 516 DM 11.9 because it would require installation of minor devices to protect human life (see BLM NEPA Handbook H-1790-1 Appendix 4 J. 8 and 4E13).

The proposed infrared safety lighting would be solar-powered, and would not have any visual impacts as this lighting is not visible to humans. Infrared lighting may attract certain common, night-flying insects, but there is no data to suggest a substantial risk to birds and bats that may be attracted to the insects clustered around the lights. However, to be conservative, the CPUC

and BLM will require full implementation of Mitigation Measure B-10a at conductor spans adjacent to infrared lights, requiring SDG&E to install bird flight diverters, fund a study to determine the effectiveness of these devices, and to implement an avian reporting system for documenting bird mortality.

The Final EIR/EIS evaluated the potential for birds to collide with the new transmission towers, and included a mitigation measure to reduce the likelihood of collision. Given this analysis, the resource values evaluated in the Final EIR/EIS for the project have not changed, nor have any new adverse impacts been identified as a result of the proposed construction infrared lights. A detailed discussion regarding infrared lights and the impacts to bird and bat species is found in Memorandum Section 1.1.1. The inclusion of infrared lighting would not alter the conclusions of the Final EIR/EIS regarding impacts to listed and sensitive bird or bat species. The EIR/EIS did not analyze alternatives related to bird or bat collision, but the approved route would not pass through areas of high bird use, so the approved alternative avoids areas where collision impacts would be more severe. Therefore, the modifications of the infrared lights are within the range of alternatives discussed in the Final EIR/EIS, and no additional alternatives are warranted as a result of this modification.

Marker Balls. After SDG&E completed final project design and defined specific tower and span heights, the Department of Defense and Homeland Security (Border Patrol) requested that marker spheres be installed on static lines (at the top of the towers, above the conductors) to ensure aircraft safety. The PMR states that over 1,300 marker balls would be required on 134 project spans (see PMR Table 2-2) based on the location of each span (near airports, at road crossings, and at crossings of canyons) as determined by FAA regulations. The FAA's *Marking and Lighting Advisory Circular, no. AC/70/7460-1K*, governs recommendations for markers.

Marker spheres improve aircraft safety by making the conductor spans more visible to aircraft in specific flight paths, but they have the potential to impact visual resources. In Section B.3.2.4 (page B-47) the EIR/EIS defined the need for marker spheres for aircraft safety. Their visual impacts are included in the EIR/EIS analysis and illustrated in Figure E.1.3-10B. Specific locations for aerial marker spheres were not identified by SDG&E or in the Final EIR/EIS because they could not be defined prior to final engineering.

The visual impact analysis in the Final EIR/EIS concluded that the FESSR (as an alternative to the proposed project) would have fewer visual impacts than the proposed project. Both routes would result in adverse visual impacts, and the analysis of all routes assumed the presence of marker balls in some locations. While the current SDG&E proposal would result in installation of a larger number of marker spheres than anticipated, the Final EIR/EIS concluded that the FESSR, when installed in an area without substantial industrial development, would result in

adverse visual impacts due to the presence of the new transmission line in an undisturbed setting, and these spheres are required for public health and safety purposes. The visual impact of the FESSR, as a new major transmission line in a new corridor in most areas, was determined to be less severe than for the other route alternatives considered. Therefore, the marker sphere locations are within the range of alternatives discussed in the Final EIR/EIS, and no additional alternatives are warranted as a result of this modification.

Telecommunications Equipment. SDG&E's proposed modifications include installation of microwave communications equipment at seven locations along the route. This equipment would be minimally visible, as it would be located within the lattice tower frames of the seven towers. It would establish a reliable communications system during project operation and would increase worker safety. Some telecommunications facilities were addressed in the Recirculated Draft EIR/Supplemental Draft EIS (the Tierra del Sol and White Star facility changes) The remainder of the communications equipment that comprises the proposed modification would be enclosed within the already approved transmission towers. No new towers would be constructed to house this equipment. The additional structural complexity added to each tower by the equipment attached to the towers would be minimally visible, and would not change the visibility of each tower.

The only resource value affected by this equipment is visual resources, and the approved alternative (the FESSR) was selected, in part, because it had less severe visual impacts. The telecommunications facilities do not change the resource values evaluated in the Final EIR/EIS and no new adverse impacts have been identified as a result of the proposed telecommunication equipment. Therefore, the telecommunications equipment is adequately analyzed and no additional alternatives are warranted as a result of this modification.

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

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

- The Bald and Golden Eagle Protection Act (September 2009) and new interim bald and golden eagle inventory and monitoring protocols and other recommendations,
- New critical habitat for arroyo toad,
- Reinstatement of the U.S. Fish and Wildlife Service proposed rule to list the flat-tailed horned lizard, and
- New critical habitat designation for the Quino checkerspot butterfly (QCB).

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

As discussed below, none of these new biological circumstances affect the validity of the EIR/EIS as it relates to the proposed modifications to the approved project. The BLM will not issue notices to proceed for any parts of the project located on BLM managed land where threatened and endangered species would potentially be impacted unless and until it receives a Biological Opinion on the issues for which it requested reinitiation of consultation, or unless otherwise determined by the BLM to be appropriate and consistent with the requirements of the Endangered Species Act.

The *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2009* concluded that the Project would not likely jeopardize the continued existence of six listed species (San Diego thornmint (*Acanthomintha ilicifolia*); 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 two species (Quino checkerspot butterfly and Peninsular bighorn sheep).

Peninsular bighorn sheep. The BLM is requesting reinitiation of formal consultation with the U.S. Fish and Wildlife Service in order to modify the seasonal work window in Peninsular bighorn sheep habitat. SDG&E is proposing that the work window specified in the Biological Opinion be extended from three months to five. Species Specific Conservation Measure 22 confines construction activities and leaves an annual window for construction of tower sites P-256 to P-281 (MP 23-MP 28) of only three months (October, November, and December). With a three month per year construction schedule in this area, it will take SDG&E three years to construct this set of towers. SDG&E seeks to reduce the construction time to two years and requests that it be permitted to construct during the July to November window in Peninsular bighorn sheep habitat of the Jacumba Mountains, including the I-8 Island. Mitigation Measure B-7c (Minimize impacts to Peninsular bighorn sheep and provide compensation for loss of critical habitat) required in the Final EIR/EIS states that construction and maintenance activities in PBS critical habitat may occur during the lambing season and/or period of greatest water need if prior approval is obtained from the Wildlife Agencies. The request for an extended work window is consistent with the Final EIR/EIS and the ultimate decision regarding the extension rest with the U.S. Fish and Wildlife Service. No additional NEPA review is required.

Bald and Golden Eagles. The Bald and Golden Eagle Protection Act (September 2009) rule published by USFWS was not in place at the time the Final EIR/EIS was published. However, the potential impacts of the project on eagles were fully analyzed in the Final EIR/EIS (Impact B-7h, Direct or indirect loss of golden eagle or direct loss of habitat) Impacts to golden eagles were considered adverse according to Significance Criteria 1.e. (substantial adverse effect on the breeding success of the golden eagle), 1.f. (project would directly or indirectly cause the mortality of a special status species), 1.g (project would result in the abandonment of migratory

bird nests and/or eggs), and 1.h (project would take golden eagles, eagle eggs, or any part of an eagle). (EIR/EIS Section D.2.4.1, Significance Criteria.) Impacts to golden eagles were considered adverse because construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Mitigation was adopted in the Final EIR/EIS to minimize effects on nesting eagles.

Four golden eagle nest sites occur within 4,000 feet of the FESSR and the EIR/EIS concluded that each of the 4 nest sites would be adversely affected by the project. The new Bald and Golden Eagle Protection Act would not change the EIR/EIS analysis; had the analysis been completed after the Act was passed, the effects of the FESSR and the proposed modifications to the approved project would remain adverse.

SDG&E completed additional eagle surveys in 2010, after project approval. A greater number of eagle nests were identified during the 2010 surveys based on the survey methodology used by the eagle biologist. The survey protocol followed the *Interim Golden Eagle Inventory and Monitoring Protocols, and Other Recommendations* recently published by the USFWS. For these surveys, a four mile radius was used. While the 2010 inventory shows that there are nine nest sites within four miles of project activities, only four nest sites are close enough to be adversely affected because they are within 4,000 feet of the project and project activities (including project construction and maintenance). Thus, the number of nest sites potentially affected by the project or the proposed modifications has not changed from the EIR/EIS.

Arroyo Toad. No designated critical habitat for the arroyo toad was in place in San Diego County at the time the Final EIR/EIS was published and the ROD issued. Impacts to the arroyo toad were analyzed based on identification of "suitable habitat" which allowed appropriate assessment of effects to the species. The analysis is presented under Impact B-7K: Direct or indirect loss of arroyo toad or direct loss of habitat in Section E.1.2, E.2.2, and E.4.2. Impacts to the arroyo toad and its habitat were assessed in the EIR/EIS, were determined to be adverse and mitigation was required to avoid or minimize the impact (Mitigation Measure B-7j Conduct arroyo toad surveys, and implement appropriate avoidance/minimization/compensation strategies). This measure was identified in the Final EIR/EIS and would also apply to all proposed modifications to the approved project. This measure is adequate to ensure that impacts to arroyo toad as a result of this modification would be minimized or avoided to the greatest extent practicable. The proposed critical habitat would not result in any new adverse impacts and no additional NEPA review is required.

Flat-Tailed Horned Lizard. The Final EIR/EIS analyzed impacts to the flat-tailed horned lizard (FTHL) as a BLM sensitive species and California Species of Special Concern and determined that the approved project would have permanent impacts to 22.62 acres of FTHL Management Areas and to 52.95 acres of habitat outside of Management Areas. The approved project would have temporary impacts to 91.31 acres FTHL Management Areas and to 141.53 acres of habitat outside of Management Areas. After the completion of the Final EIR/EIS, the U.S. Fish and Wildlife Service has notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. Additional surveys along the proposed modifications to the approved route have been performed in compliance with mitigation. Analysis now shows that the proposed modifications to the approved project would result in fewer permanent impacts to FTHL habitat (9.54 acres of Management Areas and 26.35 acres of habitat outside of Management Areas). Temporary impacts would occur to 36.87 acres of Management Areas and 94.88 acres of habitat outside Management Areas. Mitigation adopted from the Final EIR/EIS

required SDG&E to reduce impacts both to sensitive habitats and sensitive wildlife species; reduction in impacts to FTHL habitat (Management Areas as well as habitat outside Management Areas) would apply to all proposed modifications to the approved project. This measure is adequate to ensure that impacts to the FTHL as a result of this modification would be minimized or avoided to the greatest extent practicable. The reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard would not result in any new adverse impacts that were not addressed in the Final EIR/EIS and no additional NEPA review is required.

Quino Checkerspot Butterfly. The Final EIR/EIS determined that the approved project would have permanent impacts to 19.20 acres of 2002 critical habitat for the Quino checkerspot butterfly (QCB) and temporary impacts to 55.72 acres of 2002 critical habitat for the QCB and required appropriate mitigation. After the completion of the Final EIR/EIS, additional surveys have been performed in compliance with mitigation, and 2009 critical habitat for QCB has been designated. Analysis now shows that the proposed modifications to the approved project would result in fewer 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). 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 QCB habitat (occupied habitat, as well as 2002 and 2009 designated critical habitat) is consistent with the Final EIR/EIS.

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 August 2010. Biological and cultural resources surveys were performed in 2009 and 2010 as required by mitigation measures in the Final EIR/EIS, and these surveys helped shape the project modifications 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 modifications to the approved action as discussed in the following sections.

Peninsular Bighorn Sheep. The Final EIR/EIS analyzed the project's potential impacts on Peninsular bighorn sheep (Impacts B-7B). The request for an extended work window does 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) provided prior approval is obtained from the Wildlife Agencies. By including the request to modify the seasonal work window in Peninsular bighorn sheep habitat in the reinitiation of formal consultation with the U.S. Fish and Wildlife Service, the SDG&E is complying with the Mitigation Measure. There would be no change in the impacts to Peninsular bighorn sheep from the time the Final EIR/EIS was published.

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

change the conclusions in the Final EIR/EIS (adverse for Impacts B-7H and B-10, adverse but mitigable for Impact B-12 and no impact for Impact B-7I) but rather provides a permit process that the project may need to follow if disturbance impacts to eagles cannot be avoided. As stated in the Final EIR/EIS, construction activities within 4,000 feet of golden eagle nest sites could cause abandonment of a nest, subsequent reproductive failure, and continuing decline of the species. Therefore, there would be no change in the impacts to golden eagles from the time the Final EIR/EIS was published.

Flat-Tailed Horned Lizard. Since the publication of the Final EIR/EIS, the U.S. Fish and Wildlife Service notified the public of the reinstatement of the proposed 1993 rule to list the flat-tailed horned lizard. 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.

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

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

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 modifications to the approved project are similar to those analyzed in the Final EIR/EIS for the FESSR. A discussion regarding the cumulative impact analysis can be found in Memorandum Section 1.7.

The effects of each major modified component are summarized below.

Transmission Line Alignment Modifications. Table 1 summarizes the approved project and the proposed modifications. The effects of the approved project were identified in the Final EIR/EIS and the required mitigation measures resulted in SDG&E proposing changes to the approved project. Specifically, the following impacts would be reduced with the proposed modifications as compared with the approved project:

- Impact B-1: Construction activities would result in temporary and permanent losses of native vegetation (pg. E.1.2-13, E.2 2-4, and E.4.2-5; Final EIR/EIS). The proposed modifications to the approved project incorporated design revisions and increased the number of transmission towers that would be built helicopter, decreasing the miles of access roads required for the project. As such, the modifications reduced the temporary loss of native vegetation from 924.57 acres to 487.97 acres, and reduced the permanent loss of native vegetation from 475.86 acres to 254.77 acres.
- Impact B-7A: Direct or indirect loss of flat-tailed horned lizard or direct loss of habitat (pg. E.1.2-24, Final EIR/EIS). The proposed modifications reduced the temporary loss of FTHL or loss of habitat from 273.92 acres to 131.75 acres, and reduced the permanent loss from 93.42 acres to 35.89 acres through design revisions, reducing the acreage of construction yards, and increasing use of helicopters for construction.
- Impact B-7J: Direct or indirect loss of quino checkerspot butterfly or direct loss of habitat (pg. E.1.2-31, E.2.2-15, E.4.2-17; Final EIR/EIS). The proposed modifications reduced the temporary loss of QCB or loss of habitat from 101.69 acres to 19.08 acres, and reduced the permanent loss from 47.62 acres to 19.61 acres through design revisions (see proposed modification subunit PMR25), relocating construction yard (see proposed modification subunit PMR9), and increasing use of helicopters for construction.
- Impact V-1: Short-term visibility of construction activities, equipment, and night lighting (pg. E.2.3-3; Final EIR/EIS) and Impact V-2: Long-term visibility of land scars in arid and semi-arid landscapes (pg. E.2.3-4, E.2.3-12, E.4.3-7; Final EIR/EIS). The proposed modifications to the approved project increase the number of transmission towers that would be built using helicopter construction to 230 towers requiring 162 tower staging access pads (an increase of 54 percent) and reducing the new access road miles and associated long term visual scars by 59 percent. The use of helicopters for construction was required by mitigation measure V-2d, Construction by helicopter.
- Impact V-66: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 53 on westbound Alpine Road (pg. E.1.3-21). The proposed modification to the approved project would relocate the Interstate 8/Chocolate Canyon transition structures to reduce visual contrast reducing this visual impact as required by Mitigation Measure V-66a (see proposed modification subunit PMR33).
- Impact V-68: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 55 on Moreno Boulevard (pg. E.1.3-24). The proposed modification to the approved project would relocate the structures to reduce skylining as required by Mitigation Measure V-68a.
- Impact L-2: Presence of a transmission line or substation would divide an established community or disrupt land uses at or near the alignment (pg. E.1.4-13, E.4.4-7; Final EIR/EIS). The proposed modifications reduced impacts to sensitive land uses and

residential areas by incorporating where feasible landowner requests to reduce impacts to their properties. See for example, proposed modifications subunits PMR9, PMR11, PMR13, PMR18, PMR19, and PMR31

- Impact WR-2 Presence of a transmission line or substation would permanently change the character of a recreation area, diminishing its recreational value (pg. 3-25 of the RDEIR/SDEIS as modified in the Final EIR/EIS). The proposed modifications incorporated Mitigation Measure WR-2a reducing impacts to the JAM properties.
- Impact AG-1: Construction activities would temporarily interfere with Active Agricultural Operations (pg. E.1.6-2; Final EIR/EIS). The proposed modification would reduce this impact by incorporating an alignment revision to avoid a impacts to an underground irrigation system (see proposed modifications subunits PMR9).
- Impact C-1: Construction of the project would cause an adverse change to known historic properties (pg. E.1.7-4, E.2.7-2, E.4.7-2). Additional cultural surveys were completed after the ROD was published. As a result of the cultural surveys, SDG&E worked with the BLM to design modification to the route alignment to avoid resources where feasible.
- Impact C-6: Long-term presence of the project would cause an adverse change to known historic architectural (built environment) resources (pg. E.1.7-7; Final EIR/EIS). SDG&E proposed minor route alignment modifications to the approved project to reduce the visual impacts to known historic architectural resources. See for example proposed modifications subunits PMR6 (Desert View Tower) and PMR7 (Jade Mountain).
- Impact G-9: Construction activities would interfere with access to known mineral resources (pg. E.1.13-9, Final EIR/EIS). SDG&E worked with the BLM and landowners incorporate modifications to the transmission line route to avoid or reduce interference with known mineral resources.
- Impact S-2: Construction would disrupt the existing utility systems or cause a collocation accident (pg. E.1.14-4, Final EIR/EIS). SDG&E proposed modifications to the approved route to avoid collation accidents with the Imperial Valley Solar Project gen-tie line and to avoid impacts to the Caltrans ROW reducing this impact.

Impacts to biological resources, visual resources, agricultural resources, wilderness and recreation, cultural resources, geological resources, and utilities, would be reduced as a result of the modifications as compared with the impact levels defined in the Final EIR/EIS. The mitigation measures presented in the Final EIR/EIS would also apply to the proposed modifications, and would mitigate the impacts of the transmission line realignments on all resources as they would for the approved project.

Construction Yards. The proposed modifications to the approved construction yards include the following locations:

PMR 2	IV Substation Dunaway Road Construction Yard	PMR 23	Kreutzkamp Construction Yard
PMR 3	Plaster City Construction Yard	PMR 24	Barrett Canyon Construction Yard

PMR 5	BLM S2 Construction Yard	PMR 25	SWAT Training Facility Construction Yard
PMR 6	AER Construction Yard	PMR 29	Wilson Construction Yard
PMR 8	Jacumba Valley Ranch	PMR 33	Alpine Headquarters Alpine Yard
PMR 13	Rough Acres Construction Yard	PMR 34	Hartung Construction Yard
PMR 14	McCain Valley Construction Yard	PMR 36	Helix Construction Yard
PMR 16	Thing Valley Construction Yard	PMR 40	Stowe/Kirkham Construction Yard
PMR 20	Bartlett Construction Yard		

The affected environment and environmental consequences associated with the proposed modifications to approved construction yards would result in minor changes that do not create additional construction or operation impacts. Impacts to visual resources, land use, wilderness and recreation, agriculture, cultural resources and paleontology, noise, traffic, public safety, air quality, water, geology, mineral resources, socioeconomics, and fire would be the same as those presented in the Final EIR/EIS.

The Final EIR/EIS considered the visibility of construction yards in Impact V-2 (Visibility of land scarring in arid and semi-arid landscapes; pg. E.1.3-9, E.2.3-4 and -12, E.4.3-7) and concluded that land scarring from use of construction yards would create adverse impacts. Reducing the number of construction yard by over 50 percent and the acreage required for the construction yards would reduce this impact.

For biological resources, the affected environment would change because some of the construction yards would change locations. All the revised construction yards were located in the same geographic region as those proposed for the FESSR and were surveyed for biological resources and no new sensitive vegetation communities, special status plant species, or special status wildlife species were present not previously considered in the Final EIR/EIS. The temporary loss of native vegetation due to the use of construction yards was considered in the Final EIR/EIS under Impact B-1 (Construction activities would result in temporary and permanent losses of native vegetation; pg. E.1.2-13, E.2.2-4, and E.4.2-5; Final EIR/EIS). Overall, the construction yards decreased in number from 43 to 19, corresponding with a decrease in temporary ground disturbance from 801.25 acres to 428.96 acres. Therefore, given the similarity in biological resources present at the construction yards and the reduction in ground disturbance and a corresponding reduction in temporary impacts to special status plant and wildlife species, it is expected that the environmental consequences of the construction yards would be similar to the impacts of the construction yards identified in the Final EIR/EIS.

As a result, there is no new information or circumstances that would substantially change the analysis of the construction yard changes compared to the analysis in the Final EIR/EIS

Suncrest Substation (Modified Route D Substation) decreased in size. The affected environment and environmental consequences associated with the reduction in size of the substation would remain unchanged or would reduce impacts for biological resources, visual resources, land use, wilderness and recreation, agriculture, cultural resources and paleontology, noise, traffic, public safety, air quality, water, geology, mineral resources, socioeconomics, and fire, beyond those presented in Final EIR/EIS. The Suncrest Substation (Modified Route D Substation) was fully analyzed in the Final EIR/EIS in Section E.4.2.3 through E.4.15.3. The proposed modification would reduce the acreage required for the substation; and as such, would impact resources to a lesser extent than that analyzed in the Final EIR/EIS.

Reconductoring Modifications. The affected environment and environmental consequences associated with the minor modifications to the reconductoring would result in minor changes that do not create additional construction or operation related impacts to biological resources, visual resources, land use, wilderness and recreation, agriculture, cultural resources and paleontology, noise, traffic, public safety, air quality, water, geology, mineral resources, socioeconomics, and fire, beyond those presented in Final EIR/EIS. The Coastal Link Upgrade Alternative was analyzed in Section D.2.25.4, D.3.18.4 through D.6.18.4, D.7.22.4, D.8.18.4 through D.15.18.4 of the Final EIR/EIS and Section 3.2 of the RDEIR/SDEIS as modified in the Final EIR/EIS. The increase in transmission poles to be replaced would not change the direct, indirect, and cumulative impacts because the proposed modifications would occur in the same transmission corridor as the approved project and would require only minor changes to the approved project.

Infrared Lighting. SDG&E proposes to add infrared lights at specific towers in response to aircraft safety requests from the Department of Defense and Homeland Security (Border Patrol). While the infrared lights themselves were not evaluated in the EIR/EIS, the only potential environmental impacts that could result from infrared tower lighting would be indirect impacts to birds and bats that may be attracted to common, nighttime flying insects clustered around the infrared lights. Bird collision was evaluated in the EIR/EIS and mitigation was adopted to reduce the severity of this impact. Therefore, the resource values evaluated in the Final EIR/EIS for the project have not changed, nor have any new adverse impacts been identified as a result of the proposed construction infrared lights. The addition of infrared lighting on transmission towers is not expected to result in any new adverse impacts to bat species (as a result of collision) because of their flight behaviors, natural history, and echolocation abilities. A detailed discussion regarding infrared lights and the impacts to bird and bat species is found in Memorandum Section 1.1.1.

Marker Balls. After SDG&E completed final project design and defined specific tower and span heights, the Department of Defense and Homeland Security (Border Patrol)identified the specific location of marker spheres would be required on static lines (at the top of the towers, above the conductors) that would ensure aircraft safety The visual impact analysis in the Final EIR/EIS concluded that the FESSR would have unmitigable adverse visual impacts, and the analysis assumed the presence of marker balls in some locations (see Final EIR/EIS Figure E.1.3-10B). While the current SDG&E proposal would result in installation of a larger number of marker spheres than anticipated, the Final EIR/EIS concluded that the FESSR, when installed in an area without substantial industrial development, would result in unmitigable visual impacts due to the presence of the new transmission line in an undisturbed setting, and these spheres are required for public health and safety purposes. The resource values evaluated in the Final EIR/EIS for the project have not changed with the clarification of the marker ball locations, nor have any adverse impacts been identified that were not previously identified in the Final EIR/EIS as a result of the marker balls.

Telecommunications Equipment. The affected environment and environmental consequences associated with the minor modifications from the telecommunications equipment would result in minor changes that do not create additional construction or operation related impacts to biological resources, visual resources, land use, wilderness and recreation, agriculture, cultural resources and paleontology, noise, traffic, public safety, air quality, water, geology, mineral resources, socioeconomics, and fire, beyond those presented in Final EIR/EIS, Section 2. The proposed modifications would remain primarily within the same location as those analyzed in Section 2, in the White Star communications facility and on proposed transmission towers. The proposed modifications would require installing additional communications equipment on transmission towers but would not change the overall location of the towers, nor would they require additional acreage disturbance, not change the visual aspect of the towers substantially.

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.

E. Persons/Agencies/BLM Staff Consulted

Erin Dreyfuss	Planning & Environmental Coordinator	California State Office, BLM
Sandra McGinnis	Planning & Environmental Coordinator	California State Office, BLM
Daniel Steward	Resources Staff Supervisor	El Centro Field Office, BLM
Thomas Zale	Associate Field Manager	El Centro Field Office, BLM
John Kalish	Field Manager	Palm Springs/South Coast Field Office, BLM
Margaret L. Goodro	Field Manager	El Centro Field Office, BLM
Carrie Simmons	Archaeologist	El Centro Field Office, BLM
Robert Waiwood	Geologist	California Desert District, BLM
Billie Blanchard	Project Manager for the Sunrise Project	Energy Division,CPUC
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 modifications to the approved project conform to the applicable land use plans inasmuch as the proposed modifications 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 9/21/10

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.

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