

**ATTACHMENT F: ADDENDUM TO THE DESERT TORTOISE PRE-PROJECT SURVEY
REPORT**

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MEMO

To: Rey Gonzales, Southern California Edison Company (SCE)
Michael Burroughs, United States Fish and Wildlife Service (USFWS)
Wendy Campbell, California Department of Fish and Wildlife (CDFW)

From: Sarah Willbrand, Insignia Environmental (Insignia)

Date: July 17, 2017

Re: Addendum to the Desert Tortoise Pre-Project Survey Report for the Eldorado-Lugo-Mohave Series Capacitor Project (Proposed Project)

SCE's Proposed Project includes the construction of two new mid-line series capacitors, three telecommunication repeaters, and other improvements along the existing Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kilovolt transmission lines in San Bernardino County, California and Clark County, Nevada. In October 2016, Insignia conducted presence/absence surveys for the Mojave desert tortoise (*Gopherus agassizii*) for the Proposed Project. On December 13, 2016, these results were submitted to the USFWS and the CDFW in the form of the Desert Tortoise Pre-Project Survey Report for the Proposed Project. After the submittal of the report, further desert tortoise surveys were conducted on approximately 5.69 acres that were added to the Biological Resources Survey Area (BRSA) in Nevada, as shown in Attachment A: Desert Tortoise Survey Areas within the Additional Biological Resources Survey Area. None of the additional BRSA is located within desert tortoise critical habitat. This memorandum presents the results of the desert tortoise surveys conducted within the additional BRSA.

Survey Methodology

Insignia biologists Adam Hamburg and Gina Robinson conducted the desert tortoise presence/absence surveys within the approximately 5.69 acres of additional land for the BRSA between May 11 and 15, 2017. The surveys were conducted in accordance with the USFWS's survey guidelines (2010), and modified with approval by the USFWS. A 20-meter survey buffer around the perimeter of each work area was determined to be appropriate for the Proposed Project rather than the standard 200-, 400-, and 600-meter buffers recommended in the USFWS's survey guidelines. The USFWS provided approval for this buffer amendment in email correspondence, as shown in Attachment B: United States Fish and Wildlife Service Correspondence. Details of the survey methodology are discussed in the December 2016 Desert Tortoise Pre-Project Survey Report.

Results

Insignia biologists observed no live desert tortoises or desert tortoise sign during the surveys within the additional BRSA.

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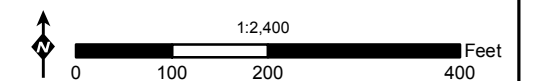
**ATTACHMENT A: DESERT TORTOISE SURVEY AREAS WITHIN THE ADDITIONAL BIOLOGICAL
RESOURCES SURVEY AREA**

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**Desert Tortoise Survey Areas
within the Additional Biological
Resources Survey Area
Map 1 of 3**

**Eldorado-Lugo-Mohave
Series Capacitor Project**

- Additional Desert Tortoise Survey Area
- Structure
- Project Alignment**
- Lugo - Mohave 500 kV Transmission Line

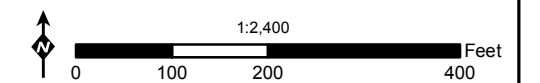
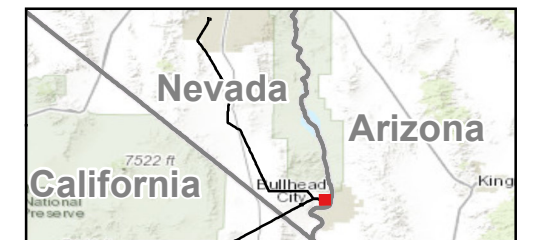


Source: Insignia, 2016; SCE

**Desert Tortoise Survey Areas
within the Additional Biological
Resources Survey Area
Map 2 of 3**

**Eldorado-Lugo-Mohave
Series Capacitor Project**

- Additional Desert Tortoise Survey Area
- Substation
- Structure
- Project Alignment**
- Eldorado - Mohave 500 kV Transmission Line

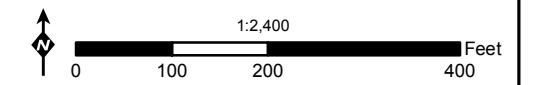


Source: Insignia, 2016; SCE

**Desert Tortoise Survey Areas
within the Additional Biological
Resources Survey Area
Map 3 of 3**

**Eldorado-Lugo-Mohave
Series Capacitor Project**

- Additional Desert Tortoise Survey Area
- Substation
- Structure
- Project Alignment**
- Eldorado - Mohave 500 kV Transmission Line



Source: Insignia, 2016; SCE

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ATTACHMENT B: UNITED STATES FISH AND WILDLIFE SERVICE CORRESPONDENCE

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From: Ray Bransfield [mailto:ray_bransfield@fws.gov]
Sent: Friday, September 30, 2016 4:12 PM
To: Audrey Johnson
Cc: Stephanie Hansen
Subject: RE: Buffer Survey Area

Audrey,

The intent of those buffer transects was to determine if desert tortoises are nearby and try to get project proponents to consult or apply for incidental take permits even if animals were not right on their project site. It has never quite worked out that way: People were not flocking to get incidental take permits; over the years, we didn't try to push incidental take permits in those cases because they take so long to get done; and worst of all, the dang desert tortoises would not always align themselves at the 200, 400, and 600 meter marks. Sometimes they just sit there at 145 meters and hide from us.

SCE's work is going to be done in fairly small areas and is temporary in nature. With those facts in mind, to me the key question then is "Can SCE do this work while avoiding desert tortoises" I would say that, for work at specific sites, the answer is yes. SCE could do its work while a desert tortoise sits in its burrow or passes by 50 feet away.

I looked back briefly at your original email but didn't see how big of an area you plan to survey at each site in relation to how big SCE's work area will be. If you are already planning to survey some distance beyond SCE's work area at each site, I would say that is good enough. I don't have a specific recommendation for how much to 'go beyond' because I think that would vary quite a bit with changes in terrain, plant cover, and adjacent development.

OK then, a summary: I suggest NOT doing buffer transects as recommended in the protocol. I suggest that the survey area at each site extend some distance beyond the maximum SCE work area; the distance beyond would depend on the nature of the site.

I hope that helps. I am working at home. Let me know if you want to talk and I will give you a call.
Ray

From: Audrey Johnson [mailto:ajohnson@insigniaenv.com]
Sent: Friday, September 30, 2016 2:48 PM
To: ray_bransfield@fws.gov
Cc: Stephanie Hansen
Subject: Buffer Survey Area

Hello Ray,

We are going to begin our desert tortoise surveys as planned on Monday Oct 3rd. As I mentioned to you over the phone a couple weeks ago, our surveys will be of approximately 300 non-contiguous survey

areas, between Hesperia, Laughlin and Boulder City, where disturbance is planned as part of SCE's Eldorado-Lugo-Mohave Series Capacitor Project. All the survey areas are along SCE's existing transmission lines, which is why we will also be doing the raven and avian mortality studies, as requested.

I had a question for you about the USFWS tortoise presence/absence protocol...

As its written, in any one survey area, if tortoise sign is not found, additional 200m, 400m and 600m buffers should be surveyed. These buffer results will contribute to the presence/absence survey, but will not affect the abundance estimate. Given that we have so many small, non-contiguous work areas, we could use your input on the value of these buffer survey results. Is it worth walking these additional buffers at every survey area without sign? Is it more valuable to have the additional buffer data in specific areas of the project? Or for the large or small survey areas?

Feel free to give me a call when you can -- [269-267-4269](tel:269-267-4269).

Have a great weekend,

Audrey

AUDREY JOHNSON

ASSOCIATE BIOLOGIST

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