

Environmental Minor Project Refinement Form



Project Name: ELM Series Capacitor Project Request Prepared By: Rincon Consultants

Date Approval Required: July 23, 2021 Variance Request No.: CPUC #1

Date Submitted: August 18, 2021 Location: M22-T2, M27-T3, M29-T3, M31-T1, M69-T1

Landowner: See Table 1

Landowner Parcel Number: See Table 1

Current Vegetative Cover/Land Use: See Table 2

Existing Sensitive Resource? NO YES Specify: See "Biological Resources"

Modifying (check as many as apply): MITIGATION MEASURE PLAN/PROCEDURE SPECIFICATION
 DRAWING PERMIT CONDITION OTHER

Specify Source (e.g., Mitigation Measure B.5): Initial Study/ Mitigated Negative Declaration

Description of Change and Justification

Attachments:

X PHOTO CONSTRUCTION DRAWING ADDITIONAL ENVIRONMENTAL ANALYSIS CORRESPONDENCE OTHER: _____

OVERVIEW AND DESCRIPTION

SCE is proposing the addition of 5 new work areas for the completion of previously approved and permitted work associated with the project, including splicing of Optical Ground Wire (OPGW) lines to serve as operational components of the ELM transmission line. Additional access points and/or work areas are proposed for 5 existing structure sites, including M22-T2, M27-T3, M29-T3, M31-T1, M69-T1. The proposed work areas are contiguous with previously-approved temporary disturbance areas (e.g. structure work areas [SWA]). The additional work areas include a total area of 0.288-acre. All 5 work areas are located entirely within the SCE Lugo-Mohave Transmission Line Right-of-Way.

For this work, a one-or two-person crew will access these locations to test the fibers after the OPGW has been installed. The crew will use the designated SWA at each of these locations, plus the additional work areas proposed by this Minor Project Refinement (MPR). Splicing operations require no ground disturbance. Rather, the crew will perform the work in a splicing vehicle parked on site and via access of the tower leg. The splicing vehicle typically drives into the approved work area and stays stationary while splicing work is performed (typically within the back of the vehicle) over a period of several hours. Upon completion, the splicing truck leaves the project area using the same entrance point. Splicing crews would use project access roads and work areas, and then drive and crush to access job sites where the work areas are not located on existing disturbed areas. Required equipment will avoid as much vegetation as practicable and utilize any existing routes that are available.

Table 1: SPLICING SITE PROPERTY INFORMATION

Area ID	APN	Owner	Figure
M22-T2	43506249	Islamic Center of Claremont	1

M27-T3	46421119	Southern California Edison	2
M29-T3	45305110	Adrian Bastians Trust	3
M31-T1	45309157	Southern California Edison	4
M69-T1	55203124	Southern California Edison	5

ALTERNATIVE CONSIDERATIONS

An alternative analysis included a “no perform” option, which is not be possible since splicing of the ELM fiber optic line must be completed for operation of the circuit and associated equipment. Splice locations were chosen based on most operationally efficient locations; thus, alternative locations for proposed splice locations are not possible.

ENVIRONMENTAL ANALYSIS

A desktop environmental analysis was performed to determine the potential for impacts to sensitive resources to occur during implementation of the approved activities within the proposed work areas. The analysis relied upon information from publicly available datasets and data collected for the project during the licensing/permitting and construction phases of the project.

BIOLOGICAL RESOURCES

The proposed work areas are located within the study area for previous habitat assessments and focused/protocol surveys, as well as recent preconstruction surveys for the project (FRED Survey Form 000042, 000062, 000106, 000130). A desktop analysis of publicly available data (e.g., CNDDDB) and relevant project data (e.g., data from focused/protocol surveys and FRED) were reviewed to determine the potential for special-status species to occur in the proposed work areas, and to assess the potential impacts to biological resources.

Site Description: The proposed work areas are extensions of previously approved SWAs associated with existing project structures where splicing will occur. The areas are dominated by *Larrea tridentata*-*Ambrosia dumosa* Shrubland (creosote bush - white burr sage scrub), *Eriogonum fasciculatum* Shrubland (California buckwheat scrub), *Larrea tridentata* Shrubland (creosote bush scrub), or *Atriplex polycarpa* Shrubland (allscale scrub), with some portions of the proposed work areas including the existing developed/disturbed areas associated with the existing stub roads and Operations and Maintenance (O&M) clearance areas. Table 2 presents the land cover types within each proposed work area:

Table 2 Impacts to Vegetation Communities and Land Cover Types in Proposed Splice Site Work Areas (acres)

Vegetation Type	M22-T2	M27-T3	M29-T3	M31-T1	M69-T1	TOTAL
<i>Larrea tridentata</i> - <i>Ambrosia dumosa</i> Shrubland Creosote bush - white burr sage scrub	0.0	0.096	0.016	0.0	0.004	0.116
<i>Larrea tridentata</i> - <i>Eriogonum fasciculatum</i> Shrubland California buckwheat scrub	0.0	0.0	0.0	0.0	0.0	0.0
<i>Larrea tridentata</i> Shrubland Creosote bush scrub	0.0	0.0	0.0	0.0	0.007	0.007
<i>Atriplex polycarpa</i> Shrubland Allscale scrub	0.084	0.0	0.0	0.012	0.0	0.096
Disturbed/Developed	0.032	0.035	0.002	0.0	0.002	0.069

TOTAL	0.116	0.131	0.018	0.012	0.013	0.288

Nesting Birds: Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, including trees, shrubs, man-made structures, and the ground surface, can be found throughout the Project area. No active nest buffers intersect the proposed work areas at this time. Special-status birds including burrowing owl (incidental observation during Insignia’s special-status plant surveys in the spring of 2016), loggerhead shrike (*Lanius ludovicianus*) (FRED Species Event 000275, 000277, 000279, 000280, 000584), prairie falcon (*Falco mexicanus*) (FRED Species Event 000295, 000583), and Swainson’s hawk (*Buteo swainsoni*) (FRED Species Event 000311, 000328), were observed near transmission structures M69-T1. Observations for loggerhead shrike, prairie falcon, and Swainson’s hawk related to flyovers, perching, and/or foraging near the Ludlow Series Capacitor project site. Insignia’s 2016 burrowing owl observation included 2 individuals and 4 active burrows 0.5-mile northwest of the proposed work area for M69-T1 and 25 feet north of the site access road.

A preconstruction survey for nesting birds will be conducted prior to the initiation of construction activities during the avian breeding season (Jan 1 – Aug 31). If active nests are identified, avoidance buffers will be established in accordance with the project NBMP. With implementation of the NBMP, no impacts are anticipated.

Special-Status Riparian Birds: No suitable habitat for riparian birds (least Bell’s vireo or southwestern willow flycatchers) occurs within 500 feet of the proposed work areas. Therefore, no impacts are anticipated.

Golden Eagle: Based on aerial habitat assessments and protocol surveys conducted for the Project, suitable nesting habitat and many historical nest records for golden eagles are located within 2 miles of the proposed work areas. At M22-T2, the closest golden eagle nest records were 0.4-mile southwest in the Lucerne Valley and 1.6 miles northeast on Chimney Rock. A cluster of historic golden eagle nest records were 0.8-mile east and 1-mile northeast of the additional work area associated with M27-T3 on White Horse Mountain and Lucerne Valley. At M29-T3, the closest golden eagle nest record was 0.5 southwest, but there were many records within 1 mile on White Horse Mountain. There were multiple golden eagle nest records within 2 miles of M31-T1 on White Horse Mountain, with the nearest being 1.6 miles away. At M69-T1, the closest golden eagle nest record was respectively 3.5 east miles and 1.8 miles northwest on Sleepy Beauty of the Cady Mountains.

Work activities are not proposed to occur during the golden eagle breeding season. Therefore, no active golden eagle nests are expected to be located within 1 mile of the splicing activities. If the proposed work activities are planned during the golden eagle breeding season, a 1-mile buffer will be implemented for all active golden eagle nests unless buffer reductions are implemented in coordination with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW).

Burrowing Owl: The entire Project is within the overall range of the burrowing owl and burrowing owl habitat is widespread across its footprint, including on/near the proposed work areas. No burrowing owls were directly observed in any previous survey for the Project; however, potential signs of burrowing owls were observed in proximity to some proposed work areas during previous surveys. Burrowing owl-focused surveys were conducted for work areas that included M22-T2, M29-T3, M31-T1, and M69-T1. Incidental observations during Insignia’s special-status plant surveys in the spring of 2016 included four burrowing owl burrows with two burrowing owl individuals 0.5-mile northwest of the proposed work area for M69-T1 and 25 feet north of the site access road.

Although an active burrowing owl burrow with two adult burrowing owls was discovered near the proposed work area and site access road in 2016, no active burrows currently exist. A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work areas. If any burrowing owl are found during the preconstruction survey or construction activities, potential impacts will be addressed according to the Burrowing Owl Plan.

Special-Status Bats: No rocky outcrops or trees potentially providing suitable roosting habitat for bat species will be affected by the proposed work. Therefore, no impacts are anticipated.

Special-Status Mammals: Special-status small mammals such as the American badger, desert kit fox, and/or desert bighorn sheep can occur in many parts of the Project area, as suitable habitat is widespread. Based on the existing data reviewed, Project-specific survey records, and habitat conditions observed during surveys, the desert kit fox, desert bighorn sheep, and American badger are assumed to be potentially present regionally. One American badger was observed 700 feet east of the proposed M69-T1 work area during a preconstruction survey (FRED Species Event 000259). One adult desert kit fox was observed crossing the site access road 0.4-mile southwest of the proposed M69-T1 work area

during a clearance sweep (FRED Species Event 000216). Suitable habitat for the ringtail is present in the region, but is limited in extent to riparian areas and some desert mountains. M27-T3, M29-T3, and M31-T1 are within one mile of Lucerne Lake. Lucerne Lake is an unvegetated lake bed with high saline levels and periodic inundation and the associated portion of Argos wash does not consist of any riparian habitat; however, ringtail may have potential to occur temporarily through utilization of the associated corridors for movement through the region. If any special-status mammals are found during the preconstruction survey or construction activities, potential impacts will be addressed according to the Desert Kit Fox, American Badger, and Ringtail Avoidance and Mitigation Plan and mitigation measures.

Desert Tortoise: The proposed work areas are located within suitable desert tortoise habitat as determined by vegetation types and ground cover. Protocol-level desert tortoise surveys were previously conducted across work areas that included these work areas. Based on previous project-specific surveys, there are multiple recorded occurrences of desert tortoise sign in the vicinity of the proposed work areas. These records include 1 potential desert tortoise burrow 1-mile southwest of M27-T3 (Insignia, 2016), 6 potential desert tortoise burrows within a mile of M69-T1 (the closest being 350 feet southeast) (FRED Species Event 000178, 000179, 000181, 000578, 000594, 000595), one desert tortoise carcass 350' northwest of M69-T1 (FRED Species Event 000566, Mortality Event 000050).

A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work areas. If any desert tortoises are found during the preconstruction survey or construction activities, potential impacts will be addressed through implementation of appropriate mitigation measures and biological monitoring.

Special-Status Terrestrial Herpetofauna: Several observations of Mohave fringe-toed lizard were recorded with the closest being 200 feet northwest of the proposed work areas associated with M69-T1 (FRED Species Event 000596). Although only Mohave fringe-toed lizard was observed, many species have the potential to occur throughout the Project area. A preconstruction survey will be conducted prior to the initiation of construction activities in the additional work areas. If any special-status terrestrial herpetofauna are found during the preconstruction survey or construction activities, potential impacts will be addressed through implementation of the mitigation measures. If Mohave fringe-toed lizard are present in the splicing work area, a biological monitor will be present to assist with the location of equipment to avoid crushing this species.

Special-Status Plants: Project-specific protocol rare plant surveys were conducted in survey areas including all of the proposed work areas. The pink funnel lily (*Androstephium breviflorum*) was observed near M69-T1. There were 10 recorded occurrences within a mile of this site, with the closest being 800 feet southwest of M69-T1 additional work area, but within the Ludlow Series Capacitor work area and 10 feet north of the site access road. white-margined penstemon (*Penstemon albomarginatus*) has potential to occur in the same area. While CNDDDB occurrences are recorded, this species has not been observed during project surveys.

The work is scheduled to occur outside the growing season for most special-status annuals, and due to drought conditions, many annuals and event perennial herbs are not currently present. Given these conditions and considering the activities involve drive and crush, no impacts to special-status plants are anticipated.

In general, if special-status plants are observed, potential impacts to special-status plants will be addressed in accordance with the Special-Status Plant Salvage and Relocation Plan.

Cacti, Yucca, and Trees: A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work area. If any cacti and yucca are found during the preconstruction survey or construction activities, they will be avoided to the extent feasible. Unavoidable impacts to cacti and yucca will be addressed in accordance with the Cacti and Yucca Salvage Plan. FRED Tree Event [FRED Tree Event 000899, Golden Cholla] at M29-T3 will likely have been avoided or transplanted as part of the construction activities (e.g., wire stringing) conducted prior to the splicing work addresses by this MPR. The Tree Event is not located in the proposed work area.

CULTURAL RESOURCES

A desktop analysis was conducted to determine the presence of and potential impacts to cultural resources within and directly surrounding the proposed work area.

The proposed work areas are located within the APE for the project. No impacts to cultural resources are expected, as no previously recorded cultural resources are located within or in proximity to the proposed work areas. Since no ground disturbing activities are expected, there is little potential for unanticipated discovery of previously unrecorded cultural resources. If cultural resources are encountered unexpectedly, a standard work stoppage will be implemented, and a qualified archaeologist contacted. The discovery would then be addressed in accordance with the project's CRMP.

PALEONTOLOGICAL RESOURCES

Analysis of paleontological resources within and directly surrounding the project areas show no sensitive resources within or surrounding the project area. Since ground disturbance is not being proposed within the scope of work, there will be no expected impacts to paleontological resources.

If earth disturbance is required to perform the work with impacts greater than 5' in depth, further analysis by a paleontological expert may be required to assess impacts in "unknown areas" (M22-T2, M27-T3) and monitoring for excavation greater than 5' in depth may be prescribed per the Project's Paleontological Resources Monitoring Plan for sites in more sensitive areas (M29-T3, M31-T1, M69-T1).

JURISDICTIONAL WATERS

No wetlands or other jurisdictional waters are present within the proposed work areas associated with M22-T2, M27-T3, or M31-T1.

The proposed work area associated with M29-T3 is immediately adjacent to a mapped jurisdictional feature defined as an unvegetated ephemeral streambed with a sand bottom; however, this channel becomes impounded by the road berm surrounding transmission structure M29-T3. The proposed work area will be accessed from the opposite side; therefore, the jurisdictional feature will be avoided.

The proposed work area associated with M69-T1 is 0.4-mile southeast of a mapped jurisdictional feature within the Newberry and Ludlow Capacitor construction area. It is a small unvegetated ephemeral streambed with a sand bottom; however, it is not in close proximity of the proposed work area.

CONCLUSION

Based on close examination and analysis of the proposed work areas and scope of work, no environmental constraints that warrant further review or would preclude approval of the work areas were identified. With preconstruction clearance surveys and implementation of the project mitigation measures and permit conditions, no additional significant impacts to biological, archaeological, paleontological resources, or jurisdictional waters are anticipated.

Resources:

Biological NO SENSITIVE RESOURCES PRESENT SENSITIVE RESOURCES PRESENT N/A

New Survey Report Attached: YES NO

If No, Previous Biological Survey Reference:

Insignia Environmental. 2018. Revised Biological Resources Technical Report for the Eldorado-Lugo-Mohave Series Capacitor Project. April.

Cultural NO RESOURCES PRESENT RESOURCES PRESENT WITH PROJECT APE: YES NO
 (PAVED/GRAVEL AREA AND NO GROUND DISTURBANCE)

If in APE, Previous Cultural Survey Reference:

Williams, Audry, 2020. Cultural Resources Management Plan For Southern California Edison Company's Eldorado-Lugo-Mohave Series Capacitor Project, San Bernardino County, California, and Clark County, Nevada.

Rincon Consultants, Inc. 2020. Eldorado-Lugo-Mohave Series Capacitor Project, Paleontological Resources Mitigation Plan

If not in APE, attach new survey report.

Other Potential Impacts:

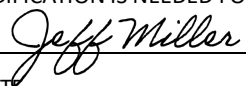

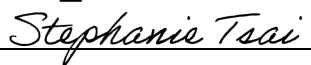
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| <input type="checkbox"/> CONTAMINATED SOILS | <input type="checkbox"/> PALEO RESOURCES | <input type="checkbox"/> WATER RESOURCES |
| <input type="checkbox"/> CULTURAL RESOURCES | <input type="checkbox"/> SOCIOECONOMIC | <input type="checkbox"/> WETLANDS |
| <input type="checkbox"/> HAZARDOUS MATERIALS | <input type="checkbox"/> STORM WATER (SWPPP) | |

CEQA and Permitting:

1. Will modification involve substantial changes that will require major changes to the CEQA document?
 YES NO
2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?
 YES NO
3. Additional agency notifications and/or permit modifications required? YES NO

Conditions of Approval or Reasons for Denial:

___ Required Signatures:

- ___ SCE Construction Project Manager : VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION
Name: Jeff Miller Signature:  Date: 8/25/2021
- Environmental Compliance Lead : FIELD REVIEW COMPLETE
Name: Matt Kelahan Signature:  Date: 8/18/2021
- ___ SCE Land Agent: CONSISTENT WITH EXISTING RIGHTS NEW RIGHTS OBTAINED
Name: Stephanie Tsai Signature:  Date: 08/19/2021
- ___ SCE Environmental Project Manager: APPROVED APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) DENIED

Name: Sylvia Granados Signature: *Sylvia Granados* Date: 08-25-2021









___ SCE Project Manager: APPROVED APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) DENIED

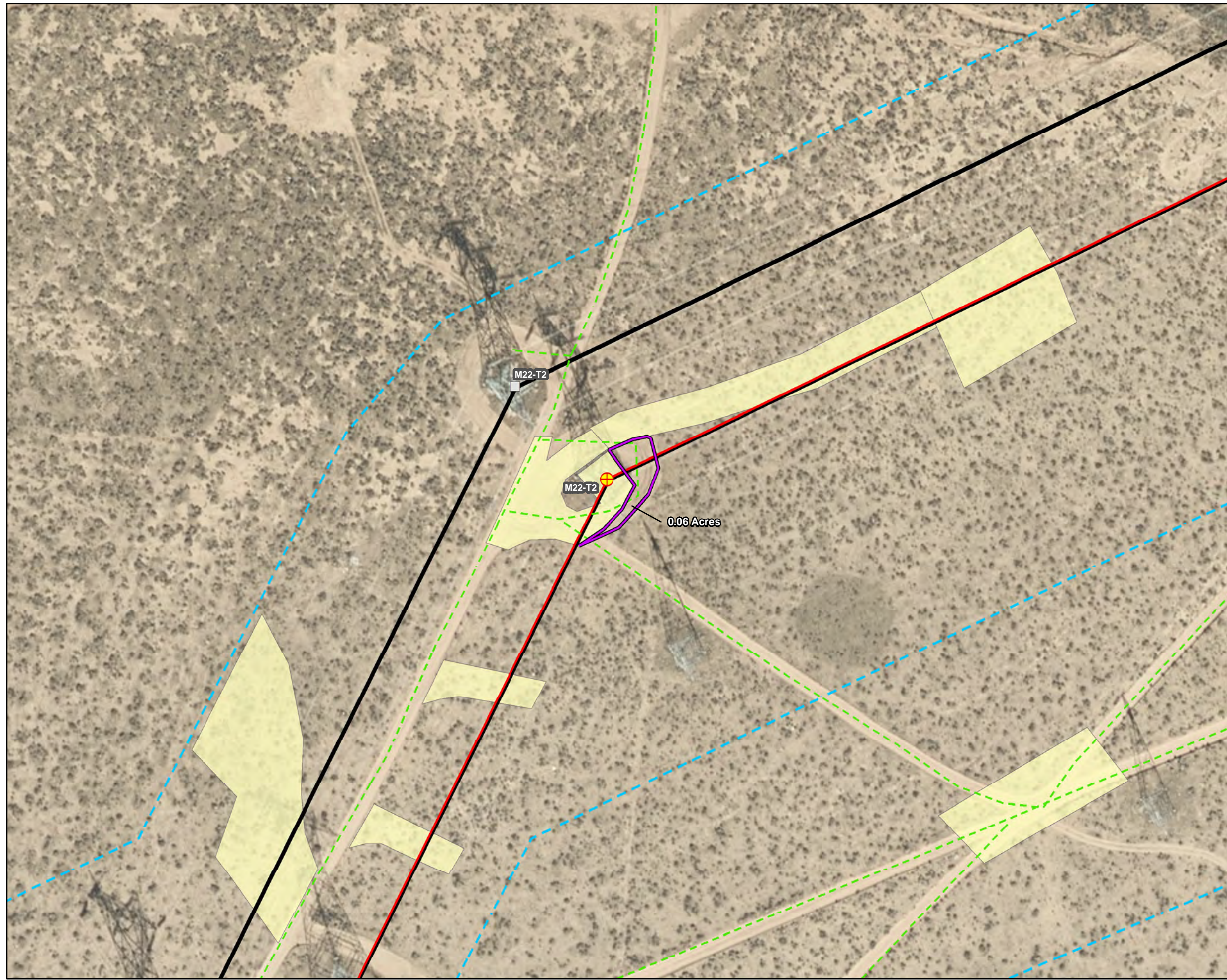
Name: Selya Arce Signature: *S Arce* Date: 08-25-2021

Eldorado-Lugo-Mohave Series Capacitors Project

Splice Site MPR

M22-T2 TTC

-  MPR Splice Site
-  OPGW Work Area
- Reference Features**
-  Existing Trans. Towers
-  OPGW Splicing Trans. Towers
-  Transmission New OPGW
-  Existing Transmission Line
-  Non-Paved Access Roads
-  ROW Easement



1 in = 100 feet

Figure 1

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Eldorado-Lugo-Mohave Series Capacitors Project

Splice Site MPR

M27-T3 TTC

-  MPR Splice Site
-  OPGW Work Area
- Reference Features**
-  Existing Trans. Towers
-  OPGW Modification Trans. Towers
-  Transmission New OPGW
-  Existing Transmission Line
-  Non-Paved Access Roads
-  New Travel Path Areas
-  ROW Easement

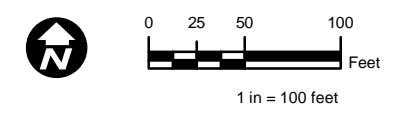
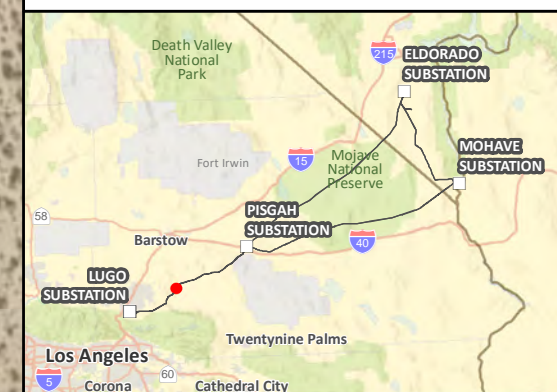
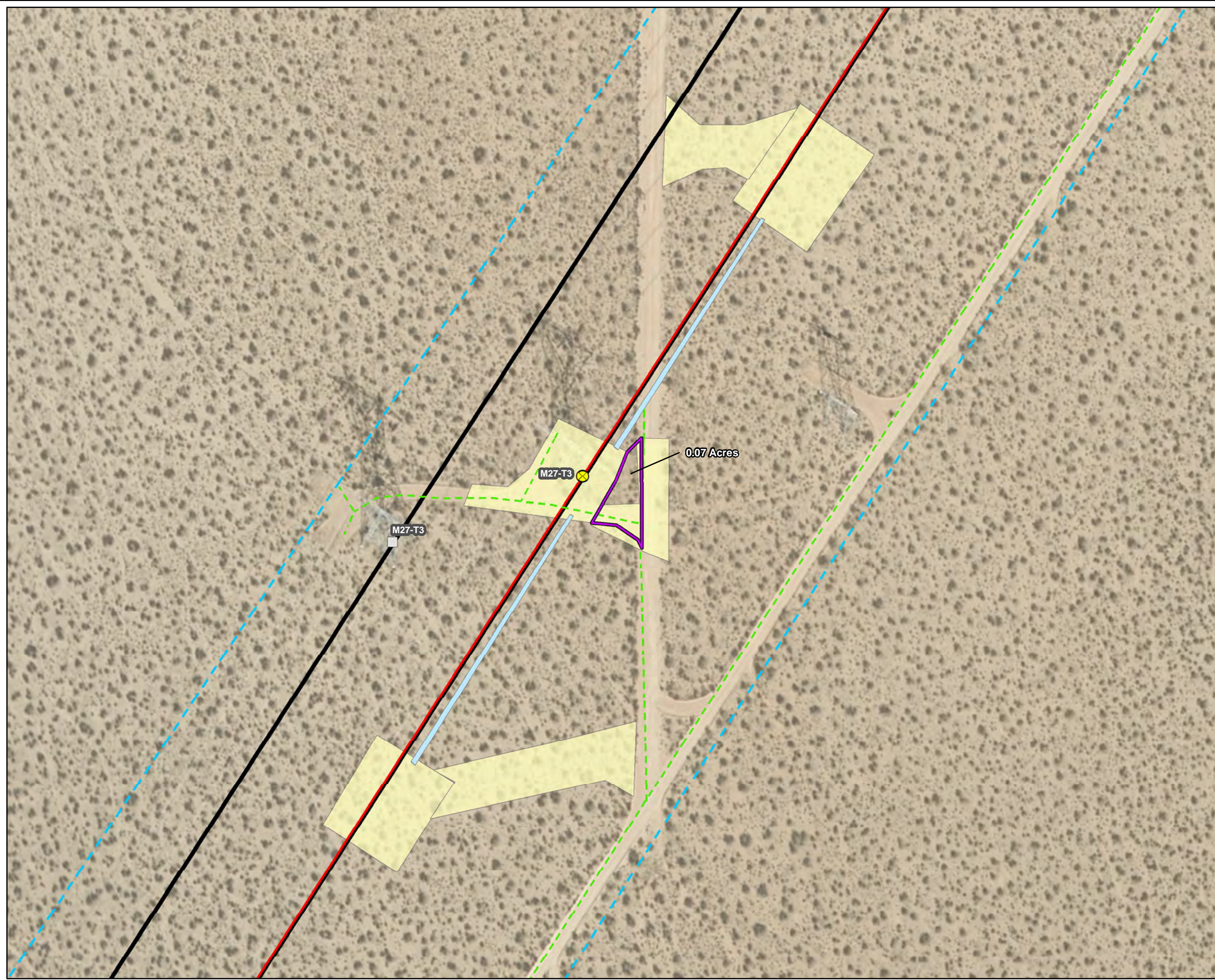


Figure 2

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



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Eldorado-Lugo-Mohave Series Capacitors Project

Splice Site MPR

M29-T3 TTC

-  MPR Splice Site
-  OPGW Work Area
- Reference Features**
-  Existing Trans. Towers
-  OPGW Modification Trans. Towers
-  Transmission New OPGW
-  Existing Transmission Line
-  Non-Paved Access Roads
-  New Travel Path Areas
-  ROW Easement
-  FRED Tree Event
-  Jurisdictional Polygons
-  BLM Land

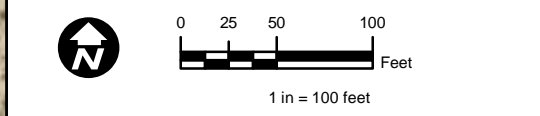
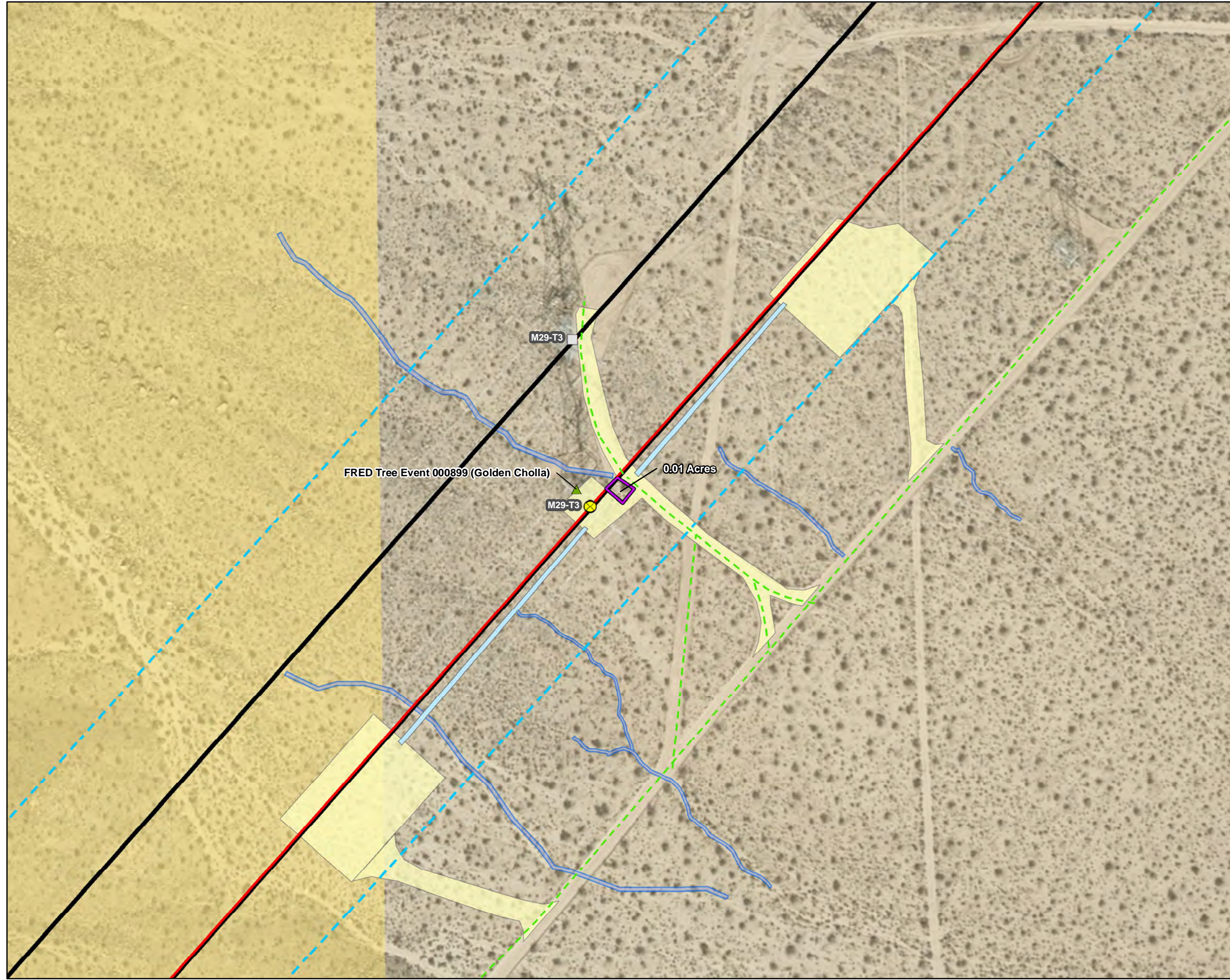


Figure 3
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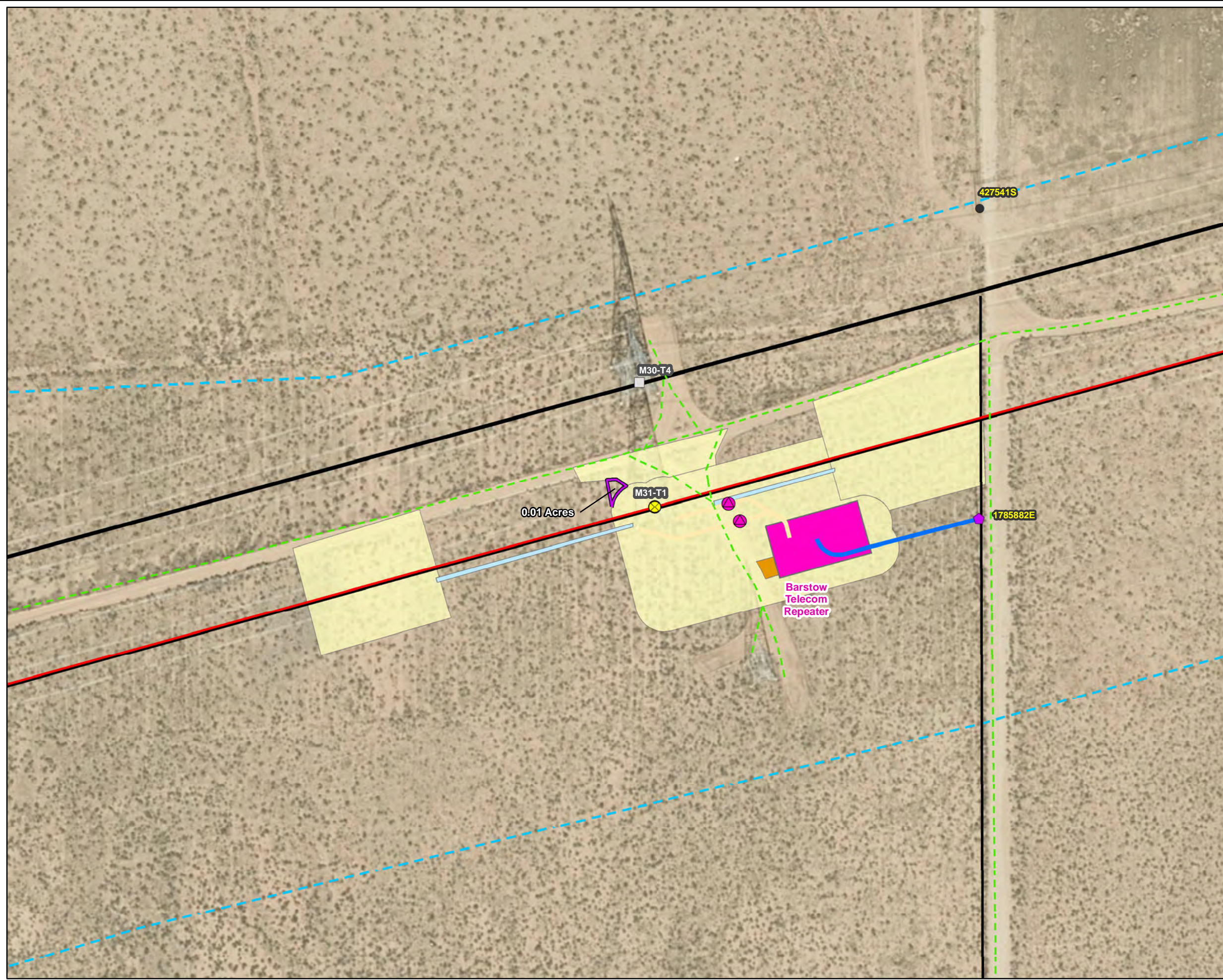


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Eldorado-Lugo-Mohave Series Capacitors Project

Splice Site MPR

M31-T1 TTC



- MPR Splice Site
- OPGW Work Area
- Reference Features**
- Existing Trans. Towers
- OPGW Modification Trans. Towers
- Existing, Existing
- New-R-EX
- Transmission New OPGW
- Existing Transmission Line
- Existing OH Distribution Line
- New UG Distribution Line
- New Manhole
- New UG Telecom. Lines
- Telecommunication Repeater Sites
- Non-Paved Access Roads
- New Access Road Areas
- New Travel Path Areas
- ROW Easement

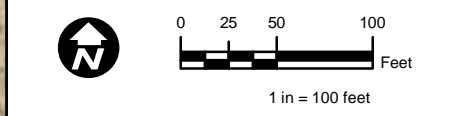
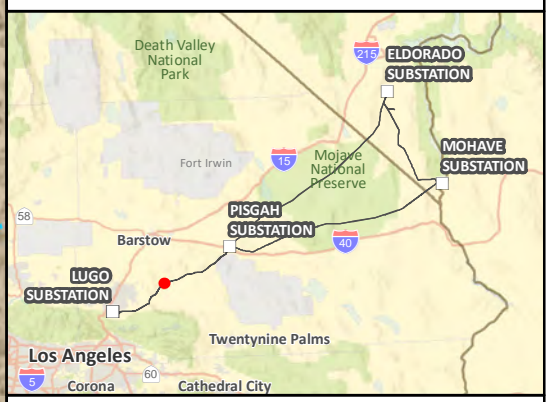


Figure 4

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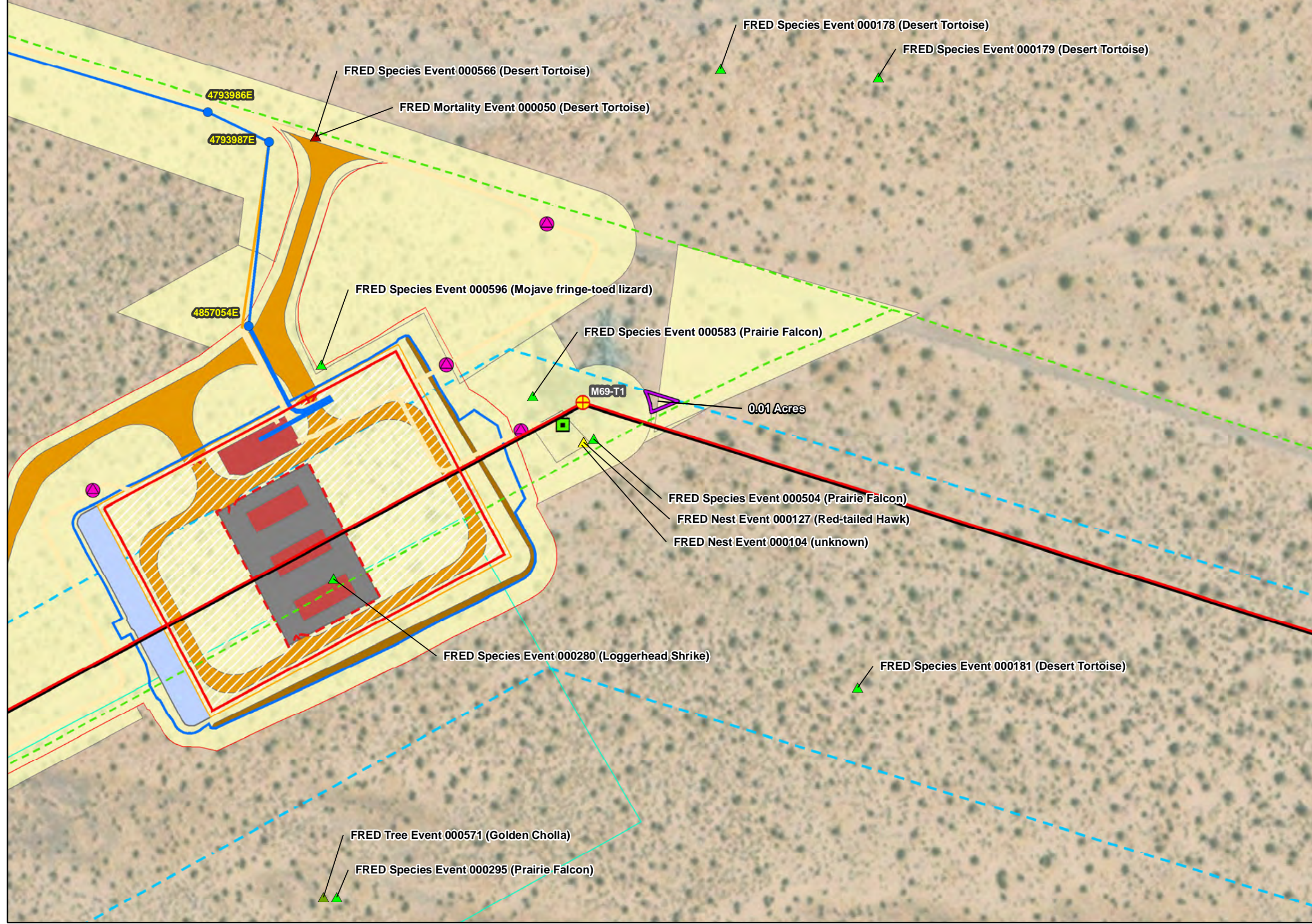
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Eldorado-Lugo-Mohave Series Capacitors Project Splice Site MPR M69-T1 TTC



- | | |
|-----------------------------|-------------------------|
| MPR Splice Site | Fence |
| OPGW Work Area | Grading Limit |
| New Capacitor Boundary | Access Road |
| Reference Features | |
| OPGW Splicing Trans. Towers | Foundation - Existing |
| New, Proposed | Rip Rap |
| Transmission New OPGW | Series Cap - Asphalt |
| Existing Transmission Line | Retention Basin |
| New OH Distribution Line | Gravel Surfacing |
| New UG Distribution Line | Ground Disturbance Area |
| New Manhole | ROW Easement |
| New Pullbox | FRED Tree Event |
| New OH Telecom. Lines | FRED Species Event |
| New UG Telecom. Lines | FRED Nest Event |
| Non-Paved Access Roads | FRED Mortality Event |

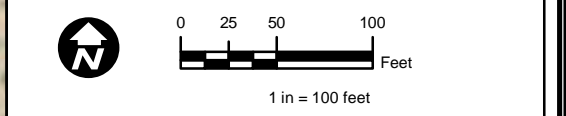


Figure 5
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Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA,



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