

Environmental Minor Project Refinement Form



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

Date Approval Required: November 20, 2021 Variance Request No.: CPUC #4

Date Submitted: October 13, 2021 Location: Deep Creek Road

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:

PHOTO X CONSTRUCTION DRAWING ADDITIONAL ENVIRONMENTAL ANALYSIS CORRESPONDENCE OTHER: _____

OVERVIEW AND DESCRIPTION

Southern California Edison (SCE) is proposing the addition/modification of work areas and description of additional work, including modification of an existing distribution line, to be conducted as part of the Eldorado-Lugo-Mohave (ELM) Series Capacitor Project (project). The structures between which the distribution line will be replaced (2360959E and 4593744E) were included in the original project data. This Minor Project Refinement (MPR) proposes the addition of a 0.02-acre work area associated with 4593744E and a 0.03-acre work area associated with 2360959E (proposed work areas), and clarification of the work to be performed. Table 1 shows associated Assessor's Parcel Numbers (APN) and property owners, although the work areas are located within an existing easement. Figure 1 shows the existing structures, proposed work areas, and other pertinent features.

SCE is proposing to lower an existing distribution line underneath the existing ELM transmission line for required distance compliance between the conductors. The current distribution line is within a non-compliant proximity to the ELM transmission line. Workers may position pickup trucks, backhoes, and bucket trucks in the existing work area associated with pole 2360959E. A new work area is proposed at pole 4593744E; however, work will be performed using foot traffic only at this location. The distribution line replacement will involve overhead work; no ground disturbance (e.g., clearing, grading, excavation) will be required unless anchor installation/repair is required, which at this time is not expected. Crews would use project access roads and work areas, and then drive and crush to access pole 2360959E. Pole 4593744E will be accessed via foot traffic only. Existing access routes will be used to access the sites and native vegetation will be avoided to the extent feasible.

Table 1: DEEP CREEK ROAD PROPERTY INFORMATION

Area ID	APN	Owner	Figure
4593744E	043-312-111	Estate of Anselmo Madrigal	1

2360959E	043-312-110	Estate of Anselmo Madrigal	1
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ALTERNATIVE CONSIDERATIONS

Alternative analysis included a “no perform” option, this would not be possible since compliance distances must be met between the distribution and transmission conductors.

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. 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 in the study area for previous habitat assessments and focused/protocol surveys. A desktop analysis of publicly available data (e.g., California Natural Diversity Database [CNDDDB]) was conducted and relevant project data (e.g., data from focused/protocol surveys) were reviewed to determine the potential for special-status species to occur, and to assess the potential impacts to biological resources. Preconstruction survey data documented in the Field Reporting Environmental Database (FRED) were also used for *general* reference regarding the potential for special-status species to occur in the region. No preconstruction surveys have yet been conducted for this site; however, a reconnaissance site visit was conducted by an agency approved biologist on June 10, 2021.

Site Description: The proposed work areas are located on the east side of Deep Creek Road, with one approximately 100 feet north of its intersection with the ELM right-of way (ROW) and the other within the ROW, abutted to an approved OPGW work area (Figure 1). The northern proposed work area is positioned adjacent to the road shoulder, which is developed/disturbed. The additional work areas includes 0.02-acre and 0.03-acre of California buckwheat (*Eriogonum fasciculatum*) scrub (see Table 2), although only foot traffic is required at these locations. Other perennial species observed included lycium (*Lycium* sp.), rabbitbrush (*Chrysothamnus nauseosus*), cheesebrush (*Hymenoclea salsola*), joint fir (*Ephedra* sp.), and silver cholla (*Cylindropuntia echinocarpa*). Joshua tree (*Yucca brevifolia*) are in the vicinity but not expected to be within the work area. Invasive species observed in the vicinity included mustards and invasive grasses. Soils are silty sand with intermixed gravel.

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.

A preconstruction survey for nesting birds will be conducted prior to the initiation of construction activities at the during the avian breeding season (Jan 1 – Aug 31). If active nests are identified, avoidance buffers will be established in accordance with the project Nesting Bird Management Plan (NBMP).

Special-Status Riparian Birds: No suitable habitat for riparian birds (least Bell's vireo [*Vireo bellii pusillus*] or southwestern willow flycatchers [*Empidonax trailii extimus*]) occurs within 500 feet of the proposed work areas.

Golden Eagle (*Aquila chrysaetos*): Based on aerial habitat assessments and protocol surveys conducted for the Project, no suitable nesting habitat for golden eagles is located within 2 miles.

Burrowing Owl (*Athene cunicularia*): The entire Project is within the overall range of the burrowing owl and burrowing owl habitat is widespread across its footprint. No burrowing owls were directly observed in any previous survey for the project, and no potential signs of burrowing owl were observed in proximity to the proposed work areas during any previous survey.

A preconstruction survey will be conducted prior to the initiation of construction activities. If burrowing owls are found during the preconstruction survey or construction activities, potential impacts will be addressed according to the Burrowing Owl Management and Passive Relocation Plan (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 at this location.

Special-Status Mammals: Special-status small mammals such as the American badger (*Taxidea taxus*), desert kit fox (*Vulpes macrotis*), and/or desert bighorn sheep (*Ovis canadensis*) 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. Suitable habitat for the ringtail (*Bassariscus astutus*) is present in the region, but is limited in extent to riparian areas and some desert mountains. The proposed work areas are approximately 0.3-mile east of the Mojave River which consists of minimal to no riparian habitat; however, ringtail may have potential to occur temporarily through utilization of the river corridor for movement through the region. San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) was observed on-site during a recent site survey. Given the location of the proposed work area is along a roadside, it is unlikely that special-status mammals will be present.

If any special-status mammals are found during the preconstruction survey or construction activities, potential impacts will be addressed according to the appropriate mitigation measures.

Desert Tortoise (*Gopherus agassizii*): The proposed work areas are located within suitable desert tortoise habitat as determined by vegetation types and ground cover. One potential desert tortoise burrow was observed approximately 0.5-mile west of the work area during a previous survey; however, no desert tortoise sign was observed within the proposed work areas during the recent site visit.

A preconstruction survey will be conducted prior to the initiation of construction activities. If any desert tortoises are found during the preconstruction survey or construction activities, potential impacts will be addressed with the implementation of the mitigation measures.

Special-Status Terrestrial Herpetofauna: No special-status terrestrial herpetofauna were observed within the proposed work areas; however, many species (e.g., desert rosy boa [*Charina trivirgata*], Mohave fringe-toed lizard [*Uma scoparia*]) have the potential to occur throughout the Project area.

A preconstruction survey will be conducted prior to the initiation of construction activities. 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 and biological monitoring.

Special-Status Plants: The proposed work areas are dominated by California buckwheat scrub. A protocol rare plant survey was previously conducted in this part of the project area. No special-status plants were observed in the area.

A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work area. If any special-status plants or skeletons thereof are found during the preconstruction survey or construction activities, potential impacts will be addressed as described in the Special-status Plant Salvage and Relocation Plan.

Cacti, Yucca, and Trees: Silver cholla and Joshua trees are also present in the vicinity but are not expected to be affected by the proposed work. Although no impacts are anticipated, unavoidable impacts to cacti and yucca will be addressed in accordance with the Cacti and Yucca Salvage Plan.

Table 2 Land Cover Types in Proposed Work Area for the Deep Creek Road Location (acres)

Vegetation Type	Location	Total (acres)	Figure
<i>Larrea tridentata</i> - <i>Eriogonum fasciculatum</i> Shrubland California buckwheat scrub	4593744E	0.02	1
<i>Larrea tridentata</i> - <i>Eriogonum fasciculatum</i> Shrubland California buckwheat scrub	2360959E	0.03	1

Note: For the purpose of containing work, distinct work areas have been created. However, with foot traffic, the activities are not expected to result in impacts.

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 Area of Potential Effects (APE) for the project. No impacts to cultural resources are expected as this new area does not have any previously recorded cultural resources, nor any within proximity to the proposed work areas. Since there are no expected ground disturbing activities scheduled, there is little potential for unanticipated discovery of previously unrecorded cultural resources. If cultural resources are encountered unexpectedly, then standard work stoppage and contact a qualified archaeologist. Procedures should take place per the existing permit mitigation requirements and project's Cultural Resources Management Plan (CRMP)

PALEONTOLOGICAL RESOURCES

Analysis of paleontological resources within and directly surrounding the project area show an "unknown sensitivity." Since ground disturbance is not being proposed within the scope of work, there will be no expected impacts to paleontological resources. If any earth disturbance is required to perform the work with impacts great than 5 feet in depth, further analysis by a paleontological expert monitoring may be required.

JURISDICTIONAL WATERS

The proposed work areas are located approximately 0.3-mile east of the Mojave River. The work area occurs along the Deep Creek Road shoulder in upland habitat and outside any documented water resources that may be considered jurisdictional and regulated by various local, state, and/or federal agencies. In addition, no wetlands or other waters have been documented during previous site visits within the work areas. Therefore, no impacts to jurisdictional water resources are anticipated.

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:


- | | | |
|---|--|--|
| <input type="checkbox"/> AIR QUALITY | <input type="checkbox"/> LAND USE | <input type="checkbox"/> TRAFFIC |
| <input type="checkbox"/> BIOLOGICAL RESOURCES | <input type="checkbox"/> NOISE | <input type="checkbox"/> VISUAL |
| <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) | |

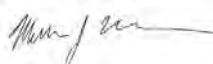
CEQA and Permitting:

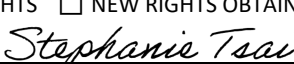
1. Will modification involve substantial changes that will require major changes to the CEQA document?
 YES NO
2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?
 YES NO
3. Additional agency notifications and/or 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: 10/11/21

Environmental Compliance Lead: FIELD REVIEW COMPLETE
Name: Matt Kelahan Signature:  Date: 09/23/2021

___ SCE Land Agent: CONSISTENT WITH EXISTING RIGHTS NEW RIGHTS OBTAINED
Name: Stephanie Tsai Signature:  Date: 10/11/21

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

Name: Sylvia Granados Signature: *Sylvia Granados* Date: 9/23/2021

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

Name: Selya Arce Signature: *S Arce* Date: 10/12/2021

Eldorado-Lugo-Mohave Series Capacitors Project

Deep Creek Road MPR

Deep Creek Distribution Work

- MPR Work Area
- OPGW Work Area

Reference Features

- Existing Trans. Towers
- Infracore Modify Pole
- Non-Paved Access Roads
- Paved Access Roads
- Transmission New OPGW
- Existing Trans. Lines
- Infracore Lower OH Distribution Line
- Stream (NHD)
- Project Right of Way
- OH Distribution Line Easement

California Buckwheat Scrub (0.02 Acres)

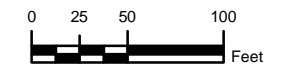
4593744E

M8-T2

California Buckwheat Scrub (0.03 Acres)

2360959E

Deep Creek Rd



1 in = 100 feet

Figure 1

Created Date: 09/21/2021

Created By:
Rincon Consultants

Features depicted herein are planning level accuracy, and intended for informational purposes only. Distances and locations may be distorted at this scale. Always consult with the proper legal documents or agencies regarding such features. Cental Field Services

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