

# **Worksheet**

## **Determination of NEPA Adequacy (DNA)**

### **Sunrise Powerlink Project**

### **Modification Request to Approved Project as Modified by the PMR**

**U.S. Department of the Interior**

**Bureau of Land Management**

**January 2013**

## **Worksheet**

### **Determination of NEPA Adequacy (DNA)**

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OFFICE: El Centro Field Office

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

CASE FILE/PROJECT NUMBER: CACA-47658

DOI-BLM-CA-D070-2013-0029-DNA

PROPOSED ACTION TITLE/TITLE: The proposed action is a set of 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 Determination of NEPA Adequacy (DNA) dated March 2011, in the DNA dated August 2011, in the DNA dated December 2011, and in the DNA dated February 2012, 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 a) permanently maintaining placement of radio communications facilities on the existing primary Tower Staging Access Pads (TSAPs) at CP60 and EP146 for future operation and maintenance and b) permanently maintaining existing secondary TSAPs at CP60 and EP146 for future operation and maintenance. The sites on which the telecommunications facilities are placed were originally evaluated and approved as permanent TSAPs and the telecommunications facilities were to be placed on flat beds in the work area during construction and then permanently installed on the transmission tower structures. Because the TSAPs were used for the telecommunications facilities, alternate temporary TSAPs were evaluated and approved. TSAPs are leveled, prepared areas suitable for helicopter use and staging of materials. Permanent TSAPs are available for operations and maintenance (O&M) activities during the life of the project; temporary TSAPs are restored following transmission line construction.

The changes have been proposed in order to increase safe working conditions during operations and safety. No additional ground disturbance will result due to the changes. Please note that a parallel request was made to the California Public Utilities Commission (CPUC) for locations on private lands and has been addressed under Variance Request 44 dated October 2, 2012.

**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, 2 miles of Department of Defense land, and 0.4 miles of state land. The remainder of the line crosses lands in various ownerships, including private and local agencies.

The proposed changes to the approved project 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, August 2011, December 2011, and February 2012 and would not substantially change the location of the approved project. All changes are within or less than 125 feet from the approved project right-of-way (ROW) as modified by the PMR (approved September 2010) and the locations of the secondary TSAPs at CP60 and EP146 were approved in the August 2011 DNA. The tower staging access pads associated with CP60 are located partially within and partially outside the ROW. The pad associated with EP146 is located approximately 125 feet outside the approved ROW.

**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 CPUC's approval of the project.

In September 2010, the BLM published a DNA 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, August 2011, December 2011, and February 2012 the BLM published DNA for additional changes proposed by SDG&E and 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 Modifications Requested**

A number of mitigation measures or safety requirements 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 and the need to ensure crew safety have resulted in further proposed changes, beyond those approved in the PMR and approved DNA. The measures resulting in additional changes include the following applicant proposed measures designed to ensure the safety of the construction crew:

### **Mitigation Measure for Public Health and Safety/Hazardous Materials**

California Code of Regulations (CCR) Title 14, Forest Practice Rules Article 8, Rule #918 Fire Protection Section 918.8 Inspection for Fire (All Districts) “The person conducting the inspection shall have adequate communication available for prompt reporting of any fire that may be detected.” (pg. D.15-53, FEIR/EIS 2008)

Mitigation Measure F-3b, Prepare and implement a Multi-agency Fire Prevention MOU, (pg. D.15-82, FEIR/EIS 2008)

In compliance with the mitigation measure and regulation and based on final engineering and design, SDG&E has identified proposed changes to the approved project. These changes are described in Table 1. They include a) permanently maintaining placement of radio communications facilities on the existing primary Tower Staging Access Pads (TSAPs) at CP60 and EP146 for future operation and maintenance and b) permanently maintaining existing secondary TSAPs at CP60 and EP146 for future operation and maintenance.

The telecommunications equipment was originally proposed to be located on flat beds during construction and then permanently installed on the transmission towers. Because this was not feasible, the BLM approved placement of the telecommunications facilities on the primary TSAPs and the construction of secondary TSAPs as temporary installations during construction. The modification would make both the telecommunications facilities and TSAPs permanent and the two temporary secondary TSAPs would be converted to permanent use and would remain in place in their current condition rather than being dismantled. Similarly, all the equipment and best management practices for the radio communication facilities exist within the TSAPs at CP60 and EP146 and would remain in their current condition rather than being dismantled. Because both the radio communications facilities and the secondary TSAPs already exist, the modifications would not change the existing conditions or result in any new vegetation crushing or ground disturbance; however, the sites would not be restored following construction as is required for temporary TSAPs and instead would be maintained for operations and maintenance purposes.

The proposed changes to the approved project are described in Micrositing Request Form dated November 21, 2012 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 measure or standard (by number only) that required each change to be made. Maintaining placement of the radio communications facilities and permanent existing TSAPs at CP 60 and EP146 would result in no new surface disturbance.

**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.

Table 1. Proposed Changes Resulting From Implementation of Mitigation			
Project Segment	Mitigation Measures Requiring Proposed Changes	Proposed Change Location	Description of Proposed Change
BCD Alternative	<ul style="list-style-type: none"> <li>California Code of Regulations (CCR) Title 14, Forest Practice Rules Article 8, Rule #918 Fire Protection Section 918.8</li> <li>Mitigation Measure F-3b</li> </ul>	Segment 6	<b>Maintaining radio communications and Secondary Permanent TSAP:</b> permanently maintaining placement of radio communications facilities on the existing primary TSAPs at EP146 for future operation and maintenance and permanently maintain existing secondary TSAPs at EP146 for future operation and maintenance.
Interstate 8 Alternative between Chocolate Canyon Option Revision and Proposed Action/Project route.	<ul style="list-style-type: none"> <li>California Code of Regulations (CCR) Title 14, Forest Practice Rules Article 8, Rule #918 Fire Protection Section 918.8</li> <li>Mitigation Measure F-3b</li> </ul>	Segment 17	<b>Maintaining radio communications and Secondary Permanent TSAP:</b> permanently maintaining placement of radio communications facilities on the existing primary TSAPs at CP60 for future operation and maintenance and permanently maintain existing secondary TSAPs at CP60 for future operation and maintenance.

Per the request, the proposed modifications will result in no additional ground disturbance impacts. The disturbance from construction of the temporary TSAPs was evaluated in the August 2011 DNA and is not repeated here. The sites were considered as temporary disturbance and included in the impact mitigation requirements imposed on the project. The only change at the site under the modifications would be the permanent installation of the

telecommunications equipment and the secondary TSAP. 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.

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 not result in additional impacts to habitats.

The major equipment installed at the permanent TSAP sites included a radio tower topped by a blade wind turbine and an equipment shed (container) with solar panels mounted on its top and extending to near the ground. The wind turbine differed from the original vertical turbine design provided by SDG&E in the PMR. In August, 2012 SDG&E provided detail to the CPUC about its intention to submit information to justify making two temporary radio installations on private lands permanent. CPUC's legal staff raised concerns over the turbines then operating on the temporary radio towers and stated that the blade-type of turbines installed on the structures was not analyzed for impacts in the EIR/EIS. On or about August 11, 2012, SDG&E removed the turbines at the TSAP locations including those on BLM-administered land.

The telecommunications and secondary TSAP now installed at these sites are within the approved TSAP footprints and no additional land disturbance is required. The only element of the facilities identified as having the potential to increase impacts to wildlife as compared to a vacant site was the blades on the wind turbines. However, with removal of the wind turbines, this potential impact has been removed. The radio towers are self-supporting, narrow structures approximately 50 feet tall. Microwave equipment is mounted on them. The presence of these towers does not significantly increase the risk of bird strikes as compared to the hundreds of

much more substantial transmission towers constructed for the project. The narrow profile of the towers does not provide a substantial impediment to flight and is readily avoided. Therefore, the permanent siting of the radio towers at their present locations would not increase biological impacts. Please note that at no future time may the wind turbines be replaced on the communications towers.

## **B. Land Use Plan (LUP) Conformance**

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)*

*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, August 2011, December 2011, and February 2012), 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 changes to the approved project on BLM-administered land in Eastern San Diego County would involve allowing the permanent TSAPs to remain outside of the right-of-way. The proposed changes are in conformance with the land use plan because they were designed to improve O&M crew and fire safety and would not result in further impacts to 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).
- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Micrositing Changes (December 2011).

- *Determination of NEPA Adequacy*. Prepared by the BLM for the Sunrise Powerlink Project, Micrositing Changes (February 2012).

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

- *Biological Assessment for the Sunrise Powerlink Project*. Prepared by San Diego Gas and Electric Company, Ebbin Moser + Skaggs LLP, ICF Jones & Stokes, KP Environmental, John Messina, TRC Companies, Inc., Wildlife International, (November 2008)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2009*, Carlsbad Fish and Wildlife Office (January 2009)
- *U.S. Fish and Wildlife Service Biological Opinion Sunrise Powerlink Project 2010*, Carlsbad Fish and Wildlife Office (November 2010)
- *Programmatic Agreement Among the Department of the Interior, Bureau of Land Management, the Department of Agriculture, Forest Service, the Marine Corps Air Station Miramar, the U.S. Army Corps of Engineers, the California Public Utilities Commission, San Diego Gas and Electric Company, and the California State Historic Preservation Officer Regarding the Proposed San Diego Gas and Electric Power Company's Sunrise Powerlink Transmission Line Project, Imperial and San Diego Counties, California* (December 2008)
- *Final Mitigation Monitoring Compliance and Reporting Plan San Diego Gas & Electric Company's Sunrise Powerlink Project* . (April, 2010). A number of pre-compliance reports, permit applications, and other documents are available at the CPUC website that are part of the construction progress and mitigation monitoring at <http://www.cpuc.ca.gov/environment/info/aspen/sunrise/otherdocs.htm>
- *Project Modification Report*. Prepared by San Diego Gas and Electric Company (May 2010)
- *Sunrise Powerlink Project Modifications Report Memorandum*. Prepared by the CPUC and BLM (September, 2010).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 changes to the approved project as revised by the PMR and DNA dated March 2011, August 2011, December 2011, and February 2012 are minor changes that would include maintaining radio communications and secondary permanent TSAPs in their current conditions and are essentially the same as the alternatives analyzed in the existing Final EIR/EIS (Sections E.1 and E.2) as modified by the PMR and DNAs dated March 2011, August 2011, December 2011, and February 2012. 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. Maintaining the radio communications and secondary permanent TSAPs would not change the overall alignment of this transmission line, the location of the line or the towers, or the analysis area. No additional ground disturbance would be required. The radio communications facilities and TSAPs are all located within 125 feet of the approved ROW and were analyzed and approved as temporary facilities in the DNA dated August 2011. The modifications would make these structures permanent in their present locations.

##### ***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, August 2011, December 2011, and February 2012, 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 changes and the proposed

route is essentially the same. The radio communication area and TSAP on public lands are within the same CDCA utility corridor as those of the approved project. All the changes are within the approved project ROW or within 125 feet of the approved project ROW.

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

As noted above, the proposed changes to the approved project do not substantially change the project location. To the extent that TSAPs are not within the approved ROW, they are within 125 feet of the area and the changes are not substantial and would be sufficiently similar to those analyzed in the Final EIR/EIS. The geographic and resource conditions in the areas where the changes would take place are virtually the same as those of the approved project and would reduce impacts to worker safety and fire safety. The Final EIR/EIS and PMR noted an essential need for operational communications capacity along the entire Sunrise route, including the remote desert areas. Communications capacity is an integral component to ensuring worker safety and facilitating any necessary communications in the event of an emergency, including potential wildfires. Mitigation Measure F-3b requires a multi-agency Fire Prevention Memorandum of Understanding for Sunrise and identifies immediate de-energization during fire emergencies and adequate and immediate communication to fire agencies of line de-energizing as a key element. The Fire Prevention MOU reiterates that the need for emergency communication is an essential part of addressing the proximity of firefighting vis-a-vis Sunrise and establishing appropriate responses to fires. Permanent placement of the communications facilities in their current locations would address this need.

***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 the modifications would only require maintaining the radio communication TSAP and the secondary permanent TSAP at the existing locations of project infrastructure. The changes reduce impacts to worker and fire safety, explained above, as required by the mitigation measures 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 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 6 and 17 are within the BCD Alternative and the Interstate 8 Alternative between Chocolate Canyon Option Revision where it joins the Proposed Action/Project route. Each of these alternative segments was analyzed in Section E.1.2 through E.1.15 and E.4.2 through E.4.15.

**Additional Conditions of Approval:**

- Compliance with the MMCRP, BO and all other approved project documents and permits.
- The radio tower was originally topped by a blade wind turbine which was the only element of the facilities identified as having the potential to increase impacts to wildlife as compared to a vacant site and not analyzed in the original EIR/EIS. With removal of the wind turbines, this potential impact has been removed. Therefore, the permanent siting of the radio towers at their present locations would not increase biological impacts. Because of the potential for the blade wind turbine to impact wildlife, the following conditions are required:
- At no future time may the wind turbines be replaced on the communications towers.

**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 (*Polioptila californica californica*); and Peninsular bighorn sheep (*Ovis canadensis nelsoni*) or adversely modify designated or proposed critical habitat of four species (coastal California gnatcatcher, Quino checkerspot butterfly, arroyo toad and Peninsular bighorn sheep). Additionally, the Biological Opinion concluded that the 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.

None of these new regulatory circumstances affect the validity of the EIR/EIS as it relates to the proposed changes to the approved project and as modified by the PMR. The changes would not require any new ground disturbance and neither EP146 nor CP60 are located in special-status species habitat, see SDG&E's Micrositing Modification Request dated 6/22/11 and the BLM

DNA dated August 2011. The disturbance from construction of the temporary TSAPs was evaluated in the August 2011 DNA and is not repeated here.

***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 February 2012. Biological and cultural resources surveys were performed in 2009 and 2010, and habitat assessment surveys were performed in 2012 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.

**Biological Resources.** The permanent radio communication towers would be placed at previously engineered TSAP locations (EP146 and CP60) and the permanent secondary TSAP locations would be located at the same locations as the temporary TSAP locations analyzed in August 2011. As such, impacts to vegetation have already been analyzed.

The only element of the facilities identified as having the potential to increase impacts to wildlife as compared to a vacant site was the blades on the wind turbines as described above. However, with removal of the wind turbines, this potential impact has been removed. The radio towers are self-supporting, narrow structures approximately 50 feet tall. Microwave equipment is mounted on them. The presence of these towers does not significantly increase the risk of bird strikes as compared to the hundreds of much more substantial transmission towers constructed for the project. In addition, the narrow profile of the towers does not provide a substantial impediment to flight and is readily avoided. Therefore, the permanent siting of the radio towers at their present locations would not increase biological impacts. Please note that at no future time may the wind turbines be replaced on the communications towers.

For the temporary communication sites and TSAPs at EP146 and CP60, biological and other resource impacts were evaluated in the DNA dated August 2011 and found not to increase the significance of impacts or to add new impacts. The loss of vegetation and habitat at the sites was to be compensated for by restoration. However, in making these permanent TSAPs,

restoration would not occur. During its acquisition of mitigation lands, SDG&E over procured and preserved habitat. The minor permanent loss of an approximately 20 x 20-foot area at the TSAP sites is offset by the extra mitigation lands set aside by SDG&E and no additional mitigation would be required.

**Visual Resources.** In response to a Variance Request to the CPUC (Variance Request #23), in September 2011, CPUC's visual resources specialist reviewed the locations identified herein. The radio tower at structure location CP60 would be visible to travelers on El Monte Road and residents in Blossom Valley. While views to travelers would be brief to moderate, views for residents would be extended. The upper portion of the 54-foot tall structure is expected to skyline (extend above the ridgeline), while the lower portion of the structure would be backdropped by a rocky/vegetated slope with colors ranging from gray (rock outcrops) to pale green, tan, and browns (for vegetation).

The radio tower at structure location EP146 would be visible to travelers on Thing Valley Road to the west and McCain Valley Road to the east, though at viewing distances of approximately two miles. The structure would skyline (extend above the ridge) and views of the tower would be extended.

Given the visual contrast introduced into the landscape by the transmission towers, it was recommended that the radio towers be treated (by galvanizing or painting) in such a manner so as to achieve a sufficiently dulled surface such that no additional reflectivity occurs along the project right of way. This recommendation is consistent with the requirements of Visual Resources Mitigation Measure V-7a. Since the original tour the towers have weathered and have a dulled finish which was confirmed by the CPUC Lead Environmental Monitor.

The permanent location of the telecommunications equipment at the permanent TSAP sites does not create a new significant effect or a substantial increase in the severity of a previously identified significant effect. The radio tower surface is matte and not shiny and would continue to weather over time. The change of the temporary TSAPs at CP60 and EP146 to permanent TSAPs would have minimal visual impacts.

**Cultural Resources.** Each proposed TSAP location was surveyed for archaeological resources during preconstruction fielding activities and cultural resources inventory work. No National

Register of Historic Places/California Register of Historic Places- (NRHP/CRHR) eligible cultural resources were or will be impacted by this request.

***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.

Habitat assessments were performed for each of the communication tower TSAPs and temporary secondary TSAPs in the DNA dated August 2011. Changing the locations to permanent would not require any ground disturbing activities or any additional impacts to habitat. SDG&E has acquired and/or provided financial assurances for the conservation of all of the offsite mitigation lands identified in the BO and HAP/HMP for this habitat. As noted above, the only element of the facilities identified as having the potential to increase impacts to wildlife as compared to a vacant site was the blades on the wind turbines as described above. However, with removal of the wind turbines, this potential impact has been removed. At no future time may wind turbines be replaced on the communications towers. Therefore, the permanent siting of the radio towers at their present locations would not increase biological impacts.

Because there would be no disturbance associated with the permanent TSAPs, the impact of the areas would be similar in nature as to the impacts identified and analyzed in the Final EIR/EIS as modified by the PMR and Changes described in the DNA dated August, 2011.

**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.

In October 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 December 2011.

In February 2012, 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 February 2012.

#### **E. Persons/Agencies/BLM Staff Consulted**

Thomas F. Zale	Acting Field Manager	El Centro Field Office, BLM
Nicollee Gaddis	Planning & Environmental Coordinator	El Centro Field Office, BLM
Carrie Simmons	Archaeologist	El Centro Field Office, BLM

Andrew Trouette Botanist

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**

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

  
\_\_\_\_\_

Signature of Project Lead

  
\_\_\_\_\_

Signature of NEPA Coordinator

  
\_\_\_\_\_

  
\_\_\_\_\_

Signature of the Responsible Official:

Date

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

**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

**El Centro Field Office**

1661 South 4<sup>th</sup> Street

El Centro, CA 92243

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In Reply Refer To:

CA-670-06-28 and CA-670-13-064/CA-47658/ EIS CA-670-2006-31 and DOI-BLM-CA-D070-2013-0029-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 #4- 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 changes to the approved 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, the DNA dated December 2011, the DNA dated February 2012, and as analyzed in the Final EIR/EIS. These changes include the following: a) permanently maintaining placement of radio communications facilities on the existing primary Tower Staging Access Pads (TSAPs) at CP60 and EP146 for future operation and maintenance and b) permanently maintaining existing secondary TSAPs at CP60 and EP146 for future operation and maintenance. The sites on which the telecommunications facilities are placed were originally evaluated and approved as permanent TSAPs. Because they were used for the telecommunications facilities, alternate temporary TSAPs were evaluated and approved. TSAPs are leveled, prepared areas suitable for helicopter use and staging of materials. Permanent TSAPs are available for operations and maintenance (O&M) activities during the life of the project; temporary TSAPs are restored following transmission line construction. There will be no new ground disturbance as part of this request.

Identification 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). Pursuant to the Sunrise Powerlink Programmatic Agreement\* executed in December 2008 and Chapter 7 of the *Final Historic Properties Management Plan for the Approved San Diego Gas and Electric Sunrise Powerlink Final Environmentally Superior Southern Route, San*

Diego and Imperial Counties, California (HPMP) which provides for issuance of clearances to begin construction and documentation of compliance with Section 106. BLM professional cultural resources staff have reviewed this undertaking and have made the following recommendations regarding historic properties that may be affected.

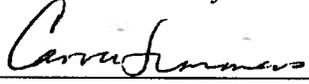
The BLM has determined that the previous inventory efforts and required mitigation measures are adequate to identify and protect historic properties on public lands that might be affected by this project modification. Therefore, the BLM staff archaeologist has recommended that the proposed changes would have no effect on historic properties.

The BLM makes the following finding for this undertaking.

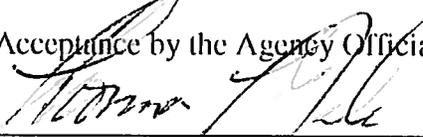
The BLM finds that there will be *no historic properties affected* by this undertaking.

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:

 1/8/13  
Archaeologist, El Centro Field Office Date

Acceptance by the Agency Official:

 PETDANC 1/9/2013  
Field Manager, El Centro Field Office 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.