

FINDING OF NO SIGNIFICANT IMPACT

El Centro Field Office

EA Number: CA-670-2008-107

Case File No: CACA-47658

Proposed Action Title/Type: Sunrise Helicopter Surveys

Applicant/Proponent: San Diego Gas & Electric

Location of Proposed Action: Mountain Springs Grade

Proposed Landing Sites on BLM Administered Lands BLM El Centro Field Office

| Landing Location ID | Attachment A Page Number | Structure # | Township | Range | Section |
|---------------------|--------------------------|-------------|----------|-------|---------|
| 4 | LZ-8 | S10305 | 17 S | 8 E | 36 |
| 5 | LZ-8 | S10306 | 17 S | 9 E | 31 |
| 7 | LZ-7 | S10307 | 17 S | 9 E | 31 |
| 8 | LZ-7 | S10308 | 17 S | 9 E | 32 |
| 9 | LZ-7 | S10309 | 17 S | 9 E | 29 |
| 10 | LZ-6 | S10310 | 17 S | 9 E | 29 |
| 11 | LZ-6 | S10311 | 17 S | 9 E | 29 |
| 12 | LZ-6 | S10312 | 17 S | 9 E | 20 |
| 13 | LZ-6 | S10313 | 17 S | 9 E | 20 |
| 14 | LZ-5 | | 17 S | 9 E | 20 |
| 15 | LZ-5 | S10314 | 17 S | 9 E | 20 |
| 16 | LZ-5 | S10315 | 17 S | 9 E | 21 |
| 17 | LZ-4 | S10316 | 17 S | 9 E | 16 |
| 18 | LZ-4 | S10317 | 17 S | 9 E | 16 |
| 19 | LZ-3 | S10318 | 17 S | 9 E | 16 |
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| 21 | LZ-3 | S10320 | 17 S | 9 E | 9 |
| 22 | LZ-3 | S10321 | 17 S | 9 E | 9 |
| 23 | LZ-2 | S10322 | 17 S | 9 E | 10 |
| 24 | LZ-2 | S10323 | 17 S | 9 E | 3 |
| 25 | LZ-2 | S10324 | 17 S | 9 E | 3 |
| 26 | LZ-1 | S10325 | 17 S | 9 E | 3 |
| 27 | LZ-1 | S10326 | 17 S | 9 E | 3 |

Conformance with Applicable Land Use Plan(s):

These plans have been reviewed to determine if the proposed action conforms to the land use plan terms and conditions as required by 43 CFR 1610.5. This proposed action is in conformance with the following land use plans:

California Desert Conservation Area Plan, approved 1980, as amended.
Eastern San Diego County Resource Management Plan 2008.

Summary of Alternatives

The proposed action (Alternative A) is to allow helicopter use for surveys along the Mountain Springs Grade portion of the proposed Sunrise Powerlink project for the purposes of geotechnical and environmental surveys.

Alternative B is the no action alternative. Under this alternative, helicopter access would not be granted to this area and walk-down surveys would have to be conducted on foot.

Rationale and Management Considerations

Alternative A (allowing the helicopter surveys) is preferred over Alternative B (no action) for the following reasons:

- Alternative A most closely conforms to the action item goals in CDCA.
- The proposed action provides the most feasible access to the site for the surveys to be conducted.
- With the mitigation measures listed below, the adverse environmental impacts of Alternative A are not significant and will be only nominally greater than those attributable to Alternative B.

Description of Mitigation Measures:

The BLM will impose the following mitigation measures.

1. No dogs shall be allowed at the work site(s).
2. All personnel involved shall receive pre-construction training and briefing on the sensitivity of biological and cultural resources.
3. To avoid the introduction of non-native plant species, the contractor shall clean construction equipment and vehicles (power or high-pressure cleaning) to remove all mud, dirt, and plant parts prior to moving equipment onto public land authorized in the project area.

4. In the event that invasive species are introduced during the course of this project, the proponent will be responsible for any eradication activities that may be required.
5. Soil disturbance shall be minimized, wherever possible, to limit opportunities for non-native species to become established.
6. Hovering time will be limited and minimized at each site in order to reduce dust emissions.
7. Avoidance of cultural resources is the preferred protocol therefore helicopter landing zones have been identified and placed outside of known cultural resources site boundaries.
8. A cultural monitor will be present to avoid significant impacts to sensitive cultural resources in the event that the field crew would have to walk on to cultural sites, the cultural monitor will review the site mapping data prior to the site visit and lead the crew to the structure location so that no surface cultural features are disturbed.
9. In the event that undiscovered cultural material, both prehistoric and historic, is encountered it is documented and recorded using Trimble or Garmin GPS equipment.
10. If human remains are encountered in any location other than a dedicated cemetery, there shall be no further disturbance of the site or any nearby area reasonably suspected to overlie the adjacent human remains until the remains have been investigated as outlined in Section 10564.5 of the CEQA guidelines, the Native American Grave Protection Act and its implementing regulations, California Health and Safety Code 7050.5, and the California Public Resources Code Section 5097.98. Other federal regulations that will be followed when applicable include NEPA, the National Historic Preservation Act (36 CFR 60.6), the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, the Federal Land Policy and Management Act, Title 43, Chapter 35, Subchapter VI, Section 1781, and Executive Orders 13007 and 13084.
11. This area will be surveyed for three (3) days immediately in advance of the walk down activities by an experienced bighorn sheep biologist. This biologist will also serve as a spotter during the walk down.
12. The pre-walk down survey will include visits to each of the 22 proposed tower sites that will be visited during the walk down, and surveying for bighorn sheep and sign along adjacent washes and ridges. Additionally, passive infrared-triggered trail cameras will be placed near underpasses previously used by bighorn sheep to capture images of bighorn sheep entering or exiting the I-8 island. Track traps (sandy areas of washes that are swept daily for tracks) will also be used to detect bighorn sheep movements into or out of the I-8 island. Both of these will be checked daily, including each morning prior to walk down activities.

13. If bighorn sheep or recent sign (tracks and pellets) are not found in the I-8 island then the walk down will proceed as planned for that day, with the precaution that if bighorn sheep are encountered during walk down helicopter flights, the helicopter will avoid approaching and hovering near the bighorn sheep. The bighorn sheep biologist will have the authority to wave off the helicopter from an approach or landing.
14. If bighorn sheep or recent sign (tracks and pellets) are found in the I-8 island during the pre-walk down bighorn survey, their location and movements will be determined by tracking and observation. This information will be used by the bighorn sheep biologist to determine the sequence of tower site visits in order to avoid close approach to bighorn sheep that may be present.
15. If bighorn sheep are observed in the I-8 island during the walk down, the bighorn biologist will work with the pilot to develop a flight plan that avoids the immediate area occupied by the bighorn sheep. Tower site(s) in the immediate area of the bighorn may be temporarily avoided until the bighorn biologist determines that the bighorn sheep have moved away. If no bighorn sheep are observed in the area, but fresh sign is found, the bighorn will be tracked to determine their location or whether they have moved out of the I-8 island.
16. The helicopter pilot and walk down crew will be instructed to avoid hovering over bighorn sheep or close to them. This will minimize any flight response of the bighorn sheep to the helicopter and prevent them from fleeing onto the roadway.
17. The walk down will be scheduled after the CDFG/USFWS bighorn sheep helicopter census of the I-8 island area.
18. The helicopter shall not refuel on BLM land.

Consultation and Coordination

The Bureau of Land Management has worked collaboratively with the USFWS for the development of the environmental assessment. Since the proposed helicopter survey locations are within Peninsular Bighorn Sheep habitat, BLM initiated informal consultation with the United States Fish and Wildlife Service in October, 2008. The Fish and Wildlife Service provided input into the EA and provided some mitigation measures. They concurred with BLM's determination of not likely to adversely affect Peninsular Bighorn Sheep and no adverse modification on November 10, 2008.

FINDING OF NO SIGNIFICANT IMPACT

I have reviewed this environmental assessment including the explanation and resolution of any potentially significant environmental impacts. I have determined that the proposed action with

the mitigation measures described above will not have any significant impacts on the human environment and that an EIS is not required. I have determined that the proposed project is in conformance with the approved land use plans.

Environmental impacts associated with the proposed action and alternatives have been assessed by an interdisciplinary team and described in Environmental Assessment (EA) CA-670-2008-107. The context of the EA was determined to be at a local and regional scale in San Diego and Imperial Counties, California. The effects of the action are not applicable on a national scale since no nationally significant values were involved.

In making this Finding of No Significant Impact (FONSI), the following criteria have been considered, in accordance with the Council on Environmental Quality (CEQ), 40 CFR. 1508.27:

1. *Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.*

Beneficial Effects: Helicopter access would allow SDG&E to collect much-needed data from difficult-to-access areas. It would also reduce the amount of time workers would be spending in bighorn sheep habitat thereby reducing the duration of human presence in the area.

Adverse Effects: Dust levels and noise levels could be temporarily increased. The helicopter could frighten wildlife.

2. *The degree to which the proposed action affects public health, safety and sanitation. The proposed project will have no effect on public health and safety other than the beneficial aspect of improved data collection.*
3. *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. The use of these sites will not occur in proximity to park lands, prime farmlands, wild and scenic rivers, or ecologically critical areas. The proposed project has been sited so as to avoid cultural or historic resources.*
4. *The degree to which the effects on the quality of the human environment are likely to be highly controversial. It is not likely that the temporary use of the areas to land the helicopter will result in impacts to the quality of the human environment that will be highly controversial. The areas in which the helicopter will be landing are extremely remote and rugged areas where the likelihood of encountering another human being is extremely low.*
5. *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risk. Effects of the proposed action are well understood and will not involve any unique or unknown risks.*

6. *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.* The proposed action will not establish precedents for future actions or represent a decision in principle about a future action.
7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.* The proposed project would contribute to gathering necessary data for tower locating for the proposed Sunrise Powerlink 500KV transmission line. The transmission line is analyzed in a separate EIR/EIS.
8. *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.* No significant scientific, cultural or historical resources will be affected by the proposed action.
9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.* Peninsular Bighorn Sheep occurs in the desert mountain ranges of Eastern San Diego, Western Imperial and Riverside Counties. BLM has implemented mitigation measures to minimize risk to the Peninsular Bighorn Sheep. Because of these mitigation measures, the Bureau determined that this project is not likely to adversely affect Peninsular Bighorn Sheep or adversely modify habitat. The United States Fish and Wildlife Service concurred with this determination on November 30, 2008.
10. *Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.* The proposed action does not threaten a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

Based on the findings discussed herein, I conclude that the proposed action is not a major Federal action and will result in no significant impacts to the environment. Preparation of an environmental impact statement to further analyze possible impacts is not required pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969.

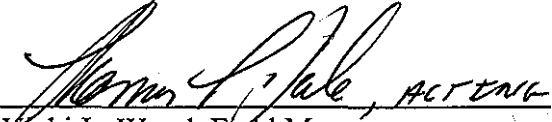
Administrative Remedies

Administrative remedies may be available to those who believe they will be adversely affected by this decision. Appeals may be made to the Office of Hearings and Appeals, Office of the Secretary, U.S. Department of Interior, Board of Land Appeals (Board) in strict compliance with the regulations in 43 CFR Part 4. Notices of appeal must be filed in this office within 30 days after publication of this decision. If a notice of appeal does not include a statement of reasons,

such statement must be filed with this office and the Board within 30 days after the notice of appeal is filed. The notice of appeal and any statement of reasons, written arguments, or briefs must also be served upon the Regional Solicitor, Pacific Southwest Region, U S Department of Interior, 2800 Cottage Way, E-1712, Sacramento, CA 95825

Reviewed By: 
Erin Dreyfuss, Environmental Coordinator

Date: 12/16/08

Approved By: 
Vicki L. Wood, Field Manager

Date: 12/16/08



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
El Centro Field Office
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El Centro, CA 92243
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Sunrise Powerlink Helicopter Access (CA-670-2008-107)
Decision Record
September 2008

1.0 Introduction and Background

On November 2, 2005, SDG&E filed with the BLM a Right-of-Way (ROW) Grant application for a 500kv transmission line, the Sunrise Powerlink (SRPL). On December 14, 2005, they also submitted to the California Public Utilities Commission (CPUC) an application (A.06-08-010) for a Certificate of Public Convenience and Necessity (CPCN), and subsequently, on August 4, 2006, submitted an amended application accompanied by its Proponent's Environmental Assessment (PEA) for SRPL. The Project primarily consists of a new electric transmission line between the Imperial Valley Substation and the western portion of SDG&E's service area in San Diego as well as a new substation in central San Diego County, along with other system upgrades and modifications. BLM and CPUC have published a Final Environmental Impact Report/Environmental Impact Statement, which evaluated the Project as well as a number of alternatives. Engineering and planning for the construction of this line is ongoing.

On June 19, 2007, the BLM issued an EA/Finding of No Significant Impact (FONSI) to SDG&E to conduct geotechnical boring activities on BLM lands for the Project identified in the above-referenced environmental review documents.

Additionally, on June 19, 2007, BLM issued a Categorical Exclusion (CX) under NEPA to SDG&E to conduct geotechnical seismic refraction, geotechnical field resistivity surveys and wetland delineations activities on BLM lands for the Project.

This EA is evaluating the effects of conducting helicopter field surveys and field walk-downs in steep terrain that supports the federally listed Peninsular bighorn sheep and has been identified as Critical Habitat by the US Fish and Wildlife Service (USFWS). These walk-downs would verify the feasibility of construction activities, techniques used for construction, and the ability to complete future operations and maintenance activities.

2.0 Decision

2.1 Alternatives Considered but not Selected

Under the No Action alternative, helicopter access would not be granted, and the applicant would not have permission to conduct the helicopter surveys. This alternative would require SDG&E

personnel and contractors to access the sites by foot, hand carrying all field equipment to the necessary sites for long distances over extremely rugged terrain

2.2 Decision and Rationale

Based on information in the EA, the project record, and consultation with my staff, I have decided to implement the proposed project as described in the EA. Helicopter access is the most safe and efficient method of reaching these remote and rugged locations. Utilization of helicopters would reduce the duration of the project so that surveyors would not be in the areas any longer than necessary. Helicopter access would efficiently facilitate SDG&E obtaining the necessary data to properly place possible future transmission towers to avoid damaging sensitive resources or creating unsafe conditions.

3.0 Consultation and Coordination

Since the project area has been identified as Peninsular Bighorn Sheep habitat, informal consultation with USFWS was initiated in October, 2008. BLM found that the project is not likely to adversely affect Peninsular Bighorn Sheep. USFWS concurred with this finding on November 10, 2008.

4.0 Plan Consistency

Based on information in the EA, the project record, and recommendations from BLM specialists, I conclude that this decision is consistent with the Eastern San Diego County RMP and the California Desert Conservation Area Plan (as amended).

5.0 Administrative Remedies

Administrative remedies may be available to those who believe they will be adversely affected by this decision. Appeals may be made to the Office of Hearings and Appeals, Office of the Secretary, U.S. Department of Interior, Board of Land Appeals (Board) in strict compliance with the regulations in 43 CFR Part 4. Notices of appeal must be filed in this office within 30 days after publication of this decision. If a notice of appeal does not include a statement of reasons, such statement must be filed with this office and the Board within 30 days after the notice of appeal is filed. The notice of appeal and any statement of reasons, written arguments, or briefs must also be served upon the Regional Solicitor, Pacific Southwest Region, U.S. Department of Interior, 2800 Cottage Way, E-1712, Sacramento, CA 95825.

The effective date of this decision (and the date initiating the appeal period) will be the date this notice of decision is posted on BLM's (El Centro Field Office) internet website.


Vicki L. Wood
Field Manager

Date 12/16/08

**Environmental Assessment
BLM El Centro Field Office
Sunrise Powerlink Pre-Construction Activities**

Environmental Assessment (EA) Number: CA-670-2008-107

Case File No.:

Proposed Action Title/Type:

Sunrise Powerlink Helicopter Access for field walk-down activities in areas with limited access and terrain issues.

Applicant/Proponent:

San Diego Gas and Electric Company (SDG&E)

Location of Proposed Action:

The general location of the activities subject to this environmental review includes Bureau of Land Management (BLM) administered lands in Imperial and San Diego Counties, California. Proposed activities are associated with the Sunrise Powerlink Project (SRPL or Project). The proposed activity would take place along the Mountain Springs Grade adjacent to the existing South West Power Link (SWPL) in Eastern San Diego and Western Imperial Counties.

Background Information:

On November 2, 2005, SDG&E filed with the BLM a Right-of-Way (ROW) Grant application. On December 14, 2005, SDG&E submitted to the California Public Utilities Commission (CPUC) an application (A.06-08-010) for a Certificate of Public Convenience and Necessity (CPCN), and subsequently, on August 4, 2006, submitted an amended application accompanied by its Proponent's Environmental Assessment (PEA) for SRPL. The Project primarily consists of a new electric transmission line between the Imperial Valley Substation and the western portion of SDG&E's service area in San Diego as well as a new substation in central San Diego County, along with other system upgrades and modifications. On January 4, 2008, the BLM and CPUC published a Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS), which evaluated the Project as well as a number of alternatives. On July 8, 2008, the CPUC/BLM issued a Recirculated Draft Environmental Impact Report/Supplemental Draft Environmental Impact Statement ("RDEIR/SDEIS"), which included new and revised data associated with connected actions and indirect effects of the Project. The RDEIR/SDEIS also presented descriptions and analyses of transmission line route revisions.

On June 19, 2007, the BLM issued an EA/Finding of No Significant Impact (FONSI) to SDG&E to conduct geotechnical boring activities on BLM lands for the Project identified in the above-referenced environmental review documents.

Additionally, on June 19, 2007, BLM issued a Categorical Exclusion (CX) under NEPA to SDG&E to conduct geotechnical seismic refraction, geotechnical field resistivity surveys and wetland delineations activities on BLM lands for the Project.

This EA is to evaluate the effects of conducting helicopter field surveys and field walk-downs in steep terrain that supports the federally listed Peninsular bighorn sheep and has been identified as Critical Habitat by the US Fish and Wildlife Service (USFWS). These walk-downs will verify the feasibility of construction activities and techniques and the ability to complete future operations and maintenance activities within occupied bighorn sheep habitat.

Figure 1 presents the CPUC/BLM Southern Alternative Route Segments (Southern Route Alternatives) that are included on BLM lands in Imperial and San Diego Counties under the El Centro Field Office that cover activities described in this EA.

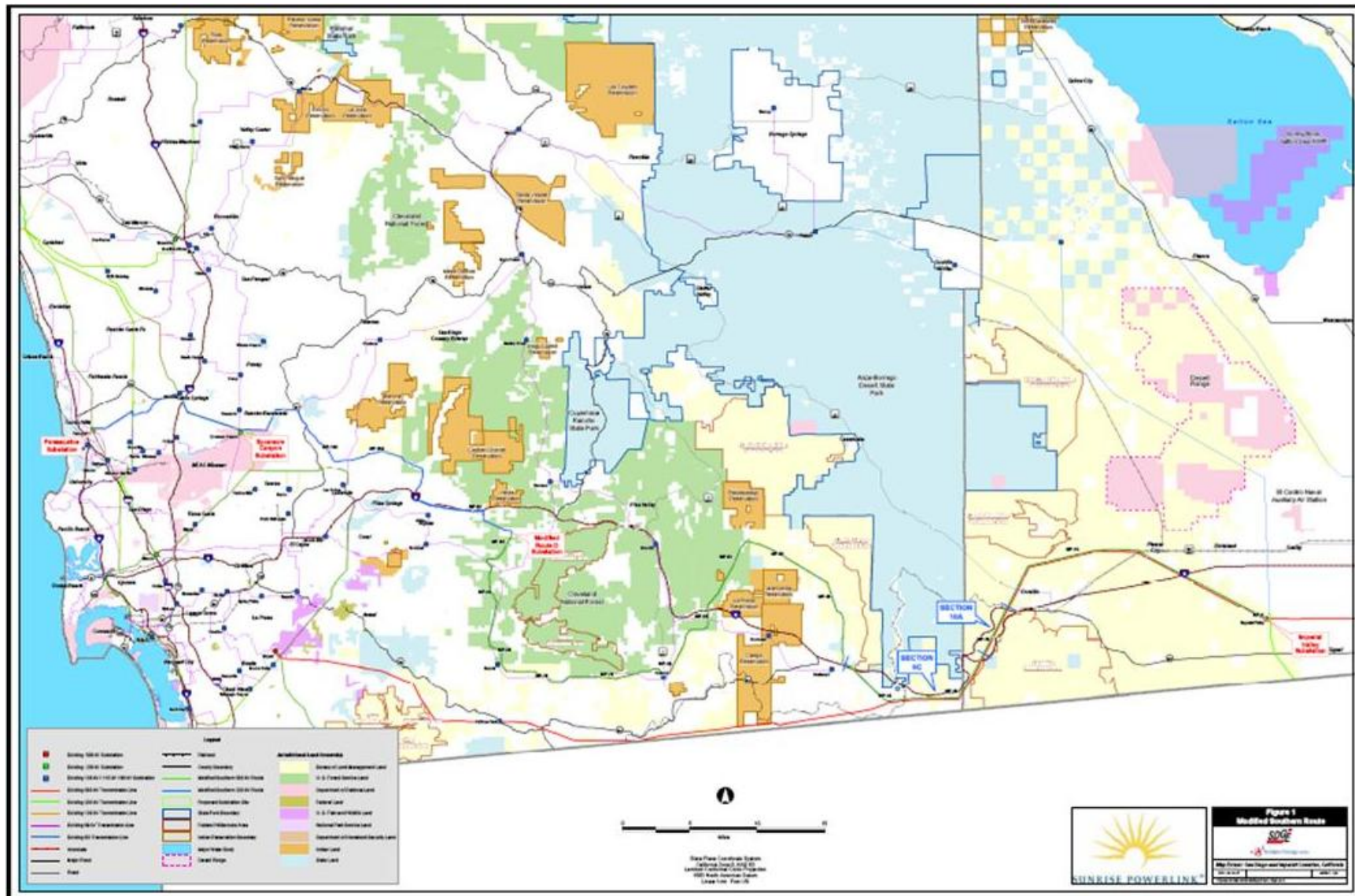
As identified on Figure 1, the Southern Route Alternatives include sections 10A and 9C, which are portions of sections assigned by SDG&E engineers to the southern alternatives analyzed in the environmental review documents. The sections start with Section 1 in coastal San Diego and end with Section 10B, which terminates at the Imperial Valley Substation.

Conformance with Applicable Land Use Plans and Other Regulatory Compliance:

This proposed action must comply, to the extent applicable, with the following land use plan(s):

Relevant BLM Land Use Plans

| Plan Name | Date Approved |
|--|----------------------|
| California Desert Conservation Area Plan (CDCA) | 1980 (revised 1999) |
| Western Colorado Desert Route of Travel Designation Plan (WECO) | 2002 |
| ACEC Management Plans (as applicable) | Various Dates |
| Eastern San Diego County Planning Area Resource Management Plan | 2008 |
| Recovery Plan for Bighorn Sheep in the Peninsular Ranges, California | 2000 |
| | |
| | |



The identified pre-construction activities are located within BLM land management classifications that include pre-disturbed lands designated for off-highway vehicle use, other lands designated for open space and pre-disturbed lands within existing utility or transportation corridors.

In relation to the California Desert Conservation Area Plan (CDCA), the above land management classifications will be consistent with the Multiple-Use Class Guidelines and the Energy Production and Utility Corridors Element of the CDCA Plan. The Eastern San Diego County Planning Unit has adopted the classifications from the overall CDCA Plan and applies them to the El Centro BLM Field Office.

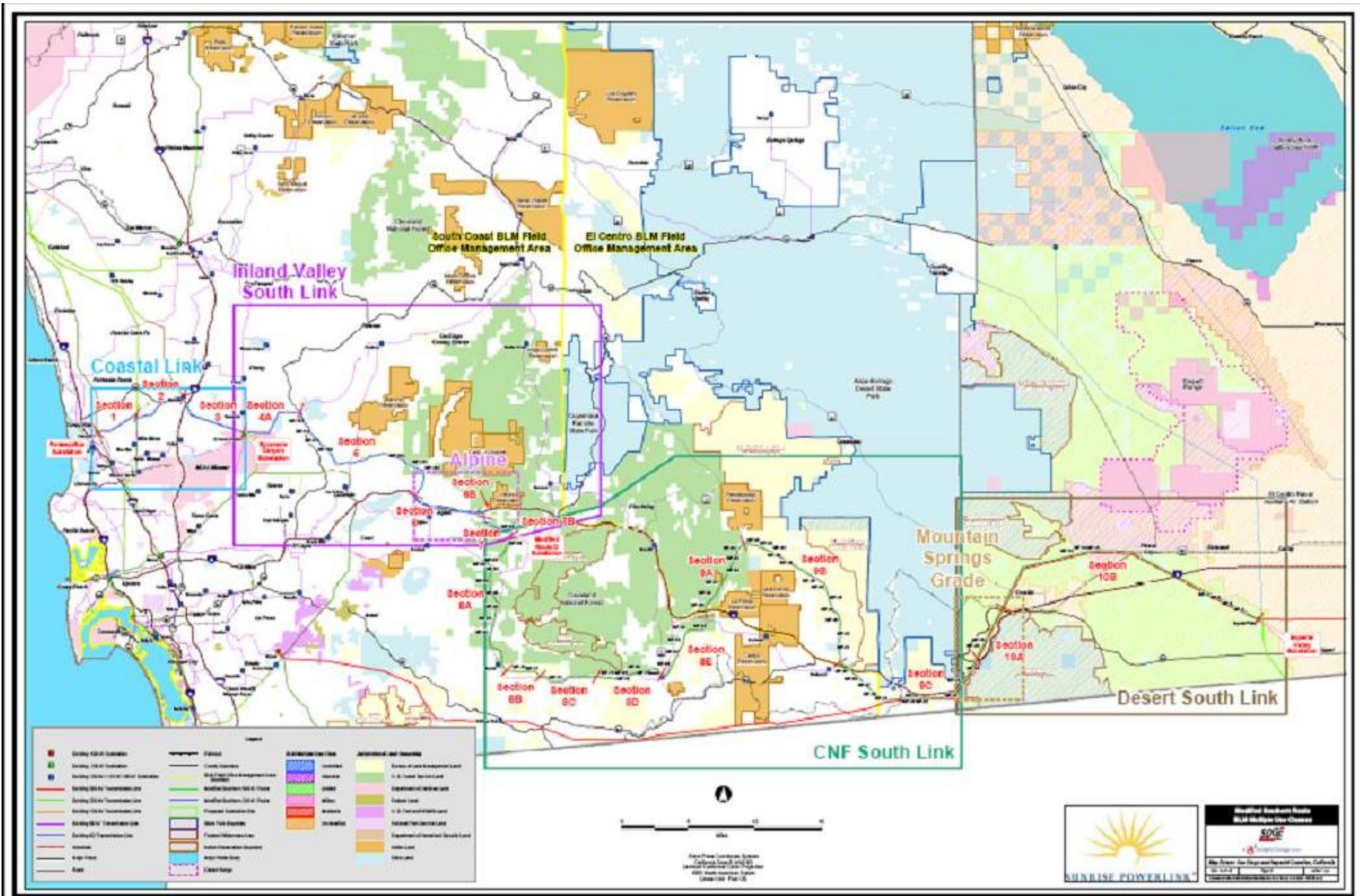
“The overall CDCA Plan was established in 1980 as a comprehensive land use management plan for the CDCA, developed by the BLM at the direction of Congress. It was approved by the Secretary of the Interior on December 19, 1980. In general, a CDCA is a national conservation area designated by Congress in 1976 in order to provide for coordinated land use management of over 12 million acres of BLM-administered public lands in the California Desert” (Eastern San Diego County Planning Unit Management Framework Plan, 1981).

There are six general Multiple Use Classifications in the BLM CDCA Plan: Class C (Controlled Use), Class L (Limited Use), Class M (Moderate Use) Class I (Intensive Use), and Unclassified. The only class that is traversed for portions of Sections 10A and 9C is listed below and depicted in Figure 2.

- Class L (Limited Use) – protects sensitive natural, scenic, ecological, and cultural resource values. These are managed to provide for generally lower-intensity, carefully controlled multiple use of resources, while ensuring that sensitive values are not significantly diminished.

The existing BLM land management classifications are in accordance with the CDCA Plan Multiple Use Classifications; specifically, the Recreation Element, Energy Production and Utility Element, and the Motorized-Vehicle Access Element. It is noted that the Project is within 200-feet of Class C lands due to the proximity to the Jacumba Wilderness Area.

Activities subject to this review would not conflict with any of the identified land management plans. This is due to nominal ground disturbing activities and minimal short-term impacts and no long-term impacts to resources or activities covered or managed by the plans. Additionally, monitors will be present at all times during field activities to ensure avoidance of resources covered by these plans.



Need for Proposed Action:

The proposed activities are necessary to field verify and optimize surveys and final engineering design of structure locations and foundations within this portion of the Southern Route Alternatives. Helicopter access is needed because the steep and rugged terrain renders the proposed structure locations inaccessible by vehicle and extremely difficult and/or unsafe to access completely by foot.

Description of Proposed Action:

The existing topography and geologic conditions of the action area require special construction techniques to install foundations that will support the lattice towers. In order to complete the initial engineering design, a team consisting of a biological monitor, cultural monitor, geologist, engineers and construction management personnel will inspect each proposed tower location. This inspection will verify the feasibility of initial construction activities and future operations and maintenance activities. These activities are similar to field verification that will occur at every potential transmission tower site; however, access in this steep terrain must be by helicopter for the reasons stated above.

Landing zones have been identified at each proposed tower site that ensures that team members will be inserted and extracted in a safe manner. These landing zones have been marked with GPS coordinates. Additionally, there is a daily meeting point (show up area) location accessed by vehicle for the transporting of field crews to board the helicopter for access to the various identified landing zones, which would be located at Landing Zone location 15 on Page Number LZ-5 of **Attachment A**. All landing zones have been identified on the table below and depicted on **Attachment A**.

**Proposed Landing Sites on BLM Administered Lands
 BLM El Centro Field Office**

| Landing Location ID | Attachment A Page Number | Structure # | Township | Range | Section |
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Field-Down Activity

SDG&E will develop a “Safe Work Plan” and distribute it to all team members in advance of the mobilization date for the proposed action. This “Safe Work Plan” will identify the location and phone numbers of the nearest emergency medical treatment facilities, law enforcement facilities, fire fighting facilities and emergency responders. The “Safe Work Plan” will also identify the emergency contact numbers for each team member and SDG&E emergency operations center. There will be a SDG&E network radio with the team and the pilot.

The field walk-down activities will begin at the show up area, where there will be a daily safety tailgate and the pilot will brief the team members on the methodology and site conditions for each insertion and extraction.

Team members will include the following:

- Cultural Monitor
- Biological Monitor
- Team Lead
- Geologist
- Civil Engineer
- Two (2) Transmission Engineers
- Two (2) Construction Team Members

The activities will use a Hughes 500D helicopter with a maximum loading of three plus the pilot. Thus, there will be three insertions and three extractions at each site. The first insertion trip will include the cultural monitor, biological monitor and team lead; the second trip will include a geologist, a civil engineer and a construction team member; and the third trip will include a transmission engineer, a transmission engineer and a construction team member. The biological and cultural monitor will be in the first landing party to clear the landing zone for cultural and biological resources prior to the multiple landings. If significant resources are found that could be impacted by the landings, the monitors will relocate the landing zone as close as possible to the original landing zone to avoid any such resources. Walk-down activities will consist of walking to the proposed structure site, observing the structure locations with regards to resources, topography, geology and future work space conditions, using GPS units and taking photographs. No surface disturbance will occur as a result of these field walk-down activities.

Alternatives:

According to the Council on Environmental Quality (CEQ), NEPA Section 1502.14(d) requires the alternatives analysis to "include the alternative of no action."

"No action" in this case means the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward. Where a choice of "no action" by the agency would result in predictable actions by others, this consequence of the "no action" alternative should be included in the analysis.

The Proposed Action

Under the Proposed Action, the helicopter surveys and field walk-down activities would be conducted by SDG&E to collect data as described in the proposed action above.

No Action Alternative

Under the no action alternative, BLM would not authorize the helicopter surveys and field walk-down activities on BLM lands in Eastern San Diego County. Without the implementation of the helicopter access, continued design, engineering and route and facility location refinements and specifications for the Southern Route Alternatives Section 10A and 9C would not occur. Helicopter activity and the associated ground activities of SDG&E and its consultants would not occur. The area would continue to experience other on-going activities such as private and military helicopter and fixed wing aircraft flyovers following I-8, SDG&E operations and maintenance activities for SWPL, US Border Patrol activities, occasional hikers, helicopter surveys by California Department of Fish and Game (CDFG) and USFWS for Peninsular bighorn sheep, freeway maintenance activities and maintenance activities associated with nearby antenna facilities.

SDG&E could attempt to complete the engineering review and other activities required to complete its design of the Southern Route Alternatives for sections 10A and 9C by hiking and climbing to each proposed structure location, including the carrying of equipment to each site. Disregarding safety issues of traversing the steep and difficult rocky terrain, the proposed activities by this method would take more than two weeks, possibly a month compared to the activities by helicopter being completed in five days. The carrying of any necessary heavier equipment for pre-construction geologic or soil testing may prove to be impossible so helicopters may still be required to deliver the equipment to each structure site and either have to land to transfer or hover and lower the equipment by cable.

Affected Environment:

The following table summarizes potential impacts to various elements of the human and natural environment, including the “critical elements” (*) listed in BLM Manual H-1790-1, Appendix 5, as amended.

| Elements | Potentially Affected | | Anticipated Significant Adverse Impacts (Y/N) | |
|---|-------------------------------------|-------------------------------------|---|-------------------------------------|
| | Yes | No | Yes | No |
| Air Quality | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Areas of Critical Environmental Concern (ACECs) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Cultural Resources | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Environmental Justice | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Farmlands | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Floodplains | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Invasive, Nonnative Species | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | | | | | |
|---|----------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| Native American Religious Concerns | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Threatened and Endangered Species, or Special Species | Wildlife | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| | Plants | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wastes, Hazardous or Solid | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Water Quality (Drinking/Ground) | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wetlands/Riparian Zones | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wild and Scenic Rivers | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wilderness | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Recreational Resources | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Visual Resources | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Wildlife/Including migratory birds | | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Energy (E.O.s 13211 and 13212) | | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Elements Not Potentially Affected:

Of these 19 elements, 15 elements are not potentially affected by the proposed action in this EA as identified below.

Areas of Critical Environmental Concern (ACECs)

The landing zones and walk-down areas are not located within ACECs. Specifically, the landing zones are over five miles outside the closest ACEC, which is the Yuha Basin ACEC, and therefore this element will not be considered further.

Environmental Justice

The landing zones and walk-down areas are located within federal BLM jurisdiction that is predominantly open space and is not located in close proximity to people, residences or communities and therefore this element will not be considered further.

Farmlands

The landing zones and walk-down areas are located within federal BLM jurisdiction that is predominantly open space and not located on agricultural lands or farmlands and therefore this element will not be considered further

Floodplains

There are no floodplains that would be affected within the areas proposed for helicopter landing zones and field walk-down activities, therefore this element will not be considered further.

Invasive, Nonnative Species

There will be no heavy equipment or transporting of field crews across different habitat regions that have invasive or nonnative species, therefore this element will not be considered further.

Native American Religious Concerns

The landing zones have been marked with GPS coordinates and are placed outside of known cultural sites that could contain features that would have Native American religious concerns and therefore there would be no impact. Cultural monitors will also be present for all field activities to identify and avoid any unknown features that would be encountered; therefore impacts to Native American religious concerns are not anticipated.

Wastes, Hazardous or Solid

All refueling would be conducted prior to accessing BLM lands and therefore there would be no wastes generated from the associated activities. As described in the FEIR/EIS Mitigation Measures P-1a and P-1b would be implemented prior to construction and entail preparation of environmental safety plans including spill prevention and response plan and therefore, this element will not be considered further.

Water Quality (Drinking/Ground)

Activities would not result in the use, consumption or discharge into surface or ground water and therefore would not affect water quality. This element will not be considered further.

Wetlands/Riparian Zones

Wetland and riparian zones would be avoided by helicopter landing zones. Biological monitors will be present during all associated field activities to direct access crews away from significant wetland or riparian areas when traversing terrain by foot to reach proposed structure locations. All of the landing locations are located on the rocky ridge tops of the Jacumba Mountains and are outside of washes and riparian habitats. No riparian habitats have been previously mapped for any of the locations. Sonoran Desert wash scrub habitat occurs north of the northern most landing location (LZ-27). This habitat occurs in the drainages north of Interstate 8 (I-8) that flow out of the Jacumba Mountains. Most of the ravines and drainages adjacent to the landing locations are likely non-riparian federal and/or state waters. As no riparian habitats are anticipated in these areas, no riparian dependent wildlife is anticipated to occur also. This element will not be considered further.

Wild and Scenic Rivers

There are no wild or scenic rivers that would be affected within the areas proposed for helicopter landing zones and field walk-down activities, therefore this element will not be considered further.

Wilderness

There are no wilderness areas that would be directly affected within the areas proposed for helicopter landing zones and field walk-down activities. The closest wilderness area is the Jacumba Wilderness and flight paths would remain outside this area. This element will not be considered further.

Recreational Resources

There are no designated recreational areas that would be affected within the areas proposed for helicopter landing zones and field walk-down activities, therefore this element will not be considered further.

Visual Resources

The proposed action is a short term activity with no temporary or permanent features that would create a visual impact, therefore this element will not be considered further.

Energy (E.O.s 13211 and 13212)

The nature of the activities associated with helicopter landings and walk-down activities would not affect energy objectives, therefore this element will not be considered further.

Global Climate Change

On-going scientific research has identified the potential impacts of “greenhouse gas” (GHG) emissions (including carbon dioxide, CO₂; methane; nitrous oxide; water vapor; and several trace gasses) on global climate. Through complex interactions on a regional and global scale, these GHG emissions cause a net warming effect of the atmosphere, primarily by decreasing the amount of heat energy radiated by the Earth back into space. Although GHG levels have varied for millennia (along with corresponding variations in climatic conditions), recent industrialization and burning of fossil carbon sources have caused CO₂ concentrations to increase dramatically, and are likely to contribute to overall climatic changes, typically referred to as global warming. Increasing CO₂ concentrations also lead to preferential fertilization and growth of specific plant species.

Global mean surface temperatures have increased nearly 1.0°C (1.8°F) from 1890 to 2006 (Goddard Institute for Space Studies, 2007). However, observations and

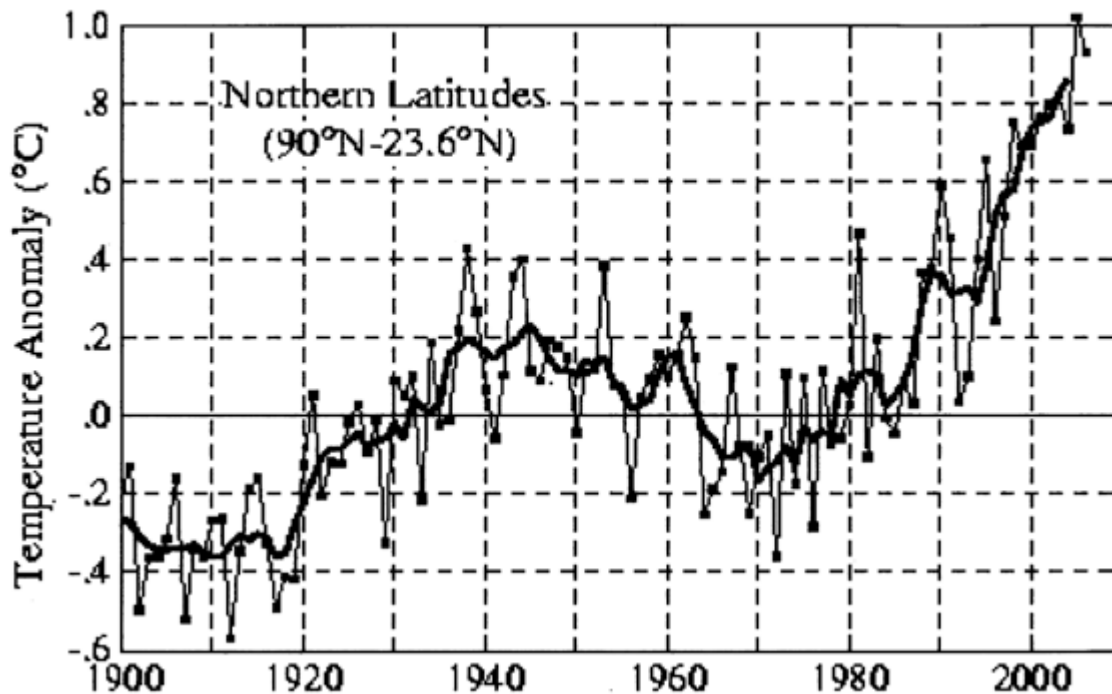
predictive models indicate that average temperature changes are likely to be greater in the Northern Hemisphere. Chart 1 demonstrates that northern latitudes (above 24° N) have exhibited temperature increases of nearly 1.2°C (2.1°F) since 1900, with nearly a 1.0°C (1.8°F) increase since 1970. Without additional meteorological monitoring systems, it is difficult to determine the spatial and temporal variability and change of climatic conditions, but increasing concentrations of GHG are likely to accelerate the rate of climate change.

The Intergovernmental Panel on Climate Change (IPCC) has recently completed a comprehensive assessment of the current state of knowledge on climate change, its potential impacts and options for adaptation and mitigation. At printing of this EA, this assessment is available on the IPCC web site at <http://www.ipcc.ch/>. According to this report, global warming may ultimately contribute to a rise in sea level, destruction of estuaries and coastal wetlands, and changes in regional temperature and rainfall patterns, with major implications to agricultural and coastal communities. The IPCC has suggested that the average global surface temperature could rise 1 to 4.5 degrees Fahrenheit (°F) in the next 50 years, with significant regional variation. The National Academy of Sciences (2006) has confirmed these findings, but also indicated that there are uncertainties regarding how climate change may affect different regions. Computer models indicate that such increases in temperature will not be equally distributed globally, but are likely to be accentuated at higher latitudes, such as in the Arctic, where the temperature increase may be more than double the global average (BLM and MMS 1998). Also, warming during the winter months is expected to be greater than during the summer, and increases in daily minimum temperatures is more likely than increases in daily maximum temperatures. Vulnerabilities to climate change depend considerably on specific geographic and social contexts.

Several activities occur within the planning area that may generate GHG emissions. Recreation, transportation, and mineral material production using combustion engines, can potentially generate CO₂ and methane. BLM recognizes the importance of climate change and the potential effects it may have on the natural environment. BLM land-use management practices are based on goals and objectives that are established for different geographical areas. These established land-uses are based on numerous criteria, including land cover and historical land uses.

The proposed action and all alternatives would result in use of combustion engines, but the levels of use would be such a small amount on a global scale that this activity would have no effect on climate change.

Chart 1 – Annual Mean Temperature Change for Northern Latitudes (24 - 90° N)



Source: Goddard Institute for Space Studies (2007)

Elements Potentially Affected:

Potentially affected elements include, air quality, cultural resources and Threatened and Endangered Species (bighorn sheep habitat) and Wildlife.

Air Quality

Air quality is determined by measuring ambient concentrations of criteria pollutants, which are air pollutants for which acceptable levels of exposure can be determined and for which standards have been set. The degree of air quality degradation is then compared to the current National and California Ambient Air Quality Standards (NAAQS and CAAQS). Because of unique meteorological conditions in California, and because of differences of opinion by medical panels established by CARB and the U.S. EPA, there is diversity between State and federal standards currently in effect in California. In general, the CAAQS are more stringent than the corresponding NAAQS. Air quality standards are designed to protect those people most susceptible to respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise, including outdoor recreational activity.

In general, Sections 10A and 9C of the Southern Route Alternatives include desert and mountainous areas of agricultural and private undeveloped lands. These sections would be west of El Centro and Calexico, where ozone, particulate matter, and carbon monoxide levels exceed ambient standards, despite the very low population density compared to coastal southern California. These portions of the Project are within the Salton Sea Air Basin, administered by the Imperial County Air Pollution Control District (ICAPCD).

Each geographic area is designated by either the U.S. EPA or CARB as a nonattainment area if violations of the ambient air quality standards are persistent. Imperial County is classified as nonattainment area for the State ozone standard, and like nearly every other area in the State of California, they are nonattainment areas with respect to the PM10 CAAQS. Since the U.S. EPA established designations for the 8-hour ozone standard, the Imperial County has been designated nonattainment area NAAQS. Since 1994, the U.S. EPA has found Imperial Valley to be in serious nonattainment for PM10. Federal PM2.5 standards are relatively recent, and although there is insufficient data to determine attainment status of the air basin as a whole under the federal PM2.5 standards, the City of Calexico is designated nonattainment for State-level CO and PM2.5.

Cultural Resources

The proposed project is located within the In-Ko-Pah Gorge. The sites within this area reflected human behaviors associated with food processing and habitation, and are primarily associated with Late Prehistoric occupation of the sites. Site types include temporary campsites, milling stations, roasting pits, rock features, trails, and ceramic and lithic scatters. Settlement in the In-Ko-Pah Gorge area was probably focused in the mountain valleys to optimize exploitation of the agave resources found along the steep hillsides surrounding the valleys. Many of the sites reflect these activities and are either isolated roasting pits or campsites with associated roasting pits (Townsend 1984:VI-4).

Also in the vicinity of the proposed project is the Desert View Tower (CHL 939), a cylindrical stone-masonry tower that is a roadside attraction near the San Diego–Imperial County line. It is listed on the National Register of Historic Places under Criteria A and C. This historic architectural resource is located within 0.5 miles of the project area.

Based on site data from the SWCA Class I records review and updated site records from SWCAs Class II survey of the area for the Sunrise Powerlink Project, which includes survey information previously completed for the adjacent existing Southwest Powerlink transmission line, there are 197 cultural sites and isolated artifacts located in the one mile radius of the proposed project route, 26 of which are in the 300-foot project corridor.

Threatened and Endangered Species, or Special Status Species: Bighorn Sheep

On February 1, 2001, the USFWS designated final Critical Habitat for the Peninsular bighorn sheep on approximately 844,897 acres in Riverside, San Diego, and Imperial Counties. Peninsular bighorn sheep live on steep, open slopes, canyons, and washes in hot and dry desert regions where the land is rough, rocky, and sparsely vegetated. Elevation ranges have been recorded between 300 and 4,000 feet where average annual precipitation is less than four inches and daily high temperatures average 104°F in the summer. Caves and other forms of shelter (e.g., rock outcrops) are used during inclement weather and for shade during the hotter months. Lambing areas are associated with ridge benches or canyon rims adjacent to steep slopes or escarpments. Alluvial fans are also used for breeding, feeding, and movement. Designated Critical Habitat is located from the San Jacinto Mountains south to the U.S.-Mexico border, generally along the eastern escarpment of the Peninsular Ranges that steeply descend into the Sonoran Desert along the Coachella Valley, Anza-Borrego Desert, and Salton Trough. The project area crosses approximately 7.6 miles of desert bighorn sheep Critical Habitat.

The southernmost known bighorn sheep ewe group associated with Peninsular bighorn sheep occurs north of I-8 in Carrizo Canyon, which includes portions of the Tierra Blanca, In-ko-pah, Coyote, and Jacumba Mountains. Historically, an ewe group may have occurred south of I-8 (Weaver et al. 1968; Cunningham 1982), but had disappeared since the 1980s. The loss was poorly documented, but may have been the result of the construction of I-8 in the mid-1960s, railroad activity, livestock grazing, poaching, and fire suppression (Rubin et al. 1998; USFWS, 2000). Sections 10A and 9C cross through two areas of Critical Habitat for desert bighorn sheep in the Peninsular Ranges - In-ko-pah Gorge (through and adjacent to the I-8 "Island") and alluvial fans along the southern edge of the Coyote Mountains. These areas are considered part of the area used by the Carrizo Canyon ewe group. Bighorn sheep have been observed in the action area in In-Ko-Pah Gorge/I-8 "Island", along with tracks and pellets from bighorn sheep and/or mule deer.

Anecdotally, it has been reported that there was once a population of 20-30 bighorn sheep between Interstate 8 and the U.S./Mexican border that can be attributed to Weaver et al. (1968). Weaver et al. (1968) listed a population estimate of 20 bighorn sheep in the Jacumba Mountains south of I-8 and 12 in Devils Canyon (part of which passes under westbound lanes of I-8). However, Weaver et al. (1968) never actually observed any bighorn sheep in this area (Table II of Weaver et al. 1968).

Later, Cunningham (1982), who studied the Carrizo Canyon subpopulation that is northwest of the I-8 island, wrote: "*Another population of bighorn south of Interstate 8 is believed to be of substantial size (>30).*" However, Cunningham (1982), like Weaver et al. (1968), did not observe any bighorn sheep south of, or in the vicinity of, I-8.

Speculation about a permanent historic population south of I-8 has since been repeated by other authors including Torres et al. (1994) and Rubin et al. (1998).

South of the U.S./Mexico border, there is a discontinuous distribution in northernmost Baja with only a handful of bighorn sheep sightings within 40 kilometer (km) of the border, in the mountains of northern Baja (Sierra Cucapa and Sierra de Juarez), and there is no evidence that these areas constitute more than transient use. These conclusions are based upon published helicopter survey data from the mid-1990's (Lee and Lopez-Saavedra 1994; Lopez et al. 1995; DeForge et al. 1996; Lee and Mellink 1996) and discussions with Ray Lee (Cody, Wyoming) who conducted these helicopter surveys. Between these mountains and the border is a busy four-lane highway, Mexican State Route 2, which forms an additional barrier to potential bighorn sheep movements north from Baja.

Recently, the USFWS has proposed to retain the I-8 Island and areas south to the Mexican border in its Critical Habitat designations (USFWS 2008) based on several observations of bighorn sheep within or adjacent to the I-8 Island. However, the data used in support of this proposal has not yet been made public.

During a survey conducted by R. Ramey in March 2008, tracks and pellet groups were found in In-Ko-Pah Gorge, concentrated on and around a sand hill (N32° 42' 38.1", W 116° 03' 24.4"). This sand hill is located approximately 1km upstream from the mouth of the canyon. The crest of the hill is approximately 184 meters line of sight south of the SWPL, and 252 meters from eastbound lanes of I-8 (which has heavy auto and truck traffic). The encilia patch in lower In-Ko-Pah gorge is located on a low sandy hill approximately 100m across and has a concentration of bighorn sheep pellets that have been confirmed by DNA analysis, indicating that the pellets are not from mule deer. The vegetation in this patch is of inadequate size to sustain permanent occupancy by bighorn sheep, and a paucity of regular observations in the area suggests seasonal use. During the March 2008 survey, ungulate tracks and pellets (deer or bighorn) were also found in Devils Canyon under I-8 but were absent from the rest of In-Ko-Pah Gorge and Meyers Valley to the south. No bighorn sheep were observed in the I-8 area or south of it. These observations are consistent with the recent undocumented observations of Dr. Guy Wagner of the USFWS made two weeks previously.

Wildlife Including Migratory Birds

The project area is home to a diversity of wildlife. Numerous resident and transient migratory birds utilize the project area. The canyons and rocks in this mountainous region provide foraging habitat and nesting habitat for many species. Some of the canyons in this mountain range contain dry wash woodlands or riparian areas that support abundant wildlife and create a great deal of habitat. The landing locations are located on the rocky ridge tops of the Jacumba Mountains and primarily support Sonoran Desert scrub habitats. Sonoran Desert mixed scrub is the primary vegetation community with smaller areas of Sonoran mixed woody scrub and Sonoran mixed woody and succulent scrub also present. Semi-desert chaparral also occurs within the action area.

Reptiles and rodents are the predominant wildlife species present in these desert scrub habitats. Western banded gecko (*Coleonyx variegatus*), barefoot banded gecko (*Coleonyx switaki*), chuckwalla (*Sauromalus ater*), desert spiny lizard (*Scleropus magister*), desert collared lizard (*Crotaphytus insularis*) and granite spiny lizard (*Scleropus orcutti*), spotted leaf-nose snake (*Phyllorhynchus decurtatus*), western diamond rattlesnake (*Crotalus atrox*) are the most common reptiles that would occur in these rocky, boulder strewn areas. Red-tailed hawk (*Buteo jamaicensis*), rock wren (*Salpinctes obsoletus*), black-throated sparrow (*Amphispiza bilineata*) are the most common bird species that would occur in the action area. Desert cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit (*Lepus californicus deserticola*), long-tailed pocket mouse (*Chaetodipus formosus*), canyon mouse (*Peromyscus crinitus*), desert woodrat (*Neotoma lepida*), coyote (*Canis latrans*), California leaf-nosed bat (*Macrotus californicus*), and California myotis (*Myotis californicus*) are the most common mammals that would occur in the action area.

Environmental Impacts:

Elements Potentially Affected:

Potentially affected elements include, air quality, cultural resources and Threatened and Endangered Species (bighorn sheep habitat) and Wildlife including Migratory Birds.

Air Quality

Proposed Action

When the helicopter lands at designated landing zones, temporary fugitive dust may be generated. However, most of the landing sites are in rocky areas with limited exposed loose soil which would minimize this impact. The field walk-down activities would have no impact on air quality.

No Action Alternative

Under the no action alternative, there would no temporary dust associated with helicopter landings. If SDG&E accessed the structure locations by foot, there would also be no dust impacts. If helicopter assistance was required to move heavy equipment to structure locations, then impacts similar to the proposed action would occur under this scenario.

Cultural Resources

Proposed Action

There are 197 cultural sites and isolated artifacts located in the vicinity of the proposed project route, 26 of which, are within the 300 foot project corridor. Using Class I and Class II site data information, the proposed helicopter landing zones were located to

avoid these known sites and included additional buffer areas to ensure avoidance to the greatest extent feasible.

However, potential impacts could occur should the field crews come into contact with unknown cultural features when conducting walk-down activities. Potential site types which could be encountered include campsites, roasting pits, bedrock milling stations, rock features, trails, and artifact scatters. One known site, AW-10, a potentially eligible temporary campsite, will need to be traversed on foot by the field walk-down personnel to reach a proposed structure location. A qualified archaeologist (as per the Secretary of the Interior qualification standards for a professional archaeologist - 36 CFR Part 61) or one working under a qualified archaeologist will review the detailed site mapping data prior to the site visit and lead the crew to the proposed structure location so that no surface cultural features are disturbed. The cultural monitor, along with the biological monitor, will take the lead to all other proposed structure locations to ensure unknown surface features are not disturbed.

In addition, to further ensure that the multiple helicopter landings on unsurveyed areas do not impact cultural resources, the biological and cultural monitor will be in the first landing party to clear the landing zone for cultural and biological resources prior to the multiple landings. If significant resources are found that could be impacted by the landings, the monitors will relocate the landing zone as close as possible to the original landing zone to avoid any such resources. No surface disturbance will occur as a result of these field walk-down activities.

No Action Alternative

Under the no action alternative, there would be no potential to disturb unknown cultural features. No temporary view or noise impacts would occur to the Desert Tower from SDG&E activities proposed under this action. However, other incidental aircraft or other activities that occur in the area during the normal course of the day would continue. No impact would occur from SDG&E accessing the proposed structure locations by foot is anticipated. If helicopter assistance was required to move heavy equipment to structure locations, then non significant temporary impacts similar to the proposed action would occur under this scenario.

Threatened and Endangered Species, or Special Status Species: Bighorn Sheep

Proposed Action

The helicopter landing areas are located within USFWS Designated Critical Habitat for bighorn sheep specifically Southern Route Alternatives section 10A includes landing zones within the "island" formed by the east and westbound lanes of I-8. The nearest permanent bighorn sheep subpopulation to the I-8 island area is the Carrizo Canyon ewe group approximately 10-20 km to the northwest (Rubin et al. 1998). The Carrizo Canyon subpopulation, due to its close proximity and recent increase in numbers (Botta and Rubin 2005), most likely accounts for intermittent observations of bighorn sheep in

or near the I-8 island area. The presence of two large bridges spanning Devils Canyon allows bighorn sheep likely from this subpopulation and other animals to pass under I-8 from the north and enter the I-8 island. The eastbound lanes of I-8 have drainage culverts that are less favorable to bighorn sheep passage.

The I-8 island is generally poor habitat for bighorn sheep because of an abundance of large boulders that cover most of the landscape and extensive human activity (including migrants, Border Patrol, and recreational use). The nearest permanent water is at Mountain Springs, north of westbound lanes of I-8. Devils Canyon and lower In-Ko-Pah gorge, where there is a patch of encilia (*Encilia farinosa*), an attractive seasonal forage for bighorn sheep, could also explain their intermittent presence in the area. In any case, the bighorn population within the Southern Route Alternatives section 10A I-8 island area would likely be transitory between population concentration areas.

Additionally, helicopter surveys have been conducted every other year in the Peninsular Ranges by the CDFG including the area of the proposed action. These surveys have been flown in contours approximately 50 meters (m) above the ground, allowing observers to easily identify and correctly classify bighorn sheep. As part of this and other research in the Peninsular Ranges, the CDFG also regularly captures bighorn sheep for radio-collaring and other research by helicopter pursuit and net-gunning. While bighorn sheep are generally unharmed by this activity, bighorn sheep that have been previously captured by helicopter can react to closely approaching helicopters by fleeing or moving several kilometers out of a local area (Bleich et al. 1990, 1994). It should be noted however that the bighorn sheep intermittently observed in or near the I-8 island have been uncollared (USFWS 2008) and therefore have not been adversely conditioned to helicopters and may not adversely react to their approach,

Within and surrounding the I-8 island area where the walk-down will occur (see **Attachment A**, map book pages LZ-1 to LZ-5), evidence of human activity is abundant. Bighorn sheep must cross over or under I-8 with the sound of constant auto and truck traffic; recreational hikers and off-road vehicles frequent dirt roads including the old highway 80, lower In-Ko-Pah Gorge, and Devil's Canyon; there is regular movement of migrants and Border Patrol agents through washes, along ridges, and past water sources; military helicopters traverse the area on training missions; and private residences are found immediately west of the I-8 island. Helicopters are currently used for inspection and maintenance of the SWPL.

The proposed walk-down activities will not interfere with bighorn sheep lambing or lamb rearing as the nearest documented lambing occurs more than 10km away in Carrizo Canyon (Cunningham 1982; Rubin 1998; USFWS 2000). As stated above, the bighorn that were recently observed in the I-8 island were thought to have walked from the Carrizo Canyon subpopulation (R. Botta, CDFG; K. Brennen, CDFG; pers. comm.). Eighty-seven percent of the lambing in the Peninsular Ranges occurs from February through April. Lambs born later than these peak months have a lower chance of survival (one sixth of those survived to six months of age) compared to lambs born during peak months (Rubin et al. 2000). Given the February-April peak lambing season in the

Peninsular Ranges, the lambs observed in the I-8 island would have been at least six months old when observed and no longer dependent upon lambing habitat in Carrizo Canyon.

Previous research on bighorn sheep reactions to low flying helicopters (Bleich et al. 1990, 1994) did not contain specific recommendations on the buffer needed between helicopter flights to prevent movement of bighorn sheep in response to helicopter. Therefore, the lead author of this research, Dr. Vern Bleich (CDFG retired) was contacted on 9/1/08. Dr. Bleich did not expect that the uncollared bighorn sheep previously observed in the I-8 area would be affected by helicopter use during the walk-down activities because: 1) the bighorn sheep had not been previously harassed by helicopter net-gun capture, and 2) the helicopter would not be directly approaching the bighorn sheep in a harassing manner. Dr. Bleich suggested that an interval of two weeks between conclusion of walk-down activities and the CDFG helicopter census in the I-8 island would be a more than adequate buffer to compensate for any potential effect of the walk-down on bighorn sheep movements.

Regardless of the factors stated above, it should however be recognized that this area is currently Designated Critical Habitat for the bighorn sheep and therefore additional measures should be taken to ensure avoidance or interference of movement to normal activities and behaviors with any transitory adult populations in the area.

No Action Alternative

Under the no action alternative, potential interference of movement to normal activities and behaviors with any transitory adult Peninsular bighorn sheep populations in the area associated with Designated Critical Habitat would not occur. If SDG&E chooses to access the proposed structure locations by foot, disturbance from helicopters would not occur although disturbance from the presence of human activities in the vicinity of the any sheep populations could still occur but presumably to a lesser degree. The longer duration, of up to a month, rather than one week, may have offsetting effects with regards to disturbance as the exposure to disturbance is lengthened and the risk of disturbance is increased by increasing the chances of an encounter. If helicopter assistance is required to move heavy equipment to structure locations, then impacts similar to the proposed action would occur under this scenario.

Wildlife Including Migratory Birds

Proposed Action

Helicopter access into this area will generate noise that could frighten birds and other wildlife. Larger mammals and birds are very mobile and while they may be flushed by the helicopter, they will likely return once the helicopter leaves. The proposed action is a short term activity with no temporary or permanent features that would interfere with

wildlife movements or foraging and therefore impacts are not anticipated. Biological monitors will be present during all associated field activities to minimize or avoid any incidental contact with wildlife.

Noise impacts to wildlife species from helicopter activity may interfere with normal behavioral patterns e.g. foraging, hunting, courtship, breeding, roosting and offspring rearing depending on seasonal timing of activity and species sensitivity to this disturbance. Though the generated noise levels are high, they are temporary and of relatively short duration and as such are not anticipated to result in any long-term adverse effect to individuals or populations.

No Action Alternative

Under the no action alternative, temporary noise and activities associated with the proposed action would not occur. If SDG&E chooses to access the proposed structure locations by foot, disturbance from helicopters would not occur although disturbance from the presence of human activities in the vicinity of wildlife and bird populations could still occur but presumably to a lesser degree. The longer duration, of up to a month, rather than one week, may have offsetting effects with regards to disturbance as the exposure to disturbance is lengthened and the risk of disturbance is increased by increasing the chances of an encounter. If helicopter assistance is required to move heavy equipment to structure locations, then impacts similar to the proposed action would occur under this scenario.

Environmental Protocol/Mitigation Measures to Avoid the Potential for Significant Impacts to Sensitive Resources:

Impacts identified above would not be considered significant by adhering to the environmental protocol/mitigation measures outlined and discussed below.

Air Quality

Potential short term air quality impacts would be mitigated by limiting hovering time at each site. Communication between field crews and the pilot will minimize extraction time and hovering at a landing zone site.

Cultural Resources

To ensure that the multiple helicopter landings on unsurveyed areas do not impact cultural resources, the biological and cultural monitor will be in the first landing party to clear the landing zone for cultural and biological resources prior to the multiple landings. If significant resources are found that could be impacted by the landings, the monitors will relocate the landing zone as close as possible to the original landing zone to avoid any such resources.

Avoidance of cultural resources is the preferred protocol therefore helicopter landing zones have been identified and placed outside of known cultural resources site boundaries. A cultural monitor will be present to avoid significant impacts to sensitive cultural resources in the event that the field crew has to walk on to cultural sites, the cultural monitor will review the site mapping data prior to the site visit and lead the crew to the structure location so that no surface cultural features are disturbed.

In the event that undiscovered cultural material, both prehistoric and historic, is encountered it would be documented and recorded using Trimble or Garmin GPS equipment. If human remains are encountered in any location other than a dedicated cemetery, there shall be no further disturbance of the site or any nearby area reasonably suspected to overlie the adjacent human remains until the remains have been investigated as outlined in Section 10564.5 of the CEQA guidelines, the Native American Grave Protection Act and its implementing regulations, California Health and Safety Code 7050.5, and the California Public Resources Code Section 5097.98. Other federal regulations that will be followed when applicable include National Environmental Policy Act (NEPA), the National Historic Preservation Act (36 CFR 60.6), the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, the Federal Land Policy and Management Act, Title 43, Chapter 35, Subchapter VI, Section 1781, and Executive Orders 13007 and 13084.

Threatened and Endangered Species, or Special Status Species: Bighorn Sheep

The following are proposed mitigation measures to address the potential disturbance of bighorn sheep located within currently Designated Critical Habitat:

This area will be surveyed for three (3) days immediately in advance of the walk-down activities by an experienced bighorn sheep biologist. This biologist will also serve as a spotter during the walk-down.

The pre-walk-down survey will include visits to each of the 22 proposed tower sites that will be visited during the walk-down, and surveying for bighorn sheep and sign along adjacent washes and ridges. Additionally, passive infrared-triggered trail cameras will be placed near underpasses previously used by bighorn sheep to capture images of bighorn sheep entering or exiting the I-8 island. Track traps (sandy areas of washes that are swept daily for tracks) will also be used to detect bighorn sheep movements into or out of the I-8 island. Both of these will be checked daily, including each morning prior to walk-down activities.

If bighorn sheep or recent signs thereof (tracks and pellets) are not found in the I-8 island then the walk-down will proceed as planned for that day, with the precaution that if bighorn sheep are encountered during walk-down helicopter flights, the helicopter will avoid approaching and hovering near the bighorn sheep. The bighorn sheep biologist will have the authority to wave off the helicopter from an approach or landing.

If bighorn sheep or recent signs thereof (tracks and pellets) are found in the I-8 island during the pre-walk-down bighorn survey, their location and movements will be determined by tracking and observation. This information will be used by the bighorn sheep biologist to determine the sequence of tower site visits in order to avoid close approach to bighorn sheep that may be present.

If bighorn sheep are observed in the I-8 island during the walk-down, the bighorn biologist will work with the pilot to develop a flight plan that avoids the immediate area occupied by the bighorn sheep. Tower site(s) in the immediate area of the bighorn may be temporarily avoided until the bighorn biologist determines that the bighorn sheep have moved away. If no bighorn sheep are observed in the area, but fresh sign is found, the bighorn will be tracked to determine their location or whether they have moved out of the I-8 island.

The helicopter pilot and walk-down crew will be instructed to avoid hovering over bighorn sheep or close to them. This will minimize any flight response of the bighorn sheep to the helicopter and prevent them from fleeing onto the roadway.

The walk-down will be scheduled after CDFG/USFWS bighorn sheep helicopter census of the I-8 island area which occurred in November 2008.

With the implementation of these mitigation measures, no significant impacts to peninsular bighorn sheep are anticipated.

Wildlife Including Migratory Birds

Activities would occur in the winter time frame (December/January), so this is assumed to be outside of the breeding season of most common species that have the potential to occur in these targeted areas; therefore minimizing potential for temporary impacts. The proposed action is a short term activity that would also be mitigated by limiting hovering time at each site to lessen temporary noise impacts. Communication between field crews and the pilot will minimize extraction time and hovering at a landing zone site, lessening interference with wildlife movements or foraging and therefore impacts are not anticipated. In addition, biological monitors will be present during all associated field activities to minimize or avoid any incidental contact with wildlife.

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Implementation Date:

Activities subject to this EA will be implemented immediately subsequent to this decision, but would be completed before September 30, 2009.

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