

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 11, 2020

Michael Bass  
Environmental Project Manager  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

**RE: Valley-Ivyglen 115kV Subtransmission Project (VIG) – Minor Project Refinement No. 1 Request: Concordia Yard**

Dear Mr. Bass,

On May 5, 2020, Southern California Edison (SCE) submitted Minor Project Refinement (MPR) No. 1 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPR would involve an approximately 5.9-acre (approximately 257,004 square feet) staging area located at 14570 Concordia Ranch Road, Lake Elsinore, CA 92530 (Concordia Yard) to service the western portions of the Project. SCE has obtained a lease agreement with the landowner to use the Concordia Yard as a construction staging area. The work activities were previously approved on July 1, 2020, under SCE's Notice to Proceed Request-1 (NTPR-1). The proposed staging area would be used for mobile office trailers, material, and equipment storage, and as a crew show-up for the duration of the Project. Per the lease agreement, the staging area would be restored to pre-existing conditions upon vacating the area at the completion of the project, including the removal of all improvements. The perimeter fencing would be removed. Equipment would be used to remove the stabilized construction entrance and surface rock, and the ground surface would be stabilized as necessary, in accordance with the Stormwater Pollution Prevention Plan (SWPPP) to control erosion and restore the vegetation to predevelopment condition.

The additional Construction Work Area in this MPR is needed because none of the 11 approved project staging areas (80.4 acres) listed in FEIR Table 2-9 are suitable as a staging area for the westerly portion of the Project, as demonstrated in Table 1. Due to the elimination of options of staging areas analyzed in the Final Environmental Impact Report (FEIR) (73.4 acres are not available for use; see Table 1), SCE proposes to add the approximately 5.9 acre (approximately 257,004 square feet) Concordia Yard, which is large enough to accommodate material and equipment storage at the western portion of the Project.

**Table 1**  
**Usability of Approved Project Staging Areas from FEIR**  
**Table 2-9**

Staging Site	Acres	Location	Useable	If Not Useable, Reason?
Staging Area VIG2	5.4	South of Valley Substation adjacent to Menifee Road, City of Menifee	Yes	Staging area at Valley Substation adequately fulfills needs for the east end of project.
Staging Area VIG3	3.5	Approximately 0.1 mile east of the intersection of SR-74 and Ethanac Road, unincorporated Riverside County	No	Under lease; not available for sublease.
Staging Area VIG4	2.8	Approximately 0.06 mi east of intersection of SR-74 and Ethanac Road, unincorporated Riverside County	No	Under lease; not available for sublease.
Staging Area VIG5	1.6	Southwest of intersection of Central Avenue and El Toro Cut Off Road, City of Lake Elsinore	Yes	Not large enough for use as a primary staging area.
Staging Area VIG6	5.0	Southwest of the intersection of Collier Avenue and Riverside Driver (SR-74), City of Lake Elsinore	No	Limited access for heavy equipment, poles, and conductor. Located within the City of Lake Elsinore; would be public hazard with frequent ingress/egress of construction equipment.
Staging Area VIG8	3.8	Southwest of the intersection of Collier Avenue and Chaney Street, City of Lake Elsinore	No	Limited access for heavy equipment, poles, and conductor. Located within the City of Lake Elsinore; would be public hazard with frequent ingress/egress of construction equipment.
Staging Area VIG9	11.0	Adjacent to Horse Thief Canyon Road, approximately 0.13 mile southwest of I-15, unincorporated Riverside County	No	Landowner will not lease to Wilson due to concern that nearby residents would not want construction staging area in the vicinity of their homes.
Staging Area VIG10	12.1	West of Menifee Road and south of Case Road, on north side of Rouse Road, City of Menifee	No	Currently being developed and not available.
Staging Area VIG12	13	Corner of SR-74 and Rosetta Canyon Drive, City of Lake Elsinore	No	Developed as residential homes.
Staging Area VIG13	5.0	Southwest corner of Chaney Street and West Minthorn Street, City of Lake Elsinore	No	Leasing company has plans to build office buildings and does not want to lease for project.
Staging Area VIG14	17.2	Approximately 0.17 mile south of West Minthorn Street on the northwest side of Chaney Street, City of Lake Elsinore	No	Leasing company has plans for office buildings and does not want to lease for project.

During development of the staging area and in accordance with the SWPPP, sediment control best management practices (BMPs) would be placed at the perimeter, as necessary, and a stabilized construction entrance for controlling trackout would be installed at the entrance at the southern end of the property. Grading of the property would not be necessary; the ground surface

would be scraped with a dozer blade to remove vegetation and three inches of gravel would be placed to suppress dust and create a suitable working surface. Post holes would be dug for the installation of a perimeter screening fence. Power for office trailers would come from an existing power pole located approximately 130 feet east of the southern end of the staging area. The installation of new utility poles would not be necessary.

MPR No. 1 would comprise of approximately 5.9 acres in size (see Attachment A). The site is a heavily disturbed vacant lot with minimal vegetative cover. Approximately 5.8 acres (126,324 square feet) of the 5.9-acre proposed staging area is located outside of the General Disturbance Area identified in the FEIR (Attachment A). The portion of the staging area included in the FEIR does not provide enough space for the storage of material and equipment required for the project. An environmental impact analysis for use of the staging area was conducted as part of this MPR (see Attachment B, *Biological, Cultural, and Paleontological Reports*). A newly completed habitat assessment for biological resources focusing on the northern portion of the property is provided with this MPR No.1. A cultural and paleontological resource assessment report is also provided. The activities under MPR No. 1 would occur during the Valley-Ivyglen 115kV Subtransmission Line Project (VIG) approved hours and would terminate after completion of the project on January 24, 2022.

The Valley-Ivyglen Subtransmission Line Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on April 2, 2013 (Decision 10-08-009). The mitigation measures (MMs) and applicant proposed measures (APMs) described in the EIR were adopted by the CPUC as conditions of Project approval. In May 2020 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all APMs and MMs during project implementation.

This letter documents the CPUC's evaluation of all activities covered in the MPR No. 1 Request. The CPUC has carefully reviewed this MPR request and has verified that the proposed activities adhere to all applicable APM and MM requirements. The evaluation process ensures that all APMs and MMs applicable to the location, and all activities covered in the MPR are implemented, as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any APM or MM, and the refinements would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the EIR.

The CPUC has determined that MPR No. 1 meets the above criteria. MPR No. 1 is approved by the CPUC for the proposed activities based on the factors described below.

### **CPUC Evaluation of MPR No. 1 Request**

The CPUC evaluated SCE's MPR Request No. 1 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that no new impacts on sensitive resources, or increases in impact severity, would result from the requested MPR activities. The following discussion summarizes this analysis for biological, cultural, paleontological, and other environmental resources, areas as well as aesthetics and visual resources.

### ***Location of Ground Disturbance Areas***

MPR No. 1 would require approximately 5.9 acres in size and measures approximately 380 feet by 980 feet (see Attachment A). The site is a heavily disturbed vacant lot with minimal vegetative cover. Approximately 5.8 acres (126,324 square feet) of the 5.9-acre proposed staging area is located outside of the General Disturbance Area identified in the FEIR (see Attachment A). The portion of the staging area included in the FEIR does not provide enough space for the storage of material and equipment required for the project. An environmental impact analysis for use of the staging area was conducted as part of this MPR and is provided in the attached biological, cultural, and paleontological reports. A newly completed habitat assessment for biological resources focusing on the northern portion of the property is provided with this MPR. Cultural and paleontological resource assessment reports are also provided.

### ***Aesthetics/Visual Impacts***

The proposed staging area is located at 14570 Concordia Ranch Road, Lake Elsinore, CA 92530, adjacent to pole locations along Concordia Ranch Road within the Temescal Canyon landscape unit identified in Chapter 4.1 of the FEIR. Activities at the proposed staging area would be visible for approximately 22 months of construction. This impact would expose viewers to the degraded visual quality resulting from material and equipment storage activities occurring at the staging area. However, the property is heavily disturbed and was previously used as a construction staging area as recently as 2016. Compliance with Project Commitment D<sup>1</sup> requires restoration of the staging area to pre-construction condition, in coordination with the property owner, and ensures the visual impact is temporary. Compliance with MM AES-1 requires that the staging area be screened with material that is visually consistent with the surrounding area. With implementation of Project Commitment D and MM AES-1, visual impacts at the staging area would be less than significant. Aesthetic impacts associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR. Furthermore, all applicable avoidance/minimization measures identified in FEIR Chapter 9 Mitigation Monitoring, Compliance, and Reporting Plan will be followed.

### ***Biological, Cultural, Paleontological Resources, and other Environmental Resources***

The southern half of Concordia Yard was surveyed for biological resources previously for the FEIR, and the northern half was assessed in 2019. Based on biological surveys of the proposed staging area, no impacts to special-status biological and jurisdictional resources are expected as a

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<sup>1</sup> The applicant shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. Per MM BR-7, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants, criteria to monitor and evaluate revegetation success, and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached.

result of using the staging area for the duration of the Project. Areas currently covered in grass would be seeded after demobilization to ensure their return to pre-existing conditions. Impacts to biological resources associated with the proposed staging area would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR. Indirect impacts that may occur to sensitive species in the vicinity of the staging area will be mitigated in accordance with the Project Commitments and Mitigation Measures. The Concordia Yard would have coverage under the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) certificate of inclusion prior to approval of NTPR-2 and mobilization to the property. The staging area is within the coverage area of the Stephens' kangaroo rat Habitat Conservation Plan; SCE will have coverage under the Stephen's Kangaroo Rat Habitat Conservation Plan (SKR HCP) prior to approval of NTPR-2 and mobilization to the property.

Furthermore, as identified in the Final EIR and biological assessment attached, MPR No. 1 would occur in a heavily disturbed bare earth lot with minimal vegetation coverage. Additionally, no nesting birds in the vicinity of this location were found. However, if active nests are observed within the Concordia Yard, SCE must avoid impacts to the nests by implementing the relevant protection measures of the MMCRP. These include surveying for and monitoring of active nests and other sensitive biological resources (MM BR-3) and implementing disturbance buffers and other measures in the Nesting Bird Management Plan (MM BR-11).

The Concordia Yard was included in previous records searches completed for the VIG Project. The results indicate that much of the staging area was not previously surveyed for cultural/paleontological resources; however, cultural and paleontological resource analyses were analyzed in addendum reports (attached). There are no sensitive archaeological or paleontological resources located at the proposed staging area based on survey results. The Concordia Yard is more than 100 feet from a known cultural resource; in accordance with the Cultural Resources Monitoring and Treatment Plan (CRMTP), cultural resource monitoring for planned activities is not required. Planned activities would not require paleontological monitoring, including the digging of postholes for perimeter fencing, the diameter of which would be under the threshold for monitoring). If a resource is found at the site, SCE would comply with the procedures for unanticipated discoveries provided in MMs CR-1b, CR-4, CR-5, CR-7, the CRMTP, and the Paleontological Resources Management Plan (PRMP). Impacts to cultural resources associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR.

The proposed staging area is shown within the highest noise contour (70 CNEL) on Figure 4.11-1 in FEIR Chapter 4 due to the proximity to I-15. There are no residences or businesses immediately adjacent to the proposed staging area, and the nearest receptor is a residence located approximately 330 feet east of the staging area. Blasting would not be conducted at the property. Impacts to noise and vibration associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR.

Work activities occurring under MPR No. 1 at the proposed staging area and the types of equipment used would be substantially similar to the activities and equipment types analyzed at

each of the eleven approved (nine of which are unusable options for the Project) staging areas in the FEIR. Therefore, impacts to Greenhouse Gas Emissions associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR. Furthermore, the Concordia Yard is not located within a 500-meter (approximately 1,640 feet) radius of sensitive receptors (e.g., schools, hospitals, playgrounds) except for two residences located north and east of the property. Placement of gravel ground cover would minimize fugitive dust at the site, and installation of a stabilized construction entrance at the ingress/egress would mitigate trackout onto Concordia Ranch Road. Impacts to air quality associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR.

The Concordia Yard is located along Concordia Ranch Road adjacent to the Project Segment 5. The staging area would not change existing roads or emergency access. Concordia Ranch Road, accessed via Temescal Canyon Road, would be used to access the proposed staging area. A single ingress/egress at the southern end of the staging area would allow access to Concordia Ranch Road; no lane or road closures would occur during use of the proposed staging area. Usage of the proposed staging area would likely increase traffic over the course of the Project on Concordia Ranch Road but would not require agency consultation relating to transportation. Concordia Ranch Road is not a main arterial road. Furthermore, there is no on-street parking or no sidewalks, and thus pedestrian traffic is expected to be minimal. Additionally, Concordia Ranch Road is not a bus route. Impacts to transportation and traffic associated with the proposed staging area do not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in the FEIR.

### ***Permits***

No additional permits or approvals are required for MPR No. 1 activities.

### **MPR No. 1 Conditions of Approval**

MPR No. 1 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

1. All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.
2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
3. SCE shall implement all appropriate erosion and sediment control BMPs for the MPR No. 1 additional Construction Work Area, in compliance with the SWPPP and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
4. All activities (e.g., stabilizing construction entrance/ ground surface, fence installation, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
5. SCE shall ensure that the Concordia Yard entrance/exit are frequently cleaned throughout the day to avoid trackout onto Concordia Ranch Road.

6. SCE shall ensure that parked construction equipment at the Concordia Yard will have adequate and properly placed drip pans underneath to contain potential spills.
7. The work associated with MPR No. 1 shall occur within approved project workdays and hours. In the event that MPR No. 1 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
8. SCE and its contractors shall adhere to the WR-MSHCP terms and conditions, including but not limited to adherence to the Project Habitat Restoration and Revegetation Plan (HRRP), adherence to the SWPPP, performance of preconstruction surveys for burrowing owls, and the use of biological monitors to record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
9. All complaints related to MPR No. 1 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.
10. SCE shall notify CPUC after completing MPR No. 1 work activities and provide photos of the restored additional Work Construction Area. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify CPUC for evaluation and approval.

Please contact me if you have any questions or concerns regarding this MPR approval.

Sincerely,



Patricia Kelly  
CPUC Project Manager

cc:

Chuck Cleaves , E & E Compliance Manager  
Fernando Guzman, E & E Deputy Compliance Manager  
Michael Bass, SCE Project Manager

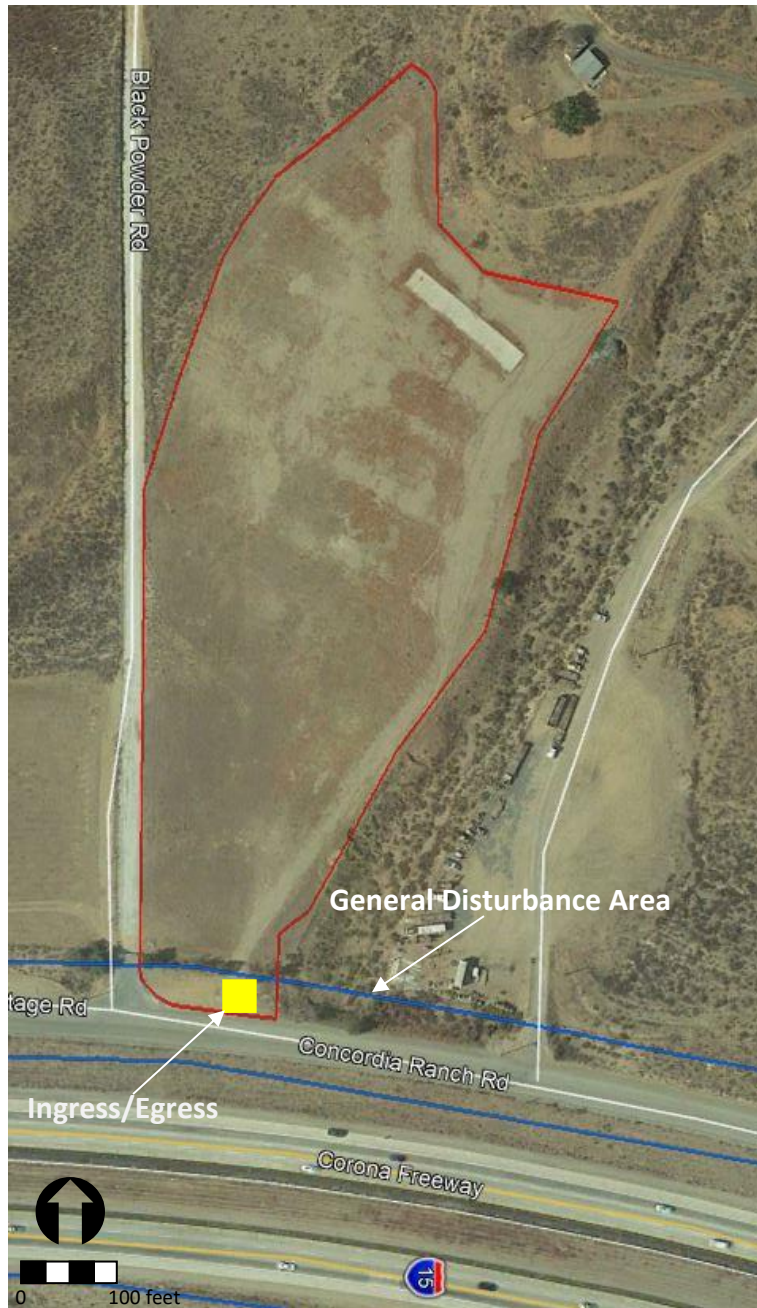
**Attachment A:**  
**MPR No. 1 Request Work Area Figures**



Figure 1: Concordia Yard Location Map



**Figure 2: Concordia Yard Boundary Map**



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**Attachment B:**  
**MPR No. 1 Biological, Cultural, and Paleontological Reports**



Environmental  
Intelligence, LLC

January 17, 2020

Matt Hooge  
Senior Environmental Manager  
Wilson Construction Company  
1190 NW 3rd Avenue  
P.O. Box 1190  
Canby, OR 97013

**SUBJECT:** Methods, Results, and Conclusions of a Habitat Assessment for Biological Resources at the Proposed Concordia Yard Minor Project Refinement for Southern California Edison's Valley-Ivyglen Subtransmission Line Project, Riverside County, California

**SUMMARY:** *On December 10, 2019, Environmental Intelligence, LLC, conducted a habitat assessment for biological resources and a jurisdictional delineation at Southern California Edison's Valley-Ivyglen Subtransmission Line Project in support of a Minor Project Refinement for the Concordia Yard. One jurisdictional Riparian/Riverine resource (wash) was identified within the Concordia Yard survey area, but east of and entirely outside of the Concordia Yard. Coulter's matilija poppy (*Romneya coulteri*) was detected in Riversidean alluvial fan sage scrub associated with the wash described above. No other special-status plants or wildlife were observed during the habitat assessment and no habitat for special-status species is present within the yard. In compliance with Mitigation Measure (MM) BR-2, pre-construction surveys are required two weeks prior to construction for special-status plant and wildlife species and to establish baseline conditions to guide post-construction restoration efforts. In addition, in compliance with MM BR-12, pre-construction burrowing owl (BUOW) surveys are required within 30 days of construction during the non-breeding season (September 1 through January 31) and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether BUOW occupy the site, with additional measures if present and unavoidable.*

Dear Mr. Hooge,

This report documents the methods, results, and conclusions of a general habitat assessment and formal jurisdictional delineation conducted on December 10, 2019, by Environmental Intelligence (EI) at Southern California Edison's (SCE) Valley-Ivyglen Subtransmission Line Project (VIG) in support of a Minor Project Refinement for the Proposed Concordia Yard. EI's habitat assessment was conducted in compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) as implemented by the Regional Conservation Authority (RCA; Riverside County Transportation and Land Management Agency 2003).

## **PROJECT LOCATION AND DESCRIPTION**

The Minor Project Refinement for the Concordia Yard is part of the larger VIG, which consists of Phase 1 (approximately 13 miles) and Phase 2 (approximately 11.5 miles). VIG involves the construction of a new 115-kilovolt (kV) subtransmission line to improve reliability and meet projected electrical load requirements in the western Riverside County area. Accordingly, SCE proposes to construct, operate, and maintain a new 115-kV subtransmission line, thereby connecting the existing SCE Valley Substation (near Perris, California) to the existing Ivyglen Substation (north of Lake Elsinore, California), in western Riverside County.

The Concordia Yard is located within Phase 2 of VIG, west of Black Powder Road and north of the Interstate 15 Frontage Road (Concordia Ranch Road), in an unincorporated portion of Lake Elsinore, Riverside County, California (Exhibit 1). The Concordia Yard consists of relatively flat (less than 4% slope), previously graded and disked land dominated by bare ground and gravel, with widely scattered annual weedy species and refuse debris, and a concrete pad, best described as heavily disturbed and previously developed. Elevations range from approximately 1,250 feet above mean sea level (amsl) at the southern end to approximately 1,285 feet amsl at the northern end.

## **HCP COMPLIANCE**

The Concordia Yard is in the coverage area of the MSHCP as implemented by the RCA located in the Elsinore Area Plan, Cell Group I, within the southwest corner of Criteria Cell 3650 and the northwest corner of Criteria Cell 3750. No existing cores or existing linkages are located within the Concordia Yard study area. The Concordia Yard is located within the MSHCP Burrowing Owl Survey Area, Criteria Area Species Survey Area (CASSA), and Narrow Endemic Plant Species Survey Area (NEPSSA).

The Concordia Yard will not impede the functions and values or the goals and objectives of the MSHCP. SCE has submitted a Participating Special Entity application for MSHCP coverage, and with consistency as anticipated, issuance of a Certificate of Inclusion for Phase 2 of VIG.

## **SURVEY METHODOLOGY**

A general habitat assessment and formal jurisdictional delineation were performed by EI qualified biologists Mitch Provance, PhD, and Joshua Zinn on December 10, 2019. Survey times and weather conditions are detailed below in Table I.

**TABLE I. SURVEY DATE, TIMES AND WEATHER CONDITIONS**

<b>Date</b>	<b>Time</b>	<b>Survey Type</b>	<b>Biologists</b>	<b>Weather (Start and End)</b>
12/10/2019	0700 - 1230	Habitat Assessment/ Jurisdictional Delineation	Mitch Provance and Joshua Zinn	75-79 °F, cloudy and light breeze at start, partly cloudy and calm at end

The Concordia Yard survey area included the proposed Concordia Yard and a 500-foot buffer. The survey area only included areas that had not been previously surveyed for Phase 2. As shown in Exhibit 1, the southern half of the yard and adjacent land out to 500 feet or more to the east, west, and south were surveyed previously between 2006 and 2018. The habitat assessment included a survey for all special-status species habitat with the potential to occur in the region

with particular focus on western burrowing owl (BUOW; *Athene cunicularia*), vernal pool branchiopods (fairy shrimp; Order Anostraca), Stephens' kangaroo rat (SKR; *Dipodomys stephensi*), and rare plants. The habitat assessment for BUOW included a focused burrow survey conducted in accordance with the *Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area* (County of Riverside 2006) and the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Wildlife [CDFW] 2012). The habitat assessment was conducted by walking meandering transects no more than 30 meters apart throughout the Concordia Yard survey area to document existing site conditions, to identify all potential natural and surrogate potential BUOW burrows/crevices (i.e., California ground squirrel [*Otospermophilus beecheyi*] burrows) and map vegetation communities. Potential burrows/crevices were assessed for suitability and inspected for evidence of use by BUOW (i.e., sign, such as white wash, pellets, scat, feathers, and bone fragments). Wildlife and plant species were recorded, including areas that provide suitable habitat (e.g., vegetation communities, rocky outcrops, burrow complexes, drainages, etc.) for any special-status plant and wildlife species. All special-status biological resources were documented if observed. Binoculars were used to scan for biological resources outside the buffer and in any inaccessible areas. This assessment was conducted outside the optimal flowering period for some special-status annual plant species found in the region; however, many plants are often still recognizable by biologists proficient in identifying these species. The formal jurisdictional delineation documented waters that are potentially MSHCP Riparian/Riverine resources and/or jurisdictional waters features. Vegetation communities and all encountered special-status biological and jurisdictional resources were documented in the field using Collector for ArcGIS connected to an external receiver via Bluetooth, with accuracy to 3 meters.

## **SURVEY RESULTS**

### **Existing Plant Communities**

The Concordia Yard consists of relatively flat (less than 4% slope), previously graded and disked land dominated by bare ground and gravel, with widely scattered annual weedy species and refuse debris, and a concrete pad. The few sparse plants observed within the Concordia Yard included recently germinated fiddleneck (*Amsinckia* sp.), cheeseweed mallow (*Malva parviflora*), Mediterranean grass (*Schismus* sp.), brome grass (*Bromus* sp.), short-podded mustard (*Hirschfeldia incana*), stinknet (*Oncosiphon piluliferum*), white horehound (*Marrubium vulgare*), tumble mustard (*Sisymbrium* sp.), and horseweed (*Erigeron* sp.). A few small individuals of brittlebush (*Encelia farinosa*) were observed in the northern corner of the yard.

East of the Concordia Yard, an ephemeral wash conveys flows generally northeast to southwest, and vegetation consists of Riversidean alluvial fan sage scrub (RAFS; State Rarity: S3) dominated by scale broom (*Lepidospartum squamatum*), with California cholla (*Cylindropuntia californica*), white sage (*Salvia apiana*), tarragon (*Artemisia dracunculus*), spiny redberry (*Rhamnus crocea*), brittlebush, and linear leaved stillingia (*Stillingia linearifolia*). West of the Concordia Yard and the furthest extents of the buffer to the north and east, vegetation consists of Riversidean sage scrub (RSS) dominated by brittlebush and California buckwheat (*Eriogonum fasciculatum*), with white sage, California matchweed (*Gutierrezia californica*), short-podded mustard, and brome grass (*Bromus* sp.). The area within the buffer directly north and east of the Concordia Yard consists of disturbed RSS (DRSS) dominated by brittlebush and linear leaved stillingia, with short-podded mustard, brome grass, Kellogg's tarweed (*Deinandra kelloggii*),

dove weed (*Croton setiger*), and a few individuals of sweetbush (*Bebbia juncea*). See Appendix A for representative site photographs.

### **Common Wildlife Observed**

Wildlife observed included common species such as California towhee (*Melospiza crissalis*), common raven (*Corvus corax*), mourning dove (*Zenaidura macroura*), red-tailed hawk (*Buteo jamaicensis*), western kingbird (*Tyrannus verticalis*), and desert cottontail (*Sylvilagus audubonii*). No small rodent or large mammal burrows, ponding or depressions that may hold water, or nests were observed during the habitat assessment.

It should be noted that short-term inventories of this nature are limited in their scope by the seasonality, timing and duration of the survey, plant blooming periods, and the nocturnal and fossorial habits of many animals. Therefore, the lists of species presented above do not necessarily reflect the total number of plants and animals that potentially occupy the Concordia Yard survey area.

### **Special-Status Plant Species Observed**

Coulter's matilija poppy (*Romneya coulteri*; California Rare Plant Rank 4.2) was observed in the ephemeral wash mapped as RAFS east of and well outside of the Concordia Yard. This species is a perennial herb typically found on dry, rocky, or sandy soils within dry washes and canyons. It typically blooms March through July. No other special-status plant species were observed during the habitat assessment.

### **Special-Status Plant Species with Potential to Occur**

Rare plants observed in the vicinity of the proposed yard during previous surveys, or that have the potential to occur in the region, include the following:

- MSHCP Adequately Conserved Species - Small-flowered morning glory (*Convolvulus simulans*), Palmer's grapplinghook (*Harpagonella palmeri*), long-spined spineflower (*Chorizanthe polygonoides* var. *longispina*), vernal barley (*Hordeum intercedens*), small-flowered microseris (*Microseris douglasii* ssp. *platycarpha*), Coulter's matilija poppy, and peninsular spineflower (*Chorizanthe leptotheca*);
- MSHCP Section 6.1.3 Narrow Endemic Plant Species (NEPS) in NEPSAA 1 - Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), slender-horned spineflower (*Dodecahema leptoceras*), many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossalis*), California Orcutt grass (*Orcuttia californica*), San Miguel savory (*Satureja chandleri*), Hammitt's clay-cress (*Sibaropsis hammittii*), and Wright's trichocoronis (*Trichocoronis wrightii* var. *wrightii*);
- MSHCP Section 6.3.2 Criteria Area Plant Species (CAPS) in CASSA 1 - thread leaved brodiaea (*Brodiaea filifolia*), Davidson's saltbush (*Atriplex serenana* var. *davidsonii*), Parish's saltbush (*Atriplex parishii*), San Jacinto Valley crownscale (*Atriplex coronata* var. *notatior*), little mousetail (*Myosurus minimus* var. *apus*), smooth tarplant (*Centromadia pungens* ssp. *laevis*), Coulter's goldfields (*Lasthenia glabrata* var. *coulteri*), and round-leaved filaree (*California macrophylla*); and



- Non-MSHCP Covered Sensitive Plant Species - chaparral sand verbena (*Abronia villosa* var. *aurita*) paniculate tarplant (*Deinandra paniculata*), Robinson's peppergrass (*Lepidium virginicum* var. *robinsonii*), white rabbit tobacco (*Pseudognaphalium leucocephalum*), and Engelmann Oak (*Quercus engelmannii*).

The topography of the site is flat, and the soils are intermixed with moderate amounts of concrete, plastic, metal, and paper debris. The soils of the proposed yard are mapped by Natural Resources Conservation Service (NRCS) as Yokohl loam and Honcut sandy loam, and during surveys the soils appeared to be sandy loam in the broad sense. The native soil horizons within the yard have been turned over and mixed likely from past grading and current soil conditions are not representative of the adjacent undisturbed soil outside the yard. There is currently evidence of routine mechanical scarification or disking. The flat topography, polluted soils, presence of a concrete foundation, and previous development seen on historical aerial imagery suggest that historical grading or mechanical modification of the landscape occurred. The vegetation onsite is sparse at this time, and is comprised entirely of upland species. There are no drainages or low-lying areas to support plants that require more mesic conditions. There are also no heavy clay soils or other unique soils required for many upland rare plant species. Based on standing debris observed onsite, mechanically altered soil composition, and the highly disturbed condition of the site, habitat for any rare plant species is absent and rare plant species noted above are unlikely to occur within the proposed yard.

### **Special-Status Wildlife Species Observed**

No special-status wildlife species were observed in the Concordia Yard survey area during the habitat assessment.

### **Special-Status Wildlife Species with Potential to Occur**

Previous surveys for VIG have been conducted in the vicinity of the Concordia Yard for BUOW, listed fairy shrimp, and small mammals.

#### Fairy Shrimp

Two species of Anostracan branchiopods listed for Federal protection under the Endangered Species Act have the potential to occur at or near the yard: the Riverside fairy shrimp (*Streptocephalus woottoni*) and the vernal pool fairy shrimp (*Branchinecta lynchi*). These listed fairy shrimp occur in natural and artificially created ephemeral habitats. Despite recent precipitation, no vernal pools, water-filled road ruts, or any otherwise inundated ponded areas were observed within the yard, or in surrounding areas during the survey. The yard is flat and there was no evidence of depressions or clay soils that would inundate and hold water to support fairy shrimp. Riverside fairy shrimp and vernal pool fairy shrimp are unlikely to occur based on the absence of suitable habitat.

#### Burrowing Owl

BUOW is a CDFW California Species of Special Concern (SSC) and MSHCP Group 3 Covered Species, and is not likely to occur. Adjacent areas with DRSS north of the yard, RSS to the west, and RAFS to the east may provide limited foraging habitat for BUOW; however, no suitable burrows or California ground squirrels were observed in the proposed yard or adjacent areas during the survey. Foraging would be limited to the more open disturbed areas within the DRSS. BUOW is unlikely to occur based on the absence of suitable habitat.

### Stephens' Kangaroo Rat

Stephens' kangaroo rat (SKR) is Federally listed as endangered and California-listed as a threatened species. SKR is likely to occur within the survey area due to the presence of suitable habitat consisting of open sage scrub habitat, but is unlikely to occur within the proposed yard as no habitat is present. SKR was detected previously west of the proposed yard.

### Coastal California Gnatcatcher

Coastal California gnatcatcher (CAGN; *Polioptila californica californica*) is Federally listed as threatened, SSC, and MSHCP Group 2 Covered Species, and is not likely to occur within the proposed yard. Adjacent areas with RSS west of the yard and DRSS to the north may provide foraging and limited nesting habitat for CAGN. No individuals of CAGN were detected within the Concordia Yard survey area during the habitat assessment or in the vicinity during previous surveys.

The Concordia Yard does not contain suitable habitat for any other special-status wildlife, although some special-status reptiles and birds such as Belding's orange-throated whiptail (*Aspidoscelis hyperythra beldingi*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), and California horned lark (*Eremophila alpestris actia*) could venture onto the site from adjacent suitable habitat.

### **MSHCP Riparian/Riverine and Jurisdictional Features**

One jurisdictional MSHCP Riparian/Riverine resource was identified in the Concordia Yard survey area during the formal jurisdictional delineation. This resource is the northern extension of the wash previously mapped by EI in late-summer/early-fall of 2018 during a formal jurisdictional delineation and MSHCP Riparian/Riverine site assessment. The limits by jurisdiction of this feature were updated during the December 2019 site visit. The unnamed drainage, observed east and entirely outside of the Concordia Yard, conveys flows generally northeast to southwest, does not contain riparian vegetation, is mapped as RAFS, and was dry during the assessment.

### **RECOMMENDATIONS**

Species-specific surveys are required for projects occurring within an MSHCP-designated Survey Area if species-specific habitat conditions are present within the project area. The proposed Concordia Yard is located within the CASSA, NEPSSA, and Burrowing Owl Survey Area. However, because no suitable habitat for Criteria Area Species, Narrow Endemic Species, or BUOW with the potential to occur within the vicinity is present within the Concordia Yard, focused surveys are not recommended. Nonetheless, pre-construction surveys will identify any new locations and implement measures necessary to minimize impacts to special-status species consistent with Project Commitment L, Mitigation Measure (MM) BR-1, MM BR-2, and MM BR-4, as applicable.

In accordance with MM BR-12, pre-construction surveys for BUOW will be conducted within 30 days of construction during the non-breeding season (September 1 through January 31) and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether BUOW occupy the site. If an occupied burrow is identified, buffer distances detailed in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012) will be adhered to.

Additionally, biological construction monitoring will occur during initial work within the Concordia Yard. The Concordia Yard does not contain suitable habitat for BUOW, but suitable habitat occurs in the vicinity.

If appropriate buffers cannot be maintained, and impacts on BUOW or occupied burrows are unavoidable, a Determination of Biologically Equivalent or Superior Preservation report will be prepared and implemented in compliance with MSHCP Section 6.3.2, and as approved by CDFW and RCA. If, in consultation with CDFW, it is determined that project activities require removal of occupied burrows, eviction and burrow closure may be required to ensure against “take” of BUOW or nests. However, this will only occur after the preparation of a Burrowing Owl Exclusion Plan, as approved by CDFW.

## **CONCLUSION**

The results of EI’s Habitat Assessment of Concordia Yard show that no State- or Federally listed plant or wildlife species were observed or are expected to occur. One CNPS-ranked plant, Coulter’s matilija poppy, was observed east and well outside of the Concordia Yard in RAFS. Marginally suitable habitat for CAGN is present north and west of the Concordia Yard. No nests or nesting activities were observed during the survey. No other special-status plant or wildlife species were observed or are expected to occur. Pre-construction surveys for special-status plant and wildlife species will be completed within two weeks of the start of construction in any given project construction area, and again if work has lapsed for longer than 30 days. Although no BUOW individuals, suitable burrows, or sign were observed during the habitat assessment, there is potential for this species to occur based on the presence of suitable foraging habitat to the north, west, and east. Pre-construction surveys for BUOW will be conducted by a qualified biologist within 30 days of construction during the non-breeding season and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether BUOW occupy the site.

For MSHCP Covered Species, SCE is applying for MSHCP coverage as Participating Special Entity. Take of SKR will be processed directly through the SKR Habitat Conservation Plan (HCP), leaving the MSHCP to cover incidental take, as needed, for 145 species potentially affected by the Project. SCE finalized an SKR HCP Implementation Agreement with the Riverside County Habitat Conservation Agency. This Agreement provides a process through which SCE may obtain take authorization of SKR pursuant to the SKR HCP.

If you have any questions or comments regarding this report, please contact Eric Kline directly at 858.261.2414.

Sincerely,

**ENVIRONMENTAL INTELLIGENCE**



Eric Kline

Attachments:

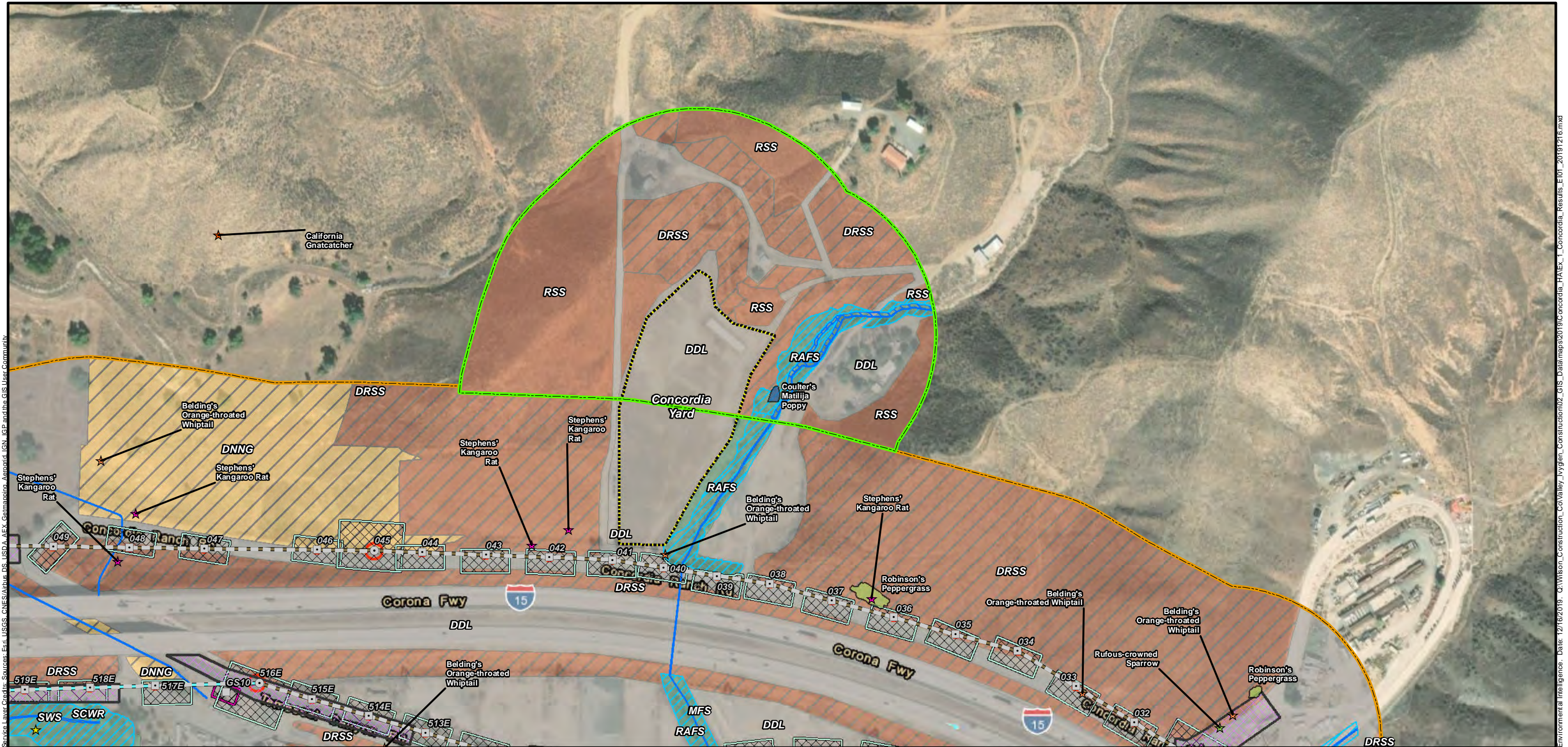
Exhibit 1 –Concordia Yard Habitat Assessment Results  
Appendix A – Site Photographs

References

California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. Unpublished report, Dated March 7, 2012.

County of Riverside. 2006. Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area. Riverside County, California.

Riverside County Transportation and Land Management Agency. 2003. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Final MSHCP—Volumes 1 and 2. Approved June 17, 2003.



- Project Structures**
- Guard Pole
  - Monopole - LWS
  - Monopole - TSP
- Subtransmission Alignment**
- Segment 5, Overhead
  - Segment 6, Overhead
- Fiber Optic Line**
- Overhead Fiber Optic Cable

- Construction Work Areas**
- Guard Site
  - Pole Impact Areas
  - Pull Site
  - Structure Work Area
  - Material Yard
- Survey Areas**
- Concordia Yard 2019 Survey Area
  - 2006-2018 Survey Area

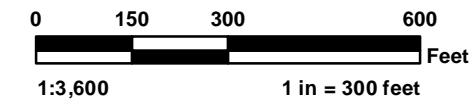
- Sensitive Species Data**
- Belding's Orange-throated Whiptail
  - California Gnatcatcher
  - Rufous-crowned Sparrow
  - Stephens' Kangaroo Rat
  - Yellow Warbler
- Sensitive Plant Polygons**
- Coulter's Matilija Poppy
  - Robinson's Peppergrass

- Riparian Vegetation**
- MFS : Mulefat Scrub
  - RAFS : Riversidean Alluvial Fan Sage Scrub
  - SCWR : Southern Cottonwood-Willow Riparian Forest
  - SWS : Southern Willow Scrub
- Upland Vegetation**
- DDL : Disturbed/Developed Land
  - DNNG : Disturbed Nonnative Grassland

- RSS : Riversidean Sage Scrub
  - DRSS : Disturbed Riversidean Sage Scrub
- Potentially Jurisdictional Waters (E1 2018)**
- Waters of the State
  - Waters of the U.S. and State



**EXHIBIT 1. CONCORDIA YARD HABITAT ASSESSMENT RESULTS**  
**VALLEY-IVYGLEN SUBTRANSMISSION PROJECT | RIVERSIDE COUNTY, CA**



Source Layer Credits: Sources: Esri, USGS, ONES/Aviris, US, USDA, ALEX, Geomatics, Aemond, IGN, IGP and the GIS User Community

Environmental Intelligence, Date: 12/16/2019, Path: \\w\Wilson\_Construction\_Co\Valley\_IvyGlen\_Construction\GIS\_Data\maps\2019\Concordia\_HA\Ex\_1\_Concordia\_Results\_EI01\_20191216.mxd



PHOTO 1:

VIEW OF NORTH END OF THE PROPOSED CONCORDIA YARD WITH CONCRETE PAD FACING NORTH.  
PHOTO TAKEN ON 12/10/2019.

PHOTO 2:

VIEW FROM THE EASTERN MIDDLE OF THE CONCORDIA YARD FACING SOUTHWEST. PHOTO TAKEN ON 12/10/2019.



PHOTO 3:

VIEW FACING EAST FROM THE RIVERSIDEAN SAGE SCRUB ADJACENT TO THE CONCORDIA YARD WITH THE YARD IN THE BACKGROUND.  
PHOTO TAKEN ON 12/10/2019.

PHOTO 4:

VIEW FACING NORTH OF THE RIVERSIDEAN ALLUVIAL FAN SAGE SCRUB LOCATED EAST OF THE CONCORDIA YARD.  
PHOTO TAKEN ON 12/10/2019.





April 30, 2020

Matt Hooge  
Senior Environmental Manager  
Wilson Construction Company  
1190 NW 3<sup>rd</sup> Avenue  
Canby, OR 97013  
E: mhooge@wilsonconst.com

**RE: Addendum: Cultural Resources Assessment for Southern California Edison's Concordia Yard, Riverside County**

This memorandum examines potential impacts to cultural resources associated with the proposed addition of the Concordia Yard for the Southern California Edison Company (SCE) Valley-Ivyglen (VIG) 115 Kilovolt (kV) Subtransmission Line Project (Project). The yard was added after the Project's Final Environmental Impact Report (FEIR) was prepared. The yard will be used for material staging and will be enclosed with a fence. Wilson will use equipment to spread 3 inches of gravel over the surface of the yard and to auger holes to install perimeter fencing. At the end of the project, front-end loaders and other equipment will be used to remove the gravel. Ground disturbance in native sediments within the Concordia Yard will be limited to augering 12-inch diameter holes.

Concordia Yard is located along the western portion of the VIG Project alignment (Attachment A: Figure 1). Concordia Yard is a previously graded area located off of Concordia Ranch Road and Black Powder Road near Lake Elsinore, California (Attachment A: Figure 2). Locational detail is provided in Table 1. The Concordia Yard was not included in the cultural resources analysis for the FEIR for the VIG Project; therefore, it is analyzed in this addendum report, as discussed below.

**Table 1.** Project Components Locational Data

Name	Location	Acreage	Quadrangle: Section/Township/Range
Concordia Yard	North of I-15 and Concordia Ranch Road, 0.5 mile north-northwest of the community of Alberhill	5.89	Alberhill: S 16/T 5S/R 5W

The Concordia Yard was included in previous records searches completed for the VIG Project. The results of those searches indicate that the majority of the Concordia Yard has not been previously surveyed for cultural resources and there are no previously-recorded sites within the Yard. Two resources have been recoded within 0.25 mile of the Yard, including one historic-age (i.e., 50 years old or older) water conveyance feature (P-33-021069/CA-RIV-10914) and one historic-age single family property (P-33-019925). Resource P-33-021069/CA-RIV-10914 (water conveyance feature) is located within 10 feet of the access road to the yard but is more than 350 feet northeast of the yard itself. Resource P-33-019925 (single family property) is located



more than 100 feet to the north of the yard and has been evaluated and recommended not eligible for the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP).

As part of this assessment, a field survey of the 5.89-acre Concordia Yard was conducted by Paleo Solutions archaeologist, Amanda Lloyd on December 10, 2019. The entire Yard was surveyed using transect intervals spaced 10 meters apart. Surveyed areas were closely inspected for evidence of prehistoric or historic-age archaeological materials and historic-age structures or features. The area was confirmed to be open field that has been regularly disced and cleared for vegetation. Ground visibility was very good and varied from 85 to 95 percent. As a result of the survey, no cultural resources were observed within the Project area.

***Summary of Findings***

The Concordia Yard has been previously disturbed, and ground disturbance in native sediments within the yard will be limited to augering 12-inch diameter holes around the perimeter of the Yard for the installation of fencing. Two cultural resources were identified within the records search radius for Concordia Yard; however, both are more than 100 feet from the Yard. No cultural resources have been identified within the yard. As a result, fencing and use of the yard will not result in any impacts to cultural resources, and no additional cultural resources work is deemed necessary for the Concordia Yard.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Chandler'.

Evelyn N. Chandler  
Principal Archaeologist & Program Director, Paleo Solutions

**Attachments:**

Attachment A Figures





## **ATTACHMENT A: Project Maps**

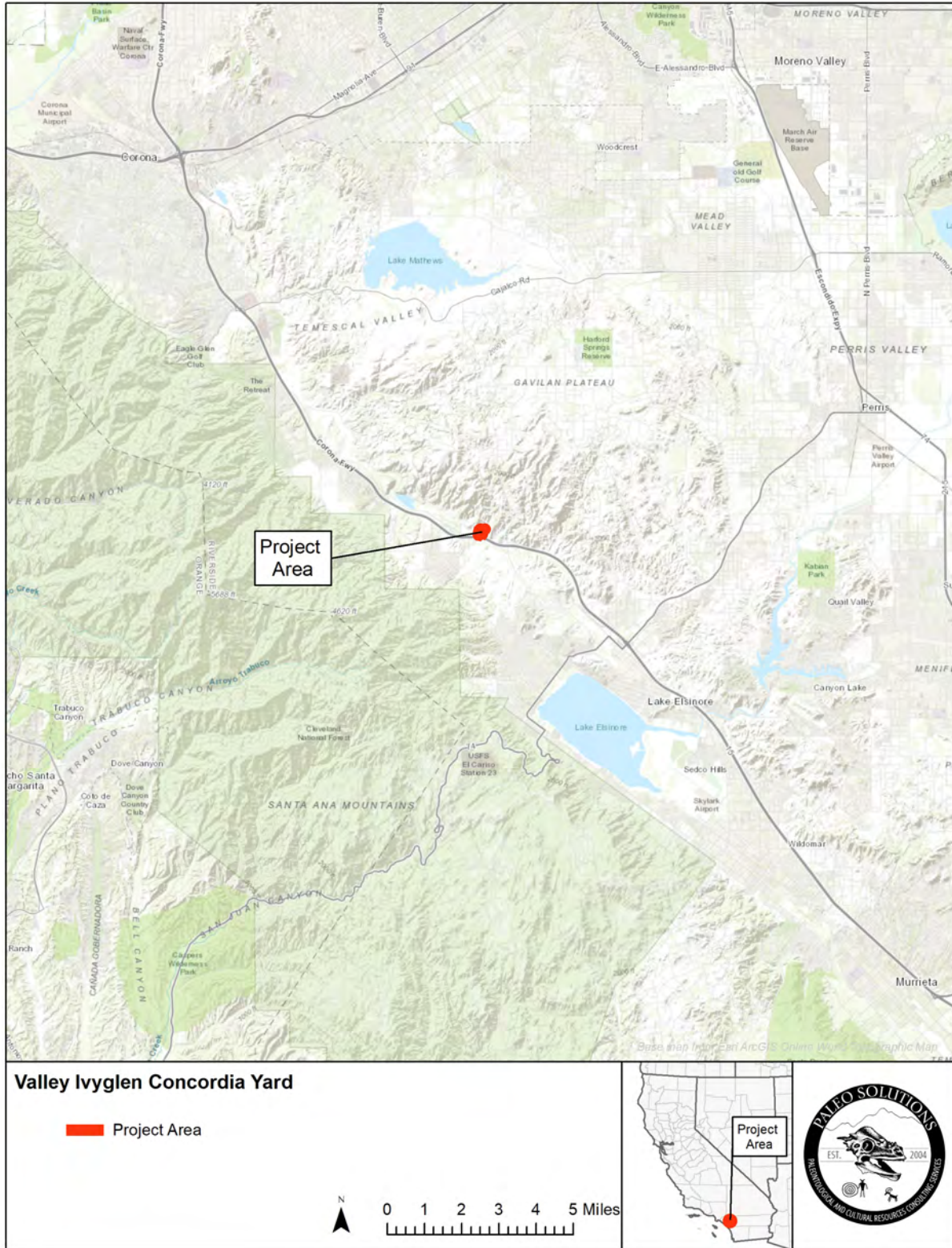


Figure 1. Project Vicinity Map.



Figure 2. Concordia Yard Location Map.



April 30, 2020

Matt Hooge  
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**RE: Paleontological Resources Assessment for the SCE Valley-Ivyglen 115 kV Subtransmission Line Project – Concordia Yard**

## 1.0 INTRODUCTION

This paleontological memorandum examines the potential impacts to paleontological resources associated with the proposed addition of the Concordia Yard to the Southern California Edison Company (SCE) Valley-Ivyglen 115 Kilovolt (kV) Subtransmission Line Project (Project). The yard was added after the Project's Final Environmental Impact Report (FEIR) was prepared. The Concordia Yard will be used for material staging only and will be enclosed with a fence. Wilson will use equipment to spread 3 inches of gravel over the surface of the yard and to auger holes to install perimeter fencing. At the end of the Project, front-end loaders and other equipment will be used to remove the gravel. Ground disturbance in native sediments within the Concordia Yard will be limited to augering 12-inch diameter holes. The Concordia Yard (Attachment A: Figure 1) is a previously graded area located off of Concordia Ranch Road and Black Powder Road near Lake Elsinore, California.

## 2.0 METHODS

The paleontological analysis consisted of a review of geologic mapping by Morton and Miller (2006), and the previously completed paleontological records searches and literature reviews for the Valley-Ivyglen Project (Jefferson, 1989; Lander, 2008; Scott, 2009), which cover the areas requested for the Concordia Yard. A supplemental paleontological survey of the Concordia Yard was conducted by Daniel Nolan, B.S. on December 10, 2019.



## 3.0 RESULTS

### 3.1 GEOLOGIC MAP REVIEW

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The Concordia Yard is mapped as middle to early Pleistocene-age very old axial-channel deposits (Qvoa) with minor amounts of Cretaceous-age volcanic rocks, specifically Santiago Peak Volcanics (Kvsp) (Morton and Miller, 2006; Attachment A: Figure 2). The geologic units within the Concordia Yard occur elsewhere in the Valley-Ivyglen Project alignment and are discussed in the FEIR (Ecology and Environment, Inc., 2017).

### 3.2 RECORDS SEARCH AND LITERATURE REVIEW

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Paleontological records searches conducted at the Natural History Museum of Los Angeles County and San Bernardino County Museum, as well as paleontological literature reviews, were negative for fossil localities within the Valley-Ivyglen Project area and immediate vicinity, which includes the Concordia Yard. However, Pleistocene-age deposits similar to those within the yard have proven to yield scientifically significant paleontological resources throughout the Inland Empire, typically from finer-grained alluvial deposits (Jefferson, 1989; Lander, 2008; Scott, 2009). Therefore, the generally fine-grained middle to early Pleistocene-age very old axial-channel deposits (Qvoa) are considered to have a high potential for buried resources based on Society of Vertebrate Paleontology (SVP) guidelines (2010). Cretaceous-age volcanic rocks, such as the Santiago Peak Volcanics (Kvsp), do not contain fossils due to their high heat of formation deep below the surface of the earth, and are therefore considered to have no paleontological potential based on SVP (2010) guidelines.

### 3.3 FIELD SURVEY

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The Concordia Yard survey area is located north of Concordia Ranch Road at Black Powder Road, north of Interstate 15 (I-15) near Lake Elsinore, California. The site is situated in an open field between private ranches located in a broad valley near the base of nearby foothills. The terrain is nearly exclusively flat with low relief hills near the northern side of the survey area that slope gently southerly with a total topographic differential of approximately 50 feet (Attachment A: Photos 1-3). Existing ground disturbances include a large concrete slab, exposed and partially buried pipelines, paved and unpaved roads, grading and spoils piles containing previously disturbed sediments, removed cement piles, fences, and miscellaneous debris (Attachment A: Photos 1 and 3-5). Additionally, most of the Concordia Yard surface is covered in previously disturbed and disked rolled sediments, as well as fresh grasses.

#### 3.3.1 Geology

Sediments observed included previously disturbed sediments and middle to early Pleistocene-age very old axial-channel deposits (Qvoa). Previously disturbed sediments were observed mostly along the boundary limits of the survey area. Due to the minimal topographic relief, alluvial sediment exposures are limited to ground surface areas devoid of vegetation and the sidewalls and bases of low-relief drainages.

Pleistocene-age very old axial-channel (Qvoa) drainages range from less than one foot deep to approximately 4 feet deep (Attachment A: Photo 5). Very old axial-channel sediments consist of buff red-brown (weathered surface) to pale yellow-brown (fresh surface) colored, moderately to poorly sorted, fine- to very coarse-grained sand with some subangular granules, pebbles, and cobbles composed primarily of plutonic rock fragments (Attachment A: Photos 5-6). Exposures along drainage walls display some coarser gravels and cobbles within the outcropping (Attachment A: Photo 5).

#### 3.3.2 Paleontology

No paleontological resources were observed or collected during the survey. However, sediments conducive to fossil preservation, particularly those of the Pleistocene-age very old axial-channel deposits (Qvoa), were observed.



## 4.0 RECOMMENDATIONS

The Concordia Yard has been previously disturbed at the surface, there are no known paleontological resources within the yard, and ground disturbance in native sediments within the yard will be limited to augering 12-inch diameter holes. Per the Project's Paleontological Resources Monitoring Plan (PRMP) (Paleo Solutions, 2019), monitoring during augering is only required if the diameter is 3 feet or greater; therefore, paleontological monitoring is not required at the Concordia Yard. However, a paleontologist will be available on-call in the event of unanticipated discoveries.

In the event that ground disturbance in native sediments becomes necessary, then paleontological monitoring, spot checking, and fossil recovery should be implemented at the Concordia Yard in accordance with Mitigation Measures (MM) CR-4 and CR-5 and the Project's PRMP (Paleo Solutions, 2019).

If you have any questions concerning the results for this study, please contact me at [crichards@paleosolutions.com](mailto:crichards@paleosolutions.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Courtney Richards".

Courtney Richards, M.S.  
Principal Paleontologist  
Paleo Solutions, Inc.

### **Attachments:**

Attachment A Figures

### **References:**

- Ecology and Environment, Inc. 2017. Final Environmental Impact Report and Mitigation Monitoring, Compliance, and Reporting Plan: Valley-Ivyglen 115-kV Subtransmission Line and Alberhill System Projects: Prepared for the California public Utilities Commission Energy Division.
- Jefferson, G.T. 1989. Late Cenozoic Tapirs (Mammalia: Perissodactyla) of Western North America. Contributions in Science, Natural History Museum of Los Angeles County, Number 406: 1-22.
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- Scott, E. 2009 Paleontology Literature and Records Review, Alberhill Substation 500 kV Transmission Line and 115 kV Source Line, Riverside County, California. San Bernardino County Museum, Redlands, CA. Dated August 27, 2009.



Society of Vertebrate Paleontologists (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, 11 p.



## **ATTACHMENT A: Figures**



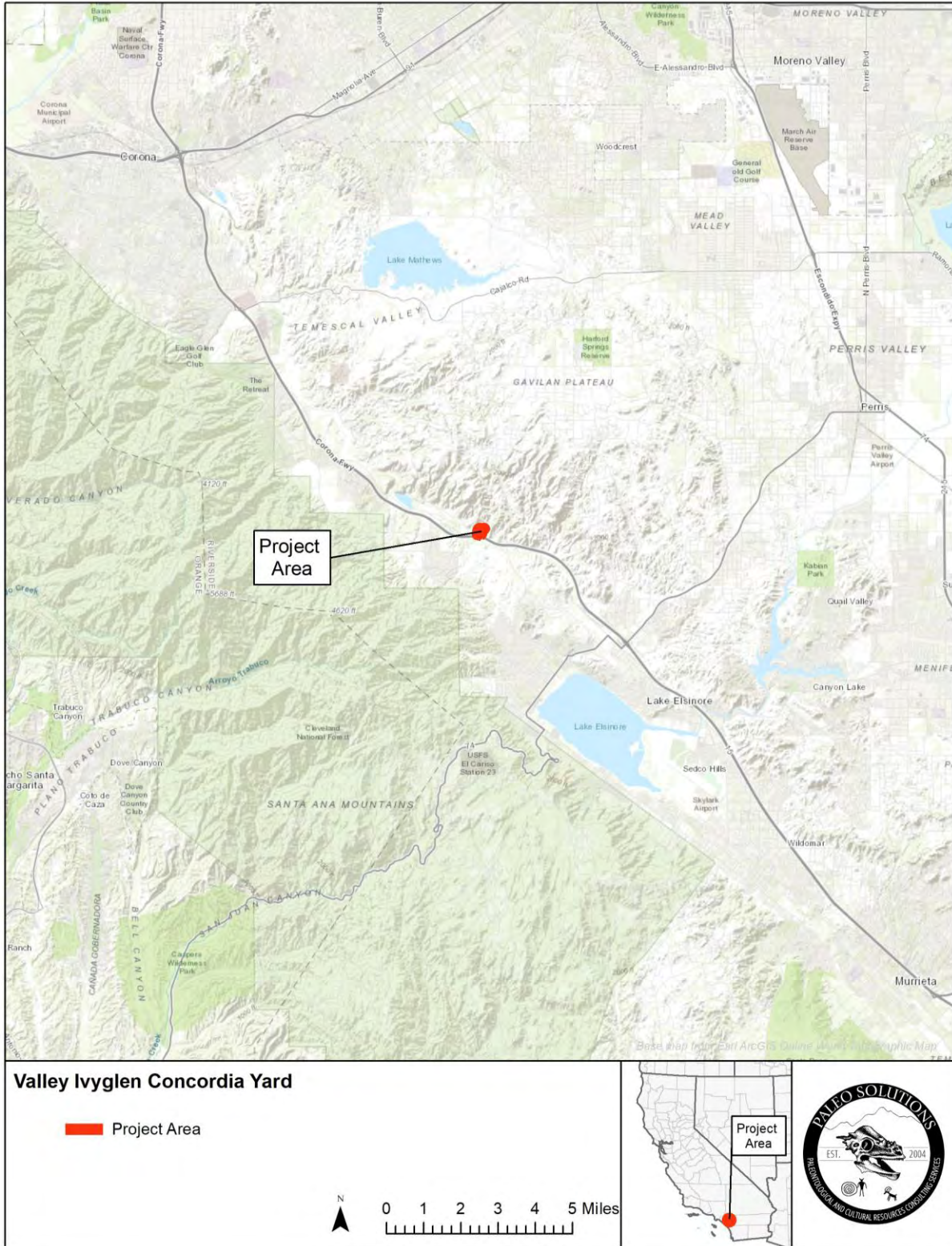


Figure 1. Concordia Yard Location Map.

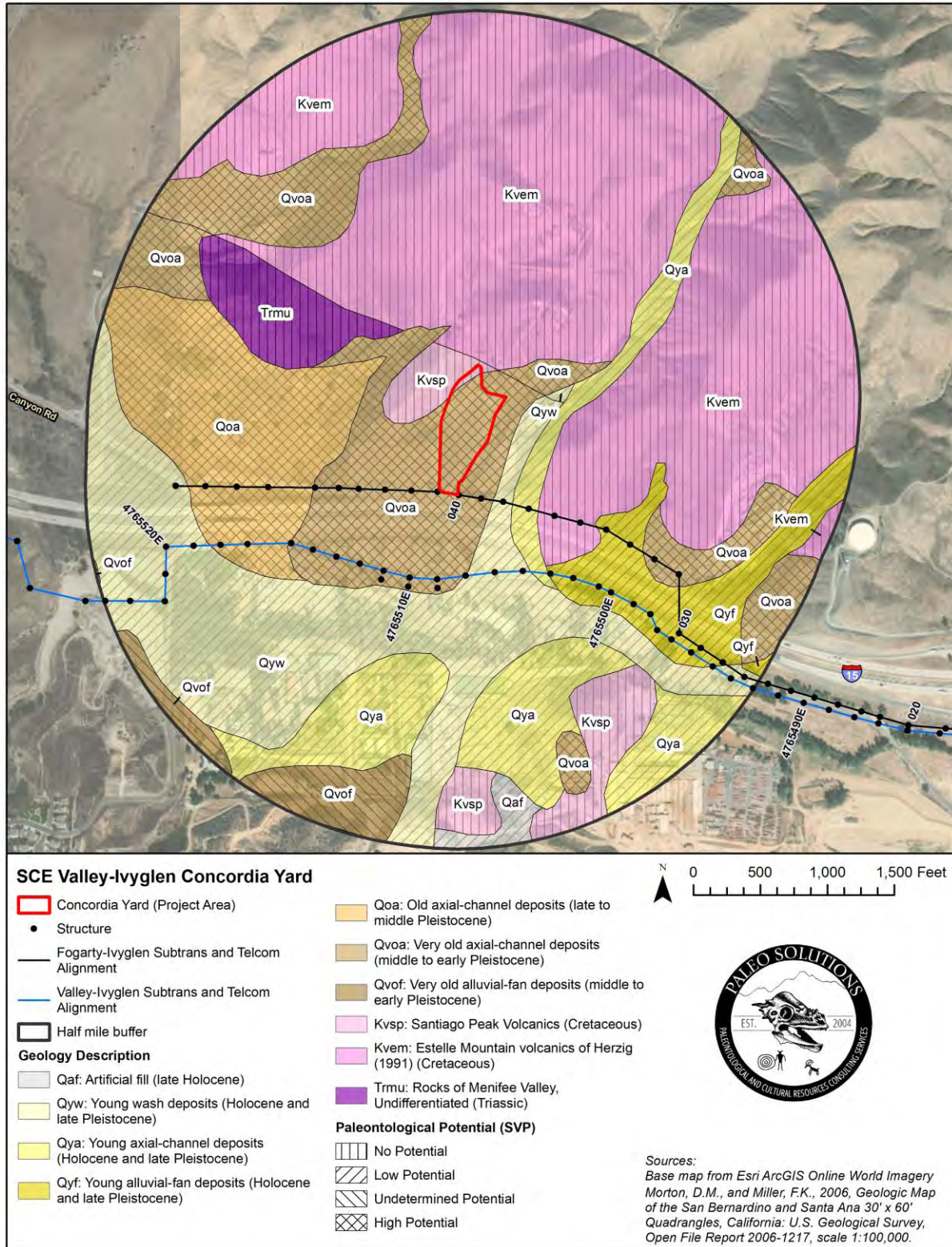


Figure 2. Concordia Yard Geology and Paleontological Sensitivity.



Photo 1. Overview of the survey area along the northern half of the western side of the proposed Concordia Yard, showing access road and northern slope. View facing to the northeast.



Photo 2. Overview of the Concordia Yard survey area along the northern access road pull out. View facing to the northeast.



Photo 3. Overview taken from along the southern half of the eastern side of the proposed construction yard, showing nearby slopes and paved road adjacent to the Concordia Yard survey area. View facing to the northeast.



Photo 4. Overview of the Concordia Yard survey area along the northern half of the eastern side of the proposed construction yard, showing the concrete slab. View facing to the southwest.



Photo 5. Drainage channel exposure of middle to early Pleistocene-age very old axial-channel deposits (Qvoa), consisting primarily of sands and gravels. Larger cobbles and occasional boulders can be observed within the wash. Partially buried pipelines are exposed within the channel and near the top of the wash. View facing to the north.



Photo 6. Weathered middle to early Pleistocene-age very old axial-channel deposits (Qvoa) as seen at and near the surface along the north end of the western side of the proposed Concordia Yard. View facing down.