Environmental Minor Project Refinement Form

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

Date Approval Required: January 15, 2022 Variance Request No.: CPUC #6

Date Submitted: December 21, 2021 Location: Fence Location North of M31-T2

Landowner: Sue Ellen Hammer Landowner Parcel Number: 0453-091-40, 0453-091-58

Current Vegetative Cover/Land Use: Allscale scrub and barren/open space

Existing Sensitive Resource? X NO ☐ YES Specify: _____

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

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

Description of Change and Justification

Attachments:

X PHOTO X CONSTRUCTION DRAWING ☐ ADDITIONAL ENVIRONMENTAL ANALYSIS ☐ CORRESPONDENCE X OTHER: Figure 1

OVERVIEW AND DESCRIPTION

Mitigation Measure (MM) UT-3 from the Initial Study/Mitigated Negative Declaration (IS/MND) for the Eldorado-Lugo-Mohave (ELM) Series Capacitor Project (project) requires Southern California Edison (SCE) to determine and report to the California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM) the location of metallic or conducting objects that may present a shock hazard to the public due to induced voltages or currents and, prior to the in-service date of the project's series capacitors, install the necessary grounding or other appropriate measures to protect the public from hazardous shocks or arcing. SCE conducted an induction study and identified a property where modifications to an existing wire mesh fence are required to reduce the induction potential in the interest of public safety. This Minor Project Refinement (MPR) proposes that the additional work area and scope-of-work be added to facilitate the fence modifications.

The proposed work area will encompass an approximately 1,300-foot segment of existing fence located along the north edge of SCE's existing transmission right-of-way (ROW) from an unnamed road approximately 425 feet east of M31-T1 to M31-T2 (near Haynes Road), in an unincorporated area north of Lucerne Valley in San Bernardino County, California (Figure 1). The proposed work area will include the approximately 1,300-foot segment of fence, plus a 25-foot buffer to the south and 15-foot buffer to the north, east, and west sides of the fence. Workers will park on the existing access road in the ROW and access the fence on foot.

The existing fence is approximately 4 feet high, comprised of steel "T-posts" and wire mesh and/or barbed wire for some sections (see Attachment 1). The proposed activities will include the following: 1) Break existing wired fencing into segments at three locations as shown on Attachment 2 by adding new posts and remove fencing between posts to create an air gap of 4 inches - the actual location of the breaks can be adjusted to meet field conditions provided fence segment does not exceed 620 feet; 2) 2-1/2" Fence posts shall be installed to match the existing fence post height - footing shall be 18 inches wide, 30 inches deep and shall encapsulate both fence posts.

These gaps effectively separate the fence into 3 segments separated such that no induced charge can be conducted or stored between/among them. The existing fence posts will be removed using a "post puller," if needed, although some minor hand digging using shovels may be required. Concrete will be mixed in a portable concrete mixer or wheelbarrow

on site and by use of a hole auger and shovel to dig 18" diameter hole 30" deep on site. No vegetation removal or grading, or excavation beyond minor shovel work is required.

The proposed work area described above includes 1.23 acres, including 0.77 acres of Allscale Scrub and 0.46 acres barren open space. The proposed work area is proposed to contain the work as required by the IS/MND MMs and other permit conditions. Because work will be limited to foot traffic and the impacts related to fence post removal and replacement are immeasurable, however, SCE proposes that the work area will not be included in the accounting of temporary impacts for the project.

ENVIRONMENTAL ANALYSIS

A desktop environmental analysis was performed to determine the potential for impacts to sensitive resources to occur during implementation of the proposed activities within the proposed work area. 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. In addition, a site visit attended by the responsible construction personnel and an agency-approved biologist (Glenn Goodlett) was conducted on July 1, 2021. The objective was to understand the scope-of-work and to conduct a reconnaissance survey for biological resources, jurisdictional waters, and other potential environmental constraints.

BIOLOGICAL RESOURCES

The proposed work area is located in the biological study area for the project. A desktop analysis of publicly available data (e.g., California Natural Diversity Database [CNDDB]) 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 in the proposed work area, and to assess the potential impacts to biological resources. Data documented in the Field Reporting Environmental Database (FRED) were also used for general reference regarding the potential for special-status species to occur. A reconnaissance site visit was conducted by an agency-approved biologist on July 1, 2021. A preconstruction clearance survey will be conducted prior to the start of work, pending approval of this MPR.

Site Description: The proposed work area described above includes 1.23 acres, including 0.77 acres Allscale Scrub and 0.46 acres of barren/open space. The area is dominated by Saltbush (*Atriplex polycarpa*) and, due to degradation due to human disturbances, invasive mustards (*Brassica* sp.) and grasses (*Bromus* sp.). Trash was observed onsite, likely blowing in from nearby private properties and public roads. No sign of desert tortoises or other special-status species was observed during the site visit.

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 loggerhead shrike (*Lanius ludovicianus*) was observed perched on M31-T2 in June 2021 (FRED Species Event 000654); however, no nest was identified. A large stick nest, potentially belonging to a red-tailed hawk (*Buteo jamaicensis*) or common raven (*Corvus corax*), was identified in M31-T1 (FRED Nest Event 000263); however, it was not determined to be active in 2021. No active nest buffers currently intersect the proposed work area at this time.

A preconstruction survey for nesting birds will be conducted prior to the initiation of construction activities at the proposed work area 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). With implementation of the NBMP, no impacts are anticipated.

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 new work areas. Therefore, no impacts are anticipated.

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 1-mile of the proposed work area. The nearest suitable breeding habitat is located approximately 1.5 miles west/southwest in the Whitehorse Mountains. Therefore, no impacts are anticipated.

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, including near the proposed work area. 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 this proposed work area during any previous survey.

A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work area. If burrowing owl is 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. Therefore, no impacts are anticipated.

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. Habitat in the proposed work area is relatively degraded and due to human presence at this location, it is unlikely that these species will inhabit the proposed work area and surrounding vicinity.

Preconstruction surveys will be conducted prior to the start of the proposed activities. 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 area is located within suitable desert tortoise habitat as determined by vegetation types and ground cover. However, no desert tortoises or sign were observed within this proposed work area during project surveys or the recent site visit.

A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work area. If any desert tortoise 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 area; however, many species (e.g., desert rosy boa [*Charina trivirgata*]).

A preconstruction survey will be conducted prior to the initiation of construction activities in the proposed work area. 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: A protocol rare plant survey was previously conducted in this part of the project area. No special-status plants were observed in the vicinity. The work is scheduled to occur outside the growing season for most special-status annuals and due to drought conditions, even perennial species would be difficult to detect. Even if present, however, considering the activities include foot traffic only and only replacement of fence posts along an existing fence line, no impacts to special-status plants would be anticipated.

Cacti, Yucca, and Trees: No impacts to cactus or yucca species are anticipated.

JURISDICTIONAL WATERS

A desktop analysis of publicly available data (National Wetland Inventory [NWI] and National Hydrography Dataset [NHD]), project jurisdictional delineation data, and the results of the July 1 site visit was conducted to determine if any drainage features subject to regulation under Sections 404 and 401 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, and Section 1600 et seq. of California Fish and Game Code are located within or adjacent to the proposed work area, and if any impacts are anticipated.

A riverine feature (R4SBJ) was identified approximately 750 feet west of the proposed work area. No features from the NWI and NHD, jurisdictional delineation data, or identified during the site visit are located within or immediately adjacent to the proposed work area. Therefore, no impacts to jurisdictional waters are anticipated.

CULTURAL RESOURCES

A desktop analysis of existing technical reports and GIS data was conducted to determine if the proposed work area is located in the existing Area of Potential Effects (APE) for the project and if cultural resources are located within and directly surrounding the proposed work area, and if any impacts to cultural resources are anticipated.

The proposed work area is located within the Area of Potential Effects (APE) for the project. Only isolates have been observed within 100 feet of the proposed work area; none within the work area. No significant cultural resources occur within or immediately adjacent to the proposed work area. No impacts to cultural resources area anticipated.

If cultural resources are encountered unexpectedly, work will be halted and the procedures in the project's Cultural Resources Management Plan (CRMP) will be followed.

PALEONTOLOGICAL RESOURCES

A desktop analysis of existing technical reports and GIS data was conducted to determine if the proposed work area is located in an area of paleontological sensitivity and if the proposed work activities have the potential to result in impacts to paleontological resources.

The proposed work area is located in an area of "unknown" sensitivity. Ground disturbance will be limited to the removal of 3 existing and installation of 6 new fence posts. The existing fence posts will be "pulled" out of the ground using a fence post puller, although minor digging with hand tools may be required. The new posts will be installed using a fence post driver; no excavation is required. The existing and new fence post depths are less than 5-feet. Therefore, no paleontological monitoring is required and no impacts to paleontological resources are anticipated.

If any earth disturbance is required to perform the work with impacts great than 5' in depth, further analysis by a paleontological expert monitoring may be required. Unanticipated discoveries would be addressed in accordance with the project's Paleontological Resources Mitigation and Monitoring Plan.

CONCLUSION

No environmental constraints that would preclude the use of the proposed work area or execution of the proposed activities were identified. Preconstruction biological surveys will be conducted prior to the start of the activities. With implementation of the project MMs, no impacts to sensitive resources, such as biological, cultural, and paleontological resources, and jurisdictional waters are anticipated.

Resources:

Biological X 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 X 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:

☐ AIR QUALITY	☐ LAND USE	☐ TRAFFIC
☐ BIOLOGICAL RESOURCES	☐ NOISE	☐ VISUAL
☐ CONTAMINATED SOILS	☐ PALEO RESOURCES	☐ WATER RESOURCES
☐ CULTURAL RESOURCES	☐ SOCIOECONOMIC	☐ WETLANDS
☐ HAZARDOUS MATERIALS	☐ STORM WATER (SWPPP)	

CEQA and Permitting:

1. Will modification involve substantial changes that will require major changes to the CEQA document?
   ☐ YES X NO
2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?
   ☐ YES X NO
3. Additional agency notifications and/or permit modifications required? ☐ YES X 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: Jeff Miller Date: 12/17/21

Environmental Compliance Lead : ☐ FIELD REVIEW COMPLETE

Name: Matt Kelahan Signature: Date: 12/16/2021

___ SCE Land Agent: ☐ CONSISTENT WITH EXISTING RIGHTS ☐ NEW RIGHTS OBTAINED

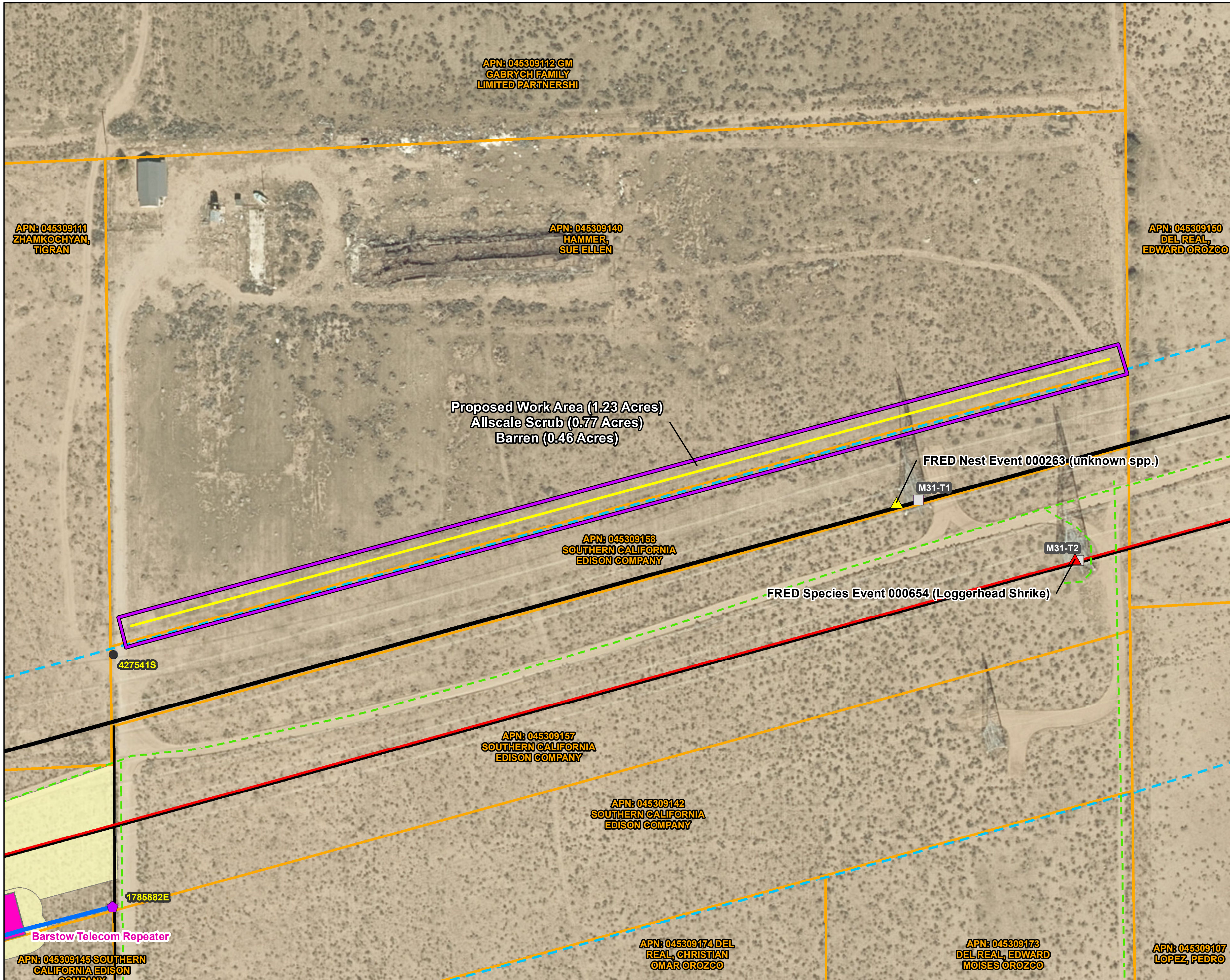
Name: Stephanie Tsai Signature: Stephanie Tsai Date: 12/17/2021

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

Name: Sylvia Granados Signature: Sylvia Granados Date: 12/20/2021

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

Name: Selya Arce Signature: Sjarce Date: 12/20/2021



Eldorado-Lugo-Mohave Series Capacitors Project

Induction Fence MPR

- Proposed Work Area
- Existing Fence
- OPGW Work Area

Reference Features

- Existing Trans. Towers
- Existing, Existing
- New-R-EX
- FRED Species Event
- FRED Nest Event
- Transmission New OPGW
- Existing Transmission Line
- Existing OH Distribution Line
- New UG Distribution Line
- Non-Paved Access Roads
- Telecommunication Repeater Sites
- ROW Easement
- APN Boundary

N

0 25 50 100 Feet

1 in = 125 feet

Figure 1

Created Date: 7/14/2021

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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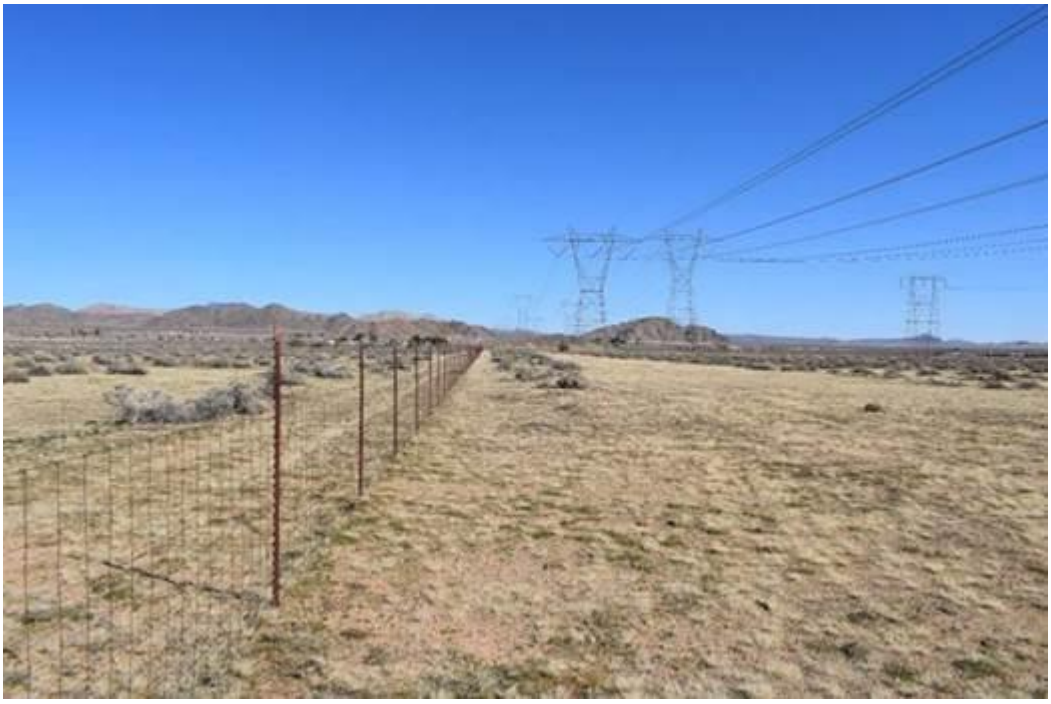
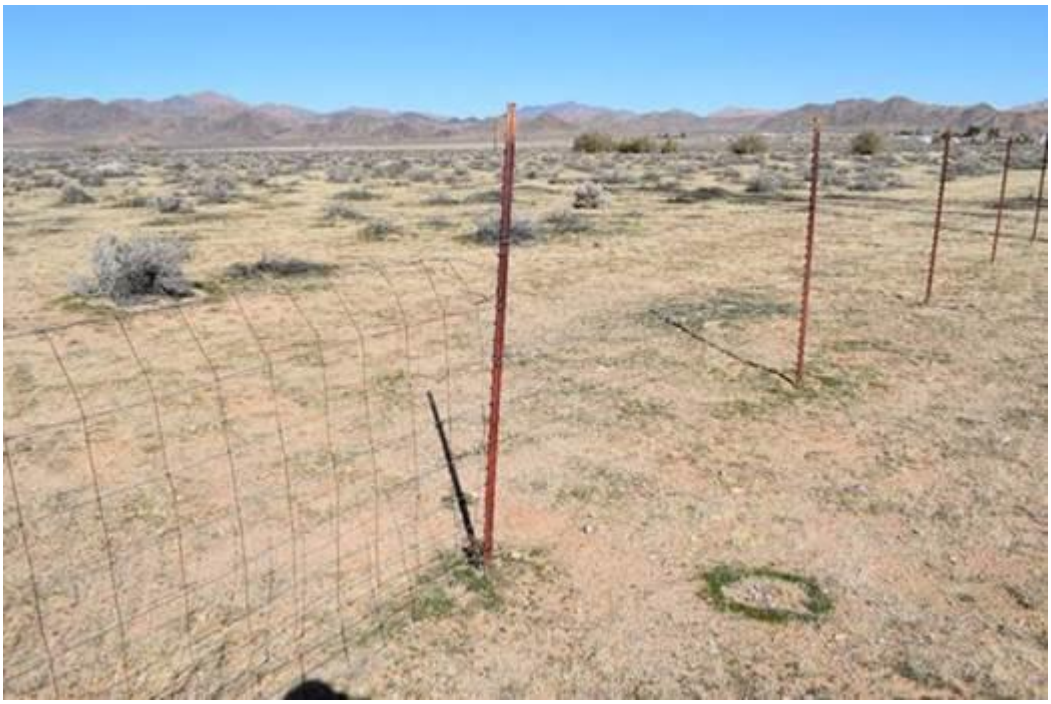
Attachment 1 - Photographs



Photograph 1 – Existing Fence and land cover. From south side of fence, facing east.



Photograph 2 – Existing Fence and Land Cover. From south side of fence, facing northeast.

Attachment 2 – Fence Drawing