

Worksheet

Determination of NEPA Adequacy (DNA)

Sunrise Powerlink Project

Micrositing Modification Request to Approved Project as Modified by the PMR

U.S. Department of the Interior

Bureau of Land Management

December 2011

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OFFICE: El Centro Field Office

TRACKING NUMBER: DOI-BLM-CA-D070-2012-0012-DNA

CASE FILE/PROJECT NUMBER: CACA-47658

PROPOSED ACTION TITLE/TYPE: The proposed action is a set of micro-siting changes to the approved project, the Final Environmentally Superior Southern Route (FESSR) of the Sunrise Powerlink Transmission Project as modified in the Project Modification Report (PMR) and in the Changes identified in the DNA dated March 2011 and in the DNA dated August 2011, and as analyzed in the Final EIR/EIS and Associated Amendment to the Eastern San Diego County Resource Management Plan (RMP) for a single utility crossing in the McCain Valley. These changes include addition of a parking area and turnaround to Structure EP40-1; addition of a parking area north of Structure EP63; and access road modification to Structure EP187-2. The DNA does not address the modification of prior approval for Tower Staging Access Pads (TSAPs) from temporary to permanent and further review will be required for those elements. The micro-siting has been proposed since the PMR approval and DNA dated August 2011 as a result of efforts to further increase access safety and to reduce impacts to cultural resources, and due to final engineering.

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 micrositing to the approved project follows the approved route of the Sunrise Powerlink Transmission Project, as defined in the Final EIR/EIS and modified in the PMR and DNA dated March 2011 and DNA dated August 2011, and would not substantially change the location of the approved project. All micrositing changes are within 375 feet of the approved project alignment as modified by the PMR (approved September 2010) and changes identified in the DNA (March 2011 and August 2011).

APPLICANT : San Diego Gas and Electric Company

A. Description of the Action and any applicable mitigation measures

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

Approved Project Components

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

In September 2010, the BLM published a Determination of NEPA Adequacy for the modifications proposed by SDG&E in the Project Modifications Report (May 2010). The BLM determined that the modifications to the Sunrise Powerlink Project were within the scope of the Record of Decision issued by the BLM. In March 2011 and August 2011, the BLM published a second and third Determination of NEPA Adequacy for additional changes proposed by SDG&E. The BLM determined that the modifications to the Sunrise Powerlink Project were

within the scope of the Record of Decision issued by the BLM. For additional information on project components on lands not managed by the BLM, please see the CPUC's website at:

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

Additional Project Micrositing Modifications Requested

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

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-4a: Complete consultation with Native American and other Traditional Groups. (pg. E.1.7-6, FEIR/EIS 2008)

Mitigation Measures for Traffic

T-1a: Restrict lane closures (pg. E.1.9-5)

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

In compliance with these mitigation measures, in responses to requests by agencies and interested parties to avoid sensitive resources, and based on final engineering and design,

SDG&E has identified proposed micrositing changes to the approved project. These changes are described in Table 1. These include modification to the access road to EP187-2, parking areas north of structure EP63, and parking and turnaround area to structure EP40-1. The DNA does not address the modification of prior approval for Tower Staging Access Pads (TSAPs) from temporary to permanent. The proposed changes to the approved project are described in Micrositing Request Form dated October 24, 2011 and are shown in the Micrositing Modification Map book, 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.

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 – the Lake or Streambed Alteration Agreement (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.

None of the modifications would require refueling or equipment storage within jurisdictional waters. None of the modifications would impact new jurisdictional waters. EP40-1 parking/turnaround and EP63 parking are not adjacent to any waters. The movement of the access road to EP187-1 impacts one (1) jurisdictional water at the same location of the original road and was included in the original water permits for the approved project.

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. E.1.9-7, FEIR/EIS 2008 • T-APM-4a: E.1.9-6, FEIR/EIS 2008 	Segment 8	<p>Parking Area North of Structure EP63: SDG&E is requesting to provide a parking area to allow for safe access to Structure EP63. The proposed parking area is located approximately 130 feet north of Structure EP63 along access road EP63-E.</p> <p>Parking and Turnaround Area to Structure EP40-1: SDG&E is requesting to provide parking and turnaround areas to allow for safe access to Structure EP40 1. One of the proposed parking area sites is located at approximately 2,500 feet in elevation along a ridge line which the access road follows until it terminates at the tower and pull site for Structure EP 42 (Area 1). The other proposed parking area and turnaround site is located at approximately 2,440 feet in elevation. Topographically, it lies within a small saddle and along a ridge line which the access road follows until it ultimately terminates at the tower and the pull site for Structure EP 42 (Area 2).</p>
Modified Route D Alternative, including the Modified Route D Alternative Substation	<ul style="list-style-type: none"> • C-1b: pg. E.1.7-5, 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 4a: pg. E.1.7-6, FEIR/EIS 2008 	Segment 9	<p>Refined access road to EP187-2: SDG&E is requesting a re-alignment of the approved Project access road to Structure EP187-2. During construction monitoring for the Sunrise Powerlink Final Environmentally Superior Southern Route, Native American monitors requested that the proposed spur road to Structure EP187-2 be re-aligned to avoid a series of granite outcrops near an identified sensitive area.</p>

The following analysis does not include analysis of the micro-siting changes related to the TSAPs. Per the request, the proposed modifications will result in impacts to an additional 0.421 acres of BLM lands including approximately 0.02 acres of temporary impacts and approximately 0.4 acres of permanent impacts. The parking structure to EP63 accounts for the temporary impacts. The additional parking structure for EP40-1 and the modification to the access road to EP 187-2 account for the permanent impacts.

Project activities at all of the sites will 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.

Per the request, the proposed modifications will result in additional permanent impacts to 0.4 acres of sensitive vegetation communities on BLM lands. The impacts are to southern mixed chaparral and semi-desert chaparral. Grading would be required at the temporary and permanent project revisions. Some vegetation crushing and vegetation clearing will occur in connection with vehicle and equipment use.

Temporary and permanent impacts will 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.

The proposed Project modifications on BLM lands will result in additional impacts to habitats of one wildlife species listed under the Endangered Species Act: the Quino checkerspot butterfly (QCB).

All of the changes are located on land previously surveyed for the approved project as modified by the PMR.

Pre-construction surveys for special status plant species occurred in the spring of 2009 and 2010. SDG&E consulted with the wildlife agencies and gained concurrence that the previous surveys meet the requirements of Mitigation Measure B-5a. Tecate tarplant have been recorded in the surrounding areas. As provided in the request where sensitive plant populations occur, the impact minimization and mitigation measures identified in the approved Restoration Plan for Special Status Plants (RPSP) will be implemented.

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

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

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

Eastern San Diego County Resource Management Plan (2008). Like the approved project (the FESSR as revised by the PMR and DNA changes dated March 2011 and August 2011), the proposed changes to the approved project traverse the BLM El Centro Field Office's Eastern San Diego County Management Area. New transmission line towers and cables 161 kV and above are required to be located within a single designated utility ROW (the SWPL corridor) one mile wide and between one and 1.5 miles in length encompassing 960 acres of BLM-administered land within the planning area. Since the FESSR would be partially located on

public lands outside of the designated utility corridor, it required a Plan Amendment. The ROD for the project amended the Eastern San Diego County RMP to allow for a one-time exemption for the Sunrise Powerlink Project (as approved and defined as the FESSR).

Some of the micrositing changes to the approved project on BLM-administered land in Eastern San Diego County would involve access roads up to 375 feet outside of the right-of-way. The proposed changes are in conformance with the land use plan because they were designed to further avoid sensitive resources as provided for in the FESSR under the mitigation listed in Table 1 and required in the ROD.

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*. Prepared by the BLM for the Sunrise Powerlink Project, Project Modifications (September 2010).
- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Changes (March 2011).
- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Micrositing Changes (August 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)
- *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/aspn/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
- SWRCB 401 certification (SB09015IN), 401 Amendment (October, 2011)
- CDFG Lake and Streambed Alteration Agreement (1600-2009-0365-R5)
- 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 micro siting changes to the approved project as revised by the PMR and DNA dated March 2011 are minor changes including extra workspace for parking, and micro siting of access roads/work areas which are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1, E.2, and E.4) as modified by the PMR and DNAs dated March 2011 and August 2011. The changes detailed in Table 1 would function the same way as the FESSR and its associated equipment as evaluated in the Final EIR/EIS. The micro siting of roads and addition of parking/turnaround areas would not materially change the overall alignment of this transmission line, the location of the line or the analysis area. All are within 375 feet of the approved project ROW and one was proposed at the request of reviewing agencies or interested parties and would further avoid impacts to 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 changes to the approved project are within the same geographic area as the approved project as modified by the PMR, DNA dated March 2011, DNA dated August 2011 and the resource conditions are substantially the same as those analyzed in the Final EIR/EIS. This fact is confirmed by the close proximity of the proposed changes and the approved route

and because the habitat of the micro-siting changes and the proposed route is essentially the same. The proposed changes on public lands requiring relocation of access roads and additional parking and turnaround areas are within the same CDCA utility corridor as those of the approved project. All the micro-siting changes are within the approved project ROW or directly adjacent to approved project access roads.

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

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

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

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

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

Proposed Parking Areas/Access Road Changes. As detailed in Table 1, the following proposed changes to the approved alignment as modified by the PMR are components of alternatives that were evaluated in the Final EIR/EIS:

- Proposed changes to Segments 8 and 9 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.

Additional Conditions of Approval.

- Compliance with the MMCRP, BO and all other approved project documents and permits.
- Impacts to nesting birds could still occur if construction was to occur during the nesting season. Therefore, Construction will be subject to Mitigation Measure B-a (Nest Survey protocol and Nesting Bird Management Plan) to protect nesting birds.
- Weed Control Plan shall be implemented.
- Restoration Plan for Special Status Plants (RPSP) will be implemented.
- A 15 mile per hour speed limit on unpaved roads shall be implemented.
- Any ground disturbing activities associated with the access road to EP187-2 realignment shall be monitored full-time by an archaeologist and Native American Monitor. Measures set forth in the Final Historic Properties Management Plan (HPMP) shall be implemented during construction.

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,
- 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. Consequently, new regulatory circumstances caused the BLM to reinitiate consultation under the Federal Endangered Species Act. While Section 7(d) of the Endangered Species Act prohibits the agency and the permit applicant from making certain commitments of resources during the pendency of the consultation, the mere act of re-initiation does not require supplementation of the EIR/EIS. In November 2010, the U.S. Fish and Wildlife Service reissued the Biological Opinion on the Sunrise Powerlink Project to address these new information or circumstances.

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

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

As discussed below, none of these new regulatory circumstances affect the validity of the EIR/EIS as it relates to the proposed micro-siting changes to the approved project and as modified by the PMR. Only the species where habitat is directly impacted by modifications under the current request will be discussed. A summary for Quino checkerspot butterfly is provided below.

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 was revised and re-designated in 2009. The approved project 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 project as amended by the PMR 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 changes detailed in Table 1 have the potential to support QCB:

- Parking and turnaround to Structure EP 40-1: approximately 0.24 acres of new permanent impacts to (USFWS designated) QCB Occupied Habitat

The approved project as amended by the PMR along with the impacts from areas as considered under the August 2011 DNA in addition to acreage proposed under the current modification request would result in permanent impacts to 20.20 acres of QCB habitat (4.45 acres of 2009 critical habitat and 15.75 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 are less than those presented in the EIR/EIS and temporary impacts are less than impacts presented in the EIR/EIS. SDG&E has also submitted numerous variance requests to the CPUC for actions on non-federal lands. Minor habitat impacts have occurred however cumulative impacts remain less than those defined under the 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.

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 December 2011. 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 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 changes to the approved action, as modified by the PMR, 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 project 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 project 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 project as amended by the PMR along with the impacts from areas as proposed under the August 2011 modification request and including acreage under the October 2011 request 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 are less than those presented in the EIR/EIS and temporary impacts are less than the impacts presented in the EIR/EIS. SDG&E has also submitted numerous variance requests to the CPUC for actions on non-federal lands. Minor habitat impacts have occurred however cumulative impacts remain less than those defined under the EIR/EIS. 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 changes to the approved project are similar to those analyzed in the Final EIR/EIS for the FESSR.

The effects of each major modified component are summarized below.

Parking and Turnaround Areas. SDG&E is requesting three parking and turnaround areas.

SDG&E is requesting to provide two parking and turnaround areas to allow for safe access to Structure EP40-1. One of the proposed parking area sites is located at approximately 2,500 feet in elevation along a ridge line which the access road follows until it terminates at the tower and pull site for Structure EP 42. The other proposed parking area and turnaround site is located at approximately 2,440 feet in elevation. Topographically, it lies within a small saddle and along a ridge line which the access road follows until it ultimately terminates at the tower and the pull site for Structure EP 42. For the safety of SDG&E personnel and their contractors, approval of these parking areas will reduce traffic flow interruptions along the ROW, provide for carpooling from the parking area to the structure site, and limit the number of vehicles parked at the structure site during construction activities. Additionally, a turnaround would allow for large vehicles to turnout should oncoming traffic be approaching and to turnaround as needed. It would also allow vehicles and equipment the work space necessary to complete three point turns. The ability to turn around will keep construction equipment from backing up entire length of the dirt road and onto the paved road.

SDG&E is requesting a parking area to allow for safe access to Structure EP63. The proposed parking area is located approximately 130 feet north of Structure EP63 along access road EP63-E. For the safety of SDG&E personnel and their contractors, approval of this parking area will reduce traffic flow interruptions along the ROW, provide for carpooling from the parking area to the structure site, and limit the number of vehicles parked at the structure site during construction activities.

The Final Inventory Report of the Cultural Resources was accepted on June 2, 2010. No known cultural resources were identified within the proposed parking and turnaround areas.

Because of the small area of disturbance associated with the parking and turnaround areas, the impact of the areas would be similar in nature as to the staging and access identified and analyzed in the Final EIR/EIS as modified by the PMR and Changes described in the DNA dated March, 2011.

Modification to Access Road to Structure EP187-2. SDG&E is requesting a re-alignment of the approved Project access road to Structure EP187-2. During construction monitoring for the Sunrise Powerlink Final Environmentally Superior Southern Route, Native American monitors requested that the proposed spur road to Structure EP187-2 be re-aligned to avoid a series of granite outcrops near an identified sensitive area.

The proposed re-alignment of the EP187-2 Spur Rd was surveyed on October 18, 2011. The proposed reroute will impact slightly more vegetation than the original route but will protect the rock outcroppings that provide habitat for various rodents and reptiles. This modification does not impact any additional jurisdictional water as compared to the original approved access road.

The area proposed for the new spur road alignment was surveyed for archaeological materials during cultural resources inventory work for the Sunrise Powerlink Final Environmentally Superior Southern Route. The spur road realignment will not impact an NRHP/CRHR eligible site; however, any ground disturbing activities associated with the spur road realignment shall be monitored full-time by an archaeologist and Native American monitor. Mitigation Measures set forth in the Final Historic Properties Management Plan (HPMP) will be implemented during construction.

Modification to the access road to structure EP187-2 would create similar permanent impacts as those for the placement of permanent project features analyzed in the FEIR/FEIS and/or the approved PMR and DNA dated March 2011. No additional mitigation would be required for impacts to sensitive vegetation or special status species.

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. These changes were acknowledged in a DNA dated March 2011.

In July 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. These changes were acknowledged in a DNA dated August 2011.

E. Persons/Agencies/BLM Staff Consulted

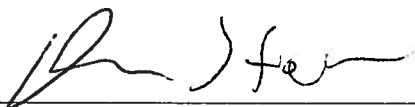
Margaret L. Goodro	Field Manager	EI Centro Field Office, BLM
Thomas Zale	Associate Field Manager	EI Centro Field Office, BLM
Sandra McGinnis	Planning & Environmental Coordinator	California State Office, BLM
Nicollee Gaddis	Planning & Environmental Coordinator	EI Centro Field Office, BLM
Carrie Simmons	Archaeologist	EI 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.)*

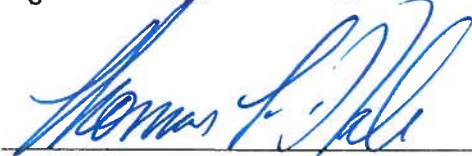
Based on the review documented above in this DNA, I conclude that the proposed changes to the approved project conform to the applicable land use plans inasmuch as the proposed changes are within the approved plan amendment for the Sunrise Powerlink Project. The NEPA EIS documentation fully covers the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



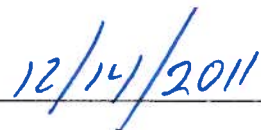
Signature of Project Lead



Signature of NEPA Coordinator

 ACTJALG

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

1661 South 4th Street

El Centro, CA 92243

www.blm.gov/ca/elcentro/

In Reply Refer To:

CA-670-06-28 and CA-670-12-020/CA-47658/ EIS CA-670-2006-31 and DOI-BLM-CA-D070-2012-0012-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: DNA #2- Sunrise Powerlink Project, 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 micro-siting 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 Notice to Proceed dated March 2011, the DNA dated August 2011, and as analyzed in the Final EIR/EIS. These changes include the following: the addition of a parking area and turnaround to Structure EP40-1; addition of a parking area north of Structure EP63; and access road modification to Structure EP187-2. The DNA does not address the modification of prior approval for Tower Staging Access Pads (TSAPs) from temporary to permanent and further review will be required for those elements.

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-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.

Environmentally sensitive area (ESA) buffers around sites within 50 feet of construction activities 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 designated ESAs.

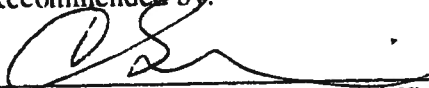
The BLM has determined that the previous inventory efforts and required mitigation measures are adequate to identify and protect historic properties on public lands that might be affected by this project modification. Therefore, the BLM staff archaeologist has recommended that the proposed micro-siting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

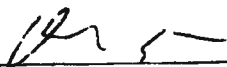


Archaeologist, El Centro Field Office

12/7/11

Date

Acceptance by the Agency Official:



Field Manager, El Centro Field Office

12/7

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.



- Digitized Stream
- Surveyed Ephemeral Stream
- Surveyed Intermittent Stream
- Surveyed Perennial Stream
- Dry Wash
- Wetland
- SPRL - Right of Way
- Current Sunrise project area
- Micrositing
- Existing Road
- Work Area
- Stringing Site
- Access Road - Temporary
- TSAP
- Access Road

Micrositing Map Book

EP187-2

Date: 12/2/2011
1 inch = 125 feet





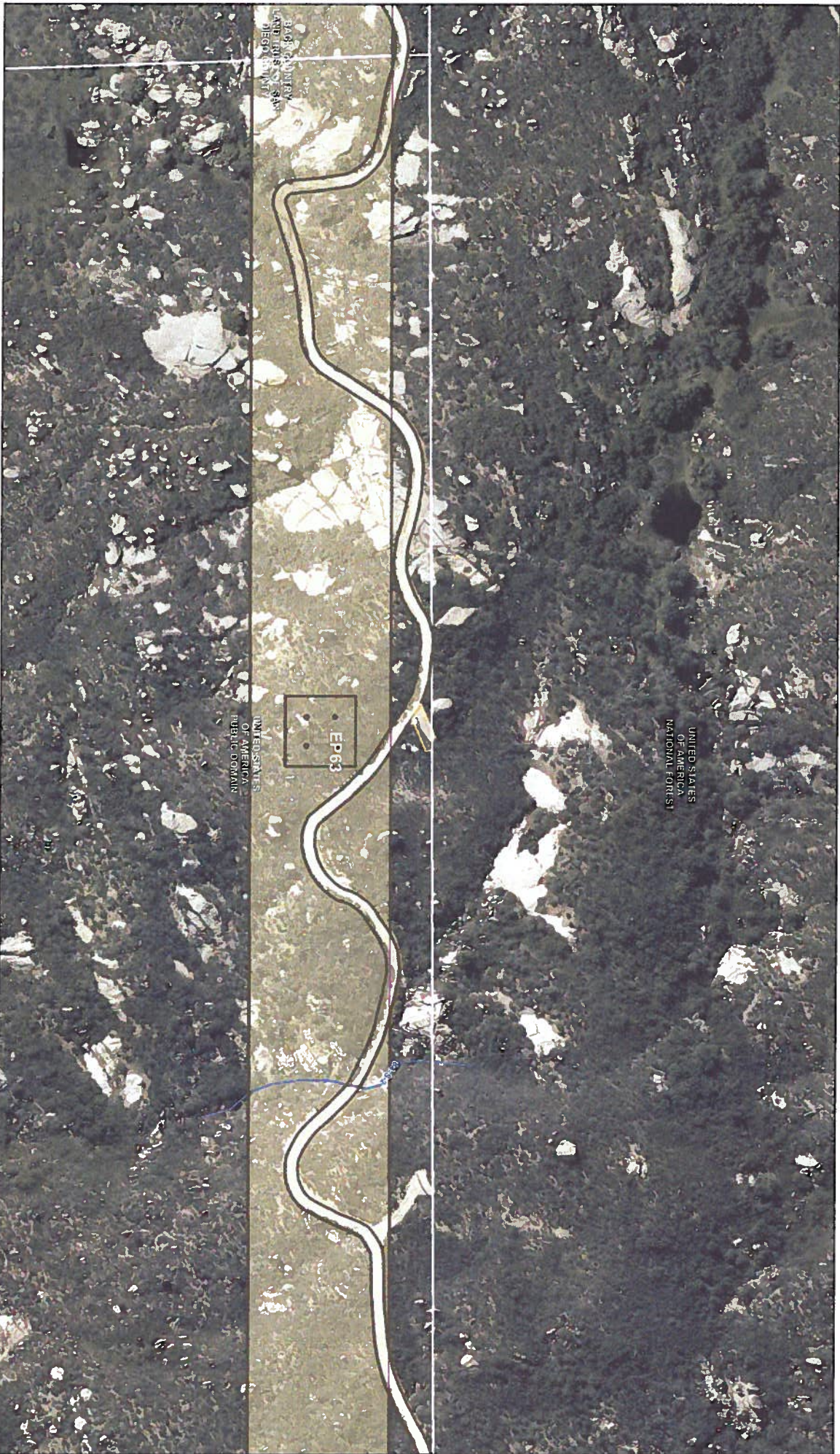
- Digitized Stream
- Surveyed Ephemeral Stream
- Surveyed Intermittent Stream
- Surveyed Perennial Stream
- Dry Wash
- Wetland
- SPPL - Right of Way
- Current Sunrise project area
- Micrositing
- Existing Road
- Work Area
- Stringing Site
- Access Road - Temporary
- Access Road - Permanent
- Access Road
- Access Road

Micrositing Map Book

EP40-1

Date: 12/2/2011
 1 inch = 125 feet





- Digitized Stream
- Surveyed Ephemeral Stream
- Surveyed Intermittent Stream
- Surveyed Perennial Stream
- Ory Wash
- Wetland
- SPPRL - Right of Way
- Current Sunrise project area
- Micrositings
- Existing Road
- Work Area
- Springing Site
- Access Road - Temporary
- Access Road - TSAP
- Access Road

Micrositing Map Book

EP63

Date: 12/2/2011
1 inch = 125 feet

