

*Southern California Edison*  
**ELM Project A.18-05-007**

**DATA REQUEST SET A1805007-ED-SCE-DEF-002**

**To:** ENERGY DIVISION  
**Prepared by:** Rey Gonzales  
**Title:** Environmental Project Manager  
**Dated:** 08/27/2018

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**Question 60:**

The BRTR Section 4.2 indicates that surveys were conducted for several resources. Table 7 indicates acreages surveyed for each resource, and attachments to the BRTR include a series of maps indicating survey areas and special-status species observations. However, these acreages and mapping data do not correspond clearly to the proposed disturbance areas shown on the route maps. The methods section indicates that field surveys were conducted with a Biological Resources Survey Area (BRSA), described as “composed of the Proposed Project area and a buffer of variable widths...” However, the text does not define or map the Proposed Project area or BRSA. Additionally, the text does not indicate if the potential staging yard locations were surveyed for biological resources.

**Q.60. Please provide a definition of the “Proposed Project area” and any “buffer”, as used during the surveys.**

**Response to Question 60:**

The Proposed Project area consists of the total footprint of the project, which includes all work areas, staging yards, landing zones, and access roads as identified in Chapter 3 – Project Description of the Proposed Project’s Proponent’s Environmental Assessment.

Buffers were used to expand the initial Proposed Project area to allow for the initial survey effort to progress while attempting to account for the expected expansion, contraction, and relocation of work areas and other construction areas during the design phase. Because the Proposed Project design has evolved over time, these original buffers are no longer directly correlated to the latest design data. Potential staging yards were surveyed. The Excel spreadsheet prepared in response to Deficiency Question 63 provides a detailed accounting of the survey efforts by Proposed Project disturbance area.

As described in response to Deficiency Question 60, GIS data representing the survey areas for each resource type and the combined Biological Resources Survey Area is being provided concurrently as Attachment: ELM\_Q#60\_Bio-Hydro Survey Areas\_20180925 which will provide the biological survey boundaries.

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**Question 61:**

The BRTR Section 4.2 indicates that surveys were conducted for several resources. Table 7 indicates acreages surveyed for each resource, and attachments to the BRTR include a series of maps indicating survey areas and special-status species observations. However, these acreages and mapping data do not correspond clearly to the proposed disturbance areas shown on the route maps. The methods section indicates that field surveys were conducted with a Biological Resources Survey Area (BRSA), described as “composed of the Proposed Project area and a buffer of variable widths....” However, the text does not define or map the Proposed Project area or BRSA. Additionally, the text does not indicate if the potential staging yard locations were surveyed for biological resources.

**Q.61. For the BRSA, identify on maps or GIS data the geographic limits of the areas surveyed, including the potential staging yards. If biological survey results are available in GIS format, provide a GIS data set that can be combined with previously provided project GIS data to identify these areas relative to project elements and work activities.**

**Response to Question 61:**

The GIS shapefiles of the Biological Resources Survey Area are provided in Question 60.

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**Question 62:**

According to Table 7 (Surveys Conducted in the BRSA), varying numbers of acres were surveyed for special-status plants and other resources, on various dates. The two 2016 rare plant surveys each covered 2,511 acres; smaller areas were surveyed in March and May 2017, and the only fall season surveys (Sep-Oct 2017) covered 774 acres. The desert tortoise surveys covered 1,342 acres. Surveys for listed riparian birds covered smaller acreages. The location of survey results is often difficult to identify. It is not clear that potential yard areas were surveyed.

**Q.62. For each potential staging yard location, please provide survey information equivalent to that provided for the other proposed disturbance areas (vegetation mapping, tortoise surveys, rare plant surveys, riparian bird surveys if appropriate) as well as additional survey data and habitat characterization identified below (burrowing owl, MFTL).**

**Response to Question 62:**

All 17 potential staging yards identified in the Biological Resources Technical Report (BRTR) were included in the habitat assessment and vegetation mapping effort (small portions of these staging areas were not included in the original assessments; however, full coverage of these sites was obtained during visits associated with other survey efforts). In addition, they were surveyed for special-status plants, desert tortoise, and jurisdictional features. These sites were not surveyed for Least bell's vireo or Southwestern willow flycatcher due to a lack of suitable habitat for these species. As a result, the resources observed during these surveys are documented in the BRTR and associated reports.

A focused habitat assessment for burrowing owl (BUOW) will be conducted in October 2018 within impact areas totaling approximately 360 acres to identify suitable burrows in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Protocol surveys will be conducted in spring and fall of 2019 to determine the quality of the habitat within the approximately 360 acres; however, the area surveyed may be reduced if during the habitat assessment, some areas are determined to be unsuitable for BUOW. Additionally, pre-construction surveys will be conducted 7 to 14 days prior to construction. The 17 potential staging yards will be included in this habitat assessment. The potential habitat suitability for Mojave fringe-toed lizard is discussed in response to Question 70 and the potential habitat suitability for banded Gila monster, Bendire's thrasher, golden eagle, and pallid bat are discussed in response to Question 71.

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**Question 63:**

According to Table 7 (Surveys Conducted in the BRSA), varying numbers of acres were surveyed for special-status plants and other resources, on various dates. The two 2016 rare plant surveys each covered 2,511 acres; smaller areas were surveyed in March and May 2017, and the only fall season surveys (Sep-Oct 2017) covered 774 acres. The desert tortoise surveys covered 1,342 acres. Surveys for listed riparian birds covered smaller acreages. The location of survey results is often difficult to identify. It is not clear that potential yard areas were surveyed.

**Q.63. Please provide a table or spreadsheet identifying each proposed disturbance area (capacitor site, repeater site, new access, tower work area, helicopter landing zone, potential yard site, wire set up, etc.). Distinguish each site by a method (e.g., tower number, HLZ number, etc.) that can be cross linked to the project's GIS data. Also link each site to corresponding mapped locations provided in the surveys (e.g., desert tortoise survey map number, rare plant survey map number, etc.).**

**-For each proposed disturbance area please indicate**

**-- the number of acres of potential disturbance and**

**-- by resource:**

- **the actual acres surveyed (e.g., project area and any buffer)**
- **indicate whether the location has been surveyed for rare plants (during spring, fall, or both), desert tortoise, jurisdictional waters, other resources (LBV, SWWF, MFTL, etc.).**

**Response to Question 63:**

The attached Excel spreadsheet, ELM\_Q#63\_Survey-Impact Table\_20180926 includes the following for each disturbance area:

- A unique ID
- Area type
- Area name, if available
- Approximately temporary and permanent area of impact
- For each type of survey conducted The least Bell's vireo and southwestern willow flycatcher survey areas do not overlap with the Proposed Project's disturbance areas; thus, they are not included in the spreadsheet. (e.g., desert tortoise, special-status plant,

jurisdictional features):

- n The approximate percent of the disturbance area included in the survey boundary
- n The corresponding page(s) on the associated detailed mapbook
- For other field efforts (e.g., habitat assessment and the original vegetation survey), the approximate percent of the disturbance area included in the field effort

As noted in the spreadsheet, not all disturbance areas have 100-percent coverage for all of the identified surveys. In some instances, the data does not reflect 100-percent coverage due to minor variations between the final disturbance areas and survey boundaries. Minor slivers of “unsurveyed” areas exist across the project due to these issues. In practical terms, we consider these sites to be fully surveyed as field biologists walking transects routinely scanned areas adjacent to the survey boundaries to determine if biological and hydrological resources were present. In addition, field biologists were diligent to walk areas just outside of the survey boundaries to ensure full coverage within the planned survey area. As shown in the survey result maps that were included in the Biological Resources Technical Report, resources were regularly mapped outside of survey boundaries.

Additional justification for these discrepancies, by survey, is as follows:

- Desert Tortoise: Protocol-level desert tortoise surveys were conducted in 2016 and 2017. Given the results of these surveys, Southern California Edison (SCE) elected to assume presence of the species throughout the project area and to pursue an Incidental Take Permit from the California Department of Fish and Wildlife (CDFW). SCE engaged CDFW staff to discuss this decision, and concurrence with the approach was obtained on January 9, 2018, prior to conducting additional surveys.
- Jurisdictional Features: Surveys for potentially jurisdictional features were conducted in 2016, 2017, and 2018. Multiple rounds of surveys were required due to the expansion, relocation, and addition of disturbance areas associated with the progression of the project’s design. As a result of recent changes to the project design, some disturbance areas have not been surveyed. Approximately 0.02 acre of disturbance areas are not found within survey boundary due to minor deviations between the survey boundary and disturbance area boundary. Approximately 14.3 acres of disturbance areas were surveyed but not included in the survey boundary due to mapping errors. Approximately 17.6 acres of disturbance areas will be surveyed and the updated results will be presented to the California Public Utilities Commission (CPUC) as soon as they are available. In addition, approximately 26.1 acres of disturbance areas were excluded from the survey area due to them being previously disturbed/developed (e.g., an existing substation, paved road, parking lot) and therefore having no potential for jurisdictional features. The Excel spreadsheet contains annotations for these locations indicating if they were excluded due to previous development or will be surveyed in a future effort.
- Special-status Plants: Surveys for special-status plant surveys were conducted in 2016 and 2017 during the appropriate blooming periods. As described previously, the planned disturbances areas have been modified since these surveys due to the progression of the Proposed Project’s design. As described in Section 4.4 Biological Resources of the

Proponent's Environmental Assessment, with approval from the Bureau of Land Management, special-status plant surveys were not conducted in 2018 due to extreme drought conditions in the Mojave Desert, which prevented germination of annual plant species. As a result, another multiple-round special-status plant survey will be conducted for all disturbance areas during the appropriate blooming periods in 2019. The results of these surveys will be presented to the CPUC as soon as they are available.

- Habitat Assessment and Vegetation Surveys: The original habitat assessment was conducted on a wide corridor along the entirety of the project alignment in 2016. Vegetation surveys were also conducted in 2016. Due to the evolution of the project, disturbance areas are located outside of the boundaries of these surveys. Data was collected during the other surveys conducted for the project to supplement these original efforts. The Excel spreadsheet does not capture these supplemental efforts as specific survey boundaries were not prepared for these data collection efforts.

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**Question 64:**

According to Table 7 (Surveys Conducted in the BRSA), varying numbers of acres were surveyed for special-status plants and other resources, on various dates. The two 2016 rare plant surveys each covered 2,511 acres; smaller areas were surveyed in March and May 2017, and the only fall season surveys (Sep-Oct 2017) covered 774 acres. The desert tortoise surveys covered 1,342 acres. Surveys for listed riparian birds covered smaller acreages. The location of survey results is often difficult to identify. It is not clear that potential yard areas were surveyed.

**Q.64. Please describe the reasoning for the varying numbers of acres surveyed on the different field dates.**

**Response to Question 64:**

As stated in the introductory paragraph of Section 4.2 – Field Surveys in the Revised Biological Resources Technical Report (BRTR), several refinements were made to the Proposed Project's design after the original surveys were conducted. Some of these refinements were located outside of areas that were previously surveyed. As a result, additional surveys were conducted to ensure that the entirety of the Proposed Project was surveyed, as appropriate. An amended version of Table 7 from the Revised BRTR has been included (i.e., file "ELM Q#64 Table 7.pdf") to further explain the history of the surveys conducted for the Proposed Project.

ELM Series Capacitor Project  
Deficiency Question 64

Survey Type	Year	Date(s)	Approximate Area Surveyed (Acres)	Explanations for Differing Survey Areas	Location of Explanation in Documents
Habitat Assessment	2016	February 22 to February 24	41,600 <sup>1</sup>	Not Applicable (N/A)	N/A
Vegetation Community Mapping	2016	March 28 through April 16	2,511	After the completion of the Habitat Assessment in February 2016, an approximately 108-mile-long segment of the Eldorado – Lugo 500 kV Transmission Line was removed from the Proposed Project area. The remaining approximately 235 miles and their associated buffers constitute the original Biological Resources Survey Area (BRSA) of 2,511 acres.	Revised BRTR, <sup>2</sup> Section 4.2 – Field Surveys
Special-Status Plants	2016	March 28 to April 15	2,511	After the completion of the Habitat Assessment in February 2016, an approximately 108-mile-long segment of the Eldorado – Lugo 500 kV Transmission Line was removed from the Proposed Project area. The remaining approximately 235 miles and their associated buffers constitute the original BRSA of 2,511 acres.	Special-Status Plant Species Survey Report, Section 3.1 – Survey Methodology (Attachment B of the Revised BRTR)
		May 2 to May 18	2,511	No Change	N/A
	2017	March 29 to April 9	124	After the completion of the 2016 special-status plant surveys, SCE requested that Insignia survey an additional area (approximately 74 acres) due to Proposed Project refinements. During this survey, Insignia also resurveyed approximately 50 acres of the 2016 BRSA due to drought conditions that may have limited survey results in 2016. These resurveyed areas were chosen based on proximity to CNDDDB records of species with blooming periods corresponding to the timing of this survey.	Supplemental Special-Status Plant Species Survey Report, Section 1 – Introduction (Attachment C of the Revised BRTR)
		May 8 to May 15	74	After the completion of the 2016 special-status plant surveys, SCE requested that Insignia survey an additional area (approximately 74 acres) due to Proposed Project refinements. This survey was conducted to target plant species with a late spring blooming period that may not have been blooming during the March 29 to April 9, 2017 survey.	Supplemental Special-Status Plant Species Survey Report, Section 1 – Introduction (Attachment C of the Revised BRTR)
		September 28 to October 5	774	This round of surveys targeted geographic areas in the eastern half of the Proposed Project alignment that had bloomed following the late summer monsoon rains, and included portions of the areas that were surveyed during the other two rounds of 2017 surveys.	Supplemental Special-Status Plant Species Survey Report, Section 1 – Introduction (Attachment C of the Revised BRTR)
Least Bell's Vireo ( <i>Vireo bellii pusillus</i> )	2016	April 20, May 8, May 23, June 5, June 15, June 25, July 6, and July 19	10	This survey was limited to areas within the BRSA identified as having suitable habitat for the species.	Revised BRTR, Section 4.2.3 Special-Status Wildlife Surveys – Least Bell's Vireo Least Bell's Vireo and Southwestern Willow Flycatcher Survey Report (Attachment D of the Revised BRTR)
Southwestern Willow Flycatcher ( <i>Empidonax traillii extimus</i> )	2016	April 20, May 8, May 23, June 5, June 15, June 25, July 6, and July 19	10	This survey was limited to areas within the BRSA identified as having suitable habitat for the species.	Revised BRTR, Section 4.2.3 – Special-Status Wildlife Surveys – Southwestern Willow Flycatcher Least Bell's Vireo and Southwestern Willow Flycatcher Survey Report (Attachment D of the Revised BRTR)

<sup>1</sup> This survey was conducted within 1,000 feet (i.e., 500 feet on either side) of the entire original approximately 343-mile Proposed Project alignment. The length of the original alignment was misreported in the Revised BRTR as approximately 240 miles.

<sup>2</sup> The Revised BRTR was completed in April 2018.



ELM Series Capacitor Project  
Deficiency Question 64

Survey Type	Year	Date(s)	Approximate Area Surveyed (Acres)	Explanations for Differing Survey Areas	Location of Explanation in Documents
Jurisdictional Delineations	2016	April 18 through May 3	2,511	After the completion of the Habitat Assessment in February 2016, an approximately 108-mile-long segment of the Eldorado – Lugo 500 kV Transmission Line was removed from the Proposed Project area. The remaining approximately 235 miles and their associated buffers constitute the original BRSA of 2,511 acres.	Revised BRTR, Section 4.2 – Field Surveys
	2017	April 1, 2, 7, and 9	77	After the submittal of the Preliminary Jurisdictional Delineation Report, approximately 77 acres were added to the BRSA to accommodate Proposed Project refinements. <sup>3</sup>	Supplemental Preliminary Jurisdictional Delineation Report, Section 1 – Introduction (Attachment I of the Revised BRTR)
		October 4 to October 5	12	After the submittal of the Preliminary Jurisdictional Delineation Report and the jurisdictional delineation in April 2017, approximately 12 acres were added to the BRSA due to the addition of an alternative distribution/telecommunications route to the Proposed Project. This alternative route was subsequently removed from the Proposed Project area and was not surveyed for rare plants.	
Desert Tortoise ( <i>Gopherus agassizii</i> )	2016	October 3 to October 20	1,342	Due to Proposed Project refinements after the spring 2016 rare plant surveys, vegetation mapping, and jurisdictional delineations, the BRSA was reduced from 2,511 acres to 1,342 acres.	Section 2.2 – Biological Resource Area of the Desert Tortoise Pre-Project Survey Report (Attachment E of the Revised BRTR).
	2017	May 11 to 15	6	After the completion of the 2016 desert tortoise surveys, approximately 6 additional acres were added to the BRSA due to Proposed Project refinements.	Addendum to the Desert Tortoise Pre-Project Survey Report (Attachment F of the Revised BRTR)
		October 4 to October 5	12	After the completion of the 2016 and spring 2017 desert tortoise surveys, approximately 12 additional acres were added to the BRSA due to Proposed Project refinements. This alternative route was subsequently removed from the Proposed Project area and was not surveyed for rare plants.	Second Addendum to the Desert Tortoise Pre-Project Survey Report (Attachment G of the Revised BRTR)

<sup>3</sup> This entire area (approximately 77 acres) was also surveyed for desert tortoise as part of the October 2016 and May 2017 surveys for the species.

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**Question 65:**

The BRTR indicates that 11 sensitive natural communities were identified within the BRSA.

**Q.65. Please indicate which, if any, of these sensitive natural communities are located within planned disturbance areas (including yards) and indicate the number of acres of each community that would be disturbed directly or indirectly by project activities.**

**Response to Question 65:**

Table 4.4-6: Impacts to Sensitive Natural Communities from the Proponent's Environmental Assessment (PEA) reported impacts to sensitive natural communities. Since the submittal of the PEA, the Proposed Project has received minor design modifications, reducing these impacts. The attached table contained in file "ELM Q#35 Table 4.4-6.pdf" lists the anticipated temporary impacts to six sensitive natural communities. No permanent impacts to sensitive natural communities will occur. These values include the 17 Potential Staging Yard Locations identified in Table 1 of the Biological Resources Technical Report which were all surveyed.

**Table 4.4-6: Impacts to Sensitive Natural Communities**

Vegetation Alliance	State Ranking <sup>1</sup>	Area Temporarily Impacted (Acres)	
		Previously Disturbed <sup>2</sup>	Undisturbed
<i>Achnatherum speciosum</i> Herbaceous Alliance	S2.2	0.0	< 0.1
<i>Cylindropuntia bigelovii</i> Shrubland Alliance	S3	0.0	< 0.1
<i>Ericameria paniculata</i> Shrubland Alliance	S3	0.0	0.3
<i>Prunus fasciculata</i> – <i>Salazaria mexicana</i> Shrubland Alliance	S3.3	0.4	1.6
<i>Suaeda moquinii</i> Shrubland Alliance	S3	0.1	0.2
<i>Yucca brevifolia</i> Woodland Alliance	S3.2	0.2	4.7
<b>Total</b>		<b>0.7</b>	<b>7.0</b>

<sup>1</sup> State Rarity Rankings are defined in Section 4.4.3.1, Vegetation Communities of the PEA.

<sup>1</sup> Areas denoted as Previously Disturbed consist of existing access roads and other areas within the larger natural community that have low or no habitat value due to a previous disturbance that is unrelated to the Proposed Project.

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<sup>1</sup> State Rarity Rankings are defined in Section 4.4.3.1, Vegetation Communities of the PEA.

<sup>2</sup> Areas denoted as Previously Disturbed consist of existing access roads and other areas within the larger natural community that have low or no habitat value due to a previous disturbance that is unrelated to the Proposed Project.