Comment Set E4, cont.
Southern California Edison Company

SCE COMMENTS ON DPV2 DEIR/DEIS
DEVERS HELIPAD RELOCATION, AUGUST 2006

Section	Page	Line	Comment	Remarks/How Suggested to Resolve
D.9.2.8	D.9-5	4th line	SCE proposes to relocate a helipad that is currently located on SCE's Devers Substation property. The relocation is needed to make room for the addition of equipment for the DPV2 Project. The heliport relocation site includes a maximum 150 foot x 150 foot concrete pad, a 3 foot high wire fence and a 12 foot x about 250 foot service road from Devers Substation to the site. The relocation site is shown in the attached figure. An intensive cultural resource survey and resource inventory was conducted on August 8, 2006 by SCE's consultant Mooney Jones and Stokes. A letter report documenting the results of the survey is attached. The survey encompassed the area shown in the red bordered area shown in the letter report. This area includes the Devers Substation area where the new equipment will be located. No cultural resources were identified on the proposed use areas although a site was found (refer to report figure) in the most northeastern quadrant of the study area. A reconnaissance level biological site assessment survey of the project area was conducted on August 8, 2006 by SCE's consultant (TRC Essex). A letter report documenting the results of the field survey is attached. No CNDDB listed species were found, however the potential for several listed species exists. Therefore, the study report recommends that focused surveys be conducted for the Desert tortoise and the Coachella Valley milk-vetch prior to ground disturbing activities. SCE will follow this recommendation	SCE requests that the proposed Devers helipad relocation site and environmental analysis described in the comment to the left be included in the DPV2 DEIR/DEIS.

E4-7

E4-8

E4-9

Comment Set E4, cont.
Southern California Edison Company

Mooney · Jones & Stokes

10 August 2006

Mr. Thomas T. Taylor, Manager
Natural & Cultural Resources
Environment, Health & Safety Division
Southern California Edison
Post Office Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770

Subject: Results of cultural resource inventory for the proposed Devers substation helipad project

E4-8

Intensive archaeological survey and resource inventory was conducted 8 August 2006 for the proposed Devers substation helipad project in eastern Riverside County, California (Figure 1). This technical study was conducted in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4321 and 4331-4335), the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC 470 et seq.), and the requirements set forth in *Protection of Historic Properties* (36 CFR 800), implementing regulations of the NHPA. This level of examination and study further satisfies the project review requirements of the California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code § 21000 et seq.), and complies with the Guidelines for Implementation of the California Environmental Quality Act (California Code of Regulations, Title 14, § 15000 et seq.).

SCE proposes to construct a replacement helipad and service road on acreage adjacent to the east of the existing developed substation footprint, within the SCE substation property boundary. Because the actual location for construction of helipad and access roads is not yet determined, all of the available acreage—an approximate 40 acres—was subjected to background research and intensive archaeological survey.

Jones & Stokes Associates (JSA) prepared the cultural resource inventory for the proposed DPV-2 T/L undertaking (Eckhardt, Walker, and Carrico 2005), and maintains a geographical information system (GIS) project file of the cultural resource inventory for the high voltage transmission line corridor extending from Devers substation to the Colorado River. Record search information in use in this file was last updated April 2004 (Eckhardt et al. 2005:25-27). These records were reviewed and existing data applied to the current project.

Results of background research were positive: one previously recorded sparse lithic scatter (P33-0113563) was identified adjacent and outside of the survey project area.

Intensive archaeological survey was conducted 8 August 2006 by JSA archaeologists Andrea M. Craft and Koji Tsunoda. The target parcel areas were easily distinguished, and vegetation provided no limitation to survey. Methods included use of standard 12-15m transects intervals between team members, systematically examining the area of potential effect. Handheld GPS units were used to record survey coverage and records.

Results of survey reveal a cluster of five historic refuse deposits in the northeastern most quadrant of the study area (Figure 2). These deposits are each small (0.5 to 1.5m diameter), discrete deposits of fragmented sanitary cans, ceramics, and glass; among them one deposit with sun colored amethyst glass fragments. No additional cultural resource sites are present within the project boundaries.

9903 Businesspark Avenue • San Diego, California 92131 • tel. 858.578.8964 • fax 858.578.0578
www.jonesandstokes.com

Comment Set E4, cont.
Southern California Edison Company

Because of the new resource discoveries in the northeastern most portion of the project area, further effort is warranted to properly record and report this new resource finding. In terms of the proposed construction, it is recommended that this portion of the project area be removed from consideration for location of the helipad and service road. Until proper recording and site evaluation are conducted, it is further recommended that SCE avoid impacting or disturbing this area of the project site.

E4-8 cont.

This letter provides you with the immediate information necessary for your planning and review process. A single Department of Parks and Recreation Primary Record form is in preparation and will be forwarded to the California Historical Resource Information System, Eastern Information Center, for assignment of a primary record number. If you have questions or require further information, please contact me at your convenience. Thank you.

William T. Eckhardt
Senior Archaeologist
Mooney • Jones & Stokes

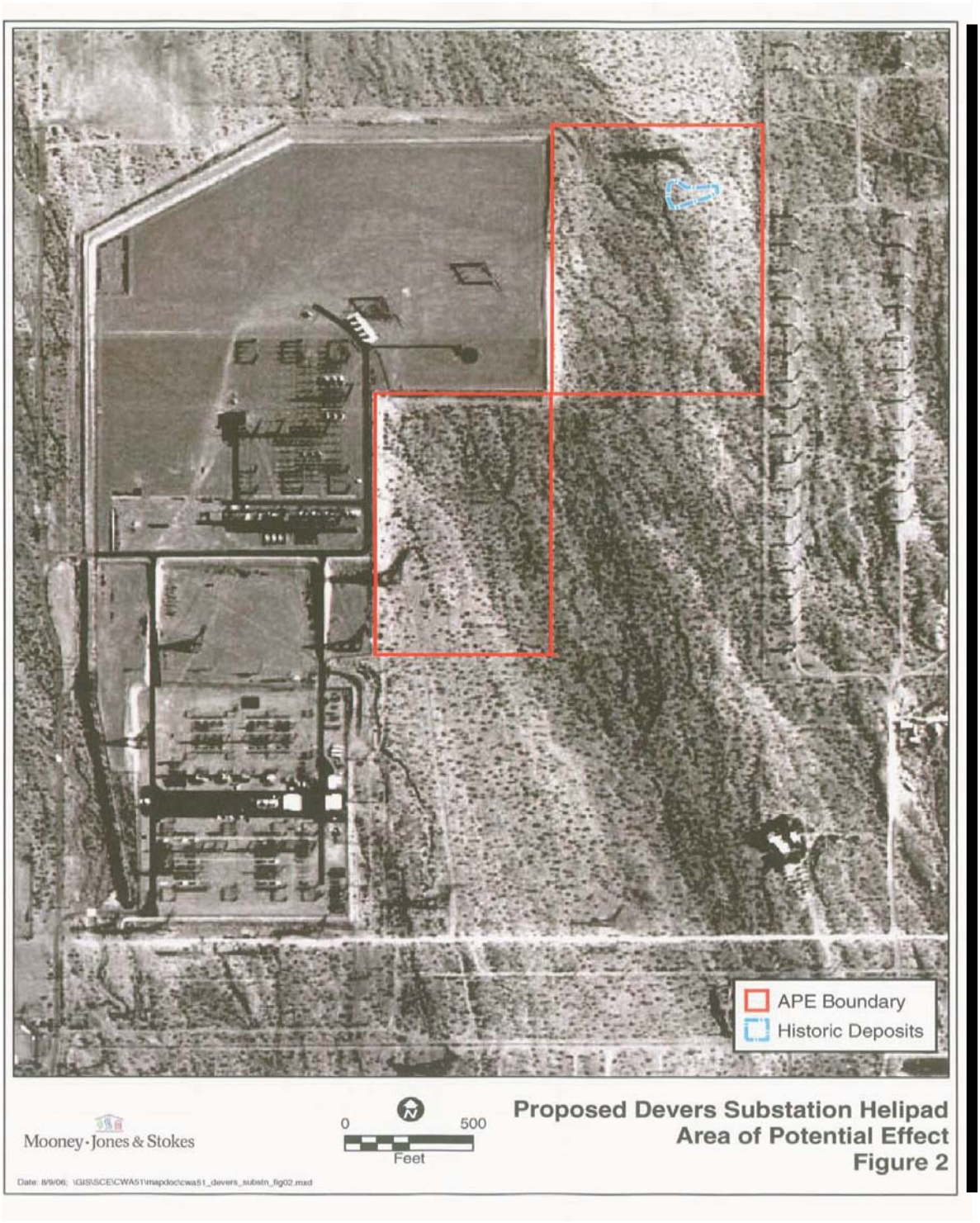
Reference Cited

Eckhardt, William T., Kristen E. Walker, and Richard L. Carrico
2005 Cultural Resources Inventory of the Proposed Devers to Palo Verde II 500 kV Transmission Line, Riverside County, California.

Comment Set E4, cont.
Southern California Edison Company

E4-8 cont.

Comment Set E4, cont.
Southern California Edison Company



E4-8 cont.

Comment Set E4, cont.
Southern California Edison Company

TRC Essex

1903 WRIGHT PLACE, SUITE 190
CARLSBAD, CA 92008
TEL: (760) 603-1740 FAX: (760) 603-1750

MEMORANDUM

TO:	KRISTI BOKEN – SOUTHERN CALIFORNIA EDISON
FROM:	PAULA POTENZA
SUBJECT:	DEVERS SUBSTATION HABITAT ASSESSMENT – BIOLOGICAL SITE ASSESSMENT REPORT
DATE:	AUGUST 10, 2006
CC:	

At the request of Southern California Edison (SCE), on August 8, 2006, Paula Potenza conducted a reconnaissance-level pre-construction habitat or biological site assessment of two areas located immediately adjacent to the east side of the Devers Substation. The Devers Substation and the survey area are located at the northeast corner of Diablo Road and Power Line Road within the City of North Palms Springs, Riverside County, California.

E4-9

Project Description

Southern California Edison is proposing to construct facilities on all or portions of the survey area immediately east of the Devers Substation. The survey area consists of two rectangular plots. The northern most plot is approximately 21.3 acres in size and the southern-most plot is approximately 11.3 acres in size.

Findings

A reconnaissance-level habitat or biological site assessment survey was conducted to identify vegetation types within the project area and to determine the presence of sensitive biological resources and the potential for them to occur within the project area. The survey was conducted between 10:15 a.m. and 1:00 p.m. on August 8, 2006. Weather conditions consisted of clear skies, temperatures ranging between 96 and 103 degrees Fahrenheit, and winds ranging between 1 and 8 miles per hour.

The project area consists of flat to slightly undulating terrain that gently slopes to the south within an undeveloped area composed of creosote bush desert scrub vegetation. The survey area ranges from approximately 1,110 to 1,170 feet above the average mean sea level and is crossed from the northwest to the southeast with several dry, sandy bottom washes, Representative photographs are located at the end of this report. The developed Devers Substation is located immediately west of the survey area, a wind farm with unpaved access roads and creosote bush desert scrub vegetation is located immediately east of the survey area, open desert with creosote bush desert scrub vegetation is located north of the survey

Comment Set E4, cont.
Southern California Edison Company

area, and to the south of the survey area are a few scattered rural homes and businesses and paved and unpaved roads surrounded by creosote bush desert scrub vegetation.

E4-9 cont.

The vegetation type found in the project area consists of Mojave creosote bush scrub vegetation. The Mojave creosote bush scrub community observed in the survey area is dominated primarily by creosote bush (*Larrea tridentata*), burro-weed (*Ambrosia dumosa*), desert brittlebush, (*Encelia farinosa*), and with additional shrub components of rhatany (*Krameria grayi*), barrel cactus (*Ferocactus cylindraceus*), and teddy-bear cholla (*Opuntia bigelovii*).

Wildlife species observed during the reconnaissance-level survey include: side-blotched lizard (*Uta stansburiana*), western whiptail (*Aspidoscelis [Cnemidophorus] tigris*), common raven (*Corvus corax*), loggerhead shrike (*Lanius ludovicianus*), red-tailed hawk (*Buteo jamaicensis*), antelope ground squirrel (*Ammospermophilus leucurus*), black-tailed jackrabbit (*Lepus californicus*), and desert wood rat (*Neotoma lepida*).

One old and unoccupied burrow (GPS Coordinate: Latitude 33° 56´ 30.5´´/Longitude 116° 34´ 19.4´´) with the potential for desert tortoise occupation (*Gopherus agassizii*) was observed during the survey. No other desert tortoise sign was observed and the burrow was partially collapsed; however, the location of the burrow (under a creosote bush) and its large size make it suitable for use by a desert tortoise. The burrow was observed in the northern most plot or survey area, approximately 150 feet south of an existing steel lattice tower structure located near the northern boundary of the plot. See photograph at the end of this report.

Potential Impacts

Although various sensitive plant and wildlife species are known to occur within vegetation similar to that found within the project area, the majority of these species are not Federal or State endangered or threatened and will not be addressed in this assessment report. A search of the California Department of Fish and Game's (CDFG) California Natural Diversity Database (CNDDB) within three miles of the project area found one listed animal and one listed plant species with the potential to occur within the survey area. One additional listed animal species not listed by the CNDDB also has the potential to occur within the survey area. These three species are:

- desert tortoise - federally threatened, state threatened;
- Coachella Valley fringed-toed lizard (*Uma inormata*) - federally threatened, state endangered; and,
- Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*) - federally endangered.

The CNDDB did not list desert tortoise for this area; however, Mojave creosote bush scrub vegetation suitable for this species is found within the project area, and one burrow potentially suitable for desert tortoise was observed during the site assessment survey. Therefore, there is a low potential for desert tortoise to occur within the survey area and vehicle traffic and ground disturbing activities within Mojave creosote bush scrub habitat within the survey area could potentially impact this species.

Coachella Valley fringed-toed lizard is restricted to the Coachella Valley, historically from Cabozan southeast to Thermal, which encompasses the Devers Substation and the survey

Comment Set E4, cont.
Southern California Edison Company

area. Coachella Valley fringed-toed lizard has been documented in the vicinity of the Devers Substation. However, current populations of the Coachella Valley fringe-toed lizard are know to occur in the Coachella Valley east of the project. In addition, this species is restricted to areas with fine, wind-blown sand of dunes, flats, riverbanks, and washes with sparse vegetation. Even though several of the dry washes crossing the survey area have loose, fine to coarse sandy bottoms, no accumulations of fine, wind-blown sand or sand dunes were observed within the survey area. It is unlikely that this species occurs in the survey area: therefore, no impacts to the Coachella Valley fringed-toed lizard are expected as a result of ground-disturbing activities within the survey area.

E4-9 cont.

Coachella Valley milk-vetch was not observed during the site assessment survey; however, this species has been documented in the vicinity of the project area. In addition, because the site assessment was conducted in August, which is outside of this plant species flowering period (February to May), and due to the extreme heat of the desert summer, which has resulted in many of the plants within the survey area dropping their leaves from dessication, individuals may not have been in a detectable condition during the site assessment survey. Because this milk-vetch is found in desert scrub habitat with sandy and/or gravelly substrates associated with desert washes and river flood plains with sandy alluvial deposits similar to the habitat observed within the survey area, the Coachella Valley milk-vetch could occur within the survey area. Therefore, impacts to this species could occur if this species was present in the survey area, but not identifiable at the time of the survey.

In summary, because SCE is proposing to construct within the survey area immediately adjacent to the east side of the Devers Substation, there is potential for impacts to sensitive biological resources to occur as a result of construction activities.

Recommendations

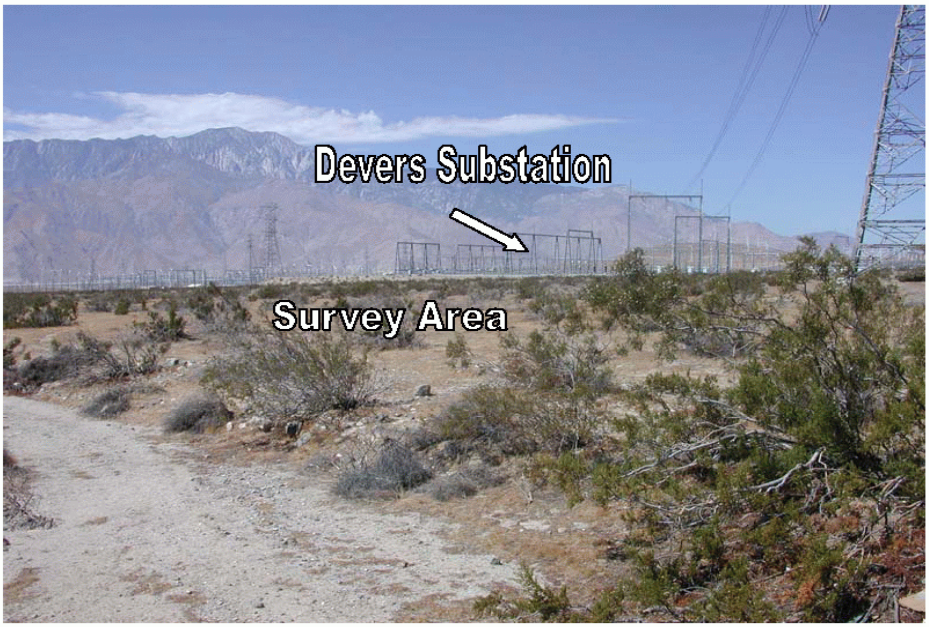
To avoid or minimize impacts to biological resources as a result of project-related activities within the survey area, it is recommended that focused surveys should be conducted for the following species prior to any ground disturbing activities:

- Desert tortoise.
- Coachella Valley milk-vetch.

Please call me if you have any questions.

Comment Set E4, cont.
Southern California Edison Company

E4-9 cont.

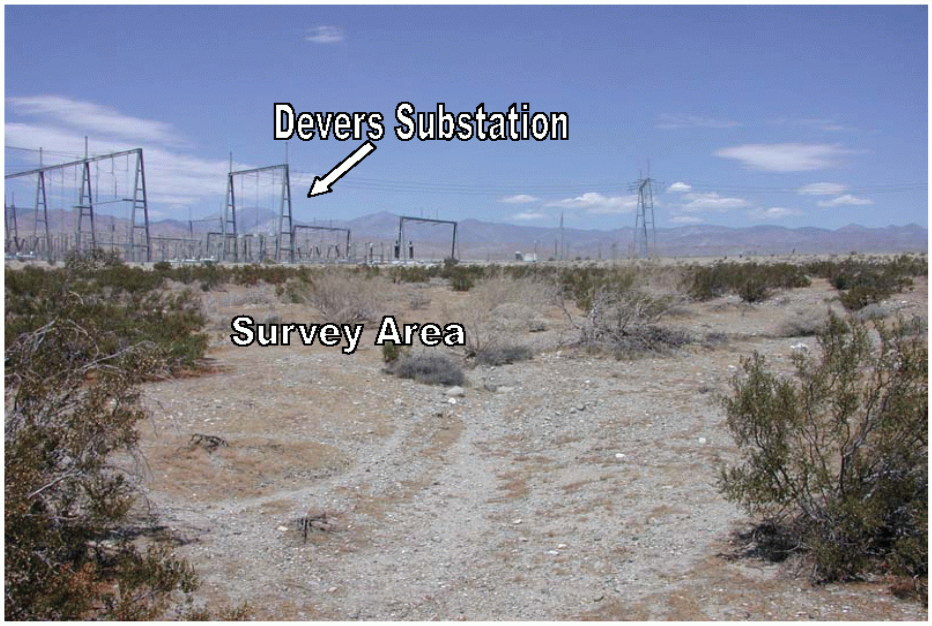


Northern-most portions of the survey area with Mojave creosote bush scrub vegetation and sandy wash, facing southwest.

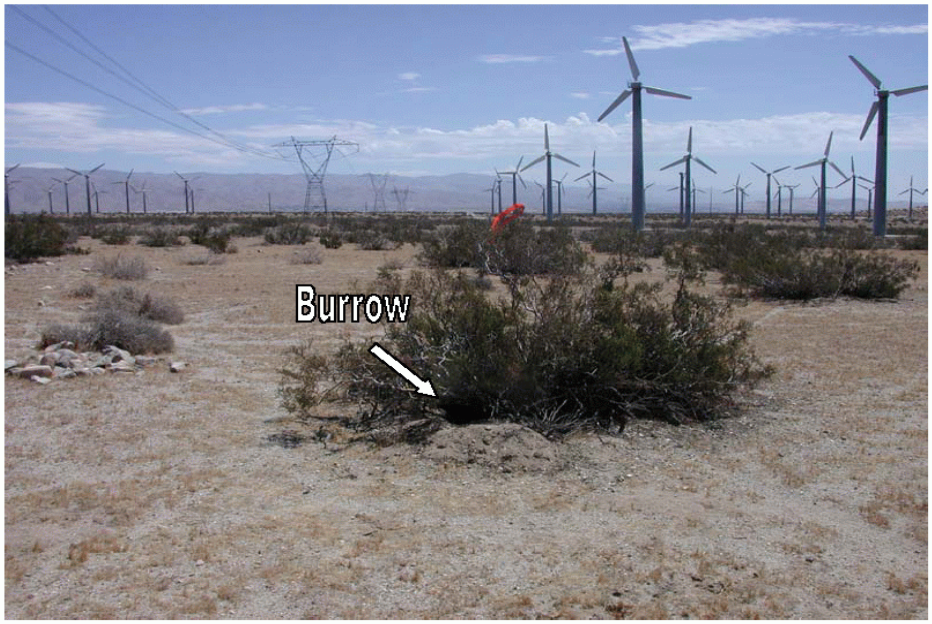
Northern-most portion of the survey area with Mojave creosote bush scrub vegetation and wind farm, facing east.

Comment Set E4, cont.
Southern California Edison Company

E4-9 cont.



Southern-most portion of the survey area with Mojave creosote bush scrub vegetation and a sandy wash, facing northwest.



Burrow observed within the northern-most portion of the survey area, facing east.

5

Responses to Comment Set E4
Southern California Edison Company

E4-1 SCE's preference for the Devers-Valley No. 2 Alternative has been noted.

E4-2 SCE's preference for the Devers-Valley No. 2 Alternative has been noted. Please refer to Comment Set A15 for comments submitted by the U.S.D.A. San Bernardino National Forest, which states the Forest's intent to issue permits and amend/issue an easement based on SBNF requirements. The National Forest is a cooperating agency and BLM is working with them to resolve any concerns regarding this alternative. Section C.4.3.1 (page C-24 of the EIR/EIS) has been modified as follows:

> While a portion of the corridor ~~is within~~ traverses a designated wilderness area, the SCE transmission corridor was specifically excluded from wilderness by Congress (see detail in Section 4.3.1 in Appendix 1).

E4-3 BLM believes that the easement along the northern end of the Potrero ACEC is on its land. If necessary, SCE can contact BLM Realty staff to further discuss the matter.

E4-4 SCE's opposition to the Alligator Rock–North of Desert Center Alternative has been noted. The proposed DPV2 route in the Alligator Rock Area of Critical Environmental Concern (ACEC) area, as well as most of the North of Desert Center Alternative, would be located on BLM land. Therefore, the decision regarding which of the Alligator Rock area alternatives to implement will be made by the BLM based on the requirements of federal and state laws and regulations, BLM's resource values and BLM-management guidelines.

The information that SCE submitted with this comment has been reviewed and considered, but the conclusion regarding the North of Desert Center Alternative has not been changed. The following points respond to the four bullets presented as comments on Section ES 1.1:

- Bullet 1: "The route crosses both BLM land and private land." This statement is correct.
- Bullet 2: "The cost to construct 12 miles of new access roads along the reroute." The EIR/EIS does not consider cost as a major consideration in comparison of alternatives, as long as the alternatives are found to be feasible. Cost is a factor that can be considered by the CPUC and the BLM in their decision processes.
- Bullets 3 and 4: "The annual costs to maintain the additional 12 miles of new access roads" and " … costs to patrol a separate … corridor." As stated above, the EIR/EIS focuses on environmental impacts, rather than costs. The EIR/EIS analysis considered the requirement for new access roads and weighed that impact against the additional disturbance within the ACEC and concluded that avoidance of the ACEC was a priority.

The other issues raised by SCE in this comment, and responses to each, are as follows:

- SCE states that the proposed DPV2 route would minimize biological impacts because it would use existing access roads. While it is correct that the North of Desert Center Alternative would require construction of new access roads, these roads would be through lower quality desert tortoise habitat. With the alternative, no new construction within the ACEC, where biological resources are highly valued, would occur.

- SCE states that the DPV2 tower locations were chosen at the time of construction of DPV1 to avoid cultural resources. While the tower locations may minimize impacts to cultural resources, impacts would still occur within the ACEC which was created primarily to protect the highly valuable cultural resources of the area. Avoidance of all new construction within the ACEC is the best way to protect remaining resources.

- SCE states that wilderness impacts are "mitigated" by the presence of the existing DPV1 line. EIR/EIS Section D.5.6, under Impact WR-2 (Operation would change the character of a recreation or wilderness area, diminishing its recreational value), the impact conclusion states the following: "The existing DPV1 transmission line has already introduced an industrial land use across the ACECs [Chuckwalla Valley Dune Thicket ACEC and Alligator Rock ACEC]. While the Proposed Project would not introduce a new industrial use across an undeveloped recreational resource, it would intensify the industrial nature of the ROW through the construction and operation of new towers and spur roads across the ACECs." As a result, the impact to recreation and wilderness is considered to be significant and unmitigable.

- SCE states that visual impacts associated with the North of Desert Center route are significantly greater due to two crossings of the I-10 required by that alternative. This conclusion is not supported by the analysis in the EIR/EIS. In Visual Resources Section D.3.8.5, the visual impact of the alternative is evaluated in Impact V-37 (Inconsistency with Interim BLM VRM Class III management objectives due to the introduction of structure contrast, industrial character, view blockage, and skylining when viewing the Chuckwalla Mountains from Key Viewpoint 31 on southbound Kaiser Road, north of Desert Center). This impact is found to be significant and unmitigable (Class I). In the analysis of the Proposed Project through the ACEC, Impact V-15 considers the "Inconsistency with Interim BLM VRM Class II management objective due to increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 10 in the Alligator Rock ACEC." This impact is also found to be significant and unmitigable (Class I). Nothing in the EIR/EIS provides a means by which one of these significant impacts can be found to be *more* significant than the other.

- SCE states that Table E-2 shows four environmental issues preferred for the proposed DPV2 route as compared with three issues preferred for the North of Desert Center Alternative. Counting environmental issue areas is not an accurate way to compare impacts. Impacts to biological and cultural resources are by far the most important in this area, because those are the values protected by the ACEC.

In conclusion, the EIR/EIS finds the Alligator Rock–North of Desert Center Alternative to be environmentally superior because it would minimize important biological, cultural, and wilderness area impacts within the ACEC, even though it would be closer to populated areas and would require two crossings of the I-10. However, as noted in EIR/EIS Section E.1.3, although this EIR/EIS identifies an environmentally superior alternative, it is possible that the CPUC and BLM decisionmakers could balance the importance of each impact area — or of the costs of alternatives — differently and reach a different conclusion.

E4-5 This comment suggests that reconfiguration of towers through the Alligator Rock Area of Critical Environmental Concern (ACEC) could reduce adverse effects of construction of the Proposed Project on cultural resources. Specifically, the letter states that "SCE is propos-

ing that only [emphasis added] type EHT-S towers will be used for suspension purposes on the proposed DPV-2 T/L within the Alligator Rock ACEC. The exclusive use of type EHT-S suspension towers and typical dead-end and angle suspension towers through Alligator Rock ACEC will significantly reduce the potential for tower failure... therefore reducing the estimated APE for DPV-2 towers in the Alligator Rock ACEC to a 150 ft radius tower pad; an area roughly 1.76 acres in size".

There appears to be some confusion about the analysis and assessment presented in the comment. The comment states that EHT-S suspension towers will be used exclusively [emphasis added] through the ACEC. However, further clarification received from SCE on August 22, 2006 (email from Gary Dudley, SCE to Susan Lee, Aspen) states that "SCE has proposed that only the Type EMT suspension towers originally proposed for use in the Alligator Rock area would be replaced with Type EHT-S suspension towers. Only 2 of the 25 proposed DPV#2 towers within the ACEC are Type EMT towers." In fact, Table 1 of the comment shows that the majority of the suspension towers will be Type EMS.

The comment also implies that the new configuration of towers will greatly reduce the Area of Potential Effect (APE) from that analyzed in the DEIR/DEIS. The comment suggests that the APE for each tower will be reduced from 11.5 acres to 1.76 acres (a 150 ft radius). This 11.5 acre APE is based on actual disturbance that occurred around a Type EMT suspension tower in the Alligator Rock ACEC when it failed on 1 July, 2006 (after the impact analysis in the Draft EIR/EIS was completed). The impact analysis in the Draft EIR/EIS is based on an average 200 ft radius around each tower site. The Draft EIR/EIS impact analysis is not based on an 11.5 acre APE for towers because the analysis did not consider the consequences and impacts of rare and unforeseeable tower failure. Therefore, the letter's implication that the APE will be greatly reduced by the use of Type EHT-S towers is exaggerated and faulty.

Finally, even if the actual construction impacts around each tower are reduced to 150 ft from the 200 ft analyzed in the Draft EIR/EIS, the impact analysis and mitigation measures are unchanged. The Draft EIR/EIS assumes that most, if not all direct impacts to sensitive cultural resources within the Alligator Rock ACEC, and specifically those in the North Chuckwalla Mountains Quarry and Rock Art National Register districts will be avoided by careful siting of tower locations, stub roads, and access roads, as well as exclusionary fencing and construction monitoring. Only if avoidance is not feasible would other measures, such as NRHP evaluation and data-recovery investigations, be needed and warranted. The measures proposed in the Draft EIR/EIS to avoid direct impacts of the Proposed Project do not differ from those in the comment letter. Therefore, the conclusions reached in the Draft EIS/DEIR remain unchanged.

E4-6 The description of the Harquahala Mountain Communications site in Section B.3.6.1 has been modified so it is consistent with the revised description provided by SCE. The conclusions of significant (Class I) impacts in Visual Resources, Cultural Resources, and Wilderness/Recreation have not been changed because the site changes did not substantially reduce impacts in these areas.

It is noted that the submittal by SCE (on pages 5 and 6) addresses potential alternatives to use of the Harquahala Mountain site, and explains why these other sites would not function adequately.

E4-7 Information about the helipad relocation site and the associated figure (Figure B-17a in the Final EIR/EIS) has been added to Section B.3.4.1 (Devers Substation) as follows:

> In addition, SCE proposes to relocate a helipad that is currently located on SCE Devers Substation property (see Figure B-17a). SCE has stated that the relocation is necessary to make room for the addition of equipment for the DPV2 Project. The heliport relocation sites would include a maximum of 150 feet by 150 feet concrete pad, a 3-foot high wire fence, and a 250-foot service road (12 feet wide) from Devers Substation to the site.

The text in Section 4.3.1 regarding the Devers-Valley No. 2 Alternative and the proposed helipad relocation has been modified as follows:

> The relocation of the helipad at Devers Substation would also be required for this alternative. The relocation site is depicted on Figure B-17a.~~As shown in Figure Ap.1-9, construction of this alternative would require the expansion of the Devers Substation to the northeast, into an area already owned by SCE and currently disturbed, but not graveled. SCE estimates that approximately 24 acres would be required at Devers Substation to accommodate the new 500 kV interconnection and related equipment. Approximately 12 acres would be required to accommodate the extension of the new 500 kV interconnection and approximately 12 acres would be needed for the relocation of the heliport. Air Operations personnel is currently in the process of evaluating the relocation of the heliport and details of the relocation will be available after this study is complete.~~

E4-8 Information about the results of cultural resources surveys for the proposed helipad have been incorporated in the Cactus City Rest Area to Devers Substation sections (Section D.7.2.7 on page D.7-20 and Section D.7.6.7 on pages D.7-70 to D.7-72). The following new subsection has been added to Section D.7.2.7:

> Devers Substation
>
> One cultural resource was identified within a 40 acre area being considered for use as a replacement helipad and service road. This cluster of five discrete historical refuse scatters has not been formally recorded or evaluated for NRHP eligibility (Eckhardt, 2006).

Impact C-1 (Construction of the project could cause an adverse change to known historic properties) in Section D.7.6.7 has been modified as follows:

> There are three known prehistoric sites located within this segment and one newly discovered historical site at the Devers Substation (Table D.7-15)…
>
> …Four additional sites (CA-RIV-164T, CA-RIV-53T(b), P-33-13561, and P-33-13569) were located near the APE of this segment of the Proposed Project but were not within designated APEs. All four of these sites appear to be ineligible for NRHP listing. Lastly, a newly discovered cluster of historical refuse scatters occurs within a 40-acre area in which a new helipad and service road will be sited at the Devers Substation. This site has neither been formally recorded nor evaluated for NRHP-eligibility. Nonetheless, direct impacts would be avoided by implementation of Mitigation Measures C-1b (Avoid and protect potentially significant resources), C-1e (Monitor construction), and C-1f (Train construction personnel).

E4-9 Sections D.2.2.7 of the Draft EIR/EIS describes the potential occurrence of the Coachella Valley milkvetch (page D.2-66), desert tortoise (page D.2-67), and Coachella Valley fringe-toed lizards (page D.2-67) in the areas adjacent to the Devers Substation. The information provided in the Devers Substation Habitat Assessment – Biological Site Assessment Report (prepared by TRC Essex and dated August 10, 2006) regarding the potential occurrence of these species near the Devers Substation is consistent with the information reported in the Draft EIR/EIS.

Section D.2.5.2 of the Draft EIR/EIS provides the Applicant Proposed Measures that are related to the protection of listed plants and wildlife species. Many of these measures generally address the protection of listed and sensitive plants and wildlife (APM's B-2, B-3, B-12, B-16 through B-18, B-26, and B-33) but there are also measures designed to specifically address and protect the Coachella Valley milkvetch (APM's B-26 and B-33), desert tortoise (APM's B-27 through B-32 and B-35), and Coachella Valley fringe-toed lizard (APM's B-26, B-33, and B-36).

Section D.2.6.1 of the Draft EIR/EIR describes the impacts of transmission line construction on the biological resources. Section D.2.6.1.6 specifically addresses the impacts on threatened and endangered species. Impact B-6 on page D.2-120 begins the discussion of the indirect or direct loss of listed plants that may result from project implementation. The potential impacts to Coachella valley milkvetch in the segment between the Cactus City Rest Area and Devers Substation are specifically addressed on page D.2-122. Mitigation Measure B-6a (Develop a transplanting plan) will be implemented to provide additional protection for this species and other listed and sensitive plant species.

Impact B-7 on page D.2-124 begins the discussion of indirect or direct loss of listed wildlife or habitat that may result from project implementation. The discussion of potential impacts on the desert tortoise in the Cactus City Rest Area to Devers Substation segment is described on page D.2-128. Mitigation Measures B-7b (Pre-construction surveys) and B-7c (Purchase of mitigation lands) will be implemented to provide additional protection for this species. In addition, Mitigation Measure B-1a (Prepare and implement a Habitat Restoration/ Compensation plan) will also be implemented to restore habitat for the tortoise.

The potential impacts of the project on the Coachella Valley fringe-toed lizard are discussed under Impact B-7 on pages D.2-131 and D.2-132. Mitigation Measure B-7d (Purchase mitigation lands for Coachella Valley fringe-toed lizard) will be implemented to provide additional protection for this species.