

United States Department of the Interior  
Bureau of Land Management  
Environmental Assessment # DOI-BLM-CA-D070-2014-0015-EA  
Case File # CACA-47658, CACA-47658-01

## Finding of No Significant Impact

### Sunrise Powerlink Invasive Plant Management

### Imperial County, California

U.S. Department of the Interior  
Bureau of Land Management  
El Centro Field Office  
1661 South 4<sup>th</sup> Street  
El Centro, CA 92243

April 2014



Finding of No Significant Impact  
El Centro Field Office  
Environmental Assessment # DOI-BLM-CA-D070-2014-0015-EA  
Case File # CACA-47658, CACA-47658-01

**Proposed Action Title/Type:**

Invasive Plant Management, Herbicide Application on BLM Lands for the Sunrise Powerlink Project.

**Applicant/Proponent:**

San Diego Gas & Electric Company (SDG&E), a wholly owned subsidiary of Sempra Energy.

**Location of Proposed Action:**

Activities would occur on approximately 208.47 acres of public land in temporary and permanent impact areas associated with the approximately 117-mile Sunrise Powerlink Transmission Line located between the El Centro area in Imperial County and western San Diego County in Southern California, as legally described in the right-of-way (ROW) grants issued by the Bureau of Land Management (BLM) on February 24, 2009.

**INTRODUCTION**

SDG&E is the holder of federal ROW grants, issued pursuant to Title V of the Federal Land Policy Management Act (FLPMA) and ROW regulations under 43 Code of Federal Regulations (CFR) 2800. The ROWs, issued by BLM on February 24, 2009, and serialized as CACA-47658 and CACA-47658-01 (as extended), authorize SDG&E to construct, operate, maintain, and terminate a transmission line, ancillary facilities, and access roads for the development of the Sunrise Powerlink (SRPL) project on public lands in San Diego and Imperial Counties (Figure 1-1).

SRPL Mitigation Measures B-1a and B-3a, adopted as part of the SRPL Record of Decision (ROD) issued on January 20, 2009, and the associated Mitigation Monitoring, Reporting and Compliance Program (MMRCP), require, in part, the restoration of temporarily impacted vegetation communities, weed control, and the preparation and implementation of a Weed Control Plan (WCP, ROD Mitigation Measure B-3a) for the selected route. Consistent with these mitigation requirements, SDG&E submitted a WCP (dated December 23, 2010, and approved by BLM on January 31, 2011<sup>1</sup>) that incorporates numerous invasive plant control methods, including chemical control via herbicide application, as part of an integrated pest management (IPM) strategy on BLM lands impacted by SRPL construction (approximately 208.47 acres). The ROW grant, Plan of Development, and WCP govern the treatment of invasive plants and application of pesticides and herbicides at the SRPL project site, and require

---

<sup>1</sup> The WCP was also approved by the California Public Utilities Commission (CPUC); United States Fish and Wildlife Service (USFWS); United States Department of Agriculture, Forest Service; United States Army Corps of Engineers (ACOE); California State Water Resources Control Board; California Department of Fish and Wildlife (CDFW); City of San Diego; and County of San Diego.

that SDG&E obtain approval of a Pesticide Use Proposal (PUP) prior to application of any chemical treatment on BLM lands.

BLM has prepared an Environmental Assessment (EA) (DOI-BLM-CA-D070-2014-0015) to analyze and disclose the environmental effects of applying certain herbicide active ingredients (Clopyralid, Glyphosate, Imazapyr, Sulfometuron methyl, and Triclopyr) identified in the PUP as part of the IPM strategy for invasive plants consistent with the WCP on BLM-administered lands within the SRPL project area. The IPM method for invasive plant species control analyzed in the EA utilizes a combination of herbicides and manual removal methods. The EA tiers to BLM's *Vegetation Treatments Using Herbicides in 17 Western States, Programmatic Environmental Impact Statement* (Vegetation Treatment PEIS; BLM 2007a) and Record of Decision (BLM 2007), as well as to the SRPL FEIR/EIS (CPUC/BLM 2008) and Record of Decision. This analysis incorporates by reference the discussions in the EA and related environmental documents of the potential environmental effects associated with the application of the five herbicide active ingredients identified in the PUP, pursuant to 40 CFR 1508.13. The SRPL was constructed in 2011/2012 and became operational in June 2012.

The EA (DOI-BLM-CA-D070-2014-0015-EA) was posted on the BLM El Centro Field Office website for a 30-day public comment and review period. The comment period began on January 29, 2014, and extended through February 28, 2014. No comment letters were received by BLM.

#### **SIGNIFICANCE DETERMINATION:**

One of the primary purposes for preparing an EA is to determine whether or not a proposed action will have a significant impact on the human environment and therefore will require the preparation of an Environmental Impact Statement (EIS). As defined in 40 CFR 1508.13, the Finding of No Significant Impact (FONSI) is a document that briefly presents the reasons why an action will not have a significant effect on the human environment. The regulations define the term "significantly" as requiring considerations of both context and intensity. 40 CFR 1508.27. The term "context" means "that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality." 40 CFR 1508.27(a). The term "intensity" "refers to the severity of the impact." 40 CFR 1508.27(b).

#### **RATIONAL FOR FINDING OF NO SIGNIFICANT IMPACT:**

*Context:* The discussion of significance criteria that follows applies to the application of certain herbicide active ingredients on BLM land within the Environmentally Superior Southern Route of SRPL as detailed in the PUP, and is evaluated in the context of local and regional importance relative to: the California Desert Conservation Area (CDCA) Plan, the Western Colorado Desert Route of Travel Designation (WECO) Plan, the Eastern San Diego County Resource Management Plan (RMP), and the South Coast RMP. The WCP includes weed management activities, including the use of chemicals, on areas disturbed during construction of the SRPL. The EA (DOI-BLM-CA-D070-2014-0015) details the potential effects of applying certain herbicide active ingredients consistent with the WCP and as identified in the PUP, and provides the basis for the conclusions in this FONSI. None of the adverse effects identified including

direct, indirect and cumulative effects are considered significant based on: the controlled application of herbicides, the disturbed nature of the site due to previous grading and construction of SRPL, and prioritizing the use of herbicide active ingredients and rates that present the lowest risk for negative effects on special-status species and their habitat. In addition, there is a potential beneficial effect of minimizing impacts to special-status species and their habitat by controlling the introduction and spread of invasive plants.

Intensity: Intensity is addressed through the ten “significance” criteria described in 40 CFR 1508.27, and discussed below:

*1) Impacts that may be both beneficial and adverse.*

Herbicide application as described in the WCP is part of an adaptive, IPM approach to prevent the introduction of new weeds and control the spread of existing weeds in connection with SRPL construction, operation, and maintenance. Chemical treatment of invasive plant species using the herbicide active ingredients identified in the PUP and analyzed in the EA would have the beneficial effect of reducing the invasive plant population and more effectively controlling the spread of invasive plants in the area. No significant adverse impacts have been identified in connection with the application of herbicides consistent with the PUP to treat invasive species.

*2) The degree to which the proposed action affects public health or safety.*

BLM’s Vegetation Treatment PEIS and the SRPL FEIR/EIS, to which the EA tiers, both analyzed the impacts to public health and safety of herbicide use. Herbicide treatment is part of an adaptive, IPM strategy on BLM lands consistent with the approved WCP, but does not include on-site storage of herbicides. Appendix F of the EA contains a SRPL Spill Contingency Plan for Herbicide Use on BLM-Managed Land. Appendix A (Table A-3) of the EA identifies Standard Operating Procedures (SOPs) for human health and safety, which is relevant to the application, posting, storage, disposal and spills. Additionally, Table A-4 Treatment Measures, identifies measures to be implemented prior to the use of herbicides on BLM lands. Any potential human exposure risks from activities described under the proposed action do not pose a significant adverse risk to public health or safety.

*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.*

BLM’s Vegetation Treatment PEIS and the SRPL FEIR/EIS, to which the EA tiers, evaluated the potential for impacts to cultural resources. Applicable mitigation measures were identified and were included in Appendix A (Table A-1) of the EA. The application of herbicides does not involve ground disturbance and will have no impact on cultural resources. There are no parklands, prime farmlands, wetlands, or wild and scenic rivers within the Project Disturbance Area (as defined in the EA). The Yuha Area of Critical Environmental Concern (ACEC) is traversed by the SRPL project and may be subject to herbicide treatment; however, the EA identified no significant adverse effects for this area associated with the application of certain herbicide active ingredients consistent with the PUP. Instead, the potential use of herbicides

would provide a beneficial effect by minimizing potential impacts from invasive plants to natural resources within the area.

*4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

No effects that may occur as a result of the approval of the PUP were identified in the EA that are likely to be controversial.

*5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

The proposed action is not unique or unusual. Treatment of invasive plant species is a common practice is required of federal agencies to comply with Executive Order 13112, and often involves the use of herbicides. The environmental effects to the human environment were analyzed in the Vegetation Treatment PEIS and SRPL FEIR/EIS, to which the EA tiers, and no new or more substantial effects not previously analyzed would occur as a result of BLM's approval of the PUP. There are no predicted effects on the human environment that are considered to be highly uncertain or involve 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 does not set a precedent for future actions that may have significant effects, nor does it represent a decision in principle about a future consideration. The proposed action is a standard practice of herbicide application for controlling invasive plants with consideration and mitigation for cultural resources, sensitive vegetation and wildlife species, and human health and safety. Any modification to the proposed action will be evaluated through the National Environmental Policy Act process as appropriate, consistent with current laws and regulations.

*7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

BLM's Vegetation Treatment PEIS and the SRPL FEIR/EIS, to which the EA tiers, analyzed cumulative effects. The Vegetation Treatment PEIS concluded that chemical treatments would have short-term adverse impacts to target vegetation, and in some cases non-target vegetation. However, treatments that remove or control invasive vegetation could provide immediate benefits to non-target species, such as increased access to water and nutrients, and enhanced vigor from reduced competition with invasive species (2007a). With implementation of the Vegetation Treatment PEIS Mitigation Measures (Table A-1 of Appendix A), the contribution of herbicide application within the SRPL on BLM lands to cumulative impacts would not be cumulatively considerable (2007a and b) and is not significant.

*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.*

The proposed action would not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places. The BLM's Vegetation Treatment PEIS and SRPL FEIR/EIS, to which the EA tiers, disclosed that effects of herbicide treatments on cultural resources differ by the method of herbicide application. Triclopyr, for example, can increase soil acidity, altering the surfaces of exposed artifacts and organic materials; however, displacement of invasive plants allows native vegetation to maintain root systems that inhibit soil erosion which could damage the integrity of buried archaeological resources. Manual treatment of invasive plants, such as hand-pulling of vegetation, has the potential to disturb archaeological resources. No historic properties would be affected provided the proposed action: 1) complies with the Mitigation Measures in Table 2-9 of the PEIS, 2) complies with the *Final Historic Properties Management Plan* prepared for the SRPL project, 3) demarcates protected exclusionary zones for the application of herbicides as Environmentally Sensitive Areas (ESAs) within 50 feet of all archaeological sites and all culturally sensitive areas, and 4) ensures an archaeological monitor must be present during hand pulling of invasive plants within cultural resource ESAs.

*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.*

Previous grading and clearing of the SRPL eliminated the habitat for special status species. Treatment crews have been trained on the recognition of sensitive resources and actions required should they be detected to avoid additional impacts. Biological monitoring will also occur in areas that require additional clearance for special status species as identified in the EA. Mitigation measures were identified (p. 2-5) in the Vegetation Treatment PEIS ROD as well as in the SRPL FEIR/EIS and BLM ROD for the SRPL. Formal consultation was required for the SRPL under Section 7 of the Endangered Species Act (ESA) with the U.S. Fish and Wildlife Service (FWS) and a Reinitiated Biological Opinion (FWS-08B0423-11F0047) was issued on November 10, 2010. The Reinitiated Biological Opinion requires control of invasive species (General Conservation Measure 47) and implementation of the approved WCP which allows the use of herbicides. The PUP involves the application of certain herbicide active ingredients on BLM lands consistent with the approved WCP.

*10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.*

The approved action does not violate any known Federal, State, or local law or requirement imposed for the protection of the environment. Herbicides will be used under the direction of a professional pesticide applicator with either a Qualified Applicator License or Pesticide Applicator License in the state of California. The Proposed Action is in conformance with all applicable 43 CFR (Code of Federal Regulations). The EA and supporting SRPL project record contain discussions pertaining to the Endangered Species Act, National Historic Preservation Act, Clean Water Act, Clean Air Act, and Executive Order 12898 (Environmental Justice). The

Proposed Action would not violate the Migratory Bird Treaty Act or Endangered Species Act. A Reinitiated Biological Opinion (BO) pursuant to Section 7 consultation was issued by the U.S. Fish and Wildlife Service to the BLM for the Sunrise Powerlink on November 10, 2010. State, local, and tribal interests were consulted during the environmental analysis process for the SRPL. No violations or inconsistencies of these interests were noted or left unresolved. Furthermore, the approved proposed action is consistent with applicable land management plans, policies, and programs.

**FINDING OF NO SIGNIFICANT IMPACT:** Environmental impacts associated with the proposed action have been assessed. Based on the analysis provided in the attached EA (DOI-BLM-CA-D070-2014-0015-EA), I conclude the approved action is not a major federal action and will result in no significant impacts to the environment under the criteria in Title 40 CFR 1508.18 and 1508.27. 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.



Thomas F. Zale  
Field Manager  
Bureau of Land Management  
El Centro Field Office  
1661 S. 4<sup>th</sup> Street  
El Centro, California 92243

4/29/2014  
Date

## References:

- Bureau of Land Management (BLM). 2007a. Vegetation Treatments using Herbicides on Bureau of Land Management Lands in 17 Western States. Programmatic Environmental Impact Statement (PEIS). Available at: [http://www.blm.gov/wo/st/en/prog/more/veg\\_eis.html](http://www.blm.gov/wo/st/en/prog/more/veg_eis.html). Accessed April 2013.
- BLM. 2007b. Record of Decision for the Vegetation Treatments using Herbicides on Bureau of Land Management Lands in 17 Western States. Available at: [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/veis/dear\\_reader\\_letter.Par.95872.File.dat/RecordofDecision.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/veis/dear_reader_letter.Par.95872.File.dat/RecordofDecision.pdf). Accessed April 2013.
- BLM. 2009. Record of Decision for the Sunrise Powerlink Project and Associated Amendment to the Eastern San Diego County Resource Management Plan San Diego County, California. Available at: [http://www.blm.gov/ca/st/en/info/fed\\_reg\\_archives/2008/october\\_2008/sunriseeis-eir.html](http://www.blm.gov/ca/st/en/info/fed_reg_archives/2008/october_2008/sunriseeis-eir.html). Accessed April 2013.
- BLM. 1999. California Desert Conservation Area (CDCA) Management Plan. U.S. Department of the Interior, Bureau of Land Management, California Desert District, Riverside. Available at [http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/cdd/cdcaplan.Par.15259.File.dat/CA\\_Desert\\_.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/cdd/cdcaplan.Par.15259.File.dat/CA_Desert_.pdf)
- California Public Utilities Commission/Bureau of Land Management (CPUC/BLM). 2008. Final Environmental Impact Report/Environmental Impact Statement EIR/EIS and Proposed Land Use Amendment for the Sunrise Powerlink Project. Available at: <http://www.cpuc.ca.gov/Environment/info/asp/sunrise/sunrise.htm>. Accessed April 2013.
- San Diego Gas and Electric. 2009/2010. Weed Control Plan for the Environmentally Superior Southern Route of the SDG&E Sunrise Powerlink Project, San Diego and Imperial Counties, California. Prepared by RECON Environmental Inc. San Diego, CA.