

## A. Introduction

### A.1 Project Background and Purpose of this SEIR

#### A.1.1 Project Background

Southern California Edison (SCE) filed an application for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the proposed Devers–Palo Verde 500 kilovolt (kV) No. 2 Transmission Line project (DPV2) in April 2005. The application was determined to be complete and in compliance with CPUC requirements on September 30, 2005. The CPUC and Bureau of Land Management (BLM) prepared a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) in 2006, and the CPUC approved the DPV2 Project on January 25, 2007 in Decision D.07-01-040 and certified the EIR as being in compliance with the requirements of CEQA.

On May 14, 2008, SCE filed a Petition for Modification (PFM) of the existing CPCN approved in Decision D.07-01-040. SCE requested that the CPUC authorize SCE to construct DPV2 facilities in only the California portion of DPV2 starting from the Midpoint Substation–Desert Southwest (DSW) near Blythe, California. This California only portion of DPV2 is called the Devers–Colorado River (DCR) transmission line.<sup>1</sup> The CPUC approved SCE’s PFM on November 20, 2009 in Decision D.09-11-007.

After the CPUC’s 2009 Decision, several large solar power projects were proposed in the Blythe area. Two of these projects, the Blythe Solar Power Project (BSPP)<sup>2</sup> and the Genesis Solar Energy Project (GSEP),<sup>3</sup> have requested interconnection to the electricity grid at the Midpoint-DSW Substation. As a result, the solar developers and SCE developed a plan to expand the substation to allow the required space for generation tie lines to be interconnected with the SCE 500 kV transmission system. Because the CRS would provide transmission access to potential future renewable resources in the Blythe area, the CPUC must evaluate the interconnections of each of these projects as the “whole of the action” under CEQA (CEQA Guidelines §15378[a]). Because neither the CRS nor the solar facilities could exist without the other, BSPP and GSEP are considered to be a “connected action” to the proposed CRS.

During 2009 to 2010, the BSPP and the GSEP were evaluated under CEQA and NEPA by the BLM and the California Energy Commission (CEC). A joint Staff Assessment<sup>4</sup>/Draft EIS was released for each of these

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<sup>1</sup> The Colorado River Substation location is analyzed as the Midpoint Substation site in the DSWTP Final EIS/EIR, published by the Imperial Irrigation District and BLM in October 2005; it is also included in the DPV2 Final EIR/EIS as part of the Desert Southwest Transmission Project Alternative.

<sup>2</sup> The BSPP is a 1,000 MW solar thermal project located approximately two miles north of I-10, eight miles west of the City of Blythe, and five miles northeast of the CRS site. Two new 230 kV overhead gen-tie lines, approximately 9.8 miles long, will connect the BSPP switchyard to CRS. The CEC approved the project on September 15, 2010 and BLM issued its ROD on October 25, 2010.

<sup>3</sup> The GSEP is a 250 MW solar thermal project located approximately 25 miles west of the city of Blythe, north of Ford Dry Lake and I-10, and 11 miles northwest of the CRS. A gen-tie line will connect from GSEP to the CRS via the Blythe Energy Project Transmission Line (BEPTL). Six new transmission poles would be constructed by GSEP to connect GSEP electricity from the BEPTL into the CRS. The CEC approved the project on September 29, 2010 and BLM issued its ROD on November 5, 2010.

<sup>4</sup> A Staff Assessment is prepared by the CEC in accordance with the requirements of CEQA. No EIR is required because the CEC’s site certification program has been certified by the Resources Agency (Pub. Resources Code, §21080.5 and Cal. Code Regs., tit. 14, §15251 (k)). The CEC is the CEQA lead agency and is subject to all portions of CEQA applicable to certified regulatory activities.

projects in March 2010. A Revised Staff Assessment for the BSPP was published in June 2010, and for the GSEP in June and July 2010. BLM published its Final EISs on the BSPP and the GSEP in August 2010. Section A.5.2 (Documents Incorporated by Reference) incorporates by reference the information in the BSPP and GSEP CEQA-equivalent and NEPA documents into this Supplemental EIR.

These environmental documents addressed the substation expansion, but they did not adequately cover all issues that the CPUC requires to be addressed in accordance with CEQA, as described for each document in Table A-2 at the end of this section. Therefore, the CPUC has prepared this focused Supplemental EIR to address only the specific issues not yet covered for its purposes.

SCE has proposed a number of refinements to the DPV2 project as approved, including the locations of the construction and helicopter yards and modifying transmission line structures. The review of these project refinements is occurring as a part of the CPUC’s mitigation monitoring process. Each of these refinements has been reviewed, and CPUC has determined that the changes would not increase the level of environmental impact or create new significant impacts. In addition, the proposed modifications would be consistent with and/or would validate the existing environmental analysis such that additional CEQA or NEPA documentation (i.e., inclusion in this SEIR) is not required.

Table A-1 lists the decision documents of the CPUC and BLM that have been issued to date, and the SCE applications that relate to the Midpoint or Colorado River Substations.

**Table A-1. Decision and Application Documents Addressing the Colorado River Substation Expansion**

Document	Description
CPUC Decision D.07-01-040 (January 2007)	<ul style="list-style-type: none"> <li>• Approves two Midpoint Substation locations as equally environmentally superior (44 acres)</li> </ul>
SCE Application for a Petition to Modify Decision D.07-10-040 (May 2008)	<ul style="list-style-type: none"> <li>• Requests approval of California-only transmission line, including Midpoint-DSW Substation for solar generation interconnections</li> </ul>
CPUC Decision D.09-11-007, including Attachment 2 Addendum to Final EIR (November 2009)	<ul style="list-style-type: none"> <li>• Approves Petition, including Midpoint-DSW Substation (44 acres)</li> </ul>
SCE Application for a Permit to Construct Electrical Facilities: Colorado River Substation Expansion Project (November 2010)	<ul style="list-style-type: none"> <li>• Requests expansion of the Midpoint-DSW Substation (now called Colorado River Substation [CRS]) to 90 acres total</li> <li>• Incorporates biological surveys conducted for the solar projects.</li> <li>• Incorporates cultural surveys conducted for the solar projects.</li> </ul>

### A.1.2 Purpose of This SEIR

The primary purpose of this Supplemental EIR is to satisfy California Environmental Quality Act (CEQA) requirements (CEQA Guidelines §15162) by fully disclosing new impacts or substantial changes in impacts that have been identified as a result of project modification (substation expansion). This SEIR will identify changes in impacts that result from project changes occurring after certification of the DPV2 EIR/EIS in 2006.

The issuance of a Supplemental EIR is governed by CEQA Guidelines §15163:

*(a) The Lead or Responsible Agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:<sup>5</sup>*

*(1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and*

*(2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.*

*(b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.*

*(c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.*

*(d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.*

*(e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.*

Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21166, Public Resources Code.

In instances where only minor additions or changes would be necessary in the previous EIR to make that EIR apply in the changed situation, a supplemental EIR may be used and need contain only the information necessary to make the previous EIR adequate for the project as revised. This Supplemental EIR incorporates information contained in related environmental documents published by the CPUC, CEC and BLM on DPV2, BSPP, and GSEP (see Table A-2, at the end of this section, and Section A.4.2). It is focused to include only a discussion of components and impacts related to the Colorado River Substation expansion, and only those impacts that would be different with the expanded substation.

Because the proposed expanded substation location would result in significant and unmitigable effects to biological resources (as disclosed in Section C of this document), this Supplemental EIR also addresses alternatives to the Colorado River Substation location. As described in Table A-2, which summarizes the components of other environmental documents related to the Colorado River Substation, alternative substation sites were not considered in the past CEC or BLM environmental documents. Therefore, in this Supplemental EIR, alternatives are evaluated in accordance with the following requirements:

- CEQA Guidelines Section 15126.6(a): “[a]n EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...”
- CEQA Guidelines Section 15021(a)(2) “[a] public agency should not approve a project as proposed if there are feasible alternatives or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment.”

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<sup>5</sup> A supplement to an EIR may be distinguished from a subsequent EIR by the following: a supplement augments a previously certified EIR to the extent necessary to address the conditions described in section 15162 and to examine mitigation and project alternatives accordingly. It is intended to revise the previous EIR through supplementation. A subsequent EIR, in contrast, is a complete EIR which focuses on the conditions described in section 15162. <http://ceres.ca.gov/ceqa/guidelines>

### A.1.3 Project Objectives

SCE's stated objectives of constructing the expanded Colorado Rivers Substation are to:

- Objective 1: Provide transmission access to potential future renewable resources in the Blythe area;
- Objective 2: Help enable California to meet its renewable energy goals; and
- Objective 3: Complete substation construction in a timely fashion to interconnect with generation tie lines from the two approved solar power projects (BSPP and GSEP) by the Large Generator Interconnection Agreements (LGIA) target dates.

The original project objectives for the DPV2 project were listed in Section A.2 (Purpose and Need for the Proposed Project) of the DPV2 Final EIR/EIS (CPUC, 2006). However, in its Petition for Modification (PFM) submitted on May 14, 2008, SCE requested modifications to CPUC Decision D.07-01-040 to permit SCE to construct the California portion of DPV2 in advance of any approval to construct the Arizona portion of DPV2. The PFM states that such a modification of the CPUC's decision regarding DPV2 is appropriate in light of the renewable resource potential in and around the California terminus of the DPV2 line, near Blythe, California. In the event that Arizona does not permit the portion of DPV2 in Arizona, DPV2 could be used to deliver renewable resources located in the Blythe area to California load centers. The PFM also requests authorization to construct the Midpoint Substation, near Blythe.

Therefore, the project objectives have been revised from the original DPV2 EIR/EIS. CPUC Decision D.09-11-007, which modifies D.07-01-040, states that SCE sought to access "potential new renewable and conventional gas-fired generation in the Blythe, California area" and the PFM stated that "[s]uch authorization will help enable California to meet its renewable energy goals." The PFM stated that "SCE is committed to constructing the DPV2 facilities in Arizona" notwithstanding ACC denial, and claimed that phasing the construction "does not change the cost-effectiveness of the DPV2 project. ... DPV2 will still provide net benefits."

SCE's Application for a Permit to Construct the Colorado River Substation Expansion states that construction would be completed and commercial operation would begin in the third quarter of 2013. SCE's current schedule assumes that the substation would be operation on May 6, 2013 (SCE, 2011).

SCE has further stated that in order to have timely completion of CRS to interconnect to GSEP and BSPP, the CRS should be online in a timely and ready fashion by the LGIA target dates with the solar power generators (i.e., BSPP and GSEP). Solar Millennium has stated that it plans to close financing in mid-2011 and to begin commercial operation of BSPP in November 2013 (Solar Millennium, 2011). Likewise, the BSPP LGIA has been executed by Solar Millennium, SCE and the California Independent System Operator (CAISO) with a Committed In-Service Date of November 1, 2013.

The planned operational date for GSEP is summer 2013 (CEC, 2010); however, the GSEP LGIA is still in negotiation. It is expected to be executed in the near future and will be to the same as or later than the BSPP LGIA target date of November 1, 2013 (SCE, 2011).

## A.2 Scope of This SEIR

### A.2.1 Public Scoping for This SEIR

The CPUC published a Notice of Preparation (NOP) of a Supplemental EIR on September 29, 2010 (see Appendix 2a). After the release of the NOP, the CPUC held a 30-day public scoping period as required under CEQA, which ended on November 1, 2010. The comment period provided the public and regulatory agencies an opportunity to comment on the scope of the environmental document, comment on the alternatives considered, and to identify issues that should be addressed in the Supplemental EIR. The Supplemental EIR for the CRS Expansion Project evaluates the potential environmental impacts associated with the CRS expansion and identifies mitigation measures to reduce these impacts, where feasible.

Seven comment letters were submitted during the scoping process by public agencies and private organizations. These letters and a discussion of scoping are included in the Scoping Report (included in Appendix 2 to this Supplemental EIR). Major issues of concern that were identified during scoping include the following:

- **Native American and Cultural Resources.** The Native American Heritage Commission (NAHC) commented that based on their Sacred Lands File search, there are resources of value to Native Americans located in the area that could be affected by the Proposed Project. NAHC provided a list of culturally affiliated tribes and interested Native American individual with whom they recommend consulting in order to avoid impacts to Native American cultural resources and ensure compliance with State and federal regulations.

Section D.2.2 of this SEIR analyzes potential impacts to the cultural resources located in the vicinity of the proposed CRS. In response to the NAHC scoping letter, all tribes listed in the NAHC letter were mailed a copy of the Notice of Preparation in November 2010. No comments were received, and in January 2011, the tribes were contacted again regarding interest in consultation.

- **Water Resources.** The Colorado River Board of California recommended that the Supplemental EIR fully analyze groundwater use and its potential impacts on water supply for other users of Colorado River water.

Section D.3 of this SEIR discusses potential impacts to water resources and public services resulting from the expanded use of groundwater at the CRS.

- **Potential Hazards.** The California Department of Toxic Substances Control (DTSC) commented that the EIR should evaluate conditions in the project area that may pose a threat to human health or the environment. DTSC listed regulatory agency databases and outlined regulatory requirements for investigating, identifying, and remediating hazardous materials that may be encountered in the project area.

An EDR database search was performed in January 2011 for proposed and alternative sites, and it showed that they do not contain any known contamination or hazardous materials (see Appendix 5). Mitigation measures included in the DPV2 Final EIR/EIS (2006) would ensure that the project would adhere to all regulatory requirements for investigating, identifying, and remediating hazardous materials that may be encountered in the project area.

- The **Riverside County Airport Land Use Commission** noted that if any associated transmission lines for the Proposed Project pass through the Airport Influence Area of any airport in Riverside County, the transmission lines would need to be reviewed by the Airport Land Use Commission.

The CRS would adhere to all required permits and neither the proposed location nor any alternative location would be located in an Airport Influence Area.

- **Sand Transport and Habitat Impacts.** Basin and Range Watch, Center for Biological Diversity, Western Watersheds Project, and the Sierra Club expressed concern about the potential impacts of the Proposed Project on sand transport and habitat for Mojave fringe-toed lizard. These groups recommended that the CPUC consider alternative locations for the substation.

Section D.2 of this SEIR addresses direct and indirect impacts of CRS on sand transport and dune habitat. Eight alternative substation locations and configurations are considered in Appendix 1 (Alternatives Screening Report) and five are fully analyzed in Section D.

## A.2.2 Issue Areas Not Addressed in This SEIR

The CRS expansion project would not result in new impacts or substantial changes in impacts analyzed in the DPV2 Final EIR/EIS for several of the environmental issues areas. In accordance with CEQA Guidelines §15163(c), the Supplemental EIR need only contain the information necessary to make the previous EIR adequate for the project as revised. However, according to CEQA Guidelines §15128, “[a]n EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.”

The following issue areas were adequately addressed in the DPV2 Final EIR/EIS and the BLM and CEC documents, and the analyses have not substantially changed as a result of the CRS expansion project. Therefore, no additional significant impacts or substantial increases in the severity of significant impacts would occur as a result of the substation expansion for ten environmental disciplines, and no additional analysis is included in this SEIR for the following reasons:

- **Visual Resources.** Given the limited public access in this area, viewer exposure to the substation site would be minimal. The incremental increase in the size of the substation would not create a new or substantially more significant impact than what was identified in Section D.3 of the DPV2 Final EIR/EIS. There are existing transmission lines in the area, including DPV1, and so the wood poles associated with the telecom facilities and distribution lines would not create a noticeable increase in industrial facilities in the area.
- **Land Use.** The CRS would be placed on BLM land or undeveloped private land, within or near a BLM-designated utility corridor. There are no nearby residences. Although development of a larger substation would incrementally increase the industrial development in an otherwise open area, the CRS would be placed adjacent to existing and future approved transmission facilities in support of the utility corridor use. The CRS expansion project would not create a new or substantially more significant impact than what was identified in Section D.4 of the DPV2 Final EIR/EIS.
- **Wilderness and Recreation.** The CRS expansion project would not be constructed across recreation or wilderness areas and so there would be no new or substantially more significant impacts than what was identified in Section D.5 of the DPV2 Final EIR/EIS.
- **Agriculture.** The CRS expansion project would not be located on agricultural land and would not interfere with agricultural operations. The CRS expansion project would not create a new or substantially more significant impact than what was identified in Section D.6 of the DPV2 Final EIR/EIS.
- **Noise.** There are no nearby residences that would be impacted by the substation expansion project, and thus, the expansion project would not create a new or substantially more significant impact than what was identified in Section D.8 of the DPV2 Final EIR/EIS.
- **Transportation and Traffic.** The substation and distribution facilities would be accessed mainly from I-10 and Wiley Well Road, which were previously analyzed in Section D.9 of the DPV2 Final EIR/EIS.

Construction activities would be greater for the larger substation, thus generating more traffic. However, the level of service of local roads in this rural area would not be substantially affected and no new or more significant impacts would be created. The CRS expansion project would not be located in a Riverside County Airport Influence Area.

- **Public Health and Safety.** The substation expansion would have greater ground disturbance, which would slightly increase the likelihood of encountering hazardous materials. However, impacts related to encountering unknown preexisting industrial contamination would not likely occur because the site does not include any industrial or commercial uses. In addition, an EDR database search was performed in January 2011 for proposed and alternative sites, and it showed that they do not contain any known contamination or hazardous materials (see Appendix 5). Mitigation measures included in Section D.10 of the DPV2 Final EIR/EIS would ensure that impacts would be less than significant and no new impacts would be created. Likewise, the CRS expansion project would comply with all regulatory requirements for investigating, identifying, and remediating hazardous materials that may be encountered in the project area.
- **Air Quality.** Section D.11 of the DPV2 Final EIR/EIS addresses the short-term construction emissions associated with substation construction. Although the expanded substation would create greater emissions associated with ground disturbance and construction duration, the implementation of the DPV2 air quality mitigation measures would ensure that this impact would remain less than significant and no new impacts would be created. A discussion of greenhouse gas impacts, which was not addressed in the DPV2 EIR/EIS since it pre-dated the CEQA requirement, has been included in Section D of this SEIR for the 90-acre CRS as it is now a requirement under CEQA.
- **Geology, Mineral Resources, and Soils.** No known active faults or mineral resources are identified at or near the proposed CRS site so the expansion project would not create a new or substantially more significant impact than what was identified in Section D.13 of the DPV2 Final EIR/EIS.

## A.3 Agency Use of This SEIR

### A.3.1 CPUC Process

Pursuant to Article XII of the Constitution of the State of California, the CPUC is charged with the regulation of investor-owned public utilities, including SCE. The CPUC is the lead State agency for CEQA compliance in evaluation of the SCE's proposed DPV2 Project, and along with BLM directed the preparation of the DPV2 Final EIR/EIS.

This Supplemental EIR will be used by the Commission, in conjunction with other information developed in the Commission's formal record, to act on SCE's application for a Permit to Construct (PTC) for construction and operation of the Colorado River Substation Expansion Project. Under CEQA requirements, the CPUC will determine the adequacy of the Supplemental EIR and, if adequate, will certify the document as complying with CEQA. The CPUC will also act on SCE's application for a PTC.

The Notice of Preparation (NOP) describing the CRS Expansion Project was published on September 29, 2010. The CPUC expects a final decision from the Commission in 2011.

### A.3.2 Potential BLM Use of This SEIR

Because the 500 kV transmission line and the Colorado River Substation (expanded as proposed) would be located on public lands managed by the BLM, SCE requires a Right-of-Way (ROW) Grant and Notice to

Proceed from BLM to construct the Proposed Project. Prior to granting the ROW, BLM must comply with the National Environmental Policy Act (NEPA). The BLM and the U.S. Forest Service (a joint signatory due to the Devers-Valley 500 kV line passing through the San Bernardino National Forest) plan to issue a single Record of Decision (ROD) for the DPV2 project after the Final Supplemental EIR is published.

The contents and conclusions of BLM’s ROD cannot be defined prior to its issuance, but it is expected to address the following issues: (a) elimination of the transmission line segment between Palo Verde and the Colorado River Substation from consideration, (b) the proposed new 500 kV transmission line from Colorado River Substation to Devers Substation and the 500 kV line from the Devers Substation to the Valley Substation, and (c) the Colorado River Substation and its proposed expansion. To support consideration of the expansion of the Colorado River Substation, the ROD will include a discussion of “New Information After the EIR/EIS.” This discussion will present a summary of this SEIR, its analysis, and its conclusions. A Determination of NEPA Adequacy (DNA) may also be prepared to document the adequacy of the original EIR/EIS and its mitigation measures, along with the information in this SEIR. In addition to addressing the proposed substation expansion, the ROD will present the selected route alternative for the DPV2 line and the substation location for the Colorado River Substation, which may differ from the CPUC’s environmentally superior and BLM’s agency preferred alternatives in the Final EIR/EIS (BLM, 2011).

This SEIR, in addition to the Final EIR/EIS, identifies alternatives for the CRS substation location. If an alternative location for the substation (and its proposed expansion) is found environmentally superior in this SEIR, and is ultimately selected/carried forward in the ROD for DPV2, the BLM may need to re-evaluate the Records of Decision (RODs) and/or amend the ROW grants for the for the Blythe Solar Power Project (BSPP) and the Genesis Solar Energy Project (GSEP) issued on October 25, 2010 and November 5, 2010, respectively. These RODs and ROW grants were inclusive of the necessary 220 kV gen-tie lines needed to connect the solar projects to the CRS.

### **A.3.3 Energy Commission Authorizations**

The CEC approved the BSPP and GSEP projects on September 15 and September 29, 2010, respectively. The approvals included the solar fields and the 220 kV generation tie (gen-tie) transmission lines that would connect the solar projects to the proposed CRS. If any alternative considered in Section C of this SEIR were implemented, the approved gen-tie routes could require modification. Accordingly, the revised gen-tie routes would need to be reviewed by the CEC per CCR Title 20, section 1769 (Post Certification Amendments and Change).

If project changes to project design, operation, or performance requirements occur after CEC approval and during the compliance process, the applicant is required to submit a petition for project modifications to the CEC. As listed in section 1769 of the CEC Siting Regulations (California Code of Regulations [CCR] Title 20, section 1769, Post Certification Amendments and Changes), the request must include a description of the proposed modifications and the necessity for the proposed modifications. In addition, the request must state whether the modification is based on (1) information that was known during the certification proceeding along with an explanation why the issues was not raised at that time, or (2) new information that was not available during certification; and an analysis of potential impacts on the environment, nearby property owners, and the general public. The petition also must outline the project’s continued ability to comply with applicable laws, ordinances, regulations, or standards (LORS) during construction and upon placing the modifications in service, and must demonstrate that the proposed modifications will not result in significant environmental impacts.



Within 30 days after the applicant files a petition, CEC staff must review the petition to determine the extent of the proposed modifications. Where staff determines that there is no possibility that the modifications may have a significant effect on the environment, and the modifications will not result in a change to or deletion of a condition of certification adopted by the CEC in the final decision, or make changes that would cause the project not to comply with applicable LORS, no Commission approval is required. The staff shall file a statement that it has made such a determination with the Commission docket and mail a copy of the statement to each commissioner and every person on the post-certification mailing list. Any person may file an objection to staff's determination within 14 days of service on the grounds that the modification does not meet the criteria in section 1769(a)(2) described above.

According to CCR Title 20, section 1769(a)(3), if staff determines that a modification does not meet the criteria in section 1769(a)(2) described above or if a person objects to a staff determination, the petition must be processed as a formal amendment to the decision and must be approved by the full Commission at a noticed business meeting or hearing. The Commission would issue an order approving, rejecting, or modifying the petition at the scheduled hearing, unless it decides to assign the matter for further hearing before the full Commission or an assigned committee or hearing officer.

As an example of a staff-approved modification, the Blythe Energy Project Transmission Line (BEPTL) was recently constructed adjacent to a portion of the DPV1 and proposed CRS-Devers corridor. Following CEC approval, BEPTL's applicant submitted at least five petitions for project modifications. All were approved by staff during the compliance proceeding. After the petition for project modification was submitted, each approval took approximately one to three months.<sup>6</sup> However, the timeframe on any staff approval(s) would be based on staff's availability and the need for clarification or additional information (i.e., data requests, responses, etc.).

Thus, a modification to approved gen-tie routes resulting from implementation of an alternative Colorado River substation location may be able to be reviewed and approved at a CEC staff level without requiring further discretionary approvals.

### **A.3.4 Other Required Permits and Approvals**

Table A-4 in Section A.3.5 of the DPV2 Final EIR/EIS (October 2006) includes a list of the federal, State, and local permits and authorization required for the Proposed Project. No new permits would be required as a part of the CRS expansion project.

## **A.4 NEPA Compliance and BLM Approval of Solar Projects**

During 2009 to 2010, BSPP and GSEP were evaluated under both CEQA (by the CEC) and the National Environmental Policy Act (NEPA) by the BLM. The interconnection of these and other generators in the region to the Colorado River Substation would require the size of the substation to increase by approximately 48-45 acres.

The EIS process was initiated by publication of the Notice of Intent (NOI) for each project on November 23, 2009. A joint Staff Assessment/Draft EIS with the CEC was released for each of these projects in March 2010. The CEC separately published a Revised Staff Assessment for BSPP in June 2010, and for GSEP in June and July 2010 under CEQA. BLM published its proposed Plan Amendment to the California Desert Conser-

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<sup>6</sup> All notices, requests and approvals are posted on the CEC's Blythe Transmission Line Compliance Proceeding website at: <http://www.energy.ca.gov/sitingcases/blythetline/compliance/index.html>.

vation Area Plan and Final EISs on BSPP and GSEP in August 2010. The Plan Amendment/Final EISs for the BSPP and GSEP were developed in accordance with NEPA and the Federal Land Policy and Management Act of 1976. Because these environmental documents addressed the substation expansion, no further analysis is required under NEPA for the individual solar projects.

However, if an alternative substation site is selected, BLM would have to evaluate its approvals of the 220 kV generation tie transmission lines that would connect the solar projects to the CRS, because the gen-tie routes would also need to be modified to connect to the new CRS location. As discussed in Section A.3.2, the substation location would be approved within the DPV2 ROD and the ROW grants would likewise be modified for the new substation site within the GSEP and BSPP RODs, assuming that no new significant impacts would be created and the modifications are minor. Similar to approval of an alternative substation site, BLM may complete additional NEPA review to consider changes to the gen-tie routes, including completing a DNA, to ensure that any modifications to the BSPP and GSEP ROW Grants would not create any new or substantially more severe impacts nor significantly alter the content of the ROD. BLM will also need to ensure that changes to gen-tie routes remain within approved utility corridors in order to avoid an additional amendment of the CDCA plan for gen-tie changes. If impacts are found to be more severe, BLM may undergo additional NEPA compliance and would conduct further inventories and/or analysis, as needed (BLM, 2011).

BLM published Records of Decision (ROD) adopting the Approved Plan Amendments and issuing right-of-way grants for the BSPP (CACA-48811) and GSEP (CACA-48880) on October 25, 2010 and November 5, 2010, respectively.

## A.5 Reader's Guide to This SEIR

### A.5.1 ~~Draft~~ Final SEIR Contents and Organization

This SEIR is organized as follows:

**Executive Summary.** A summary description of the CRS Expansion Project and its environmental impacts.

**Impact Summary Tables.** A tabulation of the impacts and mitigation measures for the Proposed Project and alternatives.

**Section A (Introduction/Overview).** A discussion of the background, project objectives, briefly describing the proposed CRS Project and the scope of this SEIR, and outlining the public agency use of the EIR/EIS.

**Section B (Project Description).** Detailed description of the proposed CRS Expansion Project.

**Section C (Alternatives).** Description of the site alternatives retained for full analysis and eliminated from consideration in the SEIR, including the No Project Alternative.

**Section D (Environmental Analysis).** Analysis and assessment of impacts and mitigation measures for the proposed expansion project and site alternatives, addressing only the environmental issue areas where impacts would be new or have changed as a result of the project modifications: Biological Resources; Cultural Resources; Hydrology and Water Resources; Socioeconomics; and Greenhouse Gas.

**Section E (Cumulative Impact Analysis).** A revised discussion of the cumulative scenario and impacts with regard to the solar generation projects in the area.

**Section F (Comparison of Alternatives).** Compares five site alternatives and the No Project Alternative to the Proposed Project and determines the Environmentally Superior Alternative.

**Section G (Additional CEQA Considerations).** A discussion of growth-inducing impacts, the potential for irreversible commitment of resources, and energy conservation if the Proposed Project is implemented.

**Section H (References).** Includes references for all citations within the SEIR.

**Section I (Comments and Responses on the Draft SEIR).** Includes all comment letters submitted on the Draft SEIR and CPUC responses to comments.

**Appendices:**

**Appendices included in printed SEIR:**

Appendix 1 Alternatives Screening Report

**Appendices included on CD only:**

Appendix 2 Notice of Preparation; Scoping Report; Scoping Letters

Appendix 3 Geomorphic Assessment and Sand Transport Impacts Analysis of the Colorado River Substation

Appendix 4 Native American Scoping Consultation

Appendix 5 EDR database search results

Appendix 6 SEIR Preparers and Reviewers

Appendix 7 Persons or Agencies Consulted

Appendix 8 Supplemental Information, Genesis Solar Energy Project, June 18, 2010 (Biological resources survey results for CRS are presented in Section 5.2 and Figures 7 and 8.)

Appendix 9 DPV2 Telecommunication System Route Biological Review

Appendix 10 United States Fish and Wildlife Service’s Section 7 Biological and Conference Opinion on the Devers to Palo Verde No. 2 Transmission Line Project, Riverside County, California

## A.5.2 Documents Incorporated by Reference

The documents listed below have been used in preparing this Supplemental EIR. Copies of these documents are available on the websites listed below. Copies can also be viewed, upon request, at the CPUC’s office (San Francisco). Table A-2 summarizes how the Midpoint-DSW Substation and CRS expansion were addressed in the completed CEQA and NEPA documents listed below.

### Devers–Palo Verde No 2. Transmission Line Project

- CPUC’s Devers–Palo Verde No 2. Transmission Line Project Final EIR/EIS (October 2006), as certified by the CPUC in its decisions D.07-01-040 and D.09-11-007:
  - <http://cpuc.ca.gov/environment/info/aspen/dpv2/toc-feir.htm>

### Blythe Solar Power Project

- California Energy Commission (CEC) Supplemental Staff Assessment for BSPP (July, 8 2010), Appendix A, Colorado River Substation Expansion and BSPP Interconnection Actions Impact Analysis:
  - <http://www.energy.ca.gov/2010publications/CEC-700-2010-004/CEC-700-2010-004-REV1-SUP.PDF>
- Bureau of Land Management (BLM) Plan Amendment/Final EIS for BSPP (August 2010):
  - [http://www.blm.gov/ca/st/en/fo/palmsprings/Solar\\_Projects/Blythe\\_Solar\\_Power\\_Project.html](http://www.blm.gov/ca/st/en/fo/palmsprings/Solar_Projects/Blythe_Solar_Power_Project.html)

## Genesis Solar Energy Project

- CEC GSEP Revised Staff Assessment (June 2010):
  - <http://www.energy.ca.gov/2010publications/CEC-700-2010-006/CEC-700-2010-006-REV.PDF>
- CEC GSEP Revised Staff Assessment Supplement, Transmission System Engineering Appendix A, Colorado River Substation Expansion and GSEP Interconnection Actions Impact Analysis (July 2010):
  - <http://www.energy.ca.gov/2010publications/CEC-700-2010-006/CEC-700-2010-006-REV-SUP.PDF>
- BLM’s Plan Amendment/Final EIS for Ford Dry Lake (Genesis) Solar Project (August 2010):
  - [http://www.blm.gov/ca/st/en/fo/palmsprings/Solar\\_Projects/Genesis\\_Ford\\_Dry\\_Lake.html](http://www.blm.gov/ca/st/en/fo/palmsprings/Solar_Projects/Genesis_Ford_Dry_Lake.html)

## A.6 ~~Draft-Final~~ SEIR Review and ~~Public Comment~~

### A.6.1 Availability of the ~~Draft-Final~~ SEIR

The SEIR is available for review at the repositories listed below, the CPUC’s office (San Francisco), and on the project website at:

<http://www.cpuc.ca.gov/Environment/info/asp/dpv2/dpv2.htm>

Copies of the ~~Draft-Final~~ SEIR may also be requested by phone or fax at 800-491-6153 or by e-mail at [dpv2@aspenerg.com](mailto:dpv2@aspenerg.com).

Copies are available at the following libraries and the BLM Palm Springs–South Coast Field Office:

- BLM Palm Springs–South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262  
(760) 833-7100
- Palo Verde Valley Library District  
125 W. Chanslor Way  
Blythe, CA 92225  
(760) 922-5371
- Indio Public Library  
200 Civic Center Mall  
Indio, CA 92201  
(760) 342-0185

### A.6.2 ~~Submitting~~ Comments on the Draft SEIR

The CPUC issued the Draft Supplemental EIR on February 22, 2011, including a detailed analysis of impacts associated with the expansion of the CRS, and an evaluation of alternatives to the Proposed Project, including the No Project Alternative. Copies of the full Draft Supplemental EIR and Appendices were sent to 40 interested parties and agencies, and to three libraries used as document repositories (see Section 1.1). Eighty-seven (87) copies of the Executive Summary and 126 CDs with the text of the Draft Supplemental EIR were also shipped. Eleven (11) comment letters were received during the 45-day comment period from agencies, organizations, individuals and the Applicant. Responses to those comment letters are included in Section I of this Final Supplemental EIR.

**IMPORTANT:** Comments on the Supplemental EIR ~~are~~were limited **only** to the topics included in the document. The Final SEIR ~~will~~presents responses to all relevant comments submitted on the Draft SEIR.

**Only written comments** ~~may be submitted~~were accepted on the SEIR; there ~~will be~~was no opportunity to make oral comments. Comments ~~must be~~should have been postmarked or received by fax or e-mail no later than **April 8, 2011**. ~~Please be sure~~Commenters were instructed to include ~~your~~their name, address, and telephone number. Written comments on the SEIR should have been sent **by U.S. mail, by electronic mail, or by fax** to:

**Billie Blanchard, CPUC  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, CA 94104-3002**

**Fax: (800) 491-6153  
E-mail: dpv2@aspeneg.com**

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
<b>Devers–Palo Verde No 2. Transmission Line Project EIR/EIS</b>			
Final EIR/EIS (October 2006)	<ul style="list-style-type: none"> <li>Analyzes SCE Midpoint and Midpoint-Desert Southwest (DSW) Substation (44 acres)</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Substation site has been expanded; current surveys revealed additional species and density of MFTL.</li> <li>Biological surveys were conducted for Midpoint-DSW Substation site. Impacts and mitigation were included in DPV2 Final EIR/EIS for Midpoint-DSW Substation; however, Mojave fringe-toed lizard were found in greater concentration during surveys of the expanded area and impacts would be significant and unmitigable.</li> <li>Desert kit fox, ribbed cryptantha, winged cryptantha, and Harwood’s eriastrum were not identified in the original surveys and thus not included in the DPV2 EIR/EIS.</li> <li>Sand transport analysis was not performed, because at time of DPV2 EIR/EIS publication, there was no model developed to quantify indirect impacts of construction barriers.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Substation site has been expanded and surveys of expanded area identified additional cultural sites.</li> <li>Cultural surveys were conducted for Midpoint-DSW Substation site. Impacts and mitigation were included in DPV2 Final EIR/EIS for Midpoint-DSW Substation, but the expanded area was not included.</li> </ul>
<b>Desert Southwest Transmission Project EIR/EIS</b>			
BLM and Imperial Irrigation District Final EIS/EIR and BLM Record of Decision (December 2005)	<ul style="list-style-type: none"> <li>Analyzes and approves Midpoint-DSW Substation (44 acres)</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Substation site has been expanded; current surveys revealed additional species and density of MFTL.</li> <li>Surveys completed in 2005 for original 44-acre substation footprint only. Impacts and mitigation were included in DSWTP Final EIS/EIR for Midpoint-DSW Substation, but impacts to Mojave fringe-toed lizard would be substantially more severe and desert kit fox was not found during surveys nor included in the analysis of the original 44-acre site.</li> <li>Sand transport analysis was not performed, because at time of DSWTP EIS/EIR publication, there was no model developed to quantify indirect impacts of construction barriers.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Substation site has been expanded and surveys have identified additional cultural sites in expansion area.</li> <li>Surveys completed in 2005 for original 44-acre substation footprint only. Impacts and mitigation were included DSWTP Final EIS/EIR for Midpoint-DSW Substation, but the expanded area was not included.</li> </ul>

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
<b>Blythe Energy Project Transmission Line (BEPTL) Modifications Staff Assessment/Environmental Assessment</b>			
California Energy Commission (CEC) Revised Staff Assessment/Draft Environmental Assessment (RSA/DEA) for BEPTL, APPENDIX B Supplemental Analysis Desert Southwest Transmission Project Midpoint Substation Option (October 2006)	<ul style="list-style-type: none"> <li>Analyzes Midpoint-DSW Substation (44 acres), and incorporates analysis from DSWTP Final EIS/EIR.</li> <li>The Midpoint-DSW Substation is analyzed as an alternative in the Alternatives Section of the RSA/DEA. Additionally, Appendix B provides a more detailed analysis of the substation impacts for each issue area and suggests mitigation measures for potentially significant impacts.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Expanded substation site not evaluated.</li> <li>Incorporates results from DSWTP EIS/EIR and recommends implementation of measures similar to the Conditions of Certification presented for BEPTL for the Midpoint-DSW Substation. The expanded substation area was not included.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Expanded substation site not evaluated</li> <li>Includes CPUC/BLM 2006 pedestrian survey results for original 44-acre substation footprint only.</li> <li>Recommends implementation of measures similar to the Conditions of Certification presented for BEPTL for the Midpoint-DSW Substation. The expanded substation area was not included.</li> </ul>

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
<b>Blythe Solar Power Project Staff Assessment and EIS</b>			
California Energy Commission (CEC) Supplemental Staff Assessment for BSPP, Transmission System Engineering APPENDIX A (July 2010)	<ul style="list-style-type: none"> <li>• Includes CRS Expansion and BSPP Interconnection Actions Impact Analysis.</li> <li>• CRS expansion is also included in the cumulative scenario.</li> <li>• Conditions of Certification, BMPs, and design measures may be applicable to the CRS expansion. CEC recommends that these measures be considered by SCE when constructing the CRS expansion and interconnection facilities.</li> <li>• States that the CPUC would license the CRS expansion and interconnection actions and may require additional measures beyond those identified, pending further environmental analysis conducted by other agencies pursuant to CEQA and NEPA.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>ADDITIONAL ANALYSIS NEEDED</b> for project-level analysis: Impacts of substation expansion were described and mitigation was presented for the MFTL, but no alternatives were considered for this significant impact and the extent of indirect (downwind) impacts was not quantified so appropriate mitigation could be defined.</li> <li>• Staff concluded that impacts could potentially be significant and were not able to determine whether impacts could be mitigated below the level of significance.</li> <li>• Surveys were conducted within a one-mile buffer around the CRS expansion and the proposed gen-tie connection area in 2010. Results were included in the CEC analysis of the CRS expansion.</li> <li>• Recommends implementation of measures similar to the Conditions of Certification presented in the BSPP RSA.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>ADDITIONAL ANALYSIS NEEDED:</b> Survey results for substation expansion area were not presented.</li> <li>• Cultural resources surveys were completed and provided to BLM, but survey results not completed/ included in the CEC analysis of the CRS expansion.</li> <li>• Recommends implementation of measures similar to the Conditions of Certification presented in the BSPP RSA.</li> </ul>



**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
Bureau of Land Management (BLM) Plan Amendment/ Final EIS for BSPP (August 2010)	<ul style="list-style-type: none"> <li>CRS and its expansion are considered only in the cumulative scenario to BSPP (see Table 4.1-1).</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED for CEQA:</b> Cumulative and indirect effects are considered, but thorough analysis of expanded substation impacts was deferred to CPUC consideration.</li> <li>Biological Cumulative Impact Analysis (Appendix H) is excerpted from the CEC RSA.</li> <li>Includes a discussion of impacts and mitigation/Conditions of Certification that would reduce BSPP contribution to the cumulative effect to less than significant.</li> <li>Addresses the direct effects to dune habitat (33 acres) from the CRS under the cumulative impacts discussion only.</li> <li>States that substation impacts will be mitigated under the authority of the CPUC, and so a complete analysis of CRS is not included in the EIS.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED:</b> Cumulative analysis and indirect effects are considered, but no project-specific analysis or consideration of survey results.</li> <li>Includes a qualitative analysis of cumulative impacts in the general vicinity of BSPP and along the I-10 corridor.</li> <li>No survey results or specific mitigation measures were included for the CRS expansion area.</li> </ul>

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
<b>Genesis Solar Energy Project Staff Assessment and EIS</b>			
CEC GSEP Revised Staff Assessment (RSA) (June 2010):	<ul style="list-style-type: none"> <li>Provides an overview of potential impacts from construction of SCE’s proposed 230 kV expansion of the already-permitted (but not yet constructed) 500 kV CRS.</li> <li>Refers to TSE Appendix A for the environmental analysis.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED for project-level analysis: Identifies potential indirect impacts but defers completion of thorough analysis, including alternatives to avoid/reduce significant impact.</b></li> <li>A description of the expansion and potential impacts are included to inform of the potential for impacts to biological resources that may result from other actions related to GSEP (RSA page C.2-124).</li> <li>Analysis of the substation expansion as a reasonably foreseeable development scenario assumed that additional environmental analysis would be conducted; therefore, significance conclusions were not made and mitigation was recommended with the caveat that additional analysis would be required. The extent of indirect (downwind) impacts was not quantified so appropriate mitigation could be defined.</li> <li>Recommends Conditions of Certification, but states that the CEC does not currently have all project-specific information, and therefore cannot address the feasibility of implementing effective avoidance measures as a means of reducing significant impacts.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED: Cultural survey results and specific mitigation measures were not presented.</b></li> <li>Cultural resources surveys were completed and provided to BLM, but survey results and the cultural resources analysis was not included in the CEC RSA.</li> <li>Refers to TSE Appendix A for the environmental analysis (see row below).</li> </ul>

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
CEC GSEP Revised Staff Assessment Supplement, Transmission System Engineering APPENDIX A (July 2010)	<ul style="list-style-type: none"> <li>• Includes CRS Expansion and GSEP Interconnection Actions Impact Analysis.</li> <li>• CRS expansion is included in the cumulative scenario as well.</li> <li>• Conditions of Certification, Best Management Practices (BMPs) and design measures may be applicable to the CRS expansion. CEC recommends that these measures be considered by SCE when constructing the CRS expansion and interconnection facilities.</li> <li>• States that the CPUC would license the CRS expansion and interconnection actions and may require additional measures beyond those identified, pending further environmental analysis conducted by other agencies pursuant to CEQA and NEPA.</li> <li>• No alternative substation sites were considered.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>ADDITIONAL ANALYSIS NEEDED</b> for project-level analysis: Impact analysis and mitigation measures were appropriate, but alternatives analysis to reduce or avoid significant impact was not presented and indirect effects were not calculated.</li> <li>• Reconnaissance surveys of the CRS expansion and gen-tie interconnection area were conducted in spring 2010 in support of the reasonably foreseeable development scenario for GSEP.</li> <li>• SCE would construct the CRS and would be expected to operate under standard SCE BMPs (listed in Appendix A) along with project-specific mitigation.</li> <li>• Recommends implementation of measures similar to Conditions of Certification listed in Appendix A.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>ADDITIONAL ANALYSIS NEEDED</b> for project-level analysis: Cultural resources survey results were not presented.</li> <li>• Cultural resources surveys were completed and provided to BLM, but survey results not completed/ included in the CEC analysis. SCE would be the builder of CRS and would be expected to operate under standard SCE BMPs (listed in Appendix A) along with project-specific mitigation.</li> <li>• Recommends implementation of measures similar to Conditions of Certification for the GSEP project.</li> </ul>

**Table A-2. Summary of CEQA and NEPA Documents Addressing Midpoint Substation and CRS Expansion**

Document	Summary of Substation Analysis	Adequate Analysis of Biological Resources for CRS Expansion?	Adequate Analysis of Cultural Resources for CRS Expansion?
BLM's Plan Amendment/ Final EIS for Ford Dry Lake (Genesis) Solar Project (August 2010)	<ul style="list-style-type: none"> <li>States that the CRS expansion is part of the Proposed Action of GSEP, but is specifically considered to be a Connected Action to GSEP (EIS Chapter 2, page 2-10).</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED for CEQA: Analyzed as a Connected Action, without specific mitigation or consideration of alternatives.</b></li> <li>A complete analysis of CRS is not included in the EIS. States that SCE would provide an analysis of impacts to biological resources and mitigation for those impacts resulting from construction of the CRS. However, because the proposed expansion of the CRS is a reasonably foreseeable development, a description of the expansion and potential impacts to biological resources is included.</li> <li>States that implementation of appropriate mitigation measures, such as those for the GSEP, would avoid, minimize or compensate for many of the impacts.</li> </ul>	<ul style="list-style-type: none"> <li><b>ADDITIONAL ANALYSIS NEEDED for CEQA: Cultural resources were evaluated only as a Connected Action so specific survey results were not presented.</b></li> <li>Cultural resources surveys results for the CRS expansion were not included in the EIS.</li> <li>No specific mitigation measures were included for the CRS expansion area.</li> </ul>