

DCRT
TEN WEST LINK TRANSMISSION LINE PROJECT
**MINOR PROJECT REFINEMENT
REQUEST FORM**

Date Submitted:	5/23/22	Request #:	001
Date Approval Required:	5/31/22	Landowner:	BLM, Private
APN:	Multiple		
Refinement from (check all that apply):			
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> APM	<input checked="" type="checkbox"/> Project Description	<input checked="" type="checkbox"/> Drawing
<input checked="" type="checkbox"/> Other (please specify): See attached summary (<i>Attachment A</i>) for all changes and their purpose			
Identify source (mitigation measure, project description, etc.):			
<i>Please refer to Attachment A Tables 1, 2 and 3 for summaries of all refinements to the POD since February 2021 that are being requested, as well as a description of the purpose of each change.</i>			
Attachments (check all that apply):			
<input checked="" type="checkbox"/> Refinement Screening Form (Attachment B)	<input type="checkbox"/> Photos	<input checked="" type="checkbox"/> Maps (Attachment C)	<input checked="" type="checkbox"/> BLM Variance Request (Attachment E)
<input checked="" type="checkbox"/> Other (please specify): Sensitive Species Memorandum (Attachment F), Summary of Changes and their Purpose (Attachment A)			<input type="checkbox"/> APN List
As identified in Section 3.3 of the MMCRP, the CPUC may approve minor project refinements under certain circumstances. In accordance with Section 3.3 of the MMCRP, respond “yes” or “no” to the following questions (a) through (d).			
(a) Is the proposed refinement outside the geographic boundary of the FEIS study area?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(b) Will the proposed refinement result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the FEIS, Appendix 1C?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(d) Does the proposed refinement trigger an additional permit requirement?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Describe refinement being requested (attach drawings and photos as needed):			
<i>Please refer to Attachment A for summaries of all refinements to the POD that are being requested and their purpose.</i>			
Provide need for refinement (attach drawings and photos as needed):			
<i>Please refer to Attachment A for summaries of all refinements to the POD that are being requested and their purpose.</i>			
Date refinement is expected to be implemented:	August, 2022		

DCRT Approvals					
Title	Name	Approval Initials	Date	Conditions (see attached)	
Project Manager	Lowell Rogers	ZR	11-15-22	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Environmental Project Manager	Randy Schulze	RLS	11-21-21	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Landowner Approval (if required)					
Landowner Name		Signature or Other Consent (see attached)		Date	
See Attachment D for a list of landowners and APNs associated with the changes					
Resource Agency Coordination					
Resource Agency	Name	Action Required	Date	Documentation (see attached if yes)	
CPUC	Eric Chiang	Approval	6/1/2022	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
CDFW	Alex Funk	Concurrence		<input type="checkbox"/> Yes	<input type="checkbox"/> No
BLM	David Hawes, Erica Stewart	BLM Variance approval	3/1/22	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
				<input type="checkbox"/> Yes	<input type="checkbox"/> No
				<input type="checkbox"/> Yes	<input type="checkbox"/> No

ATTACHMENT A: SUMMARY OF REQUESTED CHANGES AND THEIR PURPOSE

Table 1 - Mapping/Impact Area Changes from 2/2021 POD to 2/2022 POD – Changes Requiring Resource Analysis (See Attachment B – Resource Screening Form). Note that when language refers to "no changes", this also means that there are no changes or refinements that would result in a new or more severe environmental impact.

The full revised POD is provided at the following file path on the Dudek SharePoint: Documents >> Plans >> Plan of Development; <https://dudekpubs.sharepoint.com/:f/r/sites/TenWestLinkTransmission/Shared%20Documents/Plans/Plan%20of%20Development?csf=1&web=1&e=6qwMPz>

Change # or Drawing Page #	POD Change Location	POD Change	Purpose
MPRR 001-1	POD Body	Section 3.1.3 - Added reference to grouted helical pile, steel grillage cap for h-frame towers (there was already a drawing in POD that shows the grouted helical pile option) based on engineering considerations	Foundation elements for h-frame towers in the California agricultural areas were updated to reflect design updates that resulted from geotechnical data that was obtained in early 2022. Instead of only a large drilled pier foundation, the helical pile type will be used in most cases. A steel grillage cap option was added, which is an alternative method to the concrete cap.
MPRR 001-2	POD Body	Update Figure 3-11 GV Work Area to be consistent with the latest .kmz provided in relation with Guy-V anchor areas location	No change in impact areas; there was an error in the drawing alone. The guyed-V anchor work areas were incorrectly shown outside the right-of-way. Drawing was corrected to show that the guyed-V anchor work areas will be situated inside the 200' right-of-way.
MPRR 001-3	POD Body Appendix K-1 - Access Road Plan	Sections 3.1.10 and 3.5 – replaced gravel and timber mat pipeline protections with steel plating as a pipeline protection. Updated Figures 3-30, 3-31 – revised to reflect compacted soil (or gravel) and steel plates instead of timber mats and gravel Added paragraph for underground pipelines (Section 5.6) to show access road considerations when crossing over pipelines that resulted from ongoing coordination with the pipeline utilities Added the following attachments as a result of the bullets above ATTACHMENT G PIPELINE CROSSING PROTECTIONS: COMPACTED SOIL AND STEEL PLATING ATTACHMENT H PIPELINE CROSSING PROTECTION: SKEWED MULTIPLE PIPE CROSSING	Alternative pipeline protections were added to the pipeline protections section of the POD through coordination with Kinder Morgan (Arizona). TransCanada has not confirmed which protection they will require when crossing their pipeline in California, but they may require steel plating. As such, these are included in the MPRR.

Change # or Drawing Page #	POD Change Location	POD Change	Purpose
MPRR 001-4	POD Body, Appendix L-1 Reclamation Plan, Appendix C	<ol style="list-style-type: none"> 1. Table 3-10 (POD Body)/Table L-1-2 (Appendix L-1) - Removed “precast foundation” style from h-frame; 2. Guard structure characteristics update to state that they are state that they are <i>typically</i> 50-feet by 200-feet, but that” Size may vary according to site-specific conditions.” Since the size may be narrower or larger in some areas; 3. added Water Withdrawal Rock Pads to table; 4. added “Site Specific Design” to access road section in table; 5. updated turn radius descriptions to include “...or 0.1 acres in California agricultural areas.”; 6. added Wheel Wash Support Pad characteristics to reflect current project design refinements. 	<ol style="list-style-type: none"> 1. Precast foundations are no longer being considered for h-frame tower types. 2. The description of the guard pole areas was updated to reflect how they are shown on the Project maps, which in some cases is smaller or larger than 50 feet by 200 feet, because some crossings are more difficult, and some offer less space 3. Water withdrawal rock pads are a new work area type (approximately 3,300 to 5,400 square feet) 4. Access Roads in the California agricultural lands do not follow the dimensions outlined in the POD originally. The Type B access roads are a maximum of 22-feet wide, as opposed to 18 feet as originally reported due to the layout of the roads in the agricultural lands, and from landowner coordination. 5. Turn radii in the California agricultural areas require 0.1 acres 6. Wheel wash support pad is a new disturbance area type; 10'x50'=500 sq. ft.
MPRR 001-5	POD Body Appendix K-1 - Access Road Plan	<p>Section 3.6 – added mention that access road details may vary dependent on site-specific conditions.</p> <hr/> <p>Added paragraph for private landowner coordination (Section 3) to demonstrate site-specific coordination with private landowners in the California agricultural lands and impact characteristics that may deviate from the original POD (Type B access roads widths are up to 22 feet, not 18 feet; turn radii are larger; wheel wash support pads were added).</p>	<p>Type B roads in California agricultural lands have a maximum width of 22-feet instead of the 18-feet considered in the POD, and turn radii are a total of 0.1 acres instead of 0.02 acres as described in the POD. These changes were made through refinements and landowner coordination in the California agricultural lands.</p>
MPRR 001-6	POD Body	Updated Table 3-14 Guard Structures by Segment to reflect current project design refinements.	<p>The construction contractor’s wire superintendent reviewed the wire pulling plans and refined all the guard pole areas across the Project, which resulted in these stated changes to the California area.</p> <p>Impacts decreased by 0.1 acres in segments x-19, p-16</p> <p>Impacts decreased by 3.7 acres in segment p-15w</p> <p>Impacts increase in segment ca-07 by 1.1 acres</p>
MPRR 001-7	POD Body	Section 4.2.5 – updated sentence describing h-frame foundations to reflect that there may be 2-8 foundation holes (previously the text read that there would be 8).	Originally, there were four smaller holes to be drilled for each leg. This was updated to “2-8” to reflect that there may be only large drilled pier for each leg, as an alternative option.

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MPRR 001-8	POD Body	Section 4.8.2.1 BLM ROW Grant Stipulation 30 – “No surface disturbance or construction activity will be allowed within 150 feet of identified cultural sites which shall be clearly marked as specified by the authorized officer and the Historic Properties Treatment Plan (HPTP). Any deviation from this requirement shall have the prior written approval of the authorized officer.” A statement was added that the approved HPTP establishes the buffer and protocol for cultural feature avoidance because the buffers from the identified cultural sites is not always 150 feet.	This section was updated to reflect the final details from the approved HPTP. The BLM confirmed via letter with DCRT that it was acceptable to modify the ROW Grant stipulation. This letter (file name: <i>2.15.2022 BLM AZA 036819 (C020) CACA 059030 2800</i>) is provided in the following folder path on Dudek's SharePoint: Documents >> NEPA Documents >> Right of Way (ROW) Grant >> Updates; https://dudekpubs.sharepoint.com/f:/r/sites/TenWestLinkTransmission/Shared%20Documents/NEPA%20Documents/Right%20of%20Way%20(ROW)%20Grant/Updates?csf=1&web=1&e=8cC2pf
MPRR 001-9	POD Body	Section 4.21.1 - Added "Where the Ten West Link line crosses other overhead facilities, signs may be added to structures of other electrical lines as required by individual line owners." to reflect BOR signage.	BOR required permanent installation of on-the-ground signs to indicate that there are overhead electrical wires over the roads adjacent to the Colorado River. This may be required by other utilities, such as WAPA in California. Documentation of the BOR requirement is provided in <i>210303 Discussion Record BOR.Memo_Update 031121_clean.pdf</i> provided in the Dudek SharePoint at the following folder path: Documents >> Agency-specific Coordination & Approval Documents >> BOR; https://dudekpubs.sharepoint.com/b:/r/sites/TenWestLinkTransmission/Shared%20Documents/Agency-specific%20Coordination%20%26%20Approval%20Documents/BOR/210303%20Discussion%20Record%20BOR.Memo_Update%20031121_clean.pdf?csf=1&web=1&e=mm5a4
MPRR 001-10	Appendix B-3 - Compensatory Mitigation Plan	Updated Section 3 to reflect Lake and Streambed Alteration Agreement.	New stipulations/mitigation requirements from the approval of the LSA agreement. The LSA is provided in the following folder path on the Dudek SharePoint: Documents >> Permits >> CDFW Streambed Alteration Agreement; https://dudekpubs.sharepoint.com/f:/r/sites/TenWestLinkTransmission/Shared%20Documents/Permits/CDFW%20Streambed%20Alteration%20Agreement?csf=1&web=1&e=qzTGib
MPRR 001-11	Appendix B-3 - Compensatory Mitigation Plan	Added the following to Section 6.5.4 from USFWS coordination: “If a federally listed bird species is impacted by the project and compensatory mitigation is required, then USFWS should be notified. The USFWS, Applicant, and BLM will discuss the potential for reinitiation of the section 7 consultation.”	Added as a result of USFWS comments on the POD. USFWS comments (file name: <i>TWL_Draft Final POD-Plans_CRM_USFWS_2021-0726_clean.pdf</i>) on the POD are provided in the following folder path on the Dudek SharePoint: Documents >> Agency-specific Coordination & Approval Documents >> USFWS; https://dudekpubs.sharepoint.com/f:/r/sites/TenWestLinkTransmission/Shared%20Documents/Agency-specific%20Coordination%20%26%20Approval%20Documents/U/SFWS?csf=1&web=1&e=2SkxhF

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MPRR 001-12	Appendix B-3 - Compensatory Mitigation Plan	Added a memorandum as an Attachment to the Compensatory Mitigation Plan discussing updated impacts to species habitats and added an in-text reference to the memorandum in the Compensatory Mitigation Plan.	<p>The memorandum was added to summarize changes in impact areas to various sensitive species habitats as a result of mapping refinements. The Compensatory Mitigation Plan (Appendix B-3 of the POD) which includes the memorandum attachment is provided in the following file path/link: Documents >> Plans >> Plan of Development >> Volume III – Appendices B through O – Supplemental Plans >> Appendix B – Management and Mitigation Measures >> <i>B-3_TWL_CompensatoryMitigationPlan_2022-Mar-clear</i>, https://dudekpubs.sharepoint.com/:f/r/sites/TenWestLinkTransmission/Shared%20Documents/Plans/Plan%20of%20Development/Volume%20III%20-%20Appendices%20B%20through%20O%20-%20Supplemental%20Plans/Appendix%20B%20-%20Management%20and%20Mitigation%20Measures?csf=1&web=1&e=QWLh6j</p> <p>The memorandum is also provided as Attachment F to this MPRR.</p>
MPRR 001-13	Appendix C	<p>Updated disturbance calculations based on mapping refinements.</p> <p>Added memorandum attachment to discuss the summary of the mapping changes (an increase of ~34 acres of temporary disturbance overall).</p>	<p>Impact acreages changed; impact acreage changes to sensitive species habitats.</p> <p><i>Refer to the memorandum for the reduced or additional acreage quantities, and to the mapping changes descriptions at the end of this table for the purpose of the changes. The memorandum is provided as Attachment F to this MPRR.</i></p>

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MPRR 001-14	Appendix G-1 - Water, Soils, and Erosion/Sediment Controls	<p>Section 9.3.1.8 – Updated water truck description to reflect current project refinements. Used to say” “Water for dust control would include three 2,000-gallon water trucks that would water access roads twice a day, five days a week, for 18 months.”</p> <p>Now states: “Water for dust control would include two-to-three water trucks (typically between 4,000-10,000 gallon tanks) that would water access roads regularly during construction working hours, six days per week over the course of approximately 18 months. This dust control would apply at each active construction work site throughout the project.”</p>	<p>The statement was updated to be more consistent with the current equipment plans and watering needs during construction. The updated POD description provides clarification to the equipment that would be used and the typical construction work periods, and was not intended to be used for calculation of Project water volumes. Water usage as discussed in Impact WQ-2 of Appendix 1C in the final EIS is still applicable, which states: “Even under the conservative assumption that the totality of construction water demand of 56,766,542.6 gallons, equivalent to about 174 acre-feet, would be sourced from groundwater wells in the local area, construction activities would not substantially deplete groundwater supplies or interfere with groundwater recharge.” and “When distributed spatially and temporally, the amount of water required from any one source would be minimal and temporary. Compared to the volume of water stored within the groundwater basins, 174 acre-feet over a two-year period is negligible. The Palo Verde Valley Groundwater Basin (Department of Water Resources [DWR] Basin No. 7-38) and the Palo Verde Mesa Groundwater Basin (DWR Basin No. 7-39) are estimated to have an existing storage capacity of 4,960,000 acre-feet and 6,840,000 acre-feet, respectively. Furthermore, they are both classified by the DWR as having a “low” priority with respect to sustainable groundwater management, based on the low population density, low or negative growth projections, and/or low numbers of private and public supply wells (DWR 2014). In other words, existing demands on groundwater underlying these basins are not causing significant and long-term groundwater overdraft. Any pumping depression caused by withdrawal of groundwater to support construction would be minor, temporary, and recover once pumping ceases and construction begins on the next segment.” If the Project expected to exceed the approximately 60,000,000 gallon/174 acre-feet volume of water stated in the final EIS in the future, a Minor Project Refinement would be developed to support that change. The storage capacities analyzed in the final EIS for the Palo Verde Mesa would be used as a comparison to determine if additional construction water consumption could be supported under a separate MPRR.</p>

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MPRR 001-15	Appendix I-1 - Hazardous Mat	Section 7.2 – Updated description of washing vehicles Used to state: “Washing of construction vehicles, such as concrete trucks, will be allowed only in designated areas and will not occur within 100-feet of a wetland or active stream.” Now states: “Washing of construction vehicles will be allowed only in designated areas and will not occur within 100 feet of a wetland or active stream, except as necessary for wheel and undercarriage washing, as required.”	Removed mention of washing concrete trucks, since this will not occur on the right-of-way except for concrete washouts. Mentioned that washing may occur within 100-feet of streams which is typically prohibited, however, due to the nature of the access roads in the California agricultural lands and the CPUC requirement MM AQ-CEQA-1, the Project may wash vehicles within this zone.
MPRR 001-16	Appendix L-1 - Reclamation Plan	Updated Section 5.3 OHV Deterrents to discuss gates as DCRT’s chosen OHV deterrent method.	DCRT has determined that permanent gates would be the chosen method of OHV deterrents to be installed across Project access roads prohibited for public use.
MAPPING (Acreage summaries are provided in Table 3 of this document)			
MPRR 001-17	Mapping, MPRR Map Pages 27-29	Updated vegetation alliance and sensitive soil mapping in California.	Additional vegetation alliance surveys conducted for mapping change areas along roads between Structures 382-383. The survey results were added to the previous mapping and are available at the following folder path on the Dudek SharePoint (file names <i>TenWest_Memo_updated veg alliance mapping_20211101</i> and <i>Updated veg alliance mapping_Nov 2021</i>) Documents >> Survey Results >> California Botanical; https://dudekpubs.sharepoint.com/:f:/r/sites/TenWestLinkTransmission/Shared%20Documents/Survey%20Results/California%20Botanical?csf=1&web=1&e=N6GxKK
MPRR 001-18	Mapping, MPRR Map Pages 7, 34, 36	Three new water withdrawal locations added.	The numerous PVID water withdrawal areas in the California agricultural area are likely not able to be used, as determined through coordination with them. The construction contractor has sought alternative water withdrawal locations to ensure proper dust abatement for the Project.
MPRR 001-19	Mapping MPRR Map Pages 1, 3, 5-20, 22-26, 29, 35	Turn radii in the California agricultural lands acreage is 0.10 instead of 0.02 acres that is used in the rest of the POD which ultimately added 6.2 acres of disturbance in the California agricultural lands. Also added one 0.02 acre turn radius in segment ca-07. Removed one permanent turn radius in segment p-16 (decrease of 0.02 acres).	Turn radii dimensions changed as a result of mapping refinements and constructability reviews in California.

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MPRR 001-20	Mapping, No map pages provided since this was only the assignment of acreage for Table 3 and not an on-the-ground mapping change.	Disturbance calcs show an additional 0.7 acres for weed wash stations.	This is not new disturbance but the acreage was previously not assigned to a particular segment, so it was not reflected in the Appendix C calculations.
MPRR 001-21	Mapping, MPRR Map Pages 3-7, 9-29	Type B access roads in the California agricultural lands have a maximum width of 22-feet, as opposed to the 18-feet considered in the rest of the POD. Added 19.9 acres of temporary Type B roads in the California agricultural lands; many of these were previously Type A access roads.	These refinements were made through landowner coordination and constructability reviews in the California agricultural areas.
MPRR 001-22	Mapping, MPRR Map Page 13	Mapping at Structures 362-363 updated to reflect a landowners request for removal of house.	The landowner requested that, as part of the construction easement agreement, that DCRT demolish the building along the Project access road. This demolition, however, is no longer being considered.
MPRR 001-23	Mapping, MPRR Map Pages 3, 4, 7-10, 15, 17, 22, 24, 25, 35	Wheel wash locations added; includes 10x50-foot wheel wash pad to park the equipment next to the driveway.	MM AQ-CEQA-1 requires "A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the unpaved construction site." As such, the wheel washes are shown on the maps. A wheel was support pad was added to reflect that an area would be needed on the private lands next to the driveways to park the washing equipment.
MPRR 001-24	Mapping, MPRR Map Pages 7, 36	Two water withdrawal rock pads added to the disturbance mapping where water trucks would park to withdraw water from the agricultural canals; this type of disturbance area was not originally considered in the POD.	Previously, the water withdrawal areas were positioned along existing access roads. PVID indicated that they would not be able to allow water withdrawal from the canals feeding the agricultural lands, and proposed two alternative locations where water could be withdrawn from the drains. These withdrawal areas would require a rock pad to be installed so that ground was stabilized and the sites did not become muddy where the water trucks would fill up. (Approximately 3,300 to 5,400 square ft) Coordination with PVID is ongoing; the current plan which differs from the POD mirrors the original plan to withdraw water from the irrigation canals that feed the agricultural lands. Consultation with PVID is ongoing, and a new MPRR will be submitted to reflect the final plan. Any approved permits or agreements with PVID will be provided in the SharePoint drive when available.

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MPRR 001-25	Mapping MPRR Map Pages 7, 19, 21, 22, 24, 27, 35	Seven Potential staging areas added; these have no new disturbance associated with them because they are all previously disturbed.	During constructability reviews in the California agricultural areas, 7 staging areas were identified in previously disturbed areas to be used as temporary and generally short term (less than 2 weeks) equipment or material staging.
MPRR 001-26	Mapping, MPRR Map Pages 29-31	<ol style="list-style-type: none"> 1. Changed Type C access road between 385-386 from Permanent to Temporary. Decrease of 0.5 acres of temporary disturbance. 2. Changed a segment of the Type B access road leading up to the Palo Verde Mesa from the Agricultural lands from Permanent to Temporary (Structures 382-383) which caused a decrease of 0.9 acres permanent disturbance. 	Both of these changes were made to reduce the permanent impacts to Mojave Desert Tortoise habitat. The summary of impact changes for sensitive species, including Mojave Desert Tortoise, is provided in Attachment F to this MPRR.
MPRR 001-27	Mapping MPRR Map Pages 3, 5-11, 13-16, 18, 19, 23, 24, 26, 29	<p>Added 1.2 acres of temporary Type D access roads in the California agricultural lands</p> <p>Added 1.5 acres of temporary pull out areas in the California agricultural lands, since the roads were changed from Type A to Type B.</p>	<p>This is the total change in acreage as a result of the mapping refinements in the California agricultural lands.</p> <p>Note – pull out areas are not shown in mapping. As described in POD Appendix K-1, Section 3: “The pull-outs will be sited no closer than 1,000 feet on a single access road.... The pull-outs will be placed at the operator’s discretion and may be spaced greater than 1,000 feet. These areas are considered temporary in nature where they are not necessary for operation and maintenance.”</p>
MPRR 001-28	Mapping, No map pages provided since this was only the assignment of acreage for Table 3 and not an on-the-ground mapping change.	Snub sites in ca-07 and p-16 reduced by 0.4 acres	The snub sites were trimmed due to landowner and/or cultural avoidance. The POD previously assumed 2.75 acres for all snub sites. The impact acreages in Table 3 were updated to reflect the acreage of the actual trimmed polygons provided in the POD mapping.
MPRR 001-29	Mapping, MPRR Map Pages 1, 2, 5, 6, 8-11, 13-16, 18-20, 23, 24, 26, 29, 32, 33	<p>Guard pole area changes in California</p> <ul style="list-style-type: none"> • Shifted 12 • Removed 39 • Added 4 <p>Ultimately reduced the temporary guard pole acreage by 7.2 acres. This 7.2 acres includes impact changes contained in BLM Variances 16 and 18, which are provided in Attachment E).</p>	The construction contractor’s wire superintendent reviewed the wire pulling plans and refined all the guard pole areas across the Project, which resulted in these stated changes to the California area.

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MPRR 001-30	Mapping, MPRR Map Page 15	Added "Sump" sediment trap disturbance area due to CalTrans requirement; negligible acreage.	<p>This was added as a requirement from CalTrans for their driveway entrance off of Highway 78 from the CalTrans standard drawing T58. The CalTrans T58 specification is provided in the following folder path on the Dudek SharePoint (file name: <i>CalTrans T58 Temporary RCE Standard</i>): Documents >> Specification Sheets; https://dudekpubs.sharepoint.com/:f:/r/sites/TenWestLinkTransmission/Shared%20Documents/Specification%20Sheets?csf=1&web=1&e=sCZvwh</p> <p>Coordination with CalTrans is ongoing; the T58 standard drawing shows a required sump, however, through current coordination with them, CalTrans indicated that this sump is not necessary for the Project's access road design. The final CalTrans encroachment permit would ultimately be provided in the Project SharePoint file once coordination is complete.</p>
MPRR 001-31	Mapping, MPRR Map Pages 1-3, 6, 7, 18, 19	<p>Changed access road plans from Type A to Type C to travel down the right of way for Structures 344-345, 346-347, 351-353, 370-372.</p> <p>Ultimately there was a Type C temporary access road increase of 5.6 acres.</p>	<p>The roads throughout the California agricultural areas were initially mapped via desktop only, because there were no landowner agreements to access the properties and perform constructability surveys. Once those surveys were performed, it was identified that several areas shown with a Type A access roads were actually a canal and not an existing road. As such, it was found that Structures 344-347 could only be accessed from one existing road along the Colorado River, and that access must be obtained through the right-of-way for the towers. Similarly, the originally planned roads for 351-353 and 370-372 fell along narrow existing canals that would not be suitable for heavy construction equipment to travel.</p>

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MPRR 001-32	Mapping, MPRR Map Pages 2, 5, 6, 8, 11, 13-16, 18-20, 23, 24, 26, 29	<p>Towers and work pads shifted away from the agricultural canals in California:</p> <p>Tower 346 moved west 9.4' Work Area 346 shift west 4.4'</p> <p>Tower 349 moved west 18' Work Area 349 shift west 8'</p> <p>Tower 351 moved west 11.2' Work Area 351 shift east 1.2'</p> <p>Work Area 353 shifted east 100'</p> <p>Tower and Work Area 359 moved west 4.3'</p> <p>Tower and Work Area 360 moved east 13.4'</p> <p>Tower and Work Area 361 moved east 3.8'</p> <p>Tower and Work Area 362 moved east 13'</p> <p>Tower 364 moved west 25.7' Work Area 364 shift west 10.7'</p> <p>Tower 366 moved east 12.1' Work Area 366 shift west 7.9'</p> <p>Tower and Work Area 367 moved west 27'</p> <p>Tower 370 moved west 21.1' Work Area 370 shift west 6.1'</p> <p>Tower 371 moved east 10.3' Work Area 371 shift west 4.7'</p> <p>Tower 372 moved east 34.5' Work Area 372 shift east 14.5'</p> <p>Tower and Work Area 373 moved west 3'</p> <p>Tower and Work Area 374 moved east 10.1'</p> <p>Tower 375 moved east 19.6' Work Area 375 shift east 6.6'</p> <p>Tower and Work Area 378 moved east 15'</p> <p>Tower and Work Area 379 moved east 1.5'</p> <p>Tower and Work Area 380 moved east 21.2'</p> <p>Tower and Work Area 381 moved west 2.5'</p> <p>Tower and Work Area 382 moved west 8.1'</p>	Through coordination with PVID, they require a minimum of 22-feet from their canal. Towers and work areas were moved away from canals to accommodate this request, and for other constructability issues. Some tower moves would either reduce or increase structure heights, however, the structure heights are still consistent with the descriptions in the Final EIS and the February 2021 Plan of Development. There would be no resource impacts, visual or otherwise, as a result of any tower height change.
MPRR 001-33	Mapping, MPRR Map Page 15	ROW reduced at Structures 366-367.	Right-of-way-width was reduced by approximately 15-feet to avoid a landowner to the south of the right-of-way.
Additional MPRR requested under this MPRR-001 that did NOT result from changes to the POD.			
Change #	Topic	Description	

MPRR 001- 34	Understanding of MM AQ-CEQA-2 and APM AQ-01	<p>Source:</p> <p>Request to refine MM AQ-CEQA-1 understanding to confirm the acceptance of a rock-construction-entrance (specification provided in POD Appendix G) as the main method of trackout control in place of the specified wheel wash system, and to seek approval for the use of a portable air compressor/air knife system as an additional alternative, based on the construction contractor's discretion.</p> <p>Description:</p> <p>A wheel washing system is required under MM AQ-CEQA-1, with the following language under modified APM AQ-01: <i>"A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the unpaved construction site."</i> DCRT requests confirmation that a rock-construction entrance (specification provided in POD Appendix G) is acceptable as the primary method of trackout control under MM AQ-CEQA-1. DCRT also requests approval for the use of an air compressor with an air knife as an additional alternative, upon the discretion of the construction contractor, if it is determined to be necessary.</p> <p>The construction contractor would employ a rock construction entrance as the primary method of trackout control under MM AQ-CEQA-1 (specification provide in POD Appendix G). If determined necessary by the construction contractor, a wheel wash station, or alternatively, an air compressor with an air knife may be used as an alternative method of trackout control if trackout issues arise, or at the discretion of the construction contractor. The "wheel washing system" would require a pressure washer and water tank at each of the locations in the California agricultural lands where traffic will exit onto a paved roadway. Use of the rock-construction entrance and/or air compressor and air knife would reduce the need for water to be supplied at each exit onto a paved road.</p> <p>A similar method of cleaning to the air compressor/air knife is described in the Project's Noxious Weed Management Plan with the Plan of Development to be used in place of a weed wash area, an excerpt of which is provided below.</p> <p>The air compressor/air knife system would use forced air from a mobile air compressor unit which passes through the air knife that concentrates the flow of air. This concentrated airflow is able to loosen and remove dirt from vehicle undercarriage and tires to prevent trackout or transfer of soils offsite. A traditional wheel wash system would perform the same action, using water instead of air. DCRT's construction contractor estimates that there are typically around 2-5 gallons of water used per truck during washing. Most trucks are just rinsed as required, and may not actually be laden with trackout, so this quantity may be a little less, and it would be a little more for larger equipment. If wheel washes were used, the water for the wheel wash stations would not be reused. It would be allowed to collect under the RCE as it infiltrates through the bull rock which is underlain with geotextile. That is described in the excerpt provided below from Appendix F-6 of the POD. The water would be allowed to collect under the bull rock and infiltrate back into the ground under the geotextile and would not runoff.</p> <p>A disadvantage of the use of an air compressor versus a wheel wash is the control of the material being removed from the vehicles. When a wheel wash is used, the material is rinsed from the vehicle and collects in the wash area under the rock-construction entrance, where it is able to be later removed when the rock-construction entrance is decommissioned. The</p>
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		<p>removal of material with an air compressor is less controlled; as such, silt fence or other barrier would be used on the perimeter of the rocked construction entrance to contain material that is being removed from the vehicles.</p> <p>In any case, following construction completion, the bull rock would be removed (unless otherwise requested by the landowner) and would be disposed of properly because of the concern of weed seeds or oils.</p> <p>The disturbance footprint for either an air compressor/air knife or wheel washing system would be the same. A 10-foot by 50-foot equipment staging pad is being requested under this Minor Project Refinement Request 001, which will be the location where the compressor, generator, washing equipment, etc. is staged. The washing or otherwise trackout removal activity would take place in the rocked construction entrance/access road area. Alternatively, the use of a rocked construction entrance as the primary method of trackout control would eliminate the need for an equipment staging pad near the entrance.</p> <p>If a site is producing trackout, the issue is typically corrected at the source and then street sweepers, brooms, etc. are employed to clean up the road without further issue.</p> <p>From Appendix K-1 about wheel wash systems:</p> <hr/> <p><i>Wheel Wash Dimensions (blue diamond point on maps, see Attachment C):</i> <i>Gravel pad underlain with geotextile fabric to contain the wash water within the access road's turn radius area + an additional 10-ft. by 50-ft. rectangular area alongside the access road to park the washing equipment.</i></p> <p><i>Wheel Wash Description:</i> <i>The wheel wash stations are located near rock construction entrances or turning radii and require additional disturbance in the farm field to leave the washing equipment stationary for the duration of construction activities. Wheel wash disturbance areas in addition to the rock construction entrances and turning radii are 10-ft. wide by 50-ft. length.</i></p> <p><i>Please see below for some excerpts from the Noxious Weed Plan which describes the general description of a weed wash station, which is essentially a wheel wash. It also includes the air compressor/air knife option.</i></p> <p>From Appendix F-6 about air compressor systems and wheel wash systems:</p> <hr/> <p><i>Control Measures</i> <i>Control measures may include one or more of the following methods prior to implementation of reclamation actions.</i></p> <p><i>Wash Stations</i> <i>One method of removing weeds is to use air compressors or an air knife to blow the weeds off vehicles. If use of an air knife is employed, it should also be paired with a geotextile lined pit and perimeter protection such as silt fence or similar barrier to prevent seeds and spores from leaving the treatment area. Another method of removing weeds is to use water to wash away the weed seeds from equipment before it enters a weed-infested area. This will prevent introducing and spreading seeds and spores. Seeds and spores are found in vegetation, dirt, and mud clinging to the undercarriage or underbody parts (e.g., wheels, wheel wells, running boards, drive train, and bumpers).</i></p> <p><i>Equipment and technologies related to the use of weed wash stations that may be employed for the Project are described below and include: runoff containment, spraying equipment, water supply, and pumping equipment.</i></p> <p><i>Runoff Containment - Even when containment is used, invasive seeds may be blown beyond the containment system during washing. To mitigate this, the Construction Contractor will inspect wash sites regularly and treat for weeds as necessary.</i></p>
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Wastewater containment can be accomplished in several ways. Three typical forms of containment discussed below are consistent with Project BMPs.

- *Geotextile cloth lined rock pits – Geotextile cloth captures large particles in the permeable barrier and allows water to percolate back into the soil. Because most seeds are larger than 200 microns, the cloth prevents or reduces seed transplantation at the loading area. Geotextile cloth is made of polycarbonate fiber with a natural affinity for hydrocarbons, which prevents oil or grease from draining into the soil. These pits are a 70- by 20-foot area of bull-rock or smaller that is underlain by geotextile. When weed wash stations are decommissioned, the rock is removed from the pit in a manner that allows treatment with herbicides. The rock and geotextile will be tagged as weed infested and disposed of properly. Records are kept of all herbicides used, treatment dates, target species treated, and progression of infestation areas. This is the preferred method of use.*
- *Flexible mat – Flexible mats come in many sizes and styles. They serve as portable berm systems to contain wash water and debris. They are a durable, chemical-resistant rubber material. Some models have berms that are permanently attached to the perimeter, while others have removable inserts. Permanent berms on flexible mats can make storage difficult. One plain rubberized mat design has polyvinyl chloride sewer pipe fitted under the sides with foam cushions under the approach and departure ends. Prior to installation, it would be necessary to lay geotextile or similar cloth underneath to prevent sharp rocks from penetrating the mat.*
 - *Flexible mats may tear, but onsite repairs are easy. It is recommended that conveyor belting in the wheel tracks be used to prevent punctures or tears. Flexible mats, and the materials used to form containment berms, can be installed by two people. The material is easily transported in a 1/2- to 3/4-ton truck. Low-ground-clearance vehicles can be accommodated with this system. One problem with this system is that flexible mats may create sludge puddles that vehicles track through, picking up the previously washed off mud.*
- *Elevated washrack: Some manufacturers build portable elevated wash racks. One option is a wash rack with panels in 10-, 12-, and 14-foot widths. The typically eight-foot-long panels are placed side by side to the desired length. They may be designed to carry various axle loads, but standard systems accommodate up to 12 tons, and need support on just two sides. Another option is a similar modular wash rack with six- by eight-foot panels designed to handle 15,000-pound wheel loads. Wash rack systems can handle wheeled or tracked equipment, and the runoff is collected in the center or in a gutter alongside. Raised panels make it easier to wash the underbody. Containment walls are available that allow access to both sides of the vehicle and reduce overspray when the walls are set in a staggered position. Washracks can have automatic sprayers or may be operated manually and may also feature water recycling and filtration systems.*

Spraying Equipment – Pressurized sprayers paired with a water supply would be used for spraying vehicles in the wash area. These include the possibility for various pressures and water volumes, depending on the equipment selected. Two methods of spraying are standard in the vehicle- and equipment-washing installations: high pressure with low volume and low pressure with high volume. High pressure is above 1,000 pounds per square inch, and high volume is more than 10 gallons per minute. In both categories, hand-held (wand) systems and automated systems are available. Automated spraying systems may also have undercarriage spray bars. These, and other somewhat automatic systems, use lower pressure and higher flow. The number, size, nozzle shape or holes in a spray bar, and water pressure determine water-use rates. Spray bars fabricated from pipe with threaded ports and individual nozzles have many spray patterns. Although simplicity of operation might favor an automated system, reliability, effectiveness, efficiency, and economy favor manual sprayers. Some manual follow-up spray cleaning should accompany automated systems use.

Change # or Drawing Page #	POD Change Location	POD Change	Purpose
		<p><i>It is recommended that heavy debris first be removed manually by trowel, shovel, or brush before the vehicle enters the wash area to prevent clogging. The Construction Contractor will select the appropriate spraying equipment based on the needs of the Project.</i></p> <p><i><u>Water Supply</u> - The Construction Contractor will select and provide the appropriate water and water disbursing equipment as necessary. Water trucks or other mobile tanks are typical and range from 1,000 to 4,000 gallons in general. Water trucks or tanks would be enclosed, if possible, to prohibit access from wildlife. Water will be obtained from private wells and/or municipal supplies with permitted and allocated water rights, as described in Volume I of the Project POD. Collecting and recycling of water is an option, especially with automated sprayers.</i></p> <p><i><u>Pumping Equipment</u> - Spraying, recovering, and filtering operations require pumps. Due to the rural nature of the Project activity, a portable pump will typically be used. Wash systems typically require two pumps: one for retrieving water from the tank, and one for pressurizing the water for the sprayer. An additional pump may be necessary for recycling systems. Pumps can be obtained that provide various flow rates and/or pressures. The Construction Contractor will select the appropriate pumping equipment based on the needs of the Project.</i></p> <p><i>When weed wash stations are decommissioned, the rock will be removed slowly from the pit in a manner that allows treatment with herbicides as well as the fabric. The rock and fabric will be tagged as weed infested and disposed of properly. Records will be kept of all herbicides used, treatment dates, target species treated, and progression of infestation areas.</i></p> <p>From the Stormwater Pollution Prevention Plan about rocked construction entrances:</p> <p><i><u>Stabilized Construction Entrance/Exit</u></i></p> <p><i>A stabilized pad of aggregate underlain with filter cloth located at any point where traffic will be entering or exiting a construction site to or from a public right-of-way, street, alley, sidewalk or parking area. For added effectiveness, a wheel wash or wash rack area can be incorporated into the design to further reduce sediment tracking. Additionally, for construction entrances/exits onto California State roads managed by CalTrans, T58 specification must be adhered to, which is also provided in Appendix I.</i></p> <p>Need:</p> <p>The refinement is being requested to provide flexibility in trackout control methods, and to reduce the volume of water to be consumed for construction. The use of a rocked construction entrance or an air compressor/air knife in place of the wheel wash would eliminate the need for water to be supplied at each wheel wash location, as no water would be needed for the air compressor setup or rocked construction entrance.</p>	

Table 2 - Administrative POD Changes Not Affecting Resources (California-only changes)

Change #	Document	Change Summary	Purpose
MPRR 001-35	POD Body	Section 1.2 - Added reference to CPUC CPCN being issued.	Section updated to reflect project milestones achieved since the previous version of the POD.
MPRR 001-36		Section 1.5 – Added reference to Landowner Coordination documents with private landowners to reflect the landowner coordination that resulted in project refinements	Landowner Coordination documents were developed to be submitted to the landowners for approval of the Project design on their properties. These were added to the POD because the access road and turn radius designs deviate from the descriptions reported in the POD previously.
MPRR 001-37		Section 3.2 – Updated to reflect that dead fronts modifications are complete on the pipelines	Section updated to reflect project milestones achieved since the previous version of the POD.
MPRR 001-38		Updated Table 3-12 – Existing Utility Lines Crossed by the Project to reflect current project design refinements and crossing locations.	Added one crossing of SCE wood poles in segment p-16. No changes in disturbance as a result, as this was a correction in the number of crossings, and not a new crossing location.
MPRR 001-39		Updated Table 3-13 ROAD AND WATER CROSSINGS BY SEGMENT to reflect current Project design	The total number of crossings reduced based on mapping refinements. No change that needs to be addressed.
MPRR 001-40		Figure 3-17 Steel pole drawing updated to show full length anchor bolts	This change was made to reflect refinements in engineering foundation design, and would not affect resources, as the diameter and depth of the foundation holes would remain unchanged.
MPRR 001-41		Added a new subsection 4.8.2.3 “Bureau of Reclamation” and included stipulations	This subsection was added to include the stipulations provided by the Bureau of Reclamation during coordination with them.
MPRR 001-42		Section 4.15.1 – Revised to reflect current agency-approved version of HPTPs	No change to resource impacts; this change was made to be consistent with the approved HPTPs
MPRR 001-43		Section 5.1 – Added reference to O&M Plan, which is a new plan added to the POD	This is further discussed in Appendix P, below. DCRT is required to develop an Operations and Maintenance Plan, which was available and added to the POD.
MPRR 001-44		Section 5.4 – Updated description of fence grounding to match project requirements	As stated.
MPRR 001-45	Appendix B-1 - Mitigation Action Plan	Updates to crossing drawings based on mapping refinements, constructability, crossing coordination	This change is administrative, and was necessary to reflect the mapping refinements discussed in Table 1.
MPRR 001-46		Added title page, Notes, CEQA Consideration notes	Changes to the MAP are administrative only and reflect ongoing coordination mitigation
MPRR 001-47		Revised ongoing coordination, implementation status	

Change #	Document	Change Summary	Purpose
		updates, document references; added external links to the Google Drive File Share for document references	implementation status updates, etc.
MPRR 001-48		Added Kinder Morgan Encroachment Stipulations, Bureau of Reclamation stipulations	
MPRR 001-49		Added resolution of Subjective Language, CMA Clarification, and Clarification table with CPUC/Dudek	
MPRR 001-50		Added ASLD easement stipulations, ADOT permit stipulations, La Paz County POD changes	
MPRR 001-51		Added all mitigation language at the end of the document and provided links between mitigation measure and the Mitigation Action items	
MPRR 001-52		Added Lake and Streambed Alteration Agreement	
MPRR 001-53		Updated acronyms	
MPRR 001-54		Added the CWA 401 permit and Section 10 permit	
MPRR 001-55		Added Incidental Take Permit stipulations	
MPRR 001-56	Appendix B-2 Mitigation Measures	Corrected grammatical errors on headers	
MPRR 001-57	Appendix B-3 - Compensatory Mitigation Plan	Updated Table 2-1 for Couch's Spadefoot Toad Permanent Impacts Previously said: "Restoration of conditions of the impacted areas within the Project footprint shall be at 1:1 based on standard biological resources compensation ratios." Now states: "Compensation will include: a) off-site creation, enhancement, and/or preservation; and/or b) participation in an established mitigation bank program."	This update was made to reflect the correct language in MM WIL-CEQA-11.
MPRR 001-58	Appendix D - Worker Environmental Awareness Program	Includes refinements to make sure the WEAP captured every detail required by the APM/BMP/MM/CEQA MM. Slides were rearranged, narratives were trimmed, streamlined, etc. Additionally, staff has changed and the WEAP and WEAP brochure have been updated accordingly	Changes to the WEAP were administrative only.
MPRR 001-59	Appendix E-3 Supplemental Cultural Resources Information	Revised to reflect current version of HPTs	No changes to impacts; only administrative updates
MPRR 001-60	Appendix F-1 - Environmental Compliance Management Plan	Updated Attachment A - Variance Request Template to have more space in the text boxes for descriptions, as requested by DCRT	No additional resource impacts would occur as a result of these changes. They were administrative updates.
MPRR 001-61		Section 2.2 – Added discussion of the MMCRP from the CPUC	

Change #	Document	Change Summary	Purpose
MPRR 001-62		Section 2.2.6 – Updated to reflect that the MDP and HTPs are approved	
MPRR 001-63	Appendix F-2 - Plant and Wildlife Species Conservation Measures Plan + Mojave Desert Tortoise Plan + Nuisance Animal Plan <i>Not included in 2-24-21 version of the POD sent to the agencies, redline from 12/2020</i>	Added Attachment A – CDFW Lake/Streambed Alteration Agreement	These are administrative and result from coordination with USFWS and CDFW and provide additional mitigation requirements, which would <i>reduce</i> resource impacts. This plan has been reviewed and approved by the CPUC and is in compliance with all BMPs, APMs and mitigation measure established in the FEIS, including the CEQA analysis in Appendix 1C. This plan was not included in the February 2021 version of the POD, and was thus not yet approved.
MPRR 001-64		Update Section 3.3.1 Injured or Dead Wildlife bulleted list of rehabilitators to match the Avian Protection Plan	
MPRR 001-65		Added Section 3.8 – Lake/Streambed Alteration Agreement Stipulations	
MPRR 001-66		Updated Table F-2-5 – Species Surveys to reflect surveys completed to date and upcoming surveys since last revision of the POD	
MPRR 001-67		MDTP updated to reflect the ITP	
MPRR 001-68	Appendix F-3 - Avian Protection Plan + Bird and Bat Conservation Strategy + Nesting Bird Management Plan + Burrowing Owl Nesting Management Plan and Nest Management Plan + Bat Management and Protection Plan <i>Not included in 2-24-21 version of the POD sent to the agencies</i>	Revised through coordination with USFWS and BLM	This plan has been reviewed and approved by the CPUC and is in compliance with all BMPs, APMs and mitigation measure established in the FEIS, including the CEQA analysis in Appendix 1C. This plan was not included in the February 2021 version of the POD, and was thus not yet approved.
MPRR 001-69		Added Figure F-3-1 to show Guy Marker Locations	
MPRR 001-70		Removed Attachment A – 2019 Biological Survey Summary Report and edited the in-text reference for the summary reports	
MPRR 001-71		Added language for Mitigation Measures as Attachment A (requested by BLM & USFWS)	These are administrative and result from coordination with BLM, USFWS and CDFW and provide additional mitigation requirements, which would <i>reduce</i> resource impacts.
MPRR 001-72	Appendix F-4 - Raven Management Plan	Updated Sections 4.8 – Elimination of Offending Common Ravens and Section 5.2 – Monitoring Procedures based on USFWS comments	These are administrative and result from coordination with USFWS and CDFW and provide additional mitigation requirements, which would <i>reduce</i> resource impacts.
MPRR 001-73	Appendix F-6 - Vegetation Management Plan + Succulent Management Plan + Special Status Plant Transplantation and Compensation Plan + Linear ROW Rare Plant Protection Plan for Harwood's Eriastrum (with Invasive Species Management Plan)	Updated Attachment G - Hazardous Tree Survey Results to include the report section of the survey results	There were no changes that would increase impacts to any resources in California. Previously, only the mapping was provided in the POD. The Hazardous Tree Survey Results were updated to include an introduction and description.

Change #	Document	Change Summary	Purpose
	+ Noxious and Invasive Weed Management Plan		
MPRR 001-74	Appendix I-1 - Hazardous Materials Containment Plan	Rename ATTACHMENT C HAZARDOUS MATERIALS INVENTORY to HAZARDOUS MATERIALS & REPORTABLE QUANTITIES	Administrative changes only
MPRR 001-75		Renumber appendices and update appendix references in the body of the document	
MPRR 001-76		Updated staff names in HAZARDOUS MATERIAL MANAGEMENT CONTACT LIST where available	
MPRR 001-77		Section 8.1 – Clarified where fueling is/isn't allowed	The fueling update was just an administrative correction to maintain consistency in the way fueling is described in the rest of the document.
MPRR 001-78	Appendix I-2 - Spill Prevention, Control, and Countermeasures Plan + Waste Management Plan	Remove ATTACHMENT C FACILITY LOCATION AND SITE MAPS, as they will be provided in the on-site SPCC's at each facility and will not be available until the facility is chosen; renumber appendices and update appendix references in the body of the document	No additional resource impacts. Laydown yard details are broadly discussed in the EIS and the POD which would apply to any specific yard. Site maps will be developed for each yard with a site-specific SPCC, as discussed.
MPRR 001-79	Appendix J-1 - Emergency Preparedness and Response Plan	Construction Manager contact information added to Table J-1-1. Remaining names and phone numbers not available yet.	No additional resource impacts. Administrative changes.
MPRR 001-80	Appendix J-3 - Health and Safety Plan	Minor correction: " ATTACHMENT C HEAT ILLNESS PREVENTION IN <u>OURDOOR</u> PLACES OF EMPLOYMENT" corrected to <u>OUTDOOR</u>	No additional resource impacts. Administrative changes.
MPRR 001-81		Added Safety Manual Attachment A addressing safety protocol	
MPRR 001-82		Added Safety Pocket Handbook Attachment B	
MPRR 001-83		Updated Section 6.4 General Guidance on COVID-19	
MPRR 001-84	Appendix K-1 - Access Road Plan	Updated Appendix A Project Access Road Summary to reflect access road changes resulting from mapping refinements	No resource impacts. This change is administrative, and captures the access road changes in Table 1.
MPRR 001-85	Appendix P - Operations and Maintenance Plan	– <i>New addition to the POD.</i>	<p>The Operation and Maintenance (O&M) Plan is a new plan that has been added to the Plan of Development and is a requirement of the BLM ROW Grant for the TWL Project. The O&M Plan consists of a number of operations and maintenance programs, including those listed below:</p> <ul style="list-style-type: none"> • Right of Way Safety Requirements (Safety and Health Program) • Environmental Compliance Program • NERC Compliance Program

Change #	Document	Change Summary	Purpose
			<ul style="list-style-type: none"> • Transmission Line Maintenance Program (Preventative and Emergency) • Right of Way Access Maintenance Program • Distribution Line Maintenance • SCS Maintenance • Substation Maintenance (as Coordinated with substation owners) • Operations Program • Training/Qualification Program <p>Each program will be periodically updated to match any facility modifications, law, or changes in utility best practices. The O&M Plan complies with all applicable environmental APMs, BMPs and mitigation measures established for the TWL Project as established by the following key environmental documents:</p> <ul style="list-style-type: none"> • Final Environmental Impact Statement (FEIS) and Proposed Resource Management Plan Amendments for the Ten West Link Transmission Line Project September 13, 2019 • Record of Decision (ROD), November 22, 2019 for 50-year right-of-way (ROW) Grant under Title V of the Federal Land and Policy Management Act (FLPMA) • Ten West Link Transmission Line Project Final Plan of Development (POD) January 2022 • Decision Granting DCR Transmission, L.L.C. a Certificate of Public Convenience and Necessity for the Ten West Link Project, November 4, 2021, and Appendices
MPRR 001-86	Appendix N - Construction Schedule	– Construction schedule delayed.	Updated start date from January 2020 to May 2022; updated sequencing, etc. This date is currently being revised further, however; the construction start date in California reflected in the schedule is appropriate.
MPRR 001-87	POD Plans with No Changes since 2-24-21	<ul style="list-style-type: none"> – Appendix F-5 - Mojave Fringe-toed Lizard Avoidance and Clearance Plan – Appendix H-1 - Fugitive Dust Control Plan and Construction Emissions Mitigation Plan – Appendix I-3 - Field Management Plan 	N/A

Change #	Document	Change Summary	Purpose
		<ul style="list-style-type: none"> – Appendix J-2 - Fire Protection and Prevention Plan – Appendix K-2 - Traffic and Transportation Management Plan – Appendix K-3 - Helicopter Flight Plan/Flight and Safety Plan – Appendix K-4 - Blasting Plan – Appendix M-1 - Decommissioning Plan – Appendix O - Description of Federal Lands Crossed by Project 	

Table 3 – Acreage Impact Summaries (Changes highlighted YELLOW)

This table was derived From Appendix C of the Plan of Development, and was reduced to include ONLY California Project segments. The full Appendix C impact table can be accessed through the following link:
<https://dudekpubs.sharepoint.com/:f:/r/sites/TenWestLinkTransmission/Shared%20Documents/Plans/Plan%20of%20Development/Volume%20III%20-%20Appendices%20B%20through%20O%20-%20Supplemental%20Plans/Appendix%20C%20-%20Impact%20Assumptions%20and%20Summary%20Impact%20Table?csf=1&web=1&e=SoXGMT>

	Length (Miles)	Temporary Impacts (acres)							Permanent Impacts (acres)				Temporary (and Temporary Use) Access Road Impacts (acres)								Permanent Access Road Impacts (acres)						Totals	
		Structure Work Areas. (1.1 acre per ea. Structure)	Pulling and Tensioning Sites	Snub Sites	Guard Poles (10,000-square-foot work area @ each structure)	Material Laydown/ Storage¹	TOTAL TEMPORARY		Structure Footprint	Work Pads (Variable)	TOTAL PERMANENT		Turn Radius	Pullouts	Weed Wash Stations¹	Type B	Type C	Type D	TOTAL TEMPORARY ACCESS ROAD		Turn Radius	Type B	Type C	Type D	TOTAL PERMANENT ACCESS ROAD		TOTAL TEMPORARY DISTURBANCE	TOTAL PERMANENT DISTURBANCE
February, 2021																												
Segments																												
ca-07	3.0	12.1	0.0	2.8	0.9	N/A	15.8		0.2	0.6	0.8		0.00	0.7	N/A	0.0	0.0	0.4	1.1		0.28	6.5	2.6	1.3	10.7		16.9	11.5
ca-09	2.6	9.9	4.0	2.8	0.0	N/A	16.7		0.1	0.5	0.6		0.00	0.5	N/A	0.0	0.0	0.4	0.9		0.21	5.7	0.0	2.0	7.9		17.6	8.5
p-15w	6.6	26.4	0.0	8.3	7.1	N/A	41.8		0.2	1.4	1.6		0.57	0.2	N/A	0.0	0.1	3.4	4.3		0.00	0.0	0.0	0.0	0.0		46.1	1.6
p-16	4.6	19.8	5.3	2.8	7.8	N/A	35.7		0.3	1.1	1.4		0.34	0.3	N/A	0.3	0.0	2.3	3.2		0.09	2.1	0.5	0.6	3.3		38.9	4.7
x-15	1.4	6.6	4.6	0.0	0.0	N/A	11.2		0.1	0.3	0.4		0.00	0.3	N/A	0.0	0.0	0.0	0.3		0.11	3.4	0.0	0.9	4.4		11.5	4.8
x-16	2.3	8.8	2.5	2.8	0.0	N/A	14.1		0.1	0.5	0.6		0.02	0.5	N/A	0.0	0.0	0.2	0.7		0.21	5.1	0.0	1.6	6.9		14.8	7.5
x-19	1.0	4.4	6.7	0.0	0.5	N/A	11.6		0.1	0.2	0.3		0.02	0.4	N/A	0.0	0.0	0.2	0.6		0.11	4.4	0.0	0.7	5.2		12.2	5.5
	21.5	88.0	23.1	19.5	16.3	0.0	146.9		1.1	4.6	5.7		1.0	2.9	0.0	0.3	0.1	6.9	11.2		1.01	27.2	3.1	7.1	38.4		158.1	44.1
March, 2022																												
ca-07	3.0	12.1	0.0	2.7	1.1	N/A	15.9		0.2	0.6	0.8		0.02	0.7	0.1	0.0	0.0	0.4	1.2		0.28	6.5	2.6	1.3	10.7		17.1	11.5
ca-09	2.6	9.9	4.0	2.8	0.0	N/A	16.7		0.1	0.5	0.6		0.00	0.5	0.0	0.0	0.0	0.4	0.9		0.21	5.7	0.0	2.0	7.9		17.6	8.5
p-15w	6.6	26.4	0.0	8.0	3.4	N/A	37.8		0.2	1.4	1.6		3.90	0.9	0.4	7.3	4.0	4.4	21.0		0.00	0.0	0.0	0.0	0.0		58.8	1.6
p-16	4.6	19.8	5.3	2.8	3.7	N/A	31.6		0.3	1.1	1.4		3.22	1.1	0.1	12.9	1.7	2.5	21.5		0.07	1.2	0.0	0.6	2.0		53.1	3.4
x-15	1.4	6.6	4.6	0.0	0.0	N/A	11.2		0.1	0.3	0.4		0.00	0.3	0.0	0.0	0.0	0.0	0.3		0.11	3.4	0.0	0.9	4.4		11.5	4.8
x-16	2.3	8.8	2.5	2.8	0.0	N/A	14.1		0.1	0.5	0.6		0.02	0.5	0.0	0.0	0.0	0.2	0.7		0.21	5.1	0.0	1.6	6.9		14.8	7.5
x-19	1.0	4.4	6.7	0.0	0.4	N/A	11.5		0.1	0.2	0.3		0.02	0.4	0.1	0.0	0.0	0.2	0.7		0.11	4.4	0.0	0.7	5.2		12.2	5.5
	21.5	88.0	23.1	19.1	8.6	0.0	138.8		1.1	4.6	5.7		7.2	4.4	0.7	20.2	5.7	8.1	46.4		0.99	26.3	2.6	7.1	37.1		185.1	42.8
CHANGE from 2021 to 2022				-0.4	-7.7		-8.1						+6.2	+1.5	+0.7	+19.9	+5.6	+1.2	+35.2		-0.2	-0.9	-0.5		-1.3		+27	-1.3

ATTACHMENT B: REFINEMENT REQUEST SCREENING FORM

MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

The proposed minor project refinements were evaluated to verify that the minor project refinements would not result in new significant impacts or substantial increases in the severity of a previously identified significant impact based on the criteria used in Appendix 1C of the Final Environmental Impact Statement (EIS). The following checklist provides a brief summary of the potential impact for each resource area analyzed in the Final EIS. The significance criteria provided below and considered in during the resource screening was pulled directly from the Final EIS Appendix 1C.

RESOURCE EVALUATION CHECKLIST			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Aesthetics/Visual Resources The Project would result in a significant environmental impact if it would: <ul style="list-style-type: none"> adversely affect a scenic vista, damage scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway, degrade the existing visual character or quality of the site and its surroundings, or create new sources of substantial light or glare. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The requested Minor Project Refinements (MPRs) that have the potential to result in a change to the impact levels for aesthetic/visual resources would be related to the change in the location of facilities, the addition of new facilities, change in disturbance areas, configuration and location of structures, and modification of material types that could change contrast levels.</p> <p>Impacts on scenic resources would not change as a result of the MPRs because there are no officially designated scenic vistas or overlooks in the Project area. The Project would remain appearing alongside the existing Devers Palo Verde Transmission Line (DPV) in areas that have views toward the Palo Verde Mesa and Colorado River, and the MPRs are located in areas that do not contribute to scenic values in the Project area. Therefore, the MPRs would not result in a new impact or increase the severity of a previously analyzed impact to scenic vistas.</p> <p>Impacts on scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway would not change as a result of the MPRs because there are no officially designated state scenic highways in the Project area.</p> <p>MPRs potentially affecting existing visual character or quality of the site and its surroundings would not be perceived from any of the Key Observation Points (KOPs) identified in the Final EIS due to the locations of the KOPs relative to Project activities. Most of the MPRs are related to short-term or construction related impacts where contrast levels would remain the same or geographically shifted to other locations. An incremental, minor increase in contrast would result from changes in access road type/location and additional area for turn radii, the introduction of additional Water Withdrawal Rock Pad and Wheel Wash Support Pad areas, installation of permanent access gates, and the addition of staging areas. However, minor occurrences of increased contrast would be located within or near the right-of-way (ROW) and would therefore not increase the overall visual impacts of the Project.</p> <p>Impacts to the visual character of the area resulting from the MPRs would be reduced as part of Project design with the implementation of Applicant Proposed Measures (APMs) and Best Management Practices (BMPs) mitigation, including APM AES-05 (transmission line collocation; avoidance of staging and laydown areas in visually sensitive areas); BMP AES-13 (micro siting to reduce, minimize or eliminate visual impacts); BMP AES-10 (appropriate use of monopoles or guyed or lattice towers, based on landscape setting); BMP AES-04 (color treatment where necessary, and dull, non-reflective finish on all structures); BMP AES-07 (avoid siting across center of a valley bottom); BMP AES-08 (avoidance of skylining); and BMP AES-12 (reclamation to reduce visual impacts). The additional incremental increase in land "scarring" created by additional access roads and changes in road types would be mitigated by the implementation of APM AES-01 which would require minimization of grading and clearing of vegetation, and APM</p>			

AES-02/BMP AES-02 which would require removal of construction material and debris from Project areas, and restoration of disturbed areas. The largest increase in disturbance impacts is reflected in access roads in segments p-15w and p-16, as shown in Table 3, above. This refinement is discussed in MPRR 001- 21 in Table 1. The access roads in segments p-15w and p-16 are largely in active agricultural areas and are pre-disturbed (Type B access roads). Additionally, all access roads in the agricultural portion of the Project are assumed to be temporary, as the farming practices would resume after construction, and access roads to Ten West towers would be tilled/reclaimed. As such, scarring would not degrade visual resources, nor would the increased acreage in the access roads cause a significant change to visual impact considerations. The addition of up to seven additional staging areas in previously disturbed areas would cause short-term construction related contrasts, but addresses APM AES-06/BMP AES-06 which requires siting of these facilities in previously disturbed transportation access points.

The minor shifts in the location of work areas and structure locations would not alter the overall contrast levels of the Project because the structures and work areas would remain in the analysis area and ROW detailed in the 2021 Plan of Development (POD) and would still parallel the existing DPV that minimizes overall contrast levels created by the Project. The Project would still appear to slightly expand the footprint of the existing transmission corridor as described in Appendix 1C of the Final EIS, and therefore, the effects on the existing visual character or quality of the site and its surroundings would remain less than significant with the implementation of the mitigation measures described above.

Other MPR features, such as the replacement of gravel and timber mat pipeline protections with steel plating (short-term impact) and the addition of a sump sediment trap (long-term impact) would not be apparent to sensitive viewers, are not located near sensitive viewing locations or KOPs, would be short term in duration, and would not change the overall contrasts that would affect Project visual impact levels.

All Bureau of Land Management (BLM) land in California is VRM Class IV. Project changes do not affect BLM managed land, and therefore, no changes are anticipated related to VRM compliance.

Impacts on the potential for new sources of substantial light or glare would not change as a result of the MPRs because there has been no change in the potential light and glare producing features of the Project such as Federal Aviation Administration lighting, Series Compensation Station lighting, transmission line structure material finishes, or conductor finishes as described in the 2021 POD. As noted above, replacement of gravel and timber mat pipeline protections with steel plating (short-term impact) are not located near sensitive viewing locations or KOPs, would be short term in duration, and would not change the overall contrasts that would affect Project visual impact levels.

As summarized above, the MPRs requested will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to visual resources as identified in Appendix 1C of the Final EIS and described in the 2021 POD.

MPRR 001- 34 involves a change in the methods and/or type of equipment to be used to prevent trackout and/or remove sediment from vehicles exiting the construction site. This change in methods/equipment would not affect a scenic vista, damage scenic resources, degrade the visual character of the site, or create a new or substantial glare. The rocked construction entrances would be installed in existing farm access roads or actively farmed fields. The equipment used in a trackout removal system (air compressor/air knife) would be temporary in nature, is similar in setup to a wheel wash station, and there is no new ground disturbance associated with the change.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Agriculture The Project would result in a significant impact to agriculture and forestry if it would: <ul style="list-style-type: none"> convert Farmland as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non-agricultural use, conflict with zoning for agricultural use or a Williamson Act contract, conflict with existing zoning for, or cause rezoning of, forestland (as 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)),</p> <ul style="list-style-type: none"> • result in the loss of forestland or conversion of forestland to non-forest use, • involve other changes in the existing environment which, due to their location or nature, or • could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use)? 			
<p>Impacts on areas mapped pursuant to the Farmland Mapping and Monitoring Program (FMMP), zoned as agriculture, or under Williamson Act contract would not change as a result of the MPRs because the Final EIS determined that up to 71 acres of the 5,275.8 acres of National Resources Conservation Service (NRCS)-classified lands and 1,262.9 acres of Williamson Act lands along Segments p-15w and p-16 could be permanently impacted by the Project, which would be a negligible impact on the overall amount of NRCS-classified lands and Williamson Act lands available in the Colorado River and California Zone. A maximum of 6.3 acres of permanent impacts were estimated in potential NRCS-classified lands and Williamson Act lands (along Segments p-15w and p-16) in the February 2021 POD. The MPRs would result in a reduction of approximately 1.3 acres of permanent impacts and an increase of 26.9 acres of temporary impacts along Segments p-15w and p-16 within California agricultural areas. Therefore, the impacts would remain less than significant because transmission lines remain a compatible use within agricultural areas and the total actual acreages of NRCS-classified lands or Williamson Act land potentially affected (5 acres permanent) would be substantially less than what is available in both the study area of the Final EIS and along the segments being constructed for the Project.</p> <p>The Project would not conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g]) because no forestland, timberland, or Timberland Production zoned lands are located in the Project area. There would be no change in impacts as a result of MPRs because the zoning designations along the Project include agriculture and rural residential which precludes the possibility of conflicts with forest land zoning as a result of Project implementation.</p> <p>The Project would not result in the loss of forestland or conversion of farmland or forestland to non-forest use because the Project and MPRs are not located on land zoned as forestland or timberland, and as noted in Appendix 1C of the Final EIS and above, the nature of the MPRs and transmission lines remain compatible with agricultural operations. Therefore, there would be no change in impacts from Appendix 1C of the Final EIS and as described in the 2021 POD.</p> <p>The Project would not involve other changes in the existing environment that are different than those described in Appendix 1C of the Final EIS and 2021 POD because no modifications to irrigation facilities, water supplies, drainages or other resources would occur and the nature of the MPRs remain compatible with agricultural operations. Temporary impacts would remain as a result of material staging and conductor stringing, but the locations of these areas would be slightly shifted due work area and structure location adjustments that are part of the MPRs. The impacts would remain temporary and would not result in a permanent conversion of land, so there would be no change in impacts.</p> <p>Consultation and coordination with irrigation districts as required for agricultural lands enrolled in the Fallowing Program and within Metropolitan Water District fee properties has occurred as required by MM AG-CEQA-1 to avoid and reduce potential impacts resulting from Project work, so impacts would remain less than significant, and there would be no change in impacts as described in Appendix 1C of the Final EIS and 2021 POD. Consultation documentation is provided in the following link to the Dudek SharePoint site: Metropolitan Water District of Southern California</p> <p>MPRR 001- 34 would not convert farmland or conflict with any existing zoning requirements. The rockered construction entrances would be installed on existing farm access roads or would be temporarily placed in active farmfields and removed post-construction, and equipment for trackout removal would be set up temporarily during construction and would be removed when construction was complete. There is no ground disturbance associated with the requested</p>			

refinement.			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Air Quality and Climate Change The Project emissions would result in a significant impact to air quality if they would: <ul style="list-style-type: none"> • conflict with or obstruct implementation of the applicable air quality plan, • violate any air quality standard or contribute substantially to an existing or projected air quality violation, • result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors), • expose sensitive receptors to substantial pollutant concentrations, • create objectionable odors affecting a substantial number of people, • generate GHGs emissions, either directly or indirectly, that may have a significant impact on the environment, or • conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Construction and maintenance activities associated with the construction of the Project utilizing the requested MPR areas (e.g., the type of and number of equipment used and the number of truck trips) will be consistent with those discussed in Appendix 1C of the Final EIS and will not increase air emissions beyond what was analyzed. The refinement areas would continue to be located beyond 2,000 feet of sensitive receptors staying consistent with the data analyzed in Appendix 1C of the Final EIS and as described in the 2021 POD. The MPRs primarily consist of the relocation of work areas within or immediately adjacent to the proposed ROW and will therefore not affect any additional sensitive receptors or move work areas associated with the Project substantially closer to sensitive receptors. While the access road work and any additional grading required for the refinement areas may result in a minor increase in air quality impacts in localized areas and one potential staging area would be located within 2,000 feet of a sensitive receptor (residence) activities associated with these MPRs will be short-term and temporary at any given location. With the implementation of MM AQ-CEQA-1, BMP AQ-01, APM AQ-02, and BMP AQ-05, the use of the refinement areas will not significantly increase pollutant concentrations, which is consistent with the analysis in Appendix 1C of the Final EIS. Therefore, the requested MPRs will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 would not result in a new impact to air quality, and would not increase the severity of analyzed impacts from emissions. The rock construction entrance is a standard practice and would be installed regardless of the requirements of MM AQ-CEQA-1, per the Stormwater Pollution Prevention Plan for the Project. The equipment used in an air compressor setup is similar in size and design to the generators that would be used for a wheel washing system, and would not constitute a significant change in the emissions that was analyzed in the EIS. The air compressor equipment would operate on either gasoline or diesel fuel, which would also be the same fuel used in the generator for a wheel washing system. Additionally, the equipment would be run for similar amounts of time, burning similar amounts of fuel, but their use is temporary in nature (the equipment would only be used for the duration of construction activities at each location). The refinement would not violate any air quality standards, as the equipment, if necessary, would be registered for use in California. Any necessary air quality permit needed for a generator in a wheel washing system would also be needed for an air compressor, depending on the horsepower of the unit in any case. These permits are contemplated in the Final EIS as well as the Project Plan of Development, and would not constitute a new permitting requirement.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant	N/A

		Change	
Biological Resources The Project would have significant biological resource impacts if it would: <ul style="list-style-type: none"> • have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, • have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS, • have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, • interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, • conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or • conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The requested MPRs will result in a total increase of approximately 27 acres of temporary impacts and a total decrease of approximately 1.3 acres of permanent impacts. Only 0.22 acre of the temporary impacts are in desert scrub vegetation communities. All other temporary and permanent impacts are on agricultural/disturbed lands which are pre-disturbed areas (existing access roads or farm staging areas) and active agricultural fields, and thus, impacts would be less severe in these areas. Additionally, access roads in the agricultural portion of the Project are assumed to be temporary, as the farming practices would resume after construction, and access roads to Ten West towers would be tilled/reclaimed. As such, permanent land conversion would not be a risk to biological species. Special-status species will have a net decrease of approximately 24 acres of temporary impacts and a net decrease of 10.1 acres of permanent impacts. The requested MPRs will decrease temporary and permanent impacts for Mojave desert tortoise, Mojave fringe-toed lizard, Harwood's milkvetch, big galleta, and Harwood's eriastrum. The requested MPRs will decrease temporary and permanent impacts for Couch's spadefoot toad in non-agricultural areas but increase temporary impact areas for Couch's spadefoot toad in agricultural areas. There would be a net increase in temporary impacts to Couch's spadefoot toad habitat in California would of 4.5 acres. However, this would not increase severity of the impacts, because, as discussed in Attachment F to this MPRR, there will be a decrease in permanent impacts to modeled Couch's spadefoot toad habitat west of the agricultural area of 1.1 acres. Since these impacts are currently being offset at a 3:1 ratio, the decrease in permanent impacts would offset 3.3 acres of required offsite compensatory mitigation. As such, and given the 0.5:1 compensation ratio for temporary impacts to Couch's spadefoot toad, which would require approximately 2.25 additional offsite compensatory mitigation for the new temporary disturbance, DCRT would not need to acquire any additional offsite compensatory mitigation acres for the additional impacts to Couch's spadefoot toad modeled habitat resulting from the mapping changes. All impacts will be temporary and located on non-federal lands; all the construction disturbance areas in California agricultural areas will ultimately be restored to pre-construction conditions.</p> <p>The changes in impact areas by species is:</p> <p>Mojave Desert Tortoise</p> <ul style="list-style-type: none"> • Temporary: decreased 4.1 acres • Permanent: decreased 2.0 acres <p>Couch's Spadefoot Toad – Agricultural Area</p> <ul style="list-style-type: none"> • Temporary: increased 9.8 acres • Permanent: no impacts <p>Couch's Spadefoot Toad – Non-Agricultural Area</p>			

- Temporary: decreased 5.3 acres
- Permanent: decreased 1.1 acres

Mojave Fringe-toed Lizard

- Temporary: decreased 9.1 acres
- Permanent: decreased 2.6 acres

Harwood's Milkvetch

- Temporary: decreased 1.4 acres
- Permanent: decreased 1.2 acres

Big Galleta

- Temporary: decreased 6.7 acres
- Permanent: decreased 1.6 acres

Harwood's Eriastrum

- Temporary: decreased 7.2 acres
- Permanent: decreased 1.6 acres

The estimated impacts to Couch's spadefoot toad modeled habitat have resulted from having to make minor improvements to existing access roads in the California agricultural area. These improvements have been primarily driven by private landowner requests. All impacts will be temporary, as all of the construction disturbance areas in the California agricultural area will ultimately be restored to pre-construction conditions.

Compensatory mitigation for permanent impacts to Couch's spadefoot toad habitat will now include: a) off-site creation enhancement, and/or preservation; and/or b) participation in an established mitigation bank program. Compensation for temporary impacts would include habitat restoration or enhancement with similar species compositions to those present prior to construction. The compensatory mitigation for temporary impacts will be at a ratio of 1:1 on BLM-managed lands. The ratio will be a total of 1.5:1 (MM WIL-CEQA-9) for lands subject to California Public Utility Commission (CPUC)/California Environmental Quality Act (CEQA) requirements where restoration of conditions of the impacts areas within the Project footprint shall be at 1:1; and creation, restoration, or enhancement of similar vegetation communities offsite shall be 0.5:1, as approved by California Department of Fish and Wildlife (CDFW) and CPUC. As part of refinements made to the project, there will be a decrease in permanent impacts to modeled Couch's spadefoot toad habitat west of the agricultural area of 1.1 acres. Since these impacts are currently being offset at a 3:1 ratio, the decrease in permanent impacts would offset 3.3 acres of required offsite compensatory mitigation. As such, and given the 0.5:1 compensation ratio for temporary impacts that would require approximately 2.25 additional offsite compensatory mitigation, DCRT would not need to acquire any additional offsite compensatory mitigation acres for the additional impacts to Couch's spadefoot toad modeled habitat resulting from the mapping changes.

All APMs, BMPs, mitigation measures, and Desert Renewable Energy Conservation Plan Conservation and Management Actions reflected in the Project's Mitigation Action Plan, Environmental Compliance Management Plan, and other permit and plan conditions will be implemented as applicable to minimize or mitigate for any additional impacts. Thus, the MPRs will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in Appendix 1C of the Final EIS and as described in the 2021 POD.

MPRR 001- 34 would have no new or additional impacts to biological resources than the specified wheel washing system. The rocked construction entrance would be installed in such a way that would not interfere with the movement of wildlife. The refinement would not convert habitat, as the rocked construction entrances and wash areas are adjacent to active farm fields and fall on existing farm access roads. The refinement would not have an adverse effect on riparian or other sensitive communities, as the locations where the rocked construction entrances or trackout removal systems would be used are on existing farm access roads or in actively farmed fields. The use of an air compressor/air knife in place of a wheel washing system would not conflict with any local policies or conservation plans, and would not interfere with the natural movement of wildlife. The equipment used in the air compressor system is similar in size to the wheel washing system, and would only be used temporarily.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Cultural Resources The Project would have significant cultural resource impacts if it would: <ul style="list-style-type: none"> cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5, cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside of formal cemeteries. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>As noted in Section 4.5.6 of the Final EIS, resolution measures for adverse effects to historic properties were outlined in the Programmatic Agreement (PA) and Historic Properties Treatment Plans (HPTPs) for Arizona and California. The developed PA ensures the priority of avoidance of historic properties during construction phases, and ensures the process of identifying, evaluating, and avoiding or mitigating is followed. The California HPTP was developed in accordance with the stipulations contained in the PA following the Class III survey identification fieldwork and indirect studies. Measures contained in the PA and HPTPs would be implemented prior to and during construction and post-construction during maintenance activities and operations. Resolution measures for adverse effects to historic properties located within the California Desert Conservation Area (CDCA) Plan area were further outlined by specific compliance requirements.</p> <p>The Project PA Stipulation V.A.1 stated that the following aspects of the Project would require an archaeological inventory. (Specific caveats are found below in V.B.4):</p> <p><i>1. Direct effects: The Area of Potential Effect (APE) for direct effects for the Undertaking will include all areas likely to be affected by construction and reclamation activities. This APE will include the 200-foot-wide permitted right-of-way (ROW) corridor for one 500 kV transmission line and access roads (within the corridor), plus 100 feet on either side of the corridor (400 feet total width). This width will allow for adjustments in transmission line or access road placement to avoid when possible any modern infrastructure, natural features such as drainages and bedrock outcrops, or cultural resources such as archaeological sites and historic buildings or structures.</i></p> <p><i>a. Proposed new access routes and existing roads requiring improvement outside the transmission line ROW will have a 150-foot-wide direct effects APE (75 feet from centerline).</i></p> <p><i>b. The direct effects APE for staging areas, borrow areas, substations and other transmission infrastructure will include the footprint of the facility and a buffer of 250 feet around the footprint of the proposed activity/facility.</i></p> <p><i>c. The direct effects APE for pulling/tensioning sites that fall outside the ROW will be the footprint of the site plus a 250-foot buffer around the footprint of these sites.</i></p> <p><i>d. The BLM has provided the APE definitions above concurrently to the State Historic Preservation Offices (SHPOs)/Tribal Historic Preservation Officers (THPO) and Consulting Parties for a single thirty (30)-calendar-day review and comment period.</i></p> <p>PA Stipulation V.B.4 guided archaeological team planners that undertook the Class III inventories. This states that:</p> <p><i>Any part of the APE for direct effects for the final selected route that has not already been inventoried to current standards, or not considered by the BLM, the SHPOs/THPO, or other land managing agencies to be adequately inventoried, and which can be accessed safely and legally, shall be completely inventoried at a Class III level to the standards of the BLM and SHPO for Arizona and California as detailed in Stipulation IV.A and B. Determinations of eligibility, findings of effect, and possible treatment shall be made by the BLM in consultation with the SHPOs/THPO and appropriate Consulting Parties, including Tribes. Identification efforts shall be performed regardless of the ownership (public, private, State, or Tribal) of the lands. The Applicant shall be responsible for gaining access to non-BLM lands. In the event access to non-BLM lands is not</i></p>			

obtained, the Applicant will provide documentation to BLM sufficient to demonstrate two (2) unsuccessful efforts to secure access or showing that the landowner has affirmatively denied such access. Where access cannot be obtained, resorting to other means for survey such as aerial imagery may be used to determine likelihood of presence of historic properties. The Class III Inventory will be conducted with sensitivity for locations or other features identified as important through Tribal consultation or ethnographic studies.

Portions of the direct APEs delineated by Stipulation V.A.1 (200 feet on either side of the chosen circuit centerline) were located on recently surveyed areas, plowed farming fields, existing farm roads, areas bearing clear signs of recent disturbance on modern aerial imagery, and/or private areas that could not be legally accessed. The survey inventories occurred in areas that did not include these limiters. The majority of Class III inventory in California took place in 2019 with additional fieldwork in 2020. Design parameters were created by the engineering team before and after the inventory to avoid as many cultural resource sites as possible. Those that could not be avoided were evaluated for significance and recommendations of Ineligibility were provided to BLM.

In 2020, the Proponent asked that their cultural resources contractor (POWER Engineers, Inc. [POWER]) to perform a second survey of newly accessible plowed fields and roads in the farmed regions of the Palo Verde Valley, and a third survey was needed in an area located between Structures #399 and #403. These studies were combined with the 2019 study results into a single report that was submitted to BLM in the fall of 2020. A summary statement as to the potential impact to historic properties as a result of Project development was submitted to SHPO once BLM approved the final inventory results. In sum, POWER found that no historic properties (National Register of Historic Places) or historical resources (California Register of Historic Places) will be directly impacted by construction.

The results of the Class III inventories were reviewed by BLM and the CPUC and the final Class III report was utilized to develop the February 2021 version of the POD. As shown in the HPTP, the total inventory of known historic properties is 33. Each have been avoided. Maps shown in Appendix A of the HPTP refer to Project design as of February 2021. Mapped modifications to the POD subsequent to February 2021, as shown in the attached mapbook, demonstrate that differences between the February 2021 and February 2022 versions of the POD in California are, from a design standpoint, physically minor. The 400-foot survey area located outside of the Palo Verde Valley farmlands and associated survey buffer zones as defined in PA Stipulation V.A.1 allowed engineering designers to avoid all potential historic properties. The analysis shows that minor changes in design subsequent to the February 2021 version of the POD will not cause an impact to a historic property, nor will a known cultural resource site be impacted.

Mitigation measures associated with impacts to unknown historic properties/historical resources were developed in the PA-mandated HPTP; BLM is using the Class III survey report and the HPTP to develop tribal monitoring procedures during their Section 106 consultation obligation.

The February 2021 POD included elements associated with the process of avoiding or mitigating for impacts to unanticipated historic properties/historical resources should any be encountered during construction. We note that BLM ROW Grant Stipulation 30 was added to POD Section 4.8.2.1 and was included in the February 2022 version of the POD. Stipulation 30 was added because of BLM ROW Grant (August 2020) requirements:

“No surface disturbance or construction activity will be allowed within 150 feet of identified cultural sites which shall be clearly marked as specified by the authorized officer and the Historic Properties Treatment Plan (HPTP). Any deviation from this requirement shall have the prior written approval of the authorized officer.”

The final California HPTP, approved by BLM in September 2021, does not include a distance buffer requirement between any resource and any planned direct construction impact. Instead, Section 4.4 of the Monitoring and Discovery Plan (MDP) refers back to the POD (Stipulation 30) to delineate any needed buffers between a historic property and an area of direct construction impact. To delineate appropriate buffers just prior to construction, HPTP Table 1 includes a list of all avoided historic properties and ineligible resources detected during the survey and the distance between the resource and the nearest area of direct construction impact (as of February 2021). Our analysis shows that while these distances may have changed slightly as a result of Project redesign, those changes will not directly impact a historic property.

The approved California HPTP states that cultural sites will not be “clearly marked” as sites before construction begins. Marking sites calls attention to them and BLM does not want any indicator that cultural sites exist near construction zones.

Thus, to meet the requirements of Stipulation 30, site boundaries less than 150 feet (46 meters) from an area of direct construction effect would be flagged or fenced with appropriate Construction Exclusion Zone signage (see POD Table 4-3) that reads “Exclusion Zone – Project Personnel Keep Out”; such signage does not indicate what the area contains. Lastly, prior to construction in California, the Authorized Officer must be given a list of cultural resources that lie less than 150 feet from planned areas of ground disturbance and then provide the Proponent with direct written approval to allow impacts to those resources. Monitoring archaeologists will ensure that these Exclusion Zones will be avoided by construction personnel through regular inspection.

Because all of the MPRs are located within the Project's APE and as detailed above, the MPRs will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impacts to cultural resources as identified in Appendix 1C of the Final EIS.

For paleontological resources, all changes fall within the area evaluated in the Paleontological Resource Impact Mitigation Monitoring Plan (PRIMMP; Appendix E-2 of the Plan of Development). Additionally, the majority of the mapping changes fall within the agricultural lands in California which are categorized as Low (Class 2) Potential Fossil Yield Classification (PFYC). The remaining changes fall within either the Low (Class 2) PFYC area from Structures 410-422, or the Moderate (Class 3) PFYC areas from Structures 383-409. In accordance with APM PALEO-01, BMP PALEO-02, and MM CUL-CEQA-4 a paleontological monitor will conduct full-time monitoring during all excavations impacting native sediments with Class 3 PFYC, including Cretaceous or Jurassic McCoy Mountains Formation, lower part, undivided (KJmlu); Quaternary and Tertiary(?) alluvial fan and fluvial deposits (QTa); Quaternary and Tertiary dissected fan deposits (QTdf); Quaternary and Tertiary older alluvium (QToa); Pleistocene and/or Pliocene alluvial deposits of the Ehrenberg area (QTe); Pleistocene and/or Pliocene alluvial deposits of the Mule Mountains (QTmm); late to early Pleistocene alluvium (Qm/Qo); and Pleistocene alluvial deposits of Palo Verde Mesa. Note that geologic ages tagged with a “(?)” are estimates and represent poorly constrained geologic ages. These geologic units are described within the PRIMMP. Therefore, the requested refinements will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to paleontological resources as identified in the Final EIS.

MPRR 001- 34 would cause no additional ground disturbance that could affect cultural resources. The rockered construction entrances would be installed on existing farm access roads or in actively farmed fields. The air compressor/air knife equipment setup is temporary in nature, and is similar to the equipment that would be used in the wheel washing setup.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Tribal Resources</p> <p>The Project would have significant tribal impacts if it would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> • Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or • A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 	☒	<input type="checkbox"/>	<input type="checkbox"/>
<p>The analysis and impact assessment including mitigation measures proposed to reduce impacts within Appendix 1C of the Final EIS would remain unchanged for tribal resources with the implementation of the requested Project MPRs. The concerns previously expressed by the Tribes have been appropriately addressed through the Section 106, NEPA and CEQA processes. The HPTP has been completed and approved by the Tribes, California SHPO, BLM California and the CPUC. The HPTP has addressed all Tribal comments and concerns and there are no outstanding Tribal issues</p>			

not adequately addressed by the HPTP and the analysis would remain unchanged by the Project MPRs proposed. Therefore, there would be no change in tribal impacts as identified in Appendix 1C of the Final EIS.

Similar to the potential effects on cultural resources, MPRR 001- 34 would not have an adverse impact or create new impacts to tribal resources. The rock construction entrance would be installed on existing access roads or actively farmed field and equipment setup for an air knife system would be temporary, and is similar to the equipment that would be used in the wheel washing system. There would be no additional ground disturbance as a result of the refinement, and would thus not increase risks to tribal resources.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Geology and Soils</p> <p>The Project would have significant geology and soils impacts if it would:</p> <ul style="list-style-type: none"> expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving: <ul style="list-style-type: none"> rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides. result in substantial soil erosion or the loss of topsoil, be located on strata or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, be located on expansive soil, as defined in Table 18-1 B of the Uniform Building Code, creating substantial risks to life or property, or have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. 	☒	☐	☐
<p>The potential exposure of the Project to seismic hazards, including fault rupture, strong ground shaking, ground failure and liquefaction, and landslides remain unchanged from those described in Appendix 1C of the Final EIS and 2021 POD because there are no Earthquake Fault Zones or known active earthquake faults in the Project area. Furthermore, a geotechnical engineering study has been completed as part of final design that identifies potential hazards and the design of the Project has been modified accordingly and is consistent with the requirements of CPUC General Order 95, applicable industry building codes and standards such as those described in the Institute of Electrical and Electronics Engineers Standard 693-2005 and Recommended Practice for Seismic Design of Substations. Because these standards have been implemented as part of Project design, the MPRs do not affect the low susceptibility of the Project to seismic risk. Any potential impact from strong ground shaking would be to the Project itself and would represent and inspection, repair, and maintenance issue for the owner/operator rather than a significant impact to public safety or the surrounding environment. Therefore, impacts from ground shaking would remain less than significant.</p> <p>Similarly, the MPRs also remain in areas of low hazard risk of liquefaction due to the low to moderate seismic potential and low landslides risk of the overall Project area. None of the MPRs constitute a change to the degree that the Project facilities would increase in susceptibility due to liquefaction or landslide; there would be no change to the fact that the Project does not involve structures for human occupancy and the ROW remains open space, private agriculture, and existing transmission substation facilities other than in areas of public road or Colorado River crossings. Because geotechnical studies have been conducted to identify site-specific geological conditions and potential geological hazards related to liquefaction and landslide, foundation design has been or will be modified accordingly, and impacts from liquefaction and landslide would remain less than significant.</p> <p>The modification of access road location and type, the introduction of additional water withdrawal areas and rock</p>			

pads, increase in turn radii in agricultural areas, addition of weed wash disturbance areas, the shifting of work pads and structure locations, addition of potential staging areas, and the shifting and addition of guard pole areas all have the potential to affect potential soil erosion and loss of topsoil. All of the area west of the Colorado River is rated as moderate high potential for wind erosion. The majority of increased temporary disturbance would occur in agricultural areas and would be the result of an incremental temporary impact increase to facilitate construction access, but all additional temporary impacts will occur in previously impacted areas adjacent to the existing roads and within active farm fields. Additionally, these impacts are considered as temporary because the incremental area added to the existing roads will be reclaimed or agricultural activities would resume following completion of construction. In some instances, the MPRs include the shifting of work pads away from agricultural areas and canals to reduce potential impacts. With the implementation of MM-GEO-CEQA-2 (Implementation of Erosion Control Plan) and APM WQ-01 (NPDES Construction General Permit) and other BMPs (BMP SOIL-01, BMP SOIL-02, BMP SOIL-03, BMP SOIL-04, BMP SOIL-05, BMP SOIL-06, and BMP SOIL-07), the majority of the increase in disturbance being temporary in nature, and the modifications resulting from site-specific adjustments to avoid canals and agricultural areas, impacts related to ground disturbing activities that could potentially affect soil erosion and loss of topsoil would remain less than significant.

There also would be no change in potential for the Project to be located on soil that is or could become unstable as a result of the Project creating landslide, lateral spreading, subsidence, liquefaction, or collapse because the MPRs do not include a change in anticipated groundwater pumping (none) levels or a change in Project features affected by these conditions. Additionally, the potential effects of expansive soils as a result of MPRs also has not changed. Geotechnical studies have been conducted to identify areas of subsidence and soils that are expansive, corrosive or collapsible to inform Project design and minimize the risk to life and property. Impact levels would remain less than significant, and no additional mitigation is required.

None of the Project MPRs would result in a requirement to use septic tanks or other permanent wastewater disposal facilities, so there is no change in impact related to the adequacy of soils to such facilities.

MPRR 001- 34 would not result in new impacts or an increase of impacts to geological resources. There is no additional ground disturbance associated with the requested change, and the refinement has no likelihood to increase seismic potential in the Project area. The equipment would be used on the stable surface of the rock construction entrance and would not cause erosion or loss of topsoil, because it would essentially armor the soil from erosion.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Hazards and Hazardous Materials The Project would have significant hazards and hazardous materials impacts if it would: <ul style="list-style-type: none"> • create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, • create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, • emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, • be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment, • result in a safety hazard for people residing or working in the project area (for a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport), • result in a safety hazard for people residing or working in the project area (for a project within the vicinity of a private airstrip), • impair implementation of or physically interfere with an adopted 	☒	☐	☐

<p>emergency response plan or emergency evacuation plan, or</p> <ul style="list-style-type: none"> expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. 			
<p>The requested MPRs would not change the type of construction equipment used or substantially change the use of any hazardous materials or the potential for hazards as a result of construction and maintenance of the Project. No known hazardous materials sites are located in the refinement areas. Further, the MPRs would not change the proximity of the Project to known public airports or private airstrips. Additionally, with the implementation of MM HAZ-CEQA-1, MM HAZ-CEQA-2, and MM TRANS-CEQA-2 the MPRs would not result in a new impact or substantial increase in the severity of a previously analyzed impact to hazards and hazardous materials as identified in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 would not create a risk to the public or the environment through the use or transport of hazardous materials, because rocked construction entrances do not require the use of hazardous materials, and the equipment to be used in the air compressor system is similar in size, nature, and fuel consumption to the equipment that would be used in the wheel washing system discussed in MM AQ-CEQA-1. No known hazardous materials sites are located in the refinement areas. Further, the refinement would not change the proximity of the Project to known public airports or private airstrips. Additionally, with the implementation of MM HAZ-CEQA-1, MM HAZ-CEQA-2, and MM TRANS-CEQA-2 the refinement would not result in a new impact or substantial increase in the severity of a previously analyzed impact to hazards and hazardous materials as identified in Appendix 1C of the Final EIS.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Electromagnetic Fields (EMF)</p> <p>The Project would have significant hazards and hazardous materials impacts if it would:</p> <ul style="list-style-type: none"> not comply with MM EMF-CEQA-1 in development of a Field Management Plan (FMP) to show no-cost/low-cost measures and identify any appropriate EMF reduction measures to be implemented into the Project. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The FMP recommended “no-cost” magnetic field reduction design options that will be used in the design:</p> <ul style="list-style-type: none"> Utilize typical conductor to ground clearance heights that exceed the California General Order 95, Section III, Rule 37. Optimally phase and transpose proposed Project with respect to the DPV line, which parallels the proposed line for most of its length, for magnetic field reduction. Both matching and crossing the phasing of the Project with the phasing of the DPV line were considered, but cross-phasing was found to be optimal for reducing magnetic field levels at the edge of the ROW. <p>Based on the MPRs in the Mapping sections, the potential for the Project to result in minor movement of towers and work areas in the agricultural canal areas in California and the reduction of the ROW width for Structures 366 and 367 will not impact the “no cost” field reduction options of maintaining the ground clearance heights and optimal phase of the line.</p> <p>The proposed MPRs will not change the ground clearance for this Project. The ROW width would decrease for one span (Structures 366 to 367) and would increase the target calculated EMF levels at the edge of the ROW. However, this increase is minor overall for the line section being evaluated (Line Section 3 as shown in the FMP) and would not change the magnetic field reduction design option for this span which would optimally phase and transpose the proposed transmission line to be cross-phased with the DPV line.</p> <p>Therefore, the MPRs would result in no change to potential impacts related to EMF from those described in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 - Rocked construction entrances and air compressor systems do not have any EMF potential, and</p>			

would thus not cause a new impact or increased impact to electromagnetic fields.			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Hydrology and Water Quality</p> <p>The Project would have significant hydrology and water quality impacts if it would:</p> <ul style="list-style-type: none"> • violate any water quality standards or waste discharge requirements, • substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted), • substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, • substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, • create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, • otherwise substantially degrade water quality, • place housing within a 100-year flood hazard area as mapped on a federal flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, • place within a 100-year flood hazard area structures which would impede or redirect flood flows? • expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or • receive inundation by seiche, tsunami, or mudflow. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The proposed refinements would not increase impacts to Waters of the State, which are governed under the Streambed Alteration Agreement DCRT holds with CDFW, signed on December 10, 2021. No changes to the Streambed Alteration Agreement would be necessary.</p> <p>Washing of construction vehicles may occur within 100 feet of streams in designated areas when CEQA requirements necessitate wheel or undercarriage washing at the access roads in agricultural areas that are located adjacent to canals. Otherwise, washing of construction vehicles will be allowed only in designated areas (depicted as “Wheel Wash” and “Weed Wash” stations on the maps) and will not occur within 100 feet of a wetland or active stream.</p> <p>Wherever possible, work pads have shifted away from agricultural canals.</p> <p>To minimize potential impacts from erosion and off-site sedimentation during construction, refinement areas were or will be incorporated into the construction Stormwater Pollution Prevention Plan (SWPPP) or will be incorporated into a Change of Information to the SWPPP, which will be submitted to the State Water Resources Control Board’s Stormwater Multiple Applications and Report Tracking System prior to construction.</p> <p>Therefore, the Project MPRs would not result in new impact, or increase the severity of a previously analyzed impact to hydrology and water quality.</p> <p>MPRR 001- 34 does not involve the use of water, so there would be reduced risks to water quality than with the use</p>			

of the wheel washing system. There is no ground disturbance associated with the requested refinement, so drainage patterns would not be altered and there would be no impediment of flows if a 100-year rain event was to occur.			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Land Use and Planning The Project would have significant impacts on land use and planning if it would: <ul style="list-style-type: none"> physically divide an established community, conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, or conflict with any applicable habitat conservation plan or natural community conservation plan. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The MPRs detailed in this request will not result in a change in land use that would from those described in Appendix 1C of the Final EIS. There would be no change that would result in physically dividing an established community because the Project would remain adjacent to an existing utility corridor and no ROW expansion would occur; minor reduction in ROW width would occur in one area for landowner avoidance. There are no additional residential developments proposed relative to the MPRs, and no additional or new roads would occur in residential areas. All minor shifts in structure locations would remain within the ROW described in Appendix 1C of the Final EIS and shown in the February 2021 POD, and the MPRs do not change the compatibility of the Project with the land use. The additional temporary impacts resulting from the Project would be identical or substantially similar to those described in Appendix 1C of the Final EIS, with the additional Type B access road widths and wheel wash support pads not altering the underlying land use of the Project area. Changes in the location of Type A (existing) access roads would not affect land use; all changes in the location or type of access roads, guard structure areas, additional turn radii, and other MPRs potentially affecting agricultural areas would be associated with temporary disturbance or would be adjacent to agricultural areas, and the additional site-specific private landowner coordination and adjustments to avoid irrigation facilities serves to further minimize impacts on land use from those described in Appendix 1C of the Final EIS.</p> <p>The MPRs will not conflict with the applicable local land use plans, policies, or regulations of an agency with jurisdiction over the Project, as they are located in the same Riverside County land use and zoning designations that were analyzed in Appendix 1C of the Final EIS. There would be no additional Plan Amendments to the CDCA required beyond what has already been described and incorporated into the Record of Decision because most of the MPRs are associated with temporary impacts and the adjustments to structure locations are located on private land. There are two approved BLM variances for map changes on federal lands, which are provided in Attachment E to this MPRR.</p> <p>Therefore, the requested MPRs will not result in new significant impacts or a substantial increase in the severity of a previously analyzed impact to land use as described in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 involves the use of a rocked construction entrance or an air compressor system in place of a wheel washing system for trackout control, which would have no effect on dividing an established community or alter land uses. The rocked construction entrances would be installed on existing farm access roads or would be installed in actively farmed fields but would be temporary in nature. The equipment used for an air compressor/air knife system is similar in size and nature to the wheel washing equipment, which would not conflict with existing conservation plans.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Mineral Resources The Project would have significant minerals impacts if it would: <ul style="list-style-type: none"> result in the loss of availability of a known mineral resource classified 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>Mineral Resource Zone (MRZ) MRZ-2 by the State Geologist that would be of value to the region and the residents of the State, or</p> <ul style="list-style-type: none"> result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. 			
<p>The Project area west of the Colorado River, in California, is within Mineral Resource Zone 4 (MRZ-4) and impacts would not change as determined in Appendix 1C of the Final EIS because the MPRs would not involve the loss of availability of any mineral resources within the area. The shifting of work pads and structure locations would occur within the ROW and the availability of the area would remain a viable MRZ-4 area. MPRs would also include additional temporary disturbed areas near the MRZ-4 area, however, upon Project completion, these areas would be reclaimed to preconstruction conditions and remain available for mineral extraction in the future, so there would be no change in impacts.</p> <p>The Project would not result in the loss of availability of locally important mineral resource recovery sites because there are no active mining operations, claims, prospects, or occurrences of mineral resources located within the Project ROW, therefore, it is unlikely that the Project would result in the loss of availability of important mineral resources. MPRs would include additional disturbed areas, which could temporarily disrupt access to mineral resources during the construction phase, thus potentially causing loss of availability of locally important resources. However, these impacts would be temporary and disturbed areas would be restored and access to resources would be available after Project construction. Therefore, impacts to availability of locally important mineral resources would remain less than significant.</p> <p>MPRR 001- 34 - The use of a rocked construction entrance or an air compressor/air knife system in place of a wheel washing system would no result in a loss of mineral resources, as there is no ground disturbance or other excavation associated with the change.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
<p>Noise</p> <p>The Project would have significant impacts to noise if it would:</p> <ul style="list-style-type: none"> expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, expose persons to or generation of excessive ground-borne vibration or ground-borne noise levels, cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project, cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, expose people reside or working in the project area to excessive noise levels (for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport), or expose people residing or working in the project area to excessive noise levels (for a project within the vicinity of a private airstrip). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The requested MPRs that have the potential to result in a change to the impact levels would be related to the addition of new facilities that could introduce new sources of noise or introduce noise in areas not previously identified or add noise closer to Noise Sensitive Receptors (NSR), including rural residents associated with agricultural development along the Project ROW. The introduction of seven staging areas and three water withdrawal areas would introduce sources of noise in the form of construction equipment, vehicles, and construction personnel in areas not previously identified. Some of these refinement areas are within 2,000 feet of NSRs, which is consistent with the 2018 baseline data analyzed in the Final EIS. While the use of staging areas and water withdrawal areas may result in the temporary increase in noise levels, the construction activities will be short-term and temporary at any given location. Project construction would also be exempt from noise standards as included in the Riverside County General Plan, including</p>			

private construction projects located within 0.25 of a mile from an inhabited dwelling, as implementation of MM NO-CEQ-1 would ensure that Project activities would occur during specified hours as noted in the County Plan. Noise related impacts resulting from the MPRs would be reduced further with the implementation of APMS, BMPs and CMAs as outlined in MM NO-CEQA-1 and MM NO-CEQA-2, including APM NO-03 Noise Minimization through Direction of Exhaust; BMP NO-5 County, State, and Federal Noise Regulations; and BMP NO-06 Hours of Daily Activity. Therefore, impacts related to construction noise from the MPRs would be consistent with the County's thresholds and would remain a less than significant impact.

Expanding access roads and minor shifts in the location of work areas and structures would not increase noise levels or change noise related impacts beyond what was analyzed in the Final EIS because access roads to be expanded, and structures and work areas would remain in the analysis area and/or ROW detailed in the Final EIS. No additional construction equipment or methods are proposed as part of these MPRs other than a potential reduction in water truck numbers and windows of usage. The overall duration increase would not significantly affect overall noise levels, and there would be change in impact from that described in Appendix 1C of the Final EIS.

Exposure to or generation of excessive ground-borne vibration or ground-borne noise levels would not change as a result of the MPRs because there has been no change in construction methods (i.e., pile driving and blasting) that would generate ground-borne vibrations or ground-borne noise levels as described in Appendix 1C of the Final EIS and 2021 POD. Pile driving and blasting is not anticipated to occur along the portion of the Project in California.

Permanent, temporary or periodic ambient noise levels in the Project vicinity above levels existing without the Project would not change as a result of the MPRs because minor shifts in structure locations would occur within the ROW and there are no additional permanent facilities proposed. New temporary MPR areas, including staging areas and water withdrawal areas would introduce noise in areas not previously identified and add noise closer to rural NSRs. Construction noise levels are expected to generally be below 65 dBA within a few hundred feet of the limits of construction. There may be some instances during construction where noise levels may exceed ambient noise levels in the Project vicinity at NSRs near staging areas or water withdrawal areas and could result in a potential impact prior to mitigation, but the implementation of MM NO-CEQA-1 and MM NO-CEQA-2 would reduce potential impacts to a less than significant level.

Exposure to excessive noise levels for people residing or working in the Project area (for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport) would not change as a result of the MPRs. Project Segment p-16 is located approximately two miles south of the Blythe Airport. Project MPRs within two miles of Blythe Airport would occur within the ROW and include shifting works areas and structure locations and the addition of guard structure areas. No additional equipment or construction methods are proposed and work at these locations are temporary, therefore there would be no new impacts, and no change in the impacts as described in Appendix 1C of the Final EIS.

No additional exposure to people residing or working in the Project area to excessive noise levels (for a project within the vicinity of a private airstrip) would occur as a result of MPRs. The Project MPRs would occur within the ROW or along the ROW and would be approximately 3.5 to 4.0 miles south of CYR Aviation, the only private airstrip within the California portion of the Project, so there would be no impacts and no change in impacts from those described in Appendix 1C of the Final EIS.

MPRR 001- 34 - There would not be any additional noise for the use of a rocked construction entrance in place of a wheel washing system, as the rocked construction entrance is a standard requirement in the Stormwater Pollution Prevention Plan and would be installed independently from the requirements in MM AQ-CEQA-1. The noise emitted from either the use of a generator for a wheel washing system, or an air compressor unit are generally the same, and so the refinement would not cause a substantial increase in noise pollution or expose persons to excess noise levels in the Riverside County Noise Ordinance No. 847. The use of the equipment would not produce ground-borne noise or vibrations. The use of the air compressor unit would be temporary and would not violate the Riverside County Noise Ordinance No. 847 in the time of operation of the air compressor unit if within 0.25 miles of a residence. APM NO-01 would apply, which states that small stationary equipment would be shielded with portable barriers if used within 200-feet of a residence. The air compressor would not cause a substantial increase in ambient noise levels, as the equipment is used intermittently when vehicles leave a site, and is not constantly run.

Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
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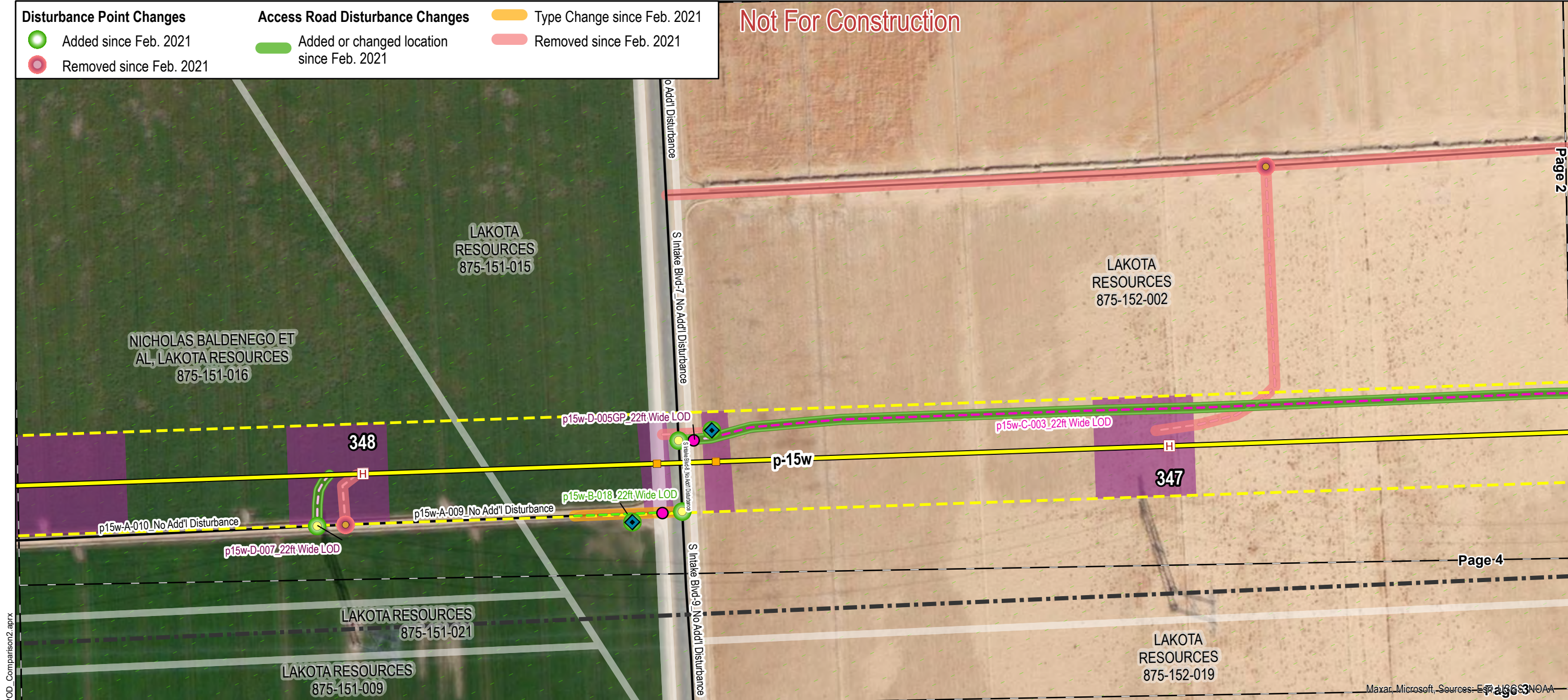
<p>Population and Housing</p> <p>The Project would have significant impacts on population and housing if it would:</p> <ul style="list-style-type: none"> induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure), displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The potential for the Project to induce substantial population growth in an area, either directly or indirectly would not change as a result of the MPRs because they do not include an increase in the number of construction personnel analyzed in the Final EIS. Direct population growth in the area would remain low and the anticipated housing units that would be required to accommodate the number of short-term construction personnel would not change. Similarly, during operation and maintenance of the Project, the MPRs would not require an increase in operations or maintenance staff beyond those identified in Appendix 1C of the Final EIS, therefore impacts to population growth would remain less than significant.</p> <p>MPRs would not indirectly induce population growth in the area because the MPRs do not include an increase in electrical services beyond what is identified in the Final EIS that would support additional growth. In addition, the modification of access road locations and type would not extend road capacity within the area as the majority of Project access includes the use of existing public and private roads. The few new access roads would be located within or directly adjacent to the ROW and used for the purpose of supporting operation and maintenance of the Project and would not support substantial growth within the area. Therefore, indirectly induced population growth would remain less than significant.</p> <p>There also would be no change in the potential for displacement of numbers of existing housing or people, necessitating the construction of replacement housing elsewhere because facilities would primarily be relocated within the existing ROW and new facility areas (i.e., water withdrawal areas, rock pads, weed wash disturbance areas, and potential staging areas) would be located on non-residential land or that has previously been disturbed. Furthermore, the MPRs do not include an increase in the number of construction personnel, therefore, there would not be a need for additional housing during construction, so there would be no change in impacts from Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 would not increase population in the area or displace persons in existing housing. The refinement is restricted to the methods for preventing or controlling trackout, which would not require additional personnel to implement.</p>			
<p>Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:</p>	No Change	Potentially Significant Change	N/A
<p>Public Services and Utilities</p> <p>The Project would have significant public services and utilities impacts if:</p> <ul style="list-style-type: none"> it would cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or cause a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of these public services: <ul style="list-style-type: none"> fire protection, police protection, schools, parks, or other public facilities it would temporarily increase water use, and project operation would 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>contribute to increased long-term water consumption and require new entitlements,</p> <ul style="list-style-type: none"> • Project construction and operations would result in increase in wastewater or wastewater treatment, • Project construction and operations would result in new storm drainage facilities or expansion of existing facilities, or • Project construction and operations would result in solid waste generated during construction of the project that exceeds landfill requirements. 			
<p>Impacts to police protection and schools, parks and recreation during Project construction and operation would remain less than significant because the MPRs do not include an increase in construction crews or maintenance personnel and therefore would not induce population growth or increase demand for these services. MPRs would not impact dispersed recreation associated with BLM land in California as the MPRs are located in agricultural areas or within or adjacent to the ROW and would not preclude access or visitation to recreation areas in the Project area, therefore there would be no change in impacts as described in Appendix 1C of the Final EIS.</p> <p>The additional staging areas where equipment and materials are stored may increase fire risk and could result in an impact prior to mitigation. Overall, impacts to fire risk resulting from MPRs would be reduced as part of the Project design with the implementation of APMs and BMP mitigation, including HAZ-01 (Hazardous Substance Control and Emergency Response Plan), TT-01 (Traffic Coordination) and BMP PH&S-02 (Fire Prevention Plan). Therefore, there would be no change as described in Appendix 1C of the Final EIS.</p> <p>The addition of seven new staging areas that will require water for dust control during Project construction, the addition of three new water withdrawal locations, an increase in water truck capacity, and broadening of the water application times have been included as part of the MPRs. However, the amount of water and sources required for the Project as described in the Final EIS and described in the February 2021 POD would remain the same. The MPRs do not include expansion or addition of new facilities, therefore, there would be no increase in long-term water consumption or the need to acquire new entitlements. Impacts on temporary and long-term water consumption would remain less than significant as described in Appendix 1C of the Final EIS.</p> <p>The requested MPRs are consistent with the public services and utilities analysis and do not include expansion of or new permanent facilities or additional construction crews, therefore the wastewater generated during Project construction or operation will not increase nor would the need for wastewater treatment. As such, impacts would remain less than significant as described in Appendix 1C of the Final EIS.</p> <p>None of the MPRs would result in a requirement to install new storm drainage facilities or expand existing facilities. Impact levels would remain less than significant.</p> <p>The requested MPRs that have the potential to result in a change to the impact levels of solid waste generated would be related to the addition of the seven potential construction staging areas. This could generate approximately 10 dumpsters-full per month for each active staging area if all were to be utilized during construction. However, the overall level of waste generated by the Project is not expected to increase because there would not be a significant increase in the personnel, equipment, materials, temporary administrative facilities, or other waste-generating operations, and the potential additional solid waste could be accommodated at the Blythe Sanitary Landfill and other privately owned and local landfills. Therefore, there would be no change in impacts which would remain less than significant.</p> <p>MPRR 001- 34 The use of a rocked construction entrance or an air compressor system versus a wheel washing system would not result in an increase of wastewater treatment, as there would be no runoff water to sewer systems. The refinement would also not result in a need for more police or fire protection resources. The requested refinement would reduce the amount of water needed in wheel washing systems, however, the overall water consumption for the Project would remain nearly the same, due to the small amount of water needed for wheel washing on the scale of the full Project need. The refinement would not result in new solid waste generated, as rocked construction entrances are a required part of the Stormwater Pollution Prevention Plan, and would be installed independently from MM AQ-CEQA-1 requirements. The refinement would not require expansion of storm drainage facilities.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A

Recreation The Project would have significant impacts to recreation if it would: <ul style="list-style-type: none"> increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>The potential for the Project to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated would not occur as a result of the MPRs because MPRs do not include an increase in the number of construction, operation or maintenance personnel that would result in new population growth that would increase the use of existing recreational facilities.</p> <p>Impacts to existing recreational facilities that could occur during the Project's construction phase, could result in usage restrictions of certain facilities/activities (i.e., trails and boating along the Colorado River) that would be inaccessible where they cross the Project ROW. However, MPRs would not increase impacts to recreation activities from those described in Appendix 1C of the Final EIS because the MPRs, including expanding existing access roads, minor shifts in the location of work areas and structures, and shifting and addition of guard pole areas, would occur within the Project ROW. Furthermore, with the implementation of measures such as providing signage for alternative access and parking, advanced notification to recreational users of construction activities and alternative routes for roads and trails, impacts would remain less than significant.</p> <p>Additional impacts that could occur during the Project's construction phase, could result from construction noise, visual disturbances, and vehicle and equipment travel, route closures/detours, and short-term over-crowding at other recreational areas. Consistent with the analysis in Appendix 1C of the Final EIS, temporary traffic delays and re-routes could hinder timely access to recreation facilities, but any delays in access will not be more substantial than what would result from work associated with the February 2021 POD. In addition, within the implementation of BMPs during construction (including BMPs REC-01, REC-02, and REC-04) which would ensure adequate notification is provided to users and signage for alternative routes, access, and parking within/to recreation areas is installed, impacts would remain less than significant.</p> <p>No new recreational facilities or expansion of existing recreational facilities which might have an adverse physical effect on the environment would be included as part of the MPRs, so there would be no impacts and no change in impacts from those described in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 would not cause an increase in the used of parks or recreational facilities. The change in methods of trackout prevention/control would have no effect on recreational resources.</p>			
Would the proposed action(s) result in a new impact, or increase the severity of a previously analyzed impact to:	No Change	Potentially Significant Change	N/A
Traffic and Transportation The Project would have significant traffic and transportation impacts if it would: <ul style="list-style-type: none"> conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways, 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<ul style="list-style-type: none"> • result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks, • substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), • result in inadequate emergency access, or • conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. 			
<p>The requested MPRs will not require additional or different types of construction vehicles and equipment than those discussed in the Final EIS. In addition, the total number of truck trips associated with construction of the Project will not change, and the use of the requested MPRs will affect the same roadways analyzed in Appendix 1C of the Final EIS. With the implementation of MM TRANS-CEQA-1 and MM TRANS-CEQA-2, potential temporary impacts to the existing levels of service will be adequately addressed. Therefore, the requested MPRs will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to transportation and traffic as identified in Appendix 1C of the Final EIS.</p> <p>MPRR 001- 34 - The use of a rocked construction entrance or air compressor/air knife system would not have a new or increased impact on traffic and transportation, as the work would be restricted to the Project access road. The refinement would not alter traffic patterns, increase traffic, or conflict with existing plans or ordinances. The use of an air compressor versus a wheel washing system would not block emergency access to the site, as the equipment is positioned next to the rocked construction entrance and would not impede the traffic flow to the site.</p>			

ATTACHMENT C: SITE MAPS



Not For Construction

0 100 200 300 400 500

Feet

1:2,400

1 inch equals 200 feet when printed at 17x11

N

Project Components

- Structure Label
- H-Frame Steel Lattice Structure
- Project Centerline labeled by Segment
- ROW Edge
- Guard Structure
- Turn Radius CA Ag
- Wheel Wash Station
- Rock Construction Entrance (RCE)

Access Road ID Label

Example: Segment-Type-Number

- Access Road Type B (Temporary Use)
- Access Road Type C (Temporary)
- Access Road Type D (Temporary)
- Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions

- Couch's Spadefoot Toad Habitat

Base Data

- Map Page Boundary
- Existing Transmission Line
- Major Road or Developed Access (Type A)
- Parcel Boundary

Ten West Link Transmission Line Project

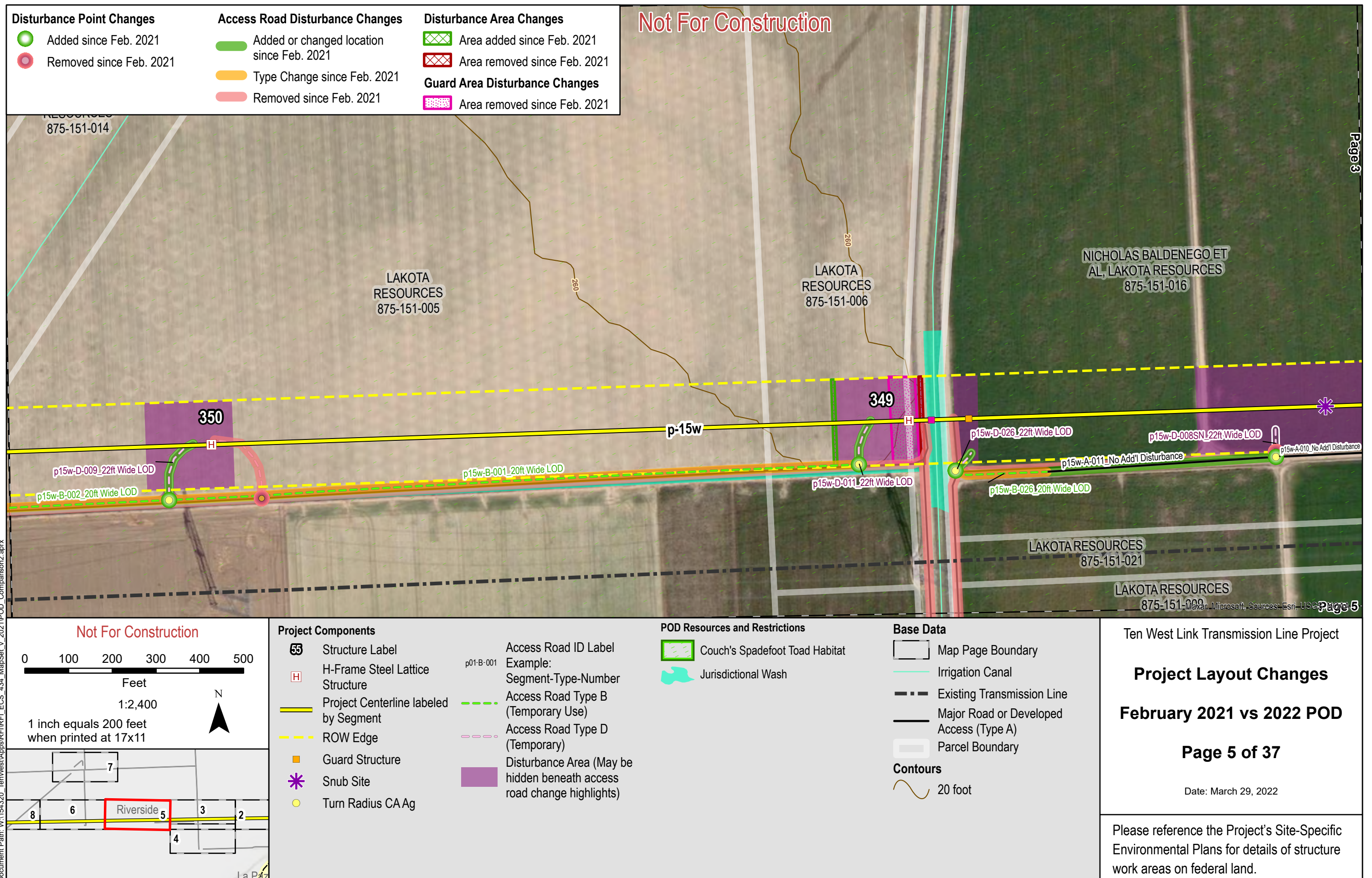
Project Layout Changes

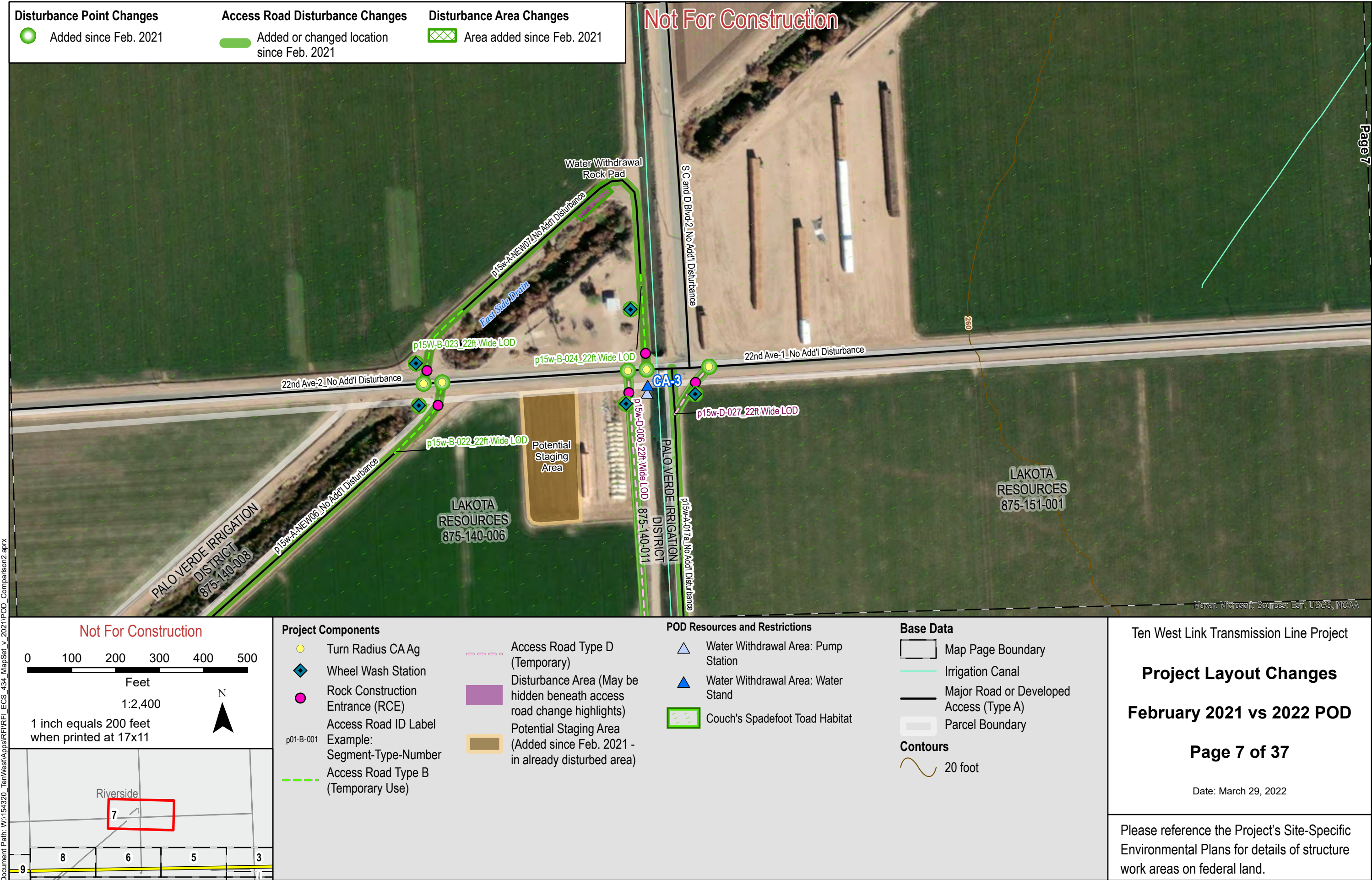
February 2021 vs 2022 POD

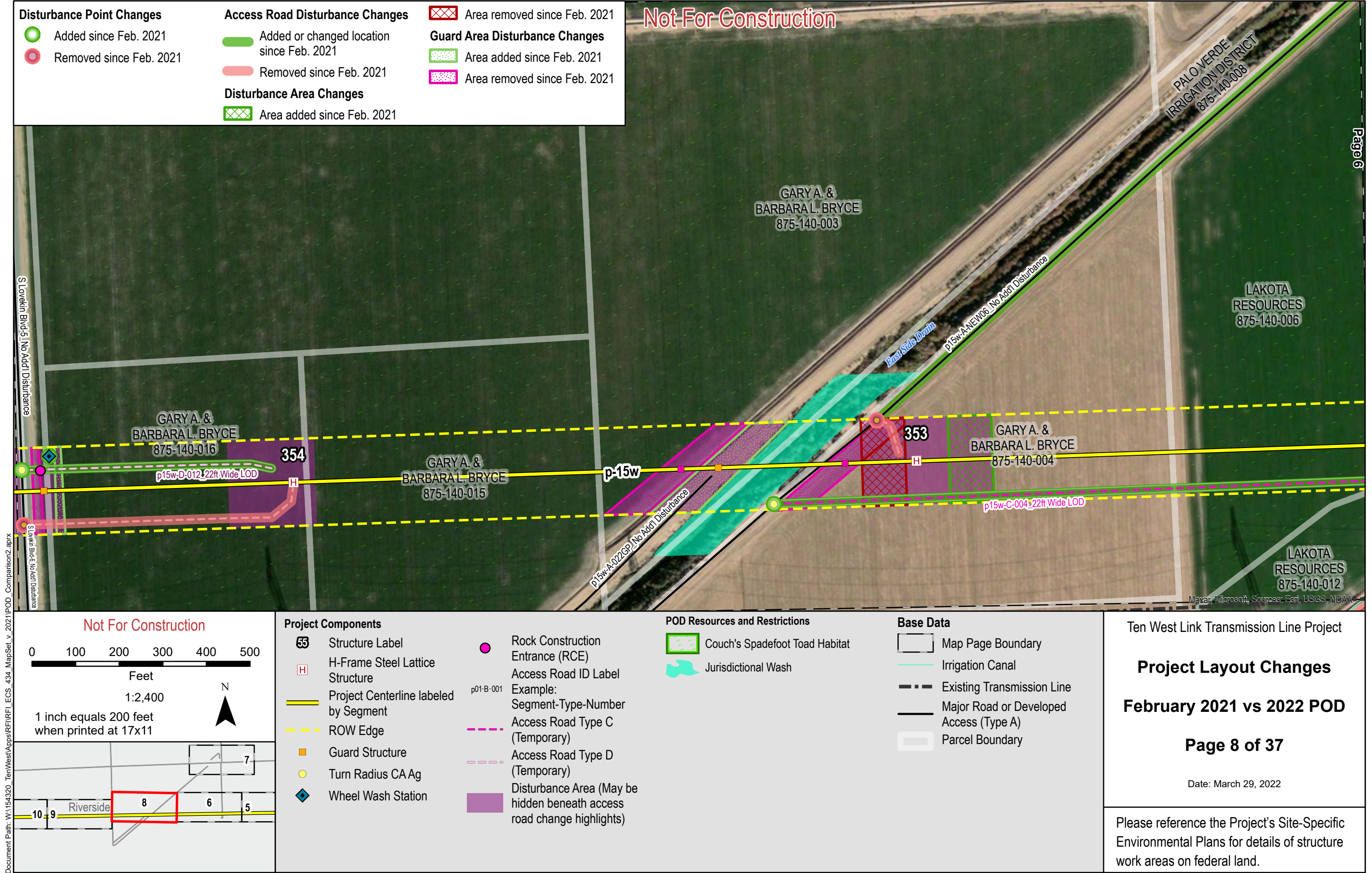
Page 3 of 37

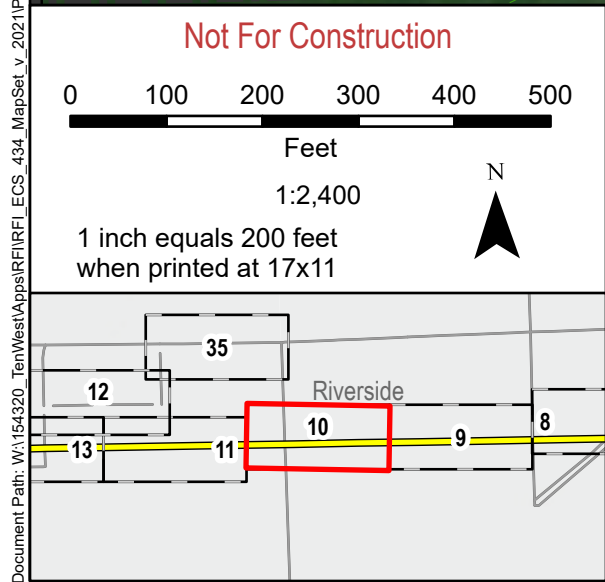
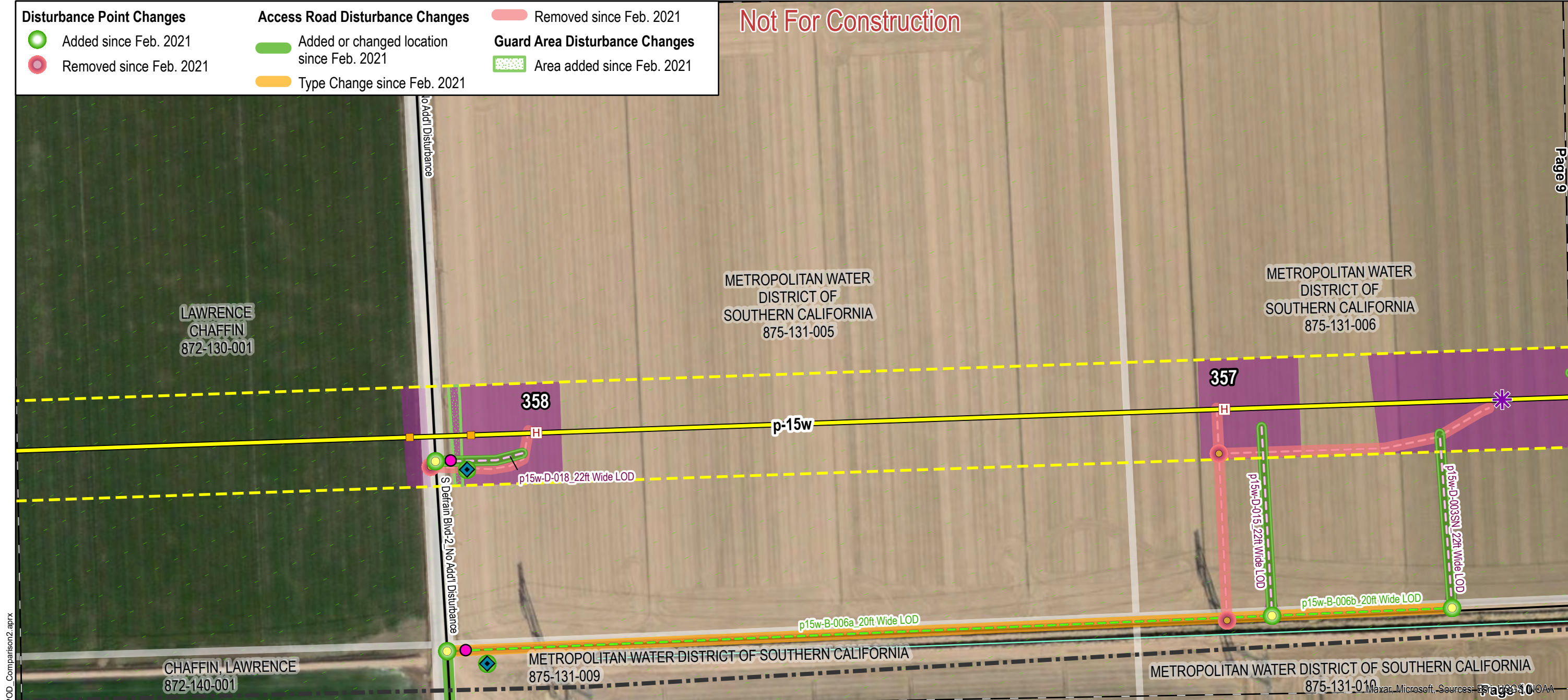
Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.









Project Components		POD Resources and Restrictions		Base Data	
55	Structure Label	Rock Construction Entrance (RCE)	Couch's Spadefoot Toad Habitat	Map Page Boundary	
H	H-Frame Steel Lattice Structure	Access Road ID Label		Irrigation Canal	
	Project Centerline labeled by Segment	Example: Segment-Type-Number		Existing Transmission Line	
	ROW Edge	Access Road Type B (Temporary Use)		Major Road or Developed Access (Type A)	
	Guard Structure	Access Road Type D (Temporary)		Parcel Boundary	
*	Snub Site				
10	Turn Radius CA Ag				
♦	Wheel Wash Station				

Ten West Link Transmission Line Project

Project Layout Changes

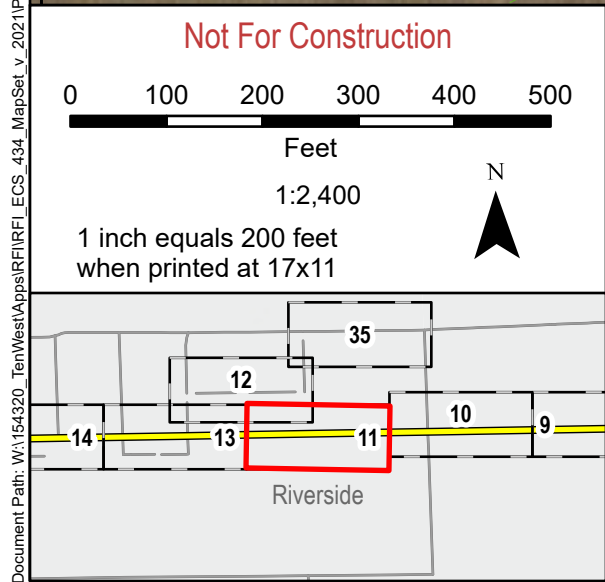
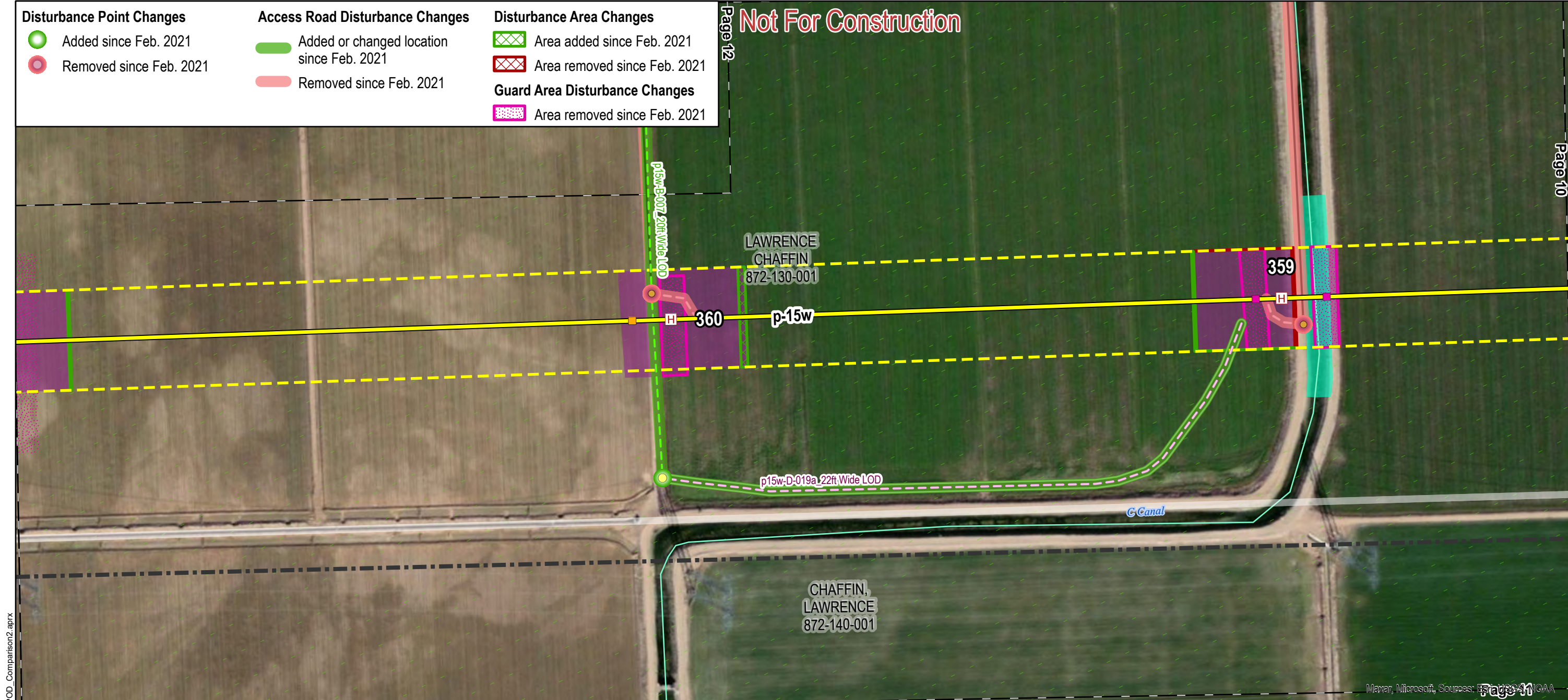
February 2021 vs 2022 POD

Page 10 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.

Document Path: W:\154320_TenWestApps\RFIR\FI_ECS_434_MapSet_V_2021\POD_Comparison2.aprx



Project Components		POD Resources and Restrictions		Base Data	
55	Structure Label		Couch's Spadefoot Toad Habitat		Map Page Boundary
H	H-Frame Steel Lattice Structure		Jurisdictional Wash		Irrigation Canal
	Project Centerline labeled by Segment				Existing Transmission Line
	ROW Edge				Parcel Boundary
	Guard Structure				
	Turn Radius CA Ag				
	Access Road ID Label Example: Segment-Type-Number				
	p01-B-001				

Ten West Link Transmission Line Project

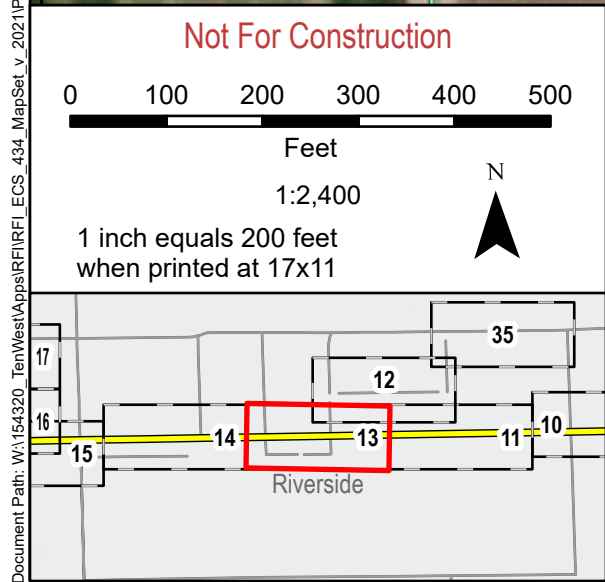
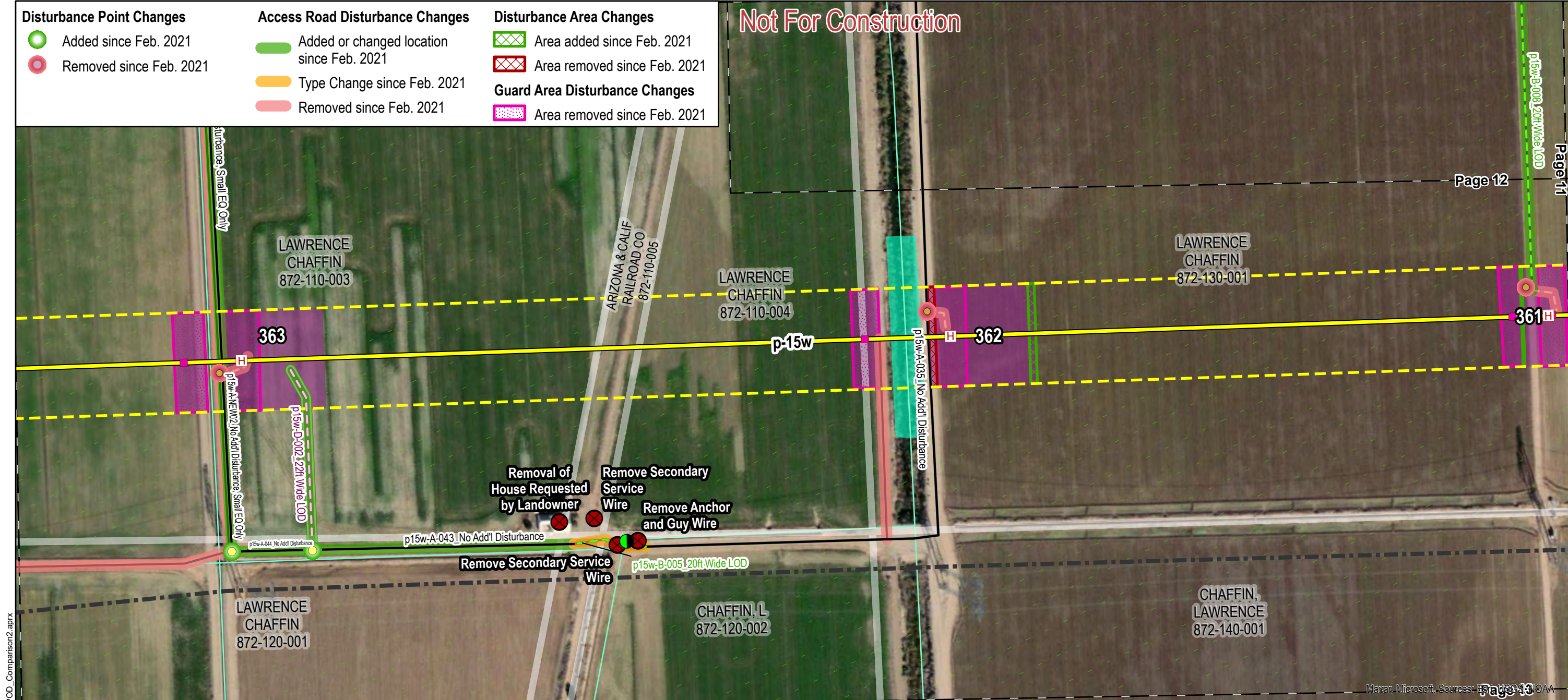
Project Layout Changes

February 2021 vs 2022 POD

Page 11 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components		POD Resources and Restrictions		Base Data	
55	Structure Label	---	Access Road Type B (Temporary Use)	---	Map Page Boundary
H	H-Frame Steel Lattice Structure	---	Access Road Type D (Temporary)	---	Irrigation Canal
---	Project Centerline labeled by Segment	---	Disturbance Area (May be hidden beneath access road change highlights)	---	Existing Transmission Line
---	ROW Edge	●	Place Steel Plate Over Corner of Concrete Ditch	---	Major Road or Developed Access (Type A)
●	Turn Radius CA Ag	X	Obstacle Removal	---	Parcel Boundary
p01-B-001	Access Road ID Label Example: Segment-Type-Number				

Ten West Link Transmission Line Project

Project Layout Changes

February 2021 vs 2022 POD

Page 13 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.

Disturbance Point Changes

●

Added since Feb. 2021

Access Road Disturbance Changes

—

Added or changed location since Feb. 2021

Disturbance Area Changes

▨

Area added since Feb. 2021

▨

Area removed since Feb. 2021

Guard Area Disturbance Changes

▨

Area removed since Feb. 2021

Removed since Feb. 2021

Not For Construction

Not For Construction

0100200300400500

Feet

1:2,400

1 inch equals 200 feet when printed at 17x11

N

17

16

18

15

14

13

11

35

Riverside

55

Structure Label

H

H-Frame Steel Lattice Structure

—

Project Centerline labeled by Segment

ROW Edge

*

Snub Site

●

Turn Radius CA Ag

p01-B-001

Access Road ID Label Example: Segment-Type-Number

Access Road Type B (Temporary Use)

Access Road Type D (Temporary)

▨

Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions

Couch's Spadefoot Toad Habitat

Jurisdictional Wash

Base Data

Map Page Boundary

Irrigation Canal

Existing Transmission Line

Major Road or Developed Access (Type A)

Parcel Boundary

Ten West Link Transmission Line Project

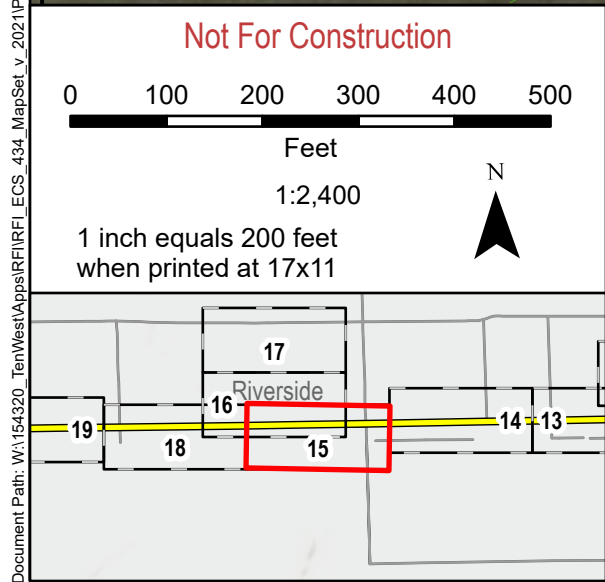
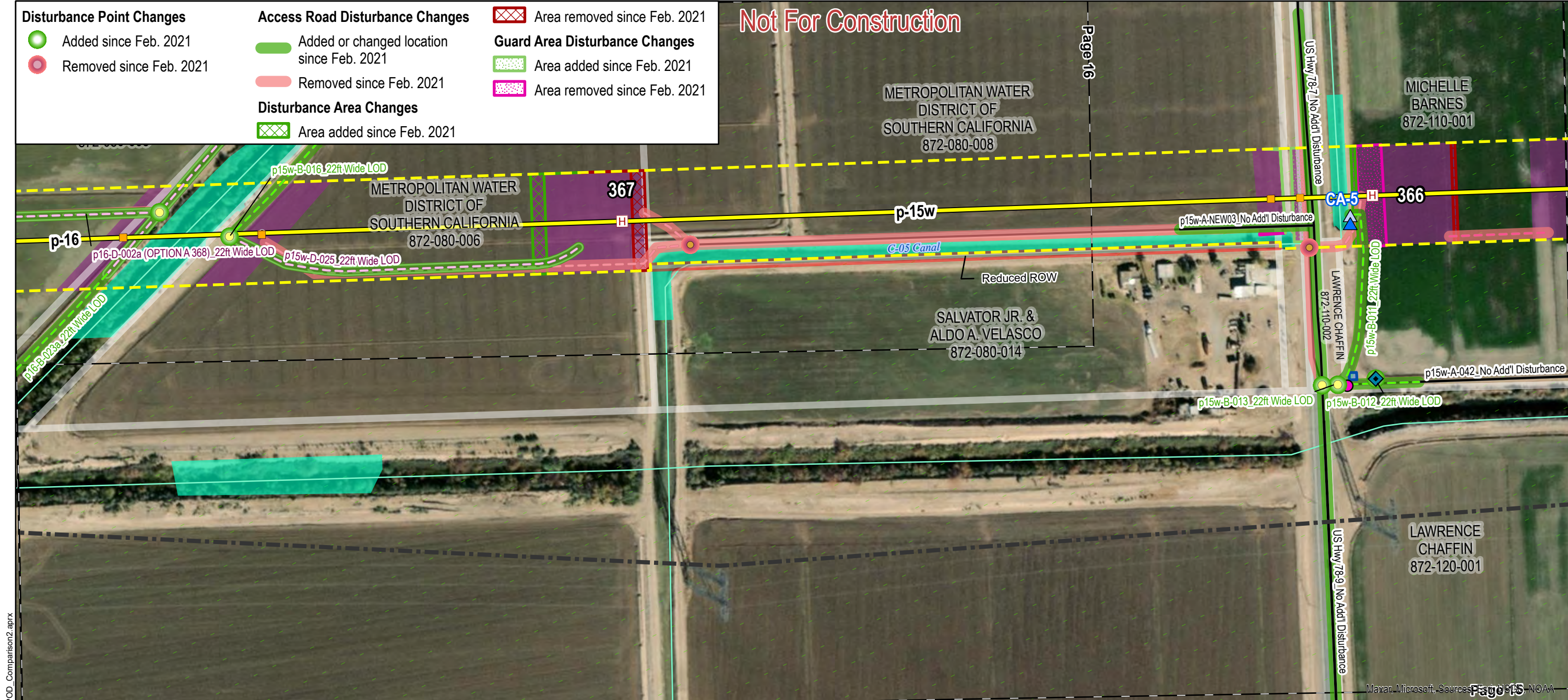
Project Layout Changes

February 2021 vs 2022 POD

Page 14 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components		POD Resources and Restrictions		Base Data	
55	Structure Label		Water Withdrawal Area: Pump Station		Map Page Boundary
H	H-Frame Steel Lattice Structure		Water Withdrawal Area: Water Stand		Irrigation Canal
	Project Centerline labeled by Segment		Couch's Spadefoot Toad Habitat		Existing Transmission Line
	ROW Edge		Jurisdictional Wash		Major Road or Developed Access (Type A)
	ROW width reduced since 2021 POD				Parcel Boundary
	Segment Node				
	Guard Structure				
	Turn Radius CA Ag				
	Wheel Wash Station				
	Rock Construction Entrance (RCE)				
	Access Road ID Label				
	Access Road Type B (Temporary Use)				
	Access Road Type D (Temporary)				
	Disturbance Area (May be hidden beneath access road change highlights)				
	Sump Sediment Trap added since Feb. 2021				

Ten West Link Transmission Line Project

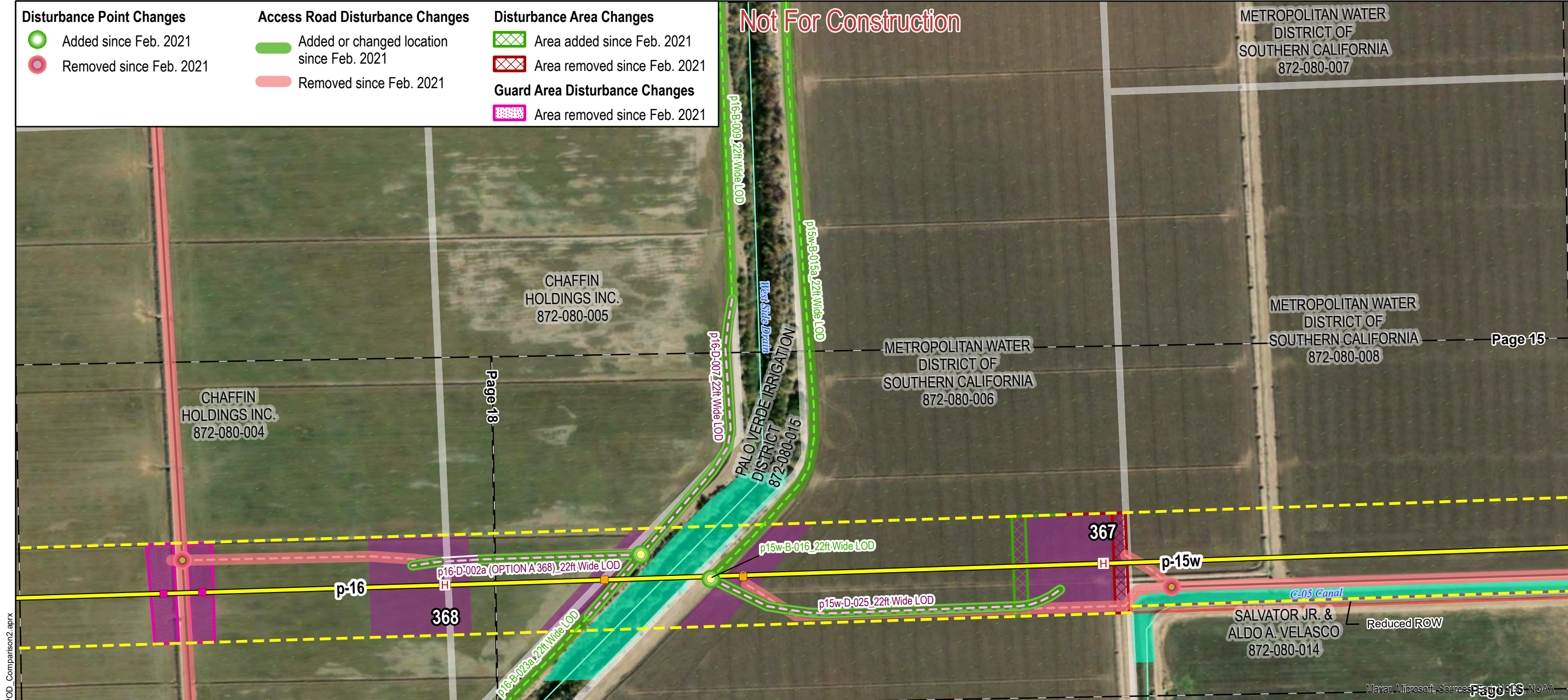
Project Layout Changes

February 2021 vs 2022 POD

Page 15 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Document Path: W:\154320_TenWestApps\IR\IR\ECOS_434_MapSet_V_2021\POD_Comparison2.aprx

Project Components

- 55** Structure Label
- H** H-Frame Steel Lattice Structure
- Project Centerline labeled by Segment
- ROW Edge
- Red shaded area: ROW width reduced since 2021 POD
- Segment Node
- Guard Structure
- Yellow circle: Turn Radius CA Ag
- Access Road ID Label Example: Segment-Type-Number
- Access Road Type B (Temporary Use)
- Access Road Type D (Temporary)
- Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions

- Green hatched area: Couch's Spadefoot Toad Habitat
- Blue area: Jurisdictional Wash

Base Data

- Black outline: Map Page Boundary
- Blue line: Irrigation Canal
- Grey outline: Parcel Boundary

Ten West Link Transmission Line Project

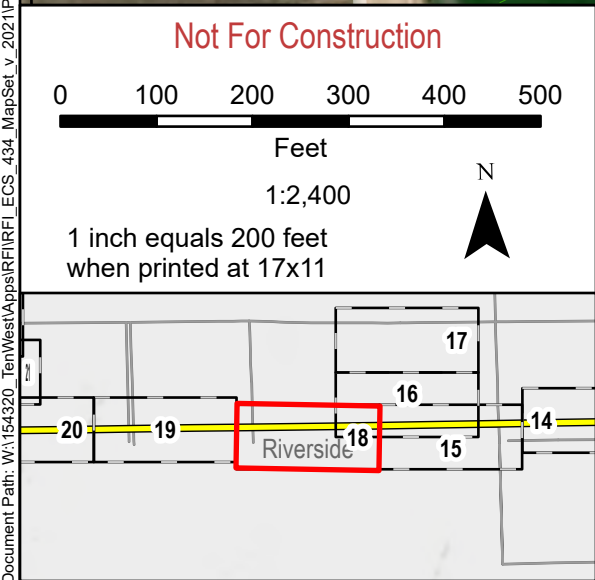
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components

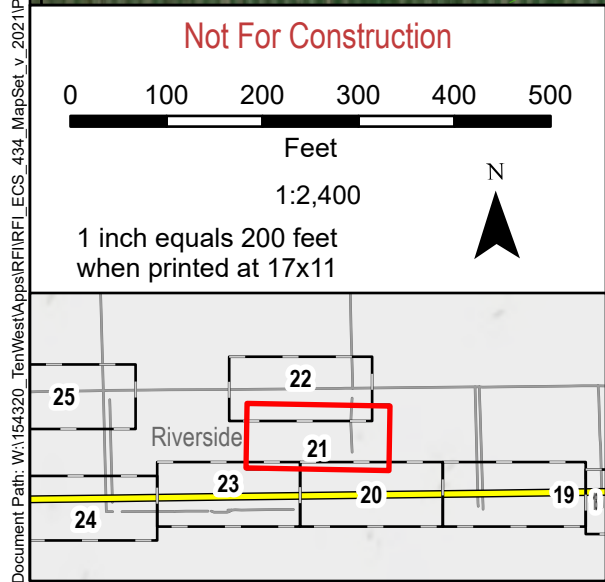
- 55 Structure Label
- H H-Frame Steel Lattice Structure
- Project Centerline labeled by Segment
- ROW Edge
- Guard Structure
- Turn Radius CA Ag
- p01-B-001 Access Road ID Label Example: Segment-Type-Number
- Access Road Type B (Temporary Use)
- Access Road Type C (Temporary)
- Access Road Type D (Temporary)
- Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions

- Couch's Spadefoot Toad Habitat
- Jurisdictional Wash

Base Data

- Map Page Boundary
- Irrigation Canal
- Existing Transmission Line
- Major Road or Developed Access (Type A)
- Parcel Boundary



Project Components p01-B-001 Access Road ID Label Example: Segment-Type-Number Access Road Type B (Temporary Use) Disturbance Area (May be hidden beneath access road change highlights) Potential Staging Area (Added since Feb. 2021 - in already disturbed area)	POD Resources and Restrictions Couch's Spadefoot Toad Habitat	Base Data Map Page Boundary Irrigation Canal Major Road or Developed Access (Type A) Parcel Boundary Contours 20 foot
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Ten West Link Transmission Line Project

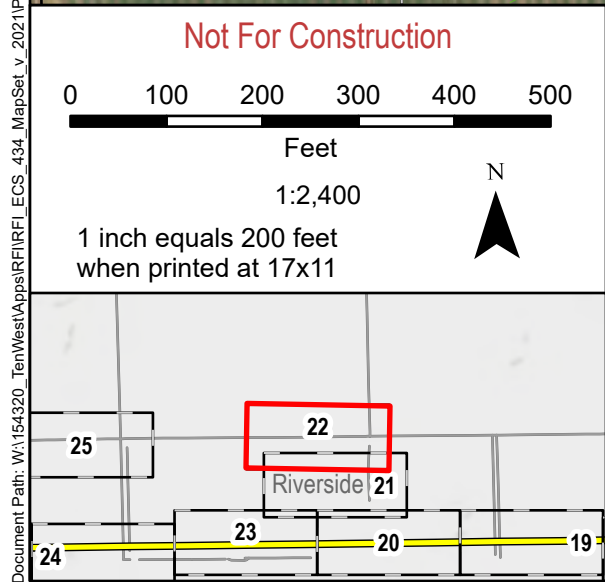
Project Layout Changes

February 2021 vs 2022 POD

Page 21 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components

- Turn Radius CA Ag
- Wheel Wash Station
- Rock Construction Entrance (RCE)
- Access Road ID Label
Example: Segment-Type-Number

Access Road Type B (Temporary Use)

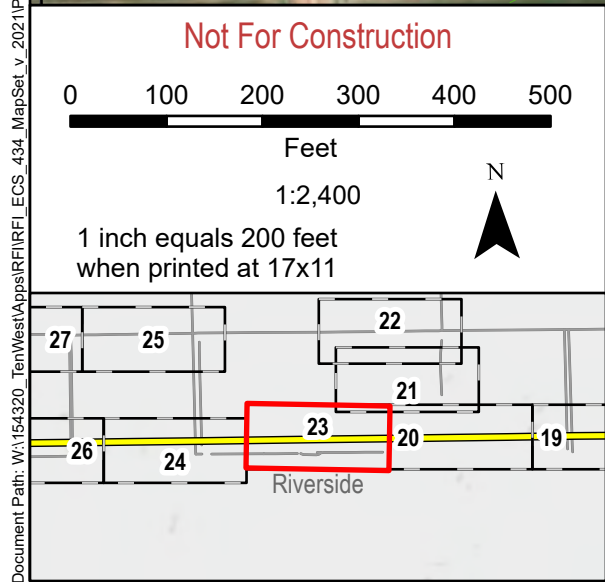
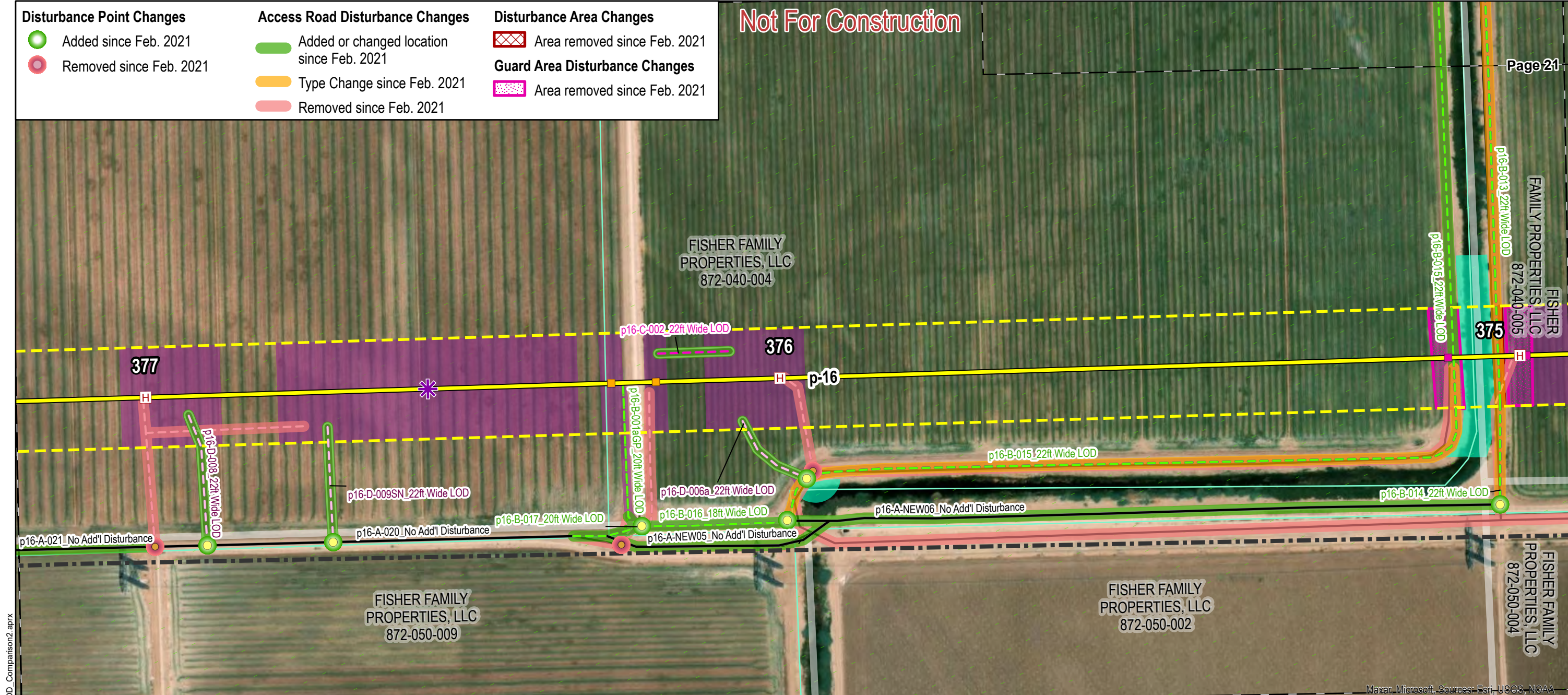
- Disturbance Area (May be hidden beneath access road change highlights)
- Potential Staging Area (Added since Feb. 2021 - in already disturbed area)

POD Resources and Restrictions

- Water Withdrawal Area: Pump Station
- Water Withdrawal Area: Water Stand
- Couch's Spadefoot Toad Habitat

Base Data

- Map Page Boundary
- Irrigation Canal
- Major Road or Developed Access (Type A)
- Parcel Boundary



Project Components

- Structure Label
- H-Frame Steel Lattice Structure
- Project Centerline labeled by Segment
- ROW Edge
- Guard Structure
- Snub Site
- Turn Radius CA Ag

Access Road ID Label
Example:
Segment-Type-Number

- Access Road Type B (Temporary Use)
- Access Road Type C (Temporary)
- Access Road Type D (Temporary)
- Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions

- Couch's Spadefoot Toad Habitat
- Jurisdictional Wash

Base Data

- Map Page Boundary
- Irrigation Canal
- Existing Transmission Line
- Major Road or Developed Access (Type A)
- Parcel Boundary

Ten West Link Transmission Line Project

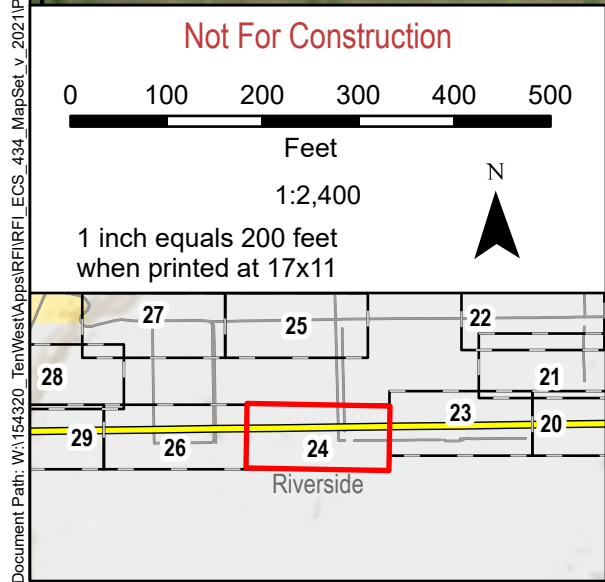
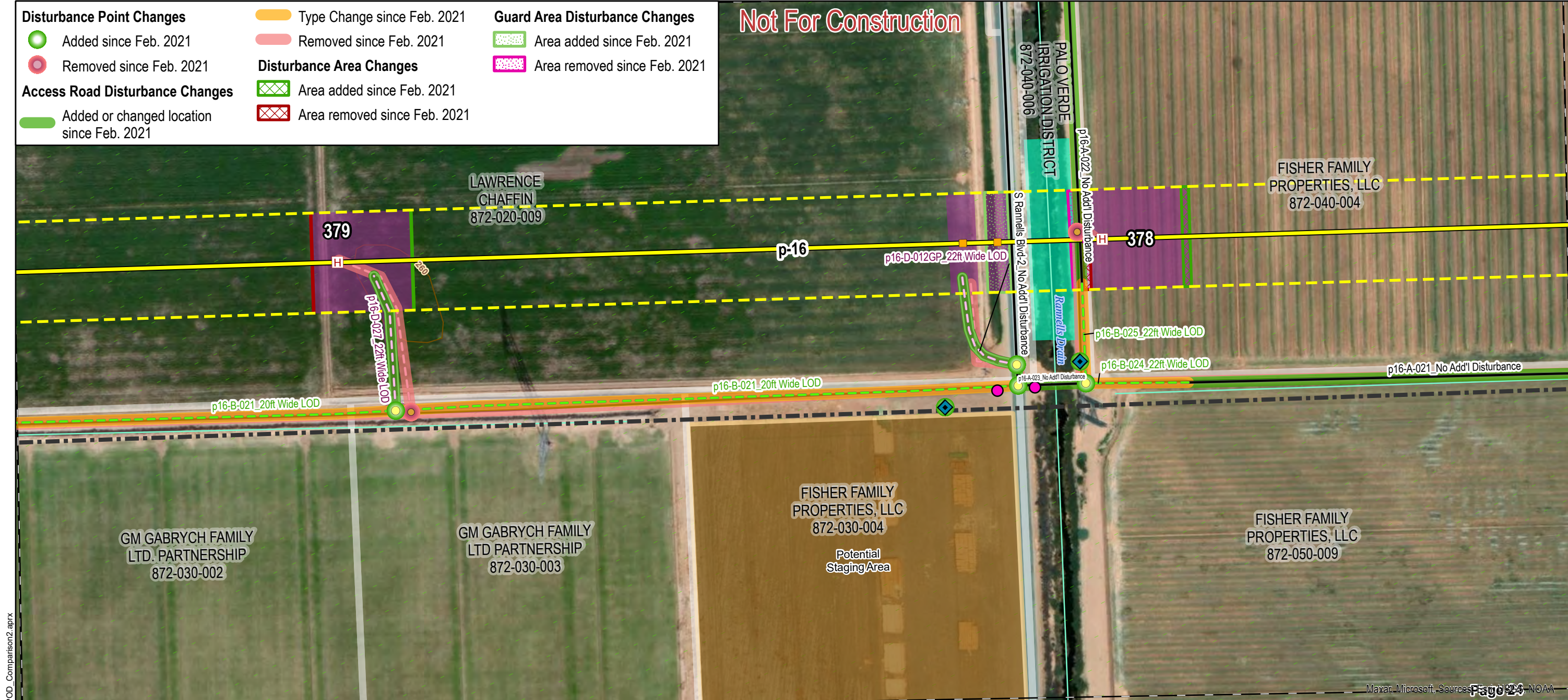
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components		POD Resources and Restrictions		Base Data	
55	Structure Label	Couch's Spadefoot Toad Habitat		Map Page Boundary	
H	H-Frame Steel Lattice Structure	Jurisdictional Wash		Irrigation Canal	
	Project Centerline labeled by Segment			Existing Transmission Line	
	ROW Edge			Major Road or Developed Access (Type A)	
	Guard Structure			Parcel Boundary	
	Turn Radius CA Ag			Contours	20 foot
	Wheel Wash Station				
	Rock Construction Entrance (RCE)				
p01-B-001	Access Road ID Label Example: Segment-Type-Number				
	Access Road Type B (Temporary Use)				
	Access Road Type D (Temporary)				
	Disturbance Area (May be hidden beneath access road change highlights)				
	Potential Staging Area (Added since Feb. 2021 - in already disturbed area)				

Ten West Link Transmission Line Project

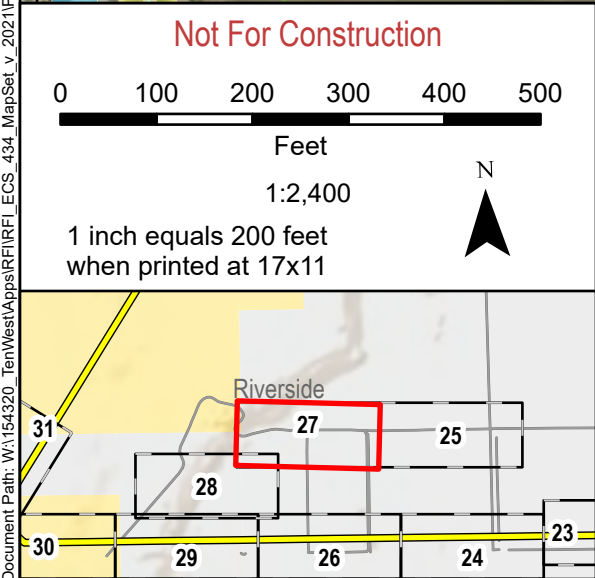
Project Layout Changes

February 2021 vs 2022 POD

Page 24 of 37

Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components

- Turn Radius CA Ag
- Access Road ID Label
Example:
Segment-Type-Number
p01-B-001
- Access Road Type B (Temporary Use)
- Disturbance Area (May be hidden beneath access road change highlights)
- Potential Staging Area (Added since Feb. 2021 - in already disturbed area)

POD Resources and Restrictions

- △ Water Withdrawal Area: Pump Station
- ▲ Water Withdrawal Area: Water Stand
- Couch's Spadefoot Toad Habitat

Vegetation Alliances

- Arrow weed thickets
- Bush seepweed scrub
- Fourwing saltbush scrub
- Irrigated row and field crops
- Tamarisk thickets

Mojave Desert Tortoise Suitable Habitat
Includes the full alignment in California outside of the agricultural land and has been omitted from the map to minimize clutter.

Base Data

- Map Page Boundary
- Irrigation Canal
- Major Road or Developed Access (Type A)
- Parcel Boundary

Contours

- 100 foot
- 20 foot

Ten West Link Transmission Line Project

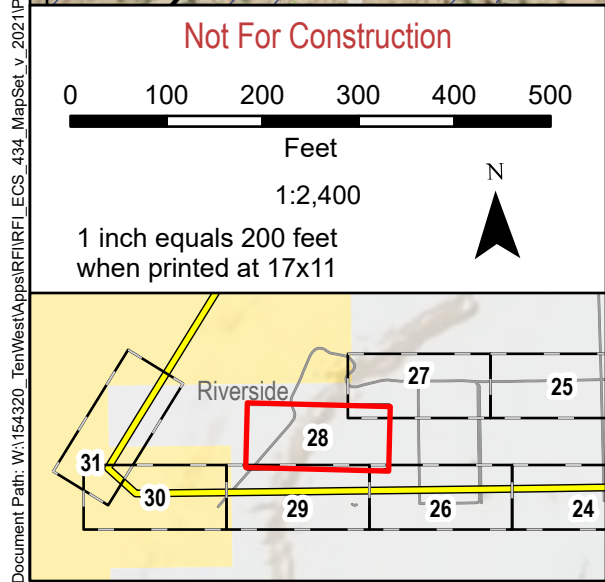
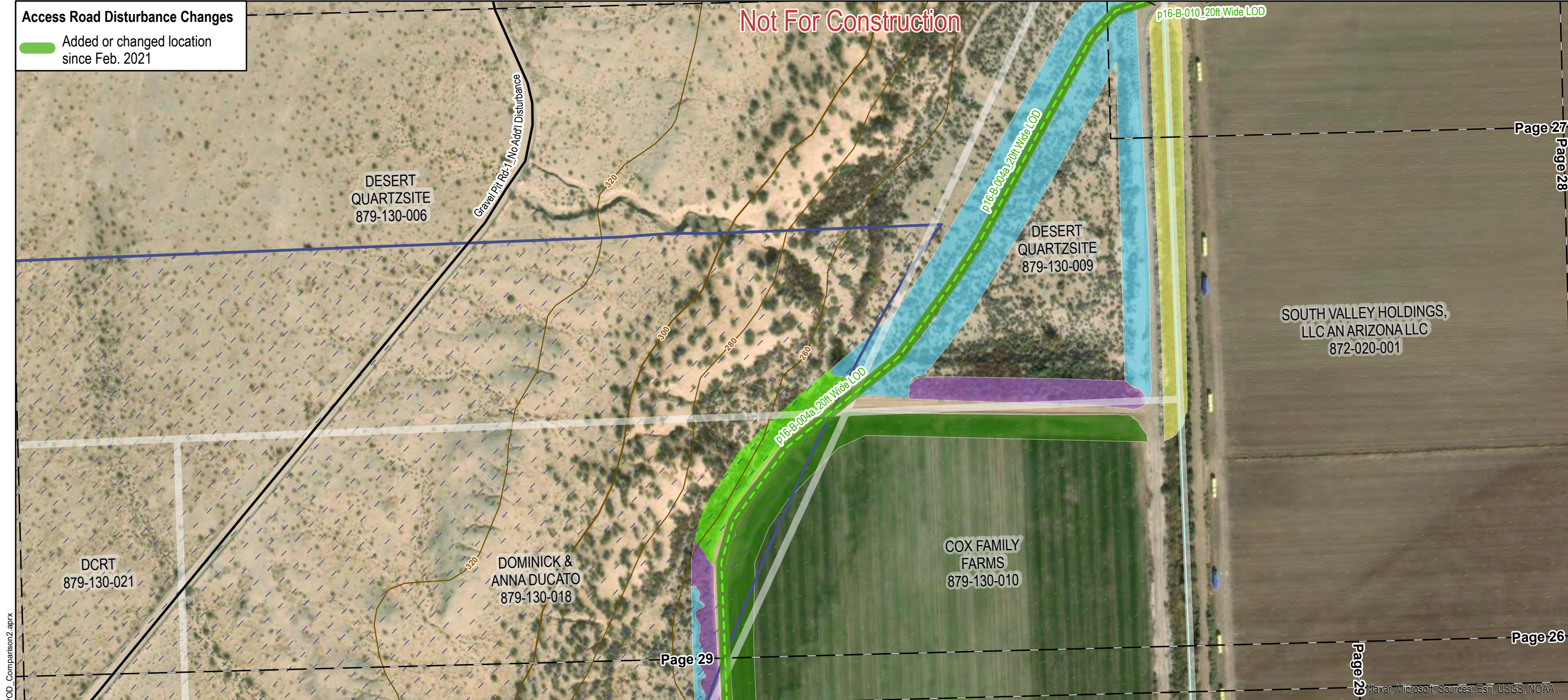
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Project Components

Access Road ID Label
Example:
Segment-Type-Number
Access Road Type B
(Temporary Use)
Disturbance Area (May be
hidden beneath access
road change highlights)

POD Resources and Restrictions

Paleontological Sensitive Area
Requiring Monitoring

Couch's Spadefoot Toad Habitat

Vegetation Alliances

- Arrow weed thickets
- Bush seepweed scrub
- Fourwing saltbush scrub
- Irrigated row and field crops
- Tamarisk thickets

Mojave Desert Tortoise Suitable Habitat

Includes the full alignment in California
outside of the agricultural land and has been
omitted from the map to minimize clutter.

Base Data

- Map Page Boundary
- Irrigation Canal
- Major Road or Developed
Access (Type A)
- Parcel Boundary

Contours

- 100 foot
- 20 foot

Ten West Link Transmission Line Project

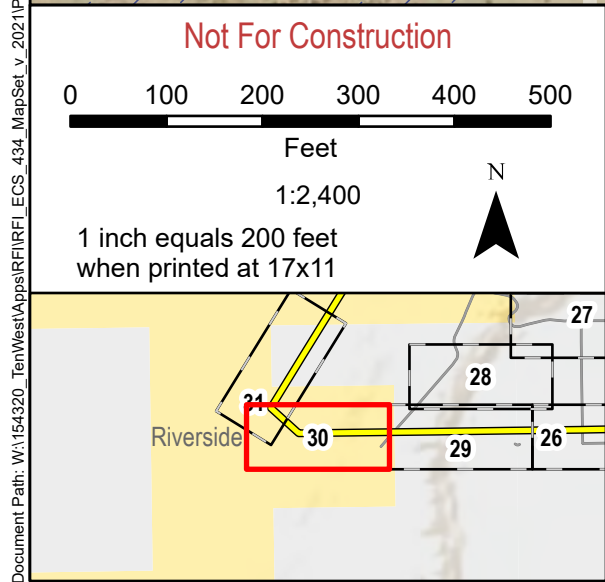
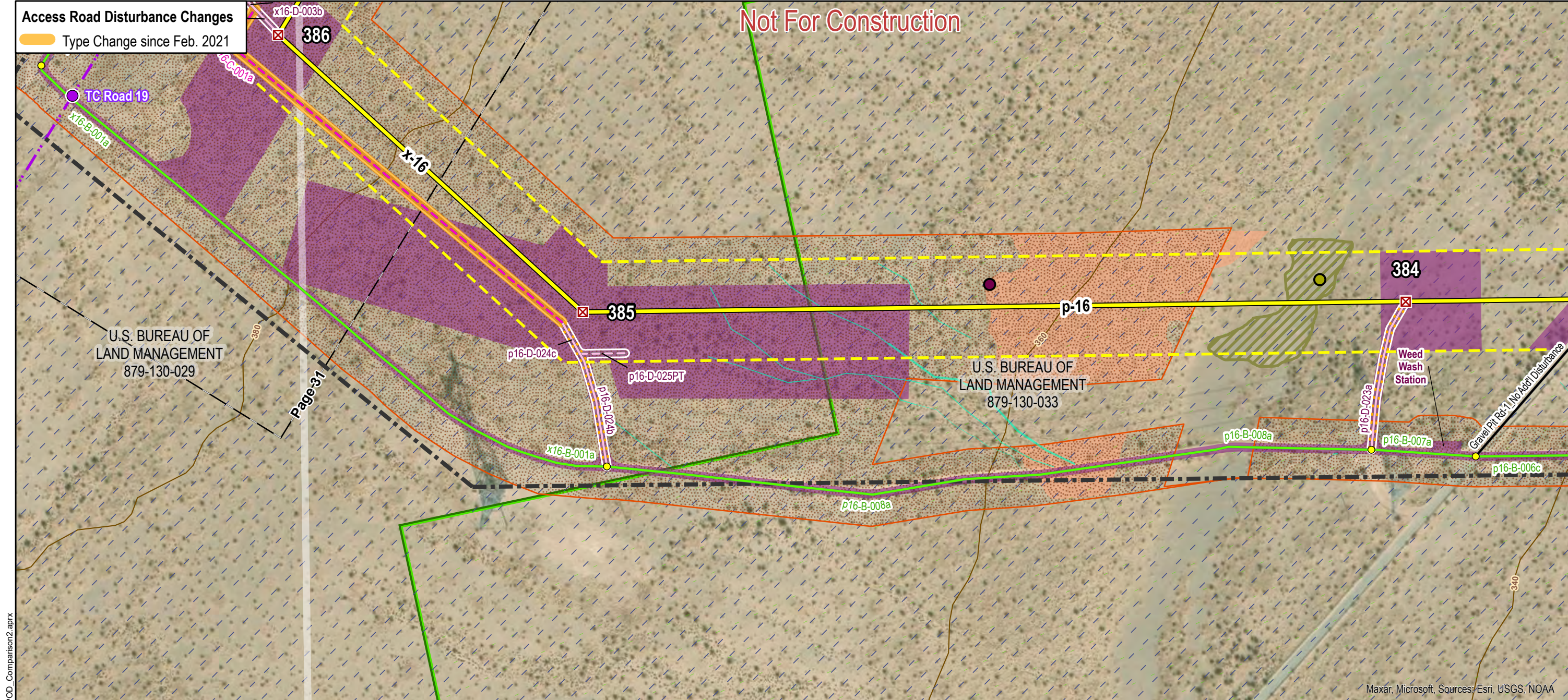
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific
Environmental Plans for details of structure
work areas on federal land.



Project Components	
	Structure Label
	Self-Supporting Lattice Steel Structure
	Project Centerline labeled by Segment
	ROW Edge
	Segment Node
	Turn Radius
	Access Road ID Label Example: Segment-Type-Number
	Access Road Type B (Permanent)
	Access Road Type C (Temporary)
	Access Road Type D (Permanent)
	Access Road Type D (Temporary)
	Drive and Crush
	Disturbance Area (May be hidden beneath access road change highlights)

POD Resources and Restrictions	
	Pipeline Crossing Point
	Paleontological Sensitive Area Requiring Monitoring
	Couch's Spadefoot Toad Habitat
	Sensitive Botanical Area: <i>Astragalus insularis</i> var. <i>harwoodii</i>
	Cryptobiotic Soil Point
	Desert Pavement Point
	Sensitive Soil: Desert Pavement
Vegetation Alliances	
	Big galleta shrub-steppe
	Jurisdictional Wash

Mojave Desert Tortoise Suitable Habitat	
Includes the full alignment in California outside of the agricultural land and has been omitted from the map to minimize clutter.	
Base Data	
	Map Page Boundary
	Existing Transmission Line
	Major Road or Developed Access (Type A)
	Parcel Boundary
	Natural Gas Interstate Pipeline
Contours	
	20 foot

Ten West Link Transmission Line Project

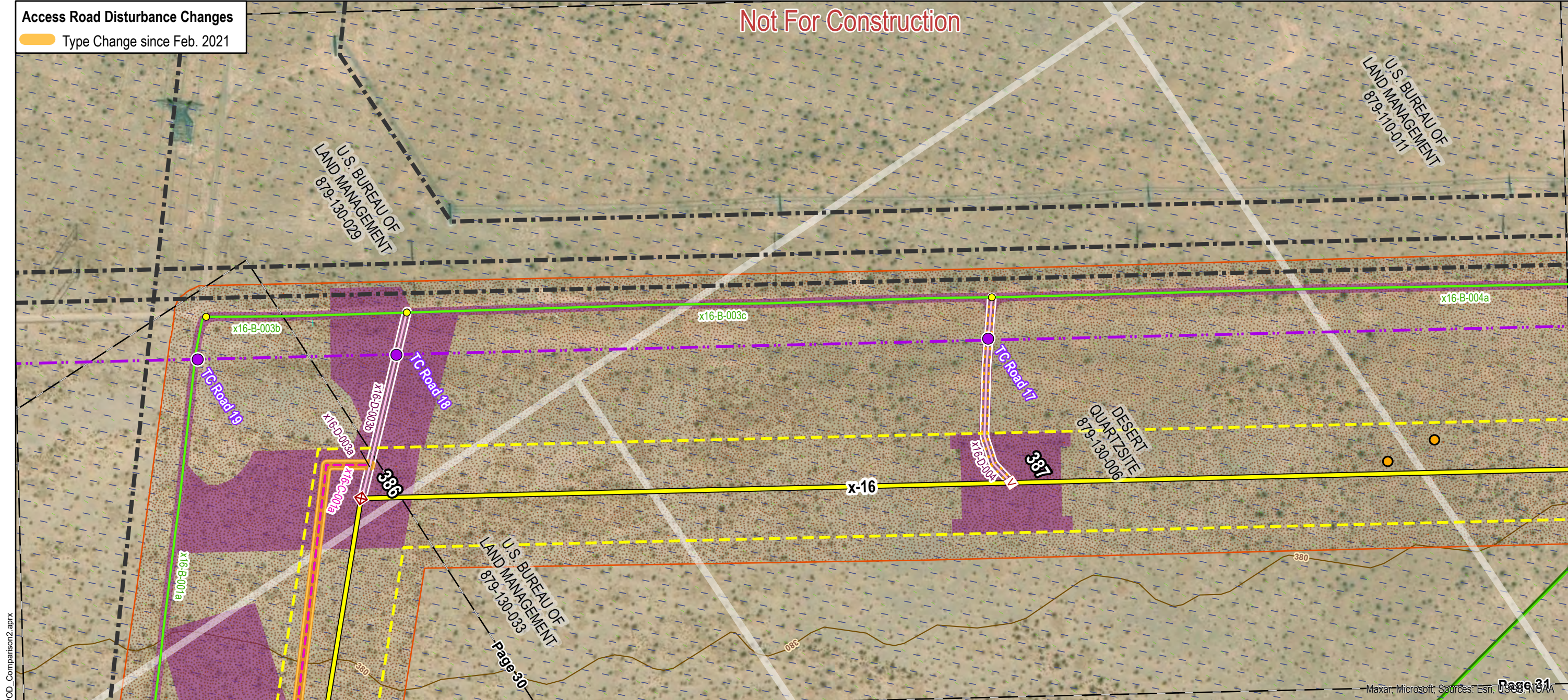
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Access Road Disturbance Changes
Type Change since Feb. 2021

Not For Construction

U.S. BUREAU OF
LAND MANAGEMENT
879-110-011

U.S. BUREAU OF
LAND MANAGEMENT
879-130-029

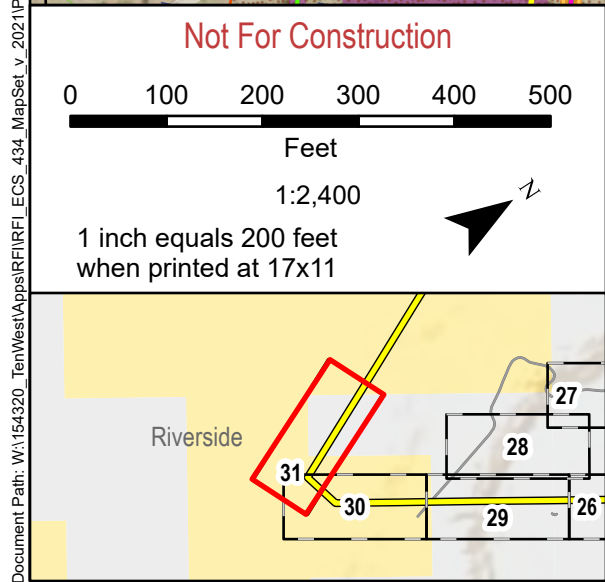
DESERT
QUARTZSITE
879-130-006

U.S. BUREAU OF
LAND MANAGEMENT
879-130-033

Document Path: W:\154320_TenWestApps\RFI\RFI_ECS_434_MapSet_V_2021\POD_Comparison2.aprx

Maxar, Microsoft, Sources: Esri, USGS, NOAA

Page 31



Project Components		POD Resources and Restrictions		Mojave Desert Tortoise Suitable Habitat	
55	Structure Label		Pipeline Crossing Point	Includes the full alignment in California outside of the agricultural land and has been omitted from the map to minimize clutter.	
	Guyed-V Structure		Paleontological Sensitive Area Requiring Monitoring		
	Self-Supporting Lattice Steel Structure		Couch's Spadefoot Toad Habitat	Base Data Map Page Boundary Existing Transmission Line Parcel Boundary Natural Gas Interstate Pipeline	
	Project Centerline labeled by Segment		Sensitive Plant Point: Proboscidea althaeifolia		
	ROW Edge		Sensitive Botanical Area: Astragalus insularis var. harwoodii	Contours 20 foot	
	Turn Radius		Jurisdictional Wash		
	Access Road ID Label Example: Segment-Type-Number				
	Access Road Type B (Permanent)				
	Access Road Type C (Temporary)				
	Access Road Type D (Permanent)				
	Drive and Crush				
	Disturbance Area (May be hidden beneath access road change highlights)				

Ten West Link Transmission Line Project

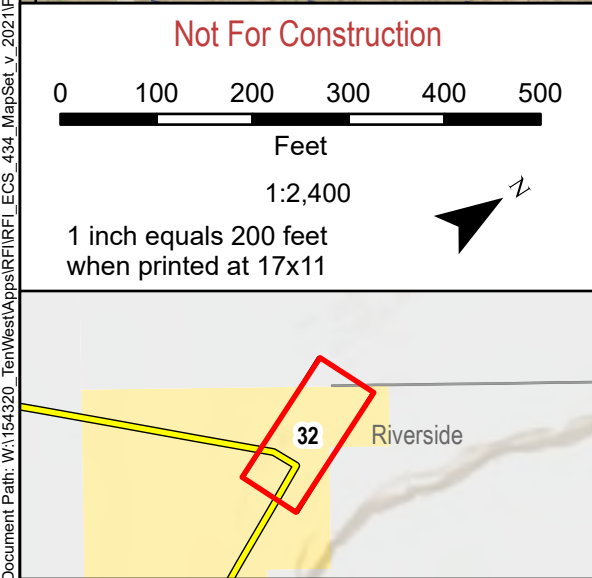
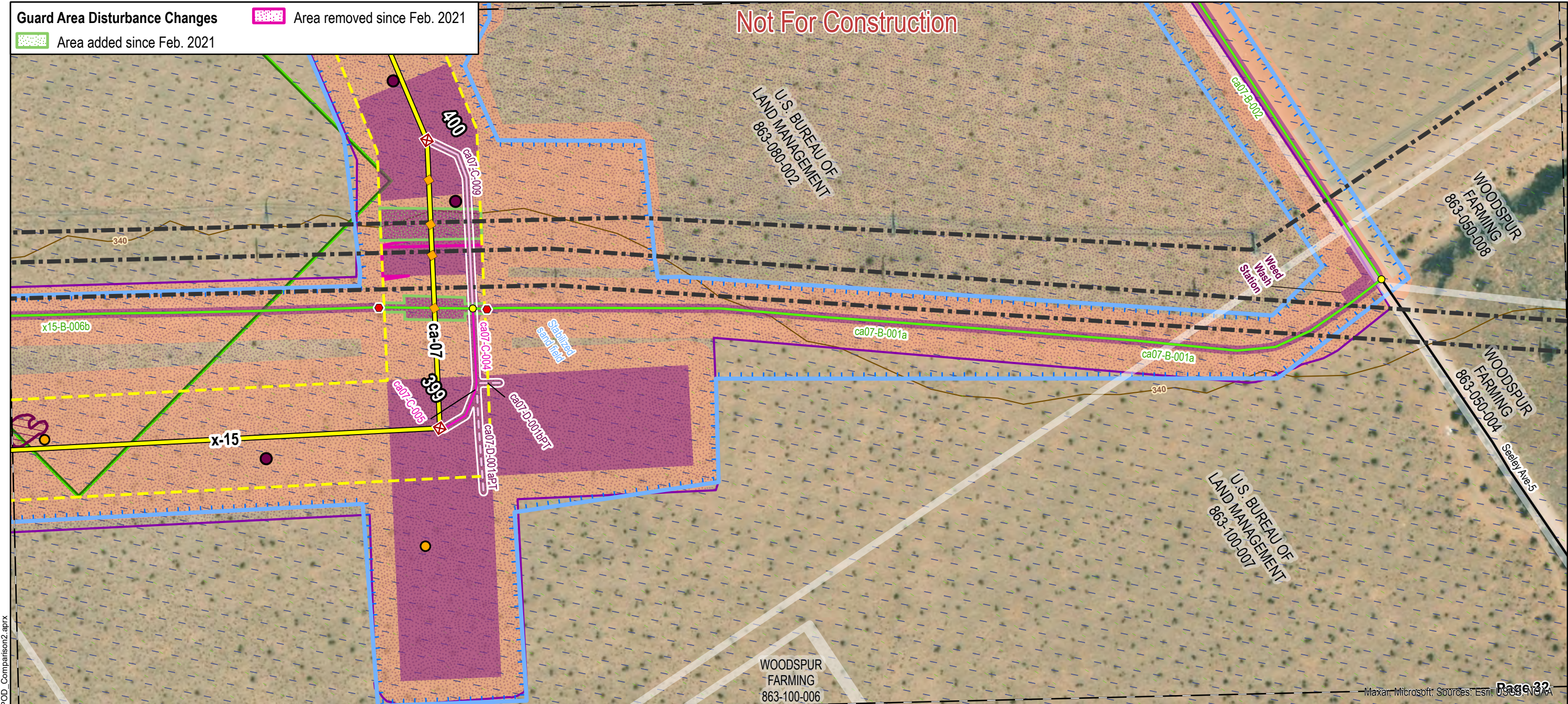
Project Layout Changes

February 2021 vs 2022 POD

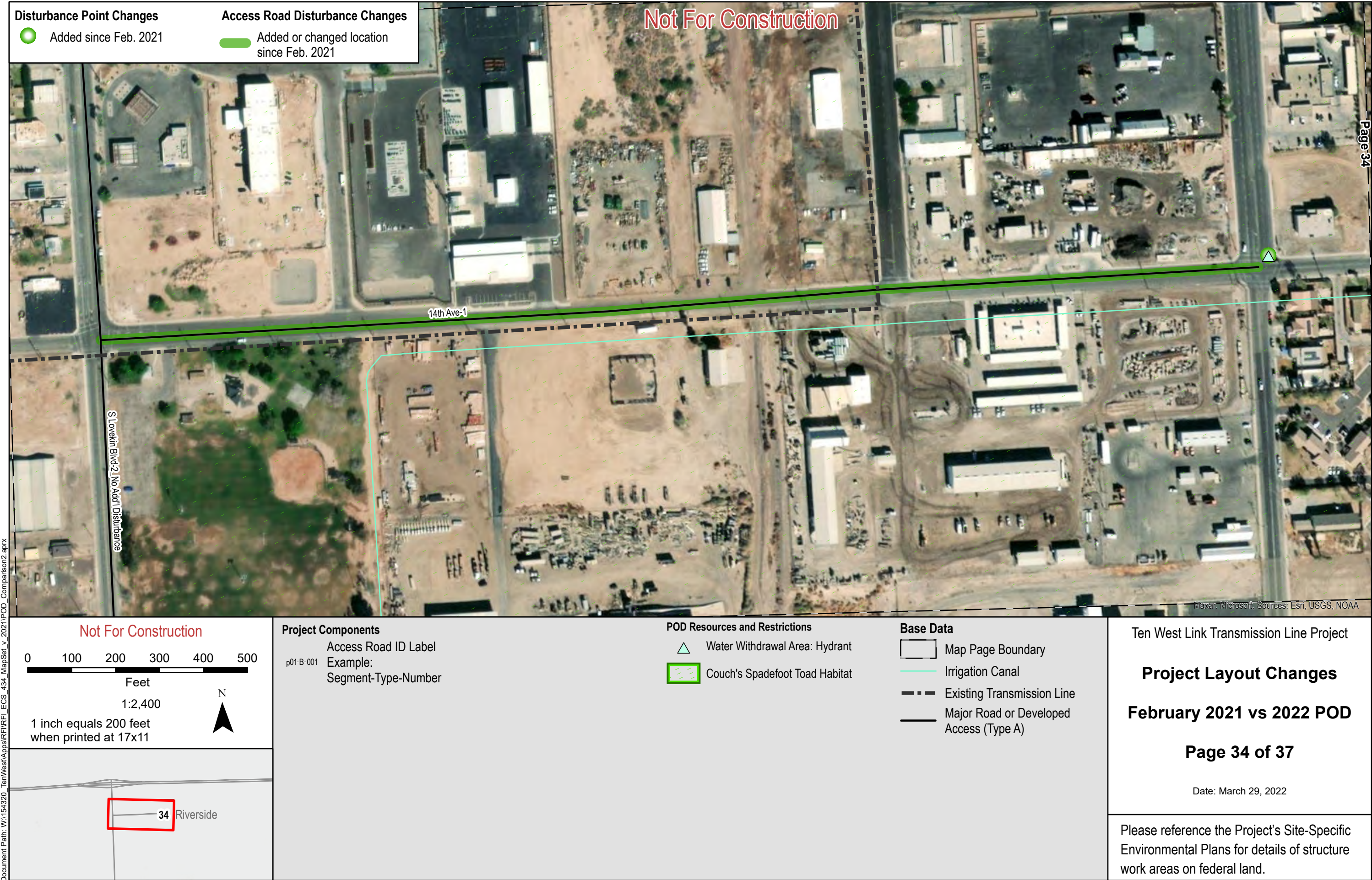
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Date: March 29, 2022

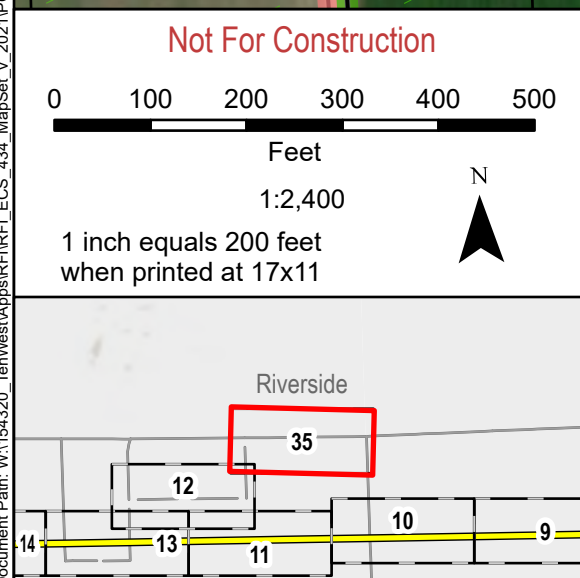
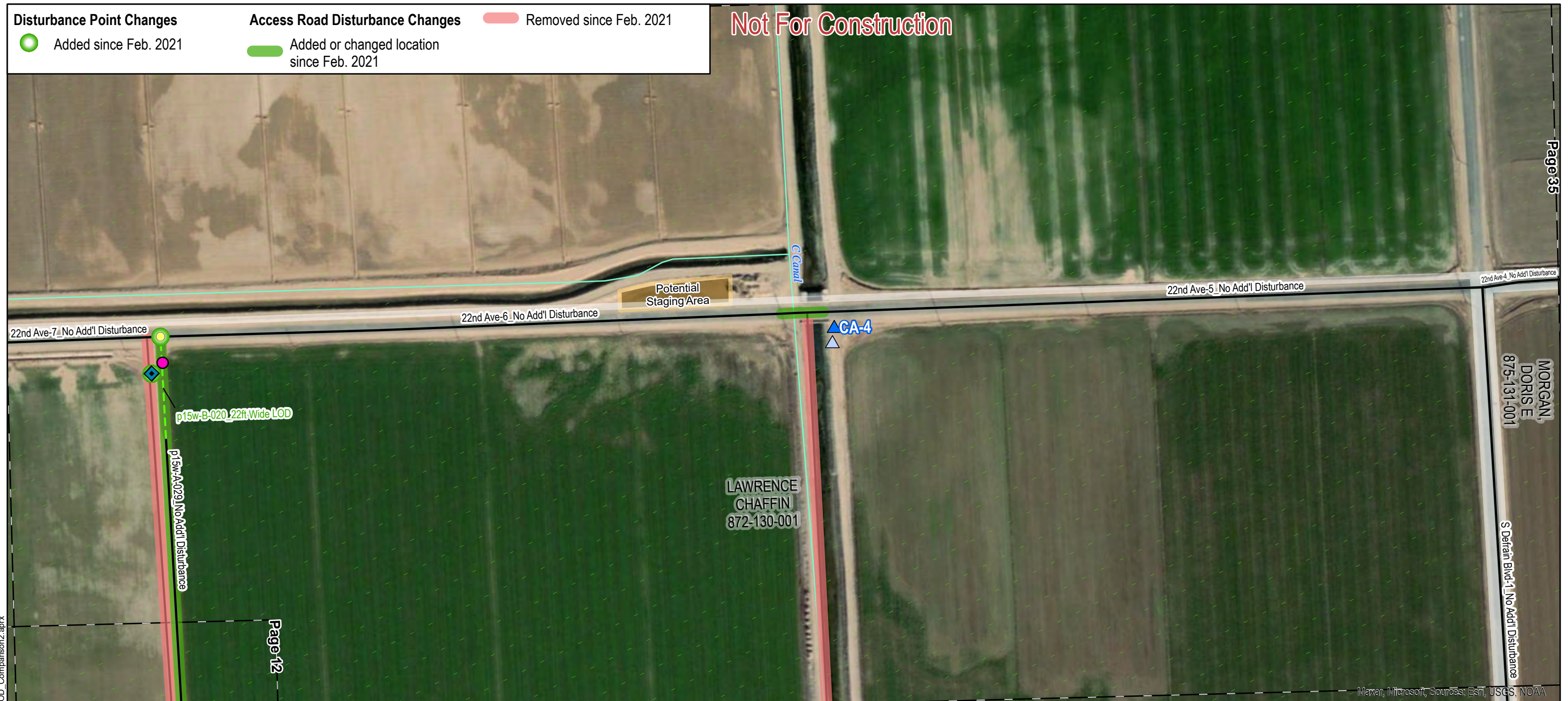
Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.






Project Components <ul style="list-style-type: none">55 Structure LabelSelf-Supporting Lattice Steel StructureProject Centerline labeled by SegmentROW EdgeSegment NodeGuard StructureTurn RadiusAccess Road ID Label Example: Segment-Type-Number	<ul style="list-style-type: none">Access Road Type B (Permanent)Access Road Type C (Permanent)Access Road Type D (Permanent)Access Road Type D (Temporary)Disturbance Area (May be hidden beneath access road change highlights)	POD Resources and Restrictions <ul style="list-style-type: none">Potential Recreation Signage and Trail Closure during wire stringing or blastingPaleontological Sensitive Area Requiring MonitoringMojave Fringe-toed Lizard Suitable HabitatStabilized sand fieldCouch's Spadefoot Toad HabitatSensitive Plant Point: Proboscidea althaeifoliaSensitive Botanical Area: Eriastrum harwoodii and Johnstonella costataCryptobiotic Soil PointSensitive Soil: Cryptobiotic SoilVegetation Alliances<ul style="list-style-type: none">Big galleta shrub-steppe	Mojave Desert Tortoise Suitable Habitat <p>Includes the full alignment in California outside of the agricultural land and has been omitted from the map to minimize clutter.</p> Base Data <ul style="list-style-type: none">Map Page BoundaryExisting Transmission LineMajor Road or Developed Access (Type A)Parcel Boundary Contours <ul style="list-style-type: none">20 foot
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




Not For Construction






Project Components





-  Turn Radius CAAG
 Wheel Wash Station
 Rock Construction Entrance (RCE)
 Access Road ID Label
 Example:
 Segment-Type-Number

-  Access Road Type B
(Temporary Use)
-  Disturbance Area (May be
hidden beneath access
road change highlights)
-  Potential Staging Area
(Added since Feb. 2021 -
in already disturbed area)

POD Resources and Restrictions

-  Water Withdrawal Area: Pump Station
 Water Withdrawal Area: Water Stand
 Couch's Spadefoot Toad Habitat

Base Data

-  Map Page Boundary
 Irrigation Canal
 Major Road or Developed Access (Type A)
 Parcel Boundary

Ten West Link Transmission Line Project

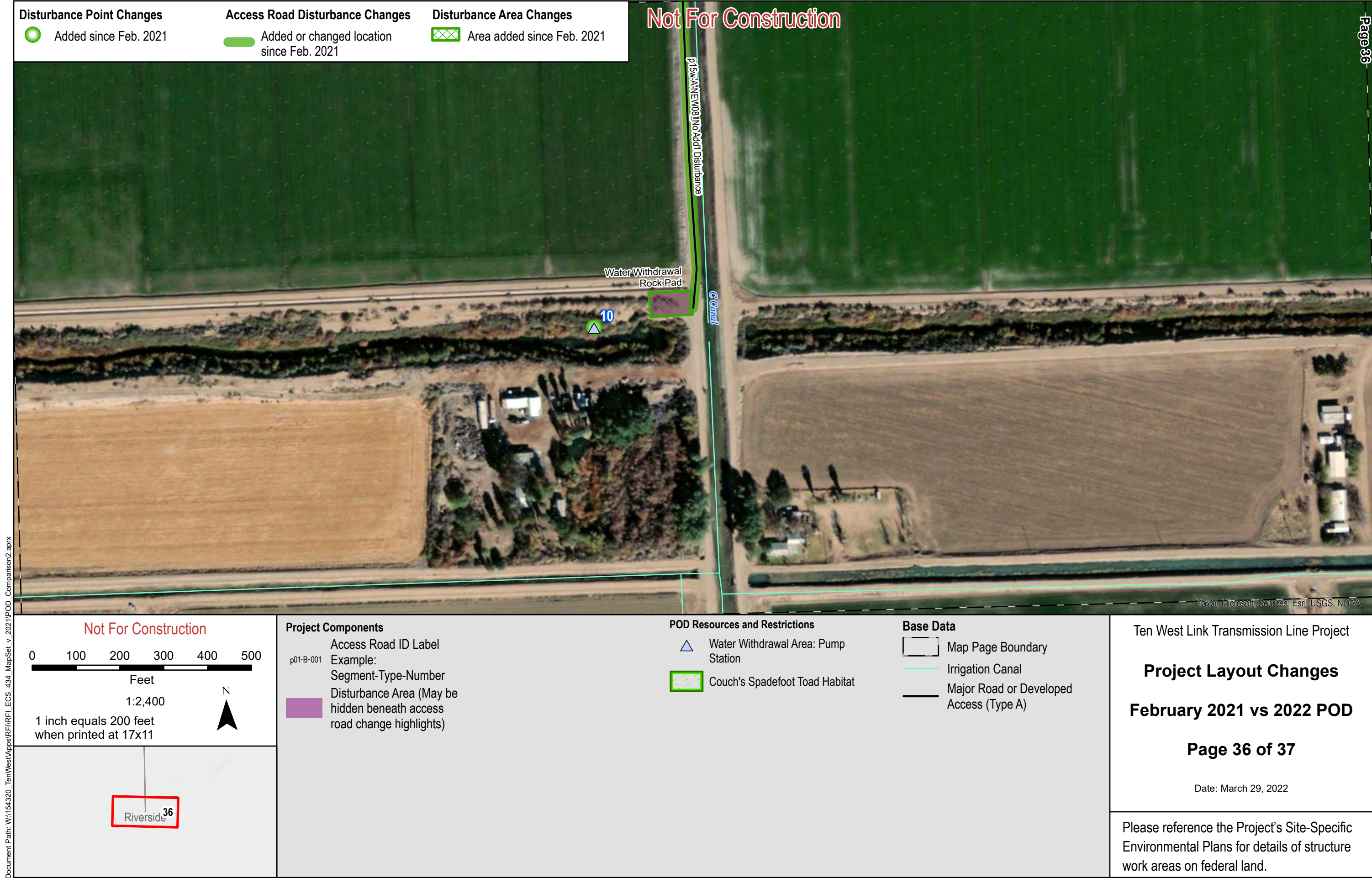
Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Disturbance Point Changes
● Added since Feb. 2021

Access Road Disturbance Changes
— Added or changed location since Feb. 2021

Disturbance Area Changes
▨ Area added since Feb. 2021

Not For Construction

Water Withdrawal Rock Pad

10

Canal

Maxar, Microsoft, Sources: Esri, USGS, NOAA

Not For Construction

0 100 200 300 400 500
Feet

1:2,400

1 inch equals 200 feet
when printed at 17x11



Riverside 36

Project Components

Access Road ID Label
Example:
Segment-Type-Number
Disturbance Area (May be
hidden beneath access
road change highlights)



POD Resources and Restrictions

- △ Water Withdrawal Area: Pump Station
- ▨ Couch's Spadefoot Toad Habitat

Base Data

- ▭ Map Page Boundary
- Irrigation Canal
- Major Road or Developed Access (Type A)

Ten West Link Transmission Line Project

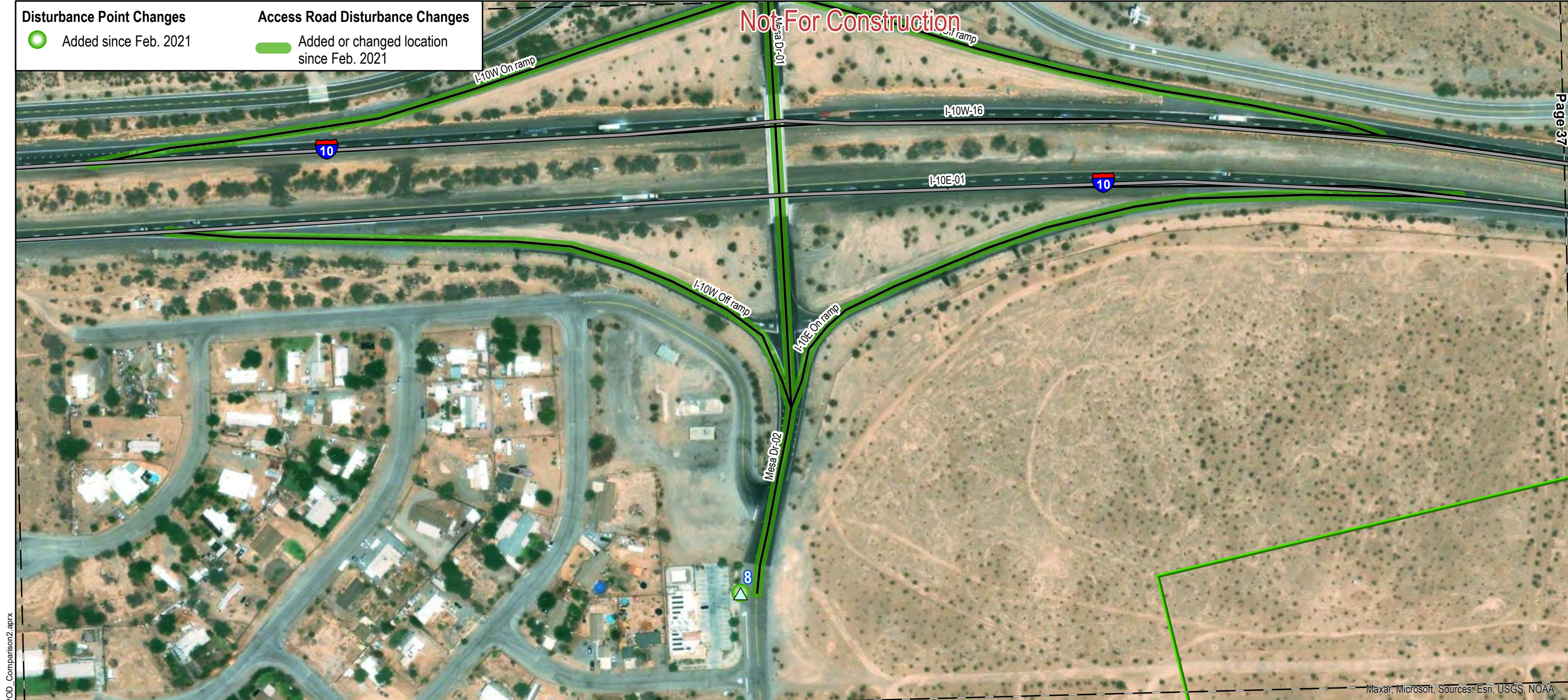
Project Layout Changes

February 2021 vs 2022 POD

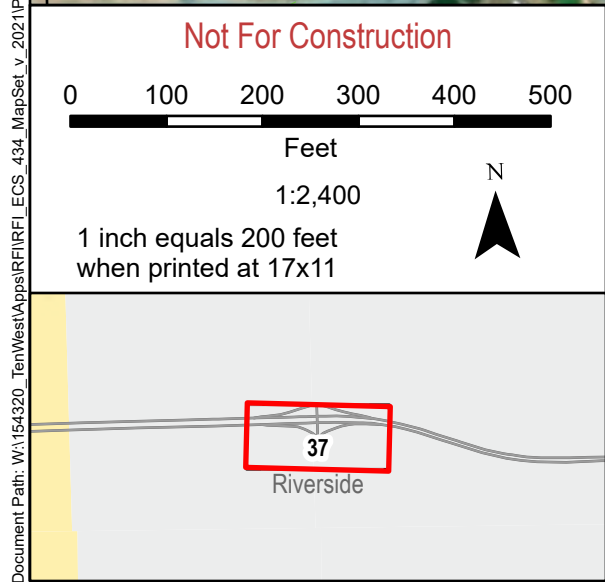
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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.



Maxar, Microsoft, Sources: Esri, USGS, NOAA



Project Components Access Road ID Label Example: Segment-Type-Number p01-B-001	POD Resources and Restrictions △ Water Withdrawal Area: Hydrant Couch's Spadefoot Toad Habitat	Mojave Desert Tortoise Suitable Habitat Includes the full alignment in California outside of the agricultural land and has been omitted from the map to minimize clutter. Base Data Map Page Boundary Interstate Highway Major Road or Developed Access (Type A)
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Ten West Link Transmission Line Project

Project Layout Changes

February 2021 vs 2022 POD

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Date: March 29, 2022

Please reference the Project's Site-Specific Environmental Plans for details of structure work areas on federal land.

ATTACHMENT E: BLM VARIANCE REQUEST FORMS

VARIANCE REQUEST FORM

Ten West Link 500 kV Transmission Line Project

CIC USE ONLY

Variance Request Number:

16

Date Received by CIC:

Section A – Owner/Contractor to Complete

Descriptive Title: Guard Pole Additions, Changes, Removals

Requested Start Work Date:

Variance Level Type: ☒ Level 1 ☐ Level 2 ☐ Level 3

Date Submitted to CIC:

Land Jurisdiction: ☒ BLM ☒ Other: BOR

BLM Field Office ☒ Lower Sonoran ☐ Lake Havasu ☒ Yuma ☐ Palm Springs ☐ Hassayampa

Purpose and Need Statement:

Need to revise mapping of guard pole structures based on more developed wire pulling plans and designs.

Description of Request:

Request to make revisions to guard pole locations across the Project as a result of more developed wire pulling plans and designs. The majority of the guard pole areas are being removed, which results in a reduction of approximately 8.5 acres of temporary disturbance. Specific descriptions for each requested change are provided in the attached summary table.

Alternatives Considered:

No other alternatives identified without decreased protection of crossings. Statements about potential alternatives for each change are provided in the attached summary table.

Resource Analysis:

The Affected Area is Analyzed within the EIS: ☒ Yes ☐ No

Document Citation: DOI-BLM-AZ-C020-2016-0010-EIS

Cultural Resources

Activity is Within Previously Surveyed Areas: ☒ Yes ☐ No

Impact to Eligible Site: ☐ Yes ☒ No

Paleontological Impact: ☐ Yes ☒ No

Name of Additional Report: N/A

Brief Summary:

Cultural: All guard pole areas fall within the typically 200-foot right of way which was fully surveyed during Class III cultural resource surveys. There are no impacts to known cultural features as a result of the changes.

Paleontological: Across the Project, the Potential Fossil Yield (PFY) classification varies between Very Low (Class 1) to Moderate (Class 3), with some small areas of unknown PFY. Generally segments p-01 and p-12 through p-15e are classified as Class 3 PFY with only small pockets of Class 1 or 2 PFY. The other areas are categorized in Class 1 or 2 PFY, which do not require monitoring. There will be no additional impacts to paleontological resources as a result of the changes, as monitoring will occur for the Class 3 and Unknown PFY as described in Appendix E-2 of the Plan of Development (POD) - Paleontological Resource Impact Mitigation and Monitoring Plan (PRIMMP).

Proposed Mitigation:

No additional mitigation needed.

Biological ResourcesActivity is Within Previously Surveyed Areas: ☒ Yes ☐ NoNoxious Weeds Present: ☒ Yes ☐ No
 Impact to Sensitive Resource: ☐ Yes ☒ No
 Name of Biological
 Variance Plan Write-Up: N/A
Brief Summary:

A brief statement on any environmental considerations for each change is provided in the attached summary table. Generally, there are no additional impacts to resources than was previously considered in the POD. There is a large overall decrease in disturbance impacts which would correlate to fewer environmental impacts, as well.

Proposed Mitigation:

No additional mitigation needed. Clearance and other surveys will be performed for avian species, desert tortoise, burrowing owl, etc. in accordance with the Project POD. Implementation of the requirements in the POD would minimize impacts to environmental resources. Additionally, weed treatment and other management strategies will take place as described in the Vegetation Management Plan, Appendix F-6 of the Plan of Development, and as authorized by BLM's Pesticide Use Permit (CA-2021-060-002 and DOI-BLM-CA-D060-2021-0026-EA). Any additional changes in plant salvage plans would be reflected in an addendum to be approved by the BLM prior to implementation.

Other Resources (Potential Impacts to Other Sensitive Resources Analyzed in the EIS)**Brief Summary:**

No additional resources are expected to be impacted as a result of the change.

Proposed Mitigation:

N/A

Disturbance Assessment:Does the Request Result in Additional Disturbance Not Addressed in the POD? ☐ Yes ☐ No ☒ N/A**Disturbance Not Accounted for in POD:**

Activity	Additional Temporary Disturbance (acres)	Additional Permanent Disturbance (acres)
See attached breakdown of individual impact changes for each feature		
Total (acres):	-8.00	0

Disturbance Notes:

Please see attached summary which provides a breakdown of all requested changes, and a summary of the disturbances. All guard pole related disturbances are temporary. There is a significant reduction of disturbances overall.

Support Materials:

Provide a map (required), supporting graphic, information, and resource reports that support or explain the proposed activity, as needed.

- ☒ Map/Drawing ☐ Engineering Drawing ☐ Photos ☐ Additional Resource Reports
☐ Site Specific Environmental Plan ☒ Other Summary Table

Owner Authorization:

- ☐ DCR Transmission, LLC confirms that this variance has been reviewed and is needed to complete the Project, provide Project documentation, and/or reduce resource impacts of the Ten West Link 500 kV Transmission Line Project. It has been thoroughly vetted for completeness and addresses potential impacts to resources analyzed in the EIS.

Section B - Compliance Inspection Contractor Review/Comments/Recommendations

NEPA:

NA

Biological Resources:

NA

Cultural Resources:

NA

Other Sensitive Resources:

NA

Additional Comments/Notes:

NA

Section C - Agency Decision

Decision: Approved

BLM Project Manager:	<div>ERICA STEWART</div> <div><small>Digitally signed by ERICA STEWART Date: 2022.02.22 16:17:13 -07'00'</small></div>	Date:	N/A: <input type="checkbox"/>
BLM Hassayampa FO Manager:		Date:	N/A: <input checked="" type="checkbox"/>
BLM Yuma FO Manager:	<div>DAVID HAWES</div> <div><small>Digitally signed by DAVID HAWES Date: 2022.03.01 10:30:17 -07'00'</small></div>	Date:	N/A: <input type="checkbox"/>
BLM Palm Springs FO Manager:		Date:	N/A: <input checked="" type="checkbox"/>
BLM Lower Sonoran FO Manager:		Date:	N/A: <input checked="" type="checkbox"/>
BLM Lake Havasu FO Manager:		Date:	N/A: <input checked="" type="checkbox"/>
CIC Project Manager (Field Variances):		Date:	N/A: <input type="checkbox"/>

Stipulations:

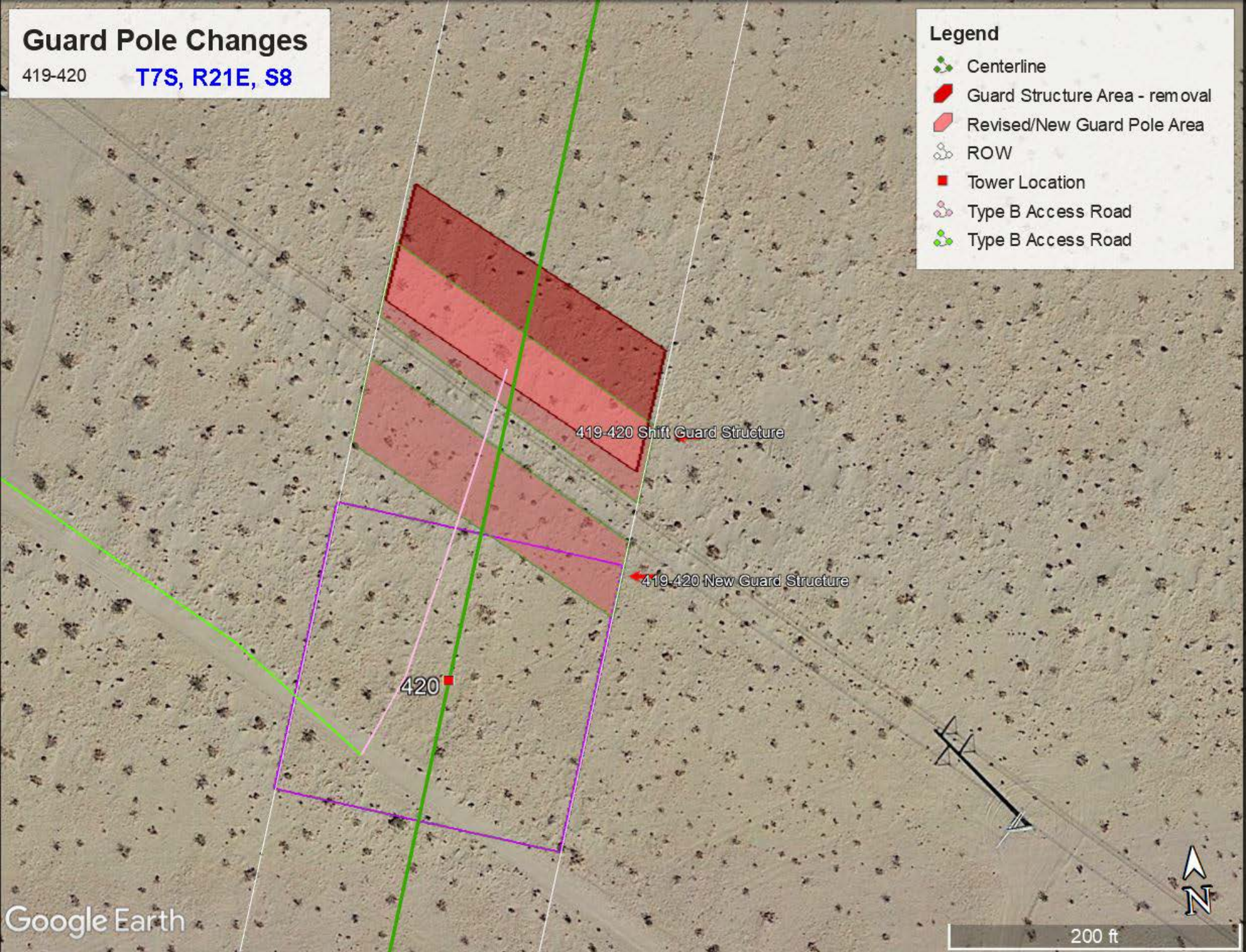
Guard Pole Changes

419-420

T7S, R21E, S8

Legend

- Centerline
- Guard Structure Area - removal
- Revised/New Guard Pole Area
- ROW
- Tower Location
- Type B Access Road
- Type B Access Road



ID # on Map	Temporary Disturbance Change (acres)	Land Jurisdiction	Description of Request	Alternatives (if Applicable)	Environmental Considerations
15 Remove Guard Structure	-0.24	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
15-16 Remove Guard Structure	-0.23	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
31-32 Remove Guard Structure (1)	-0.22	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
31-32 Remove Guard Structure (2)	-0.21	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
31-32 Remove Access Road and Turn Radius	-0.04	BLM	Remove access road and turn radius along with the 45-46 Guard Pole removal.	N/A	N/A
31-32 Remove Access Road	-0.02	BLM	Remove access road along with the 45-46 Guard Pole removal.	N/A	N/A
45-46 Remove Guard Structure	-0.29	BLM	Remove Guard Pole due to 45-46 New Guard Structure (relocation of Guard Pole outside the CAP fence).	N/A	N/A
45-46 New Guard Structure	0.13	BLM	Move guard pole from the current location to just outside of the CAP fence along the existing disturbed access road to better protect the canal during wire stringing. (Related to CAP changes but not specifically included in the RFI on the matter).	No other alternatives identified without decreased protection of crossing during wire pull.	Change would reduce the amount of vegetation clearing needed, as it was moved from an area with no previous disturbance and some mature vegetation to an area that is previously disturbed and without vegetation. Some noxious and invasive weeds in the area (<i>Brassica tournefortii</i> , <i>Hordeum murinum</i>) along existing access roads. No changes in plant salvage plans based on site reconnaissance; this area has a general lack of the proposed salvage species.
46 Remove Guard Structure	-0.27	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
45-46 Type A to guard pole	0.00	BLM	Type A segment to access revised Guard Pole area.	N/A	N/A
124-125 Shift Guard Structure (1)	-0.07	BLM	Move Guard Pole closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shifts. No new environmental concerns. One additional saguaro that would be salvaged based on site reconnaissance.
124-125 Shift Guard Structure (2)	-0.06	BLM	Move Guard Pole closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shifts. No new environmental concerns. No noxious weeds identified in this area to date.
125-126 Shift Guard Structure	0.03	BLM	Move Guard Pole closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shifts. No new environmental concerns. No noxious weeds identified in this area to date.
128-129 Remove Guard Structure (1)	-0.31	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
128-129 Remove Guard Structure (2)	-0.32	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
129 Shift Guard Structure	0.04	BLM	Straighten this guard pole area so that it properly aligns with the distribution line to provide adequate coverage.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shift. No new environmental concerns and no changes in plant salvage based on site reconnaissance. This area is classified as Category 3 desert tortoise habitat, but the change falls along an existing access road and there are no burrows in the area. No noxious weeds identified here to date.
129-130 New Guard Structure	0.55	BLM	Add guard pole area on the west side of the distribution line to box in that crossing during wire stringing.	No other alternatives identified without decreased protection of overhead line being crossed.	Additional plant salvage not likely here, as this area is sparse for salvageable species. No noxious weeds identified here to date. This area is classified as Category 3 desert tortoise habitat, but the change falls along an existing access road and there are no burrows in the area.
156-157 Shift Guard Structure (1)	-0.03	BLM	Move Guard Pole closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shift. No noxious weeds identified here to date. No additional plant salvage likely based on site reconnaissance. This is an potential overwintering area for burrowing owls but there have been no burrows identified in the guard pole area which falls along an existing access road.
156-157 Shift Guard Structure (2)	-0.03	BLM	Move Guard Pole closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing during wire pull.	Minor shift. One noxious weed individual identified here (<i>Brassica tournefortii</i>). No additional plant salvage likely based on site reconnaissance. This is an potential overwintering area for burrowing owls but there have been no burrows identified in the guard pole area which falls along an existing access road.
194-195 Remove Guard Structure (1)	-0.40	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
194-195 Remove Guard Structure (2)	-0.41	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
210-211 Shift Guard Structure	-0.05	BLM	Move closer to the public road to facilitate better protection during wire stringing.	No other alternatives identified without decreased protection of crossing.	Minor shift toward the existing road. No new environmental concerns. There are expected to be some minor changes in plant salvage plans based on site reconnaissance. This area is classified as Category 2 desert tortoise habitat, but the change falls along an existing access road and there have been no burrows in the area. No noxious weeds identified here to date.
212 Remove Guard Structure	-0.21	BLM	Remove Guard Pole due to 212-213 New Guard Structure (relocation of Guard Poles to more appropriate area)	N/A	N/A
212-213 Remove Guard Structure (1)	-0.21	BLM	Remove Guard Pole due to 212-213 New Guard Structure (relocation of Guard Poles to more appropriate area)	N/A	N/A
212-213 Remove Guard Structure (2)	-0.23	BLM	Remove Guard Pole due to 212-213 New Guard Structure (relocation of Guard Poles to more appropriate area)	N/A	N/A
212-213 New Guard Structure (1)	0.23	BLM	Due to the terrain and the distribution line coming up the hill, the traditional, square guard pole areas will not provide the appropriate coverage. Instead, a site-specific guard area was mapped to provide adequate protection.	No other alternatives identified without decreased protection of crossing.	Minor shifts. No new environmental concerns. There are expected to be minor changes in plant salvage plans based on site reconnaissance. This area is classified as Category 2 desert tortoise habitat, but the change falls along an existing access road and there have been no burrows found here to date. No noxious weeds identified here during surveys currently.
212-213 New Guard Structure (2)	0.24	BLM	Due to the terrain and the distribution line coming up the hill, the traditional, square guard pole areas will not provide the appropriate coverage. Instead, a site-specific guard area was mapped to provide adequate protection.	No other alternatives identified without decreased protection of crossing.	Minor shifts. No new environmental concerns. There are expected to be minor changes in plant salvage plans based on site reconnaissance. This area is classified as Category 2 desert tortoise habitat, but the change falls along an existing access road and there have been no burrows found here to date. No noxious weeds identified here during surveys currently.
221 Remove Guard Structure	-0.39	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
226-227 Shift Guard Structure (1)	-0.05	BLM	Move the Guard Pole closer to the public road to provide better protection. Also shift it so it is within the ROW.	No other alternatives identified without decreased protection of crossing.	Minor shift toward the existing road. No new environmental concerns. Some changes in the plant salvage assessments needed based on site reconnaissance. No noxious weeds identified here to date.
226-227 Shift Guard Structure (2)	-0.04	BLM	Move the Guard Pole closer to the public road to provide better protection. Also shift it so it is within the ROW.	No other alternatives identified without decreased protection of crossing.	Minor shift toward the existing road. No new environmental concerns. Some changes in the plant salvage assessments needed based on site reconnaissance. No noxious weeds identified here to date.
231 Remove Guard Structure	-0.35	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
240-241 Shift Guard Structure	-0.01	BLM	Guard pole area shifted closer to road to avoid adding a Type D road segment per DCRT request.	Alternative is to leave guard structure area in place but this would require Type D road to access the area.	Guard pole area shifted closer to the existing access road which has some previous disturbance. No changes in plant salvage expected because this area has sparse vegetation due to desert pavement. No noxious weeds identified here to date.
247 Remove Guard Structure	-0.39	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A

247-248 Remove Guard Structure (1)	-0.38	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
247-248 Remove Guard Structure (2)	-0.28	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
248-249 Remove Guard Structure	-0.31	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
261 Remove Guard Structure	-0.34	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
268-269 New Guard Structure	0.27	BLM	Add guard pole area on the east side of the distribution line (west side of highway 35) to box in that crossing during wire stringing.	No other alternatives identified without decreased protection of overhead line being crossed.	No additional plant salvage expected; this area has sparse vegetation due to desert pavement. Some noxious weeds identified here.
268-269 Shift Guard Structure	0.00	BLM	Shift the guard pole structure BOL so it is closer to the distribution line to provide better coverage.	No other alternatives identified without decreased protection of overhead line being crossed.	Additional plant salvage not likely due to desert pavement. No cultural features identified during a check of Class III survey results. Low (Class 2) fossil yield potential here. Some noxious weeds identified here.
291-292 Expand Guard Structure	0.20	BLM	Due to the terrain and the distribution line coming up the hill, the traditional, square guard pole area will not provide the appropriate coverage. Instead, a site-specific guard area was mapped to provide adequate protection.	No other alternatives identified without decreased protection of overhead line being crossed.	This area is classified as Category 3 desert tortoise habitat, but there have been no burrows identified here to date. This area is also considered suitable big horn sheep habitat. Some additional plant salvage likely based on site reconnaissance. No noxious weed identified here.
312-313 Shift Guard Structure (1)	-0.04	BOR	Shifted closer to the public road for better coverage which allowed the Type D road mapped to the guard pole area to be removed.	Alternative is to leave guard structure area in place but this would require Type D road to access the area.	Minor shift. No new environmental concerns. Some noxious weeds already present here. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area to date. There is also an ephemeral wash here, but all guard pole disturbances will be reclaimed during post-construction. Additional plant salvage not likely based on site reconnaissance.
312-313 Shift Guard Structure (2)	-0.01	BOR	Shifted the guard pole area closer to the public road for better coverage.	Alternative is to leave guard structure area in place but this would require Type D road to access the area.	Minor shift. No new environmental concerns. No noxious weeds identified in this area to date. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area to date. There is also an ephemeral wash here, but all guard pole disturbances will be reclaimed during post-construction. Additional plant salvage not likely based on site reconnaissance.
313 Remove Access Road and Turn Radius	-0.05	BOR	Road removed because guard poles were shifted closer to existing road which will provide adequate access	N/A	N/A
314-315 Shift Guard Structure (1)	0.02	BOR/BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. No noxious weeds identified in this area to date. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area to date. There is also an ephemeral wash here, but all guard pole disturbances will be reclaimed during post-construction. Additional plant salvage not likely based on site reconnaissance.
314-315 Shift Guard Structure (2)	0.01	BOR/BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. Some noxious weeds already present here. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area to date. There is also an ephemeral wash here, but all guard pole disturbances will be reclaimed during post-construction. Additional plant salvage not likely based on site reconnaissance.
315 Remove Guard Structure	-0.33	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
315-316 Shift Guard Structure (1)	0.01	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. No noxious weeds identified in this area to date. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area. Additional plant salvage not likely based on site reconnaissance. The change may alleviate the need to salvage a barrel cactus.
315-316 Shift Guard Structure (2)	0.01	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. No noxious weeds identified in this area to date. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area. Additional plant salvage not likely based on site reconnaissance.
318-319 Remove Guard Structure (1)	-0.23	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
318-319 Remove Guard Structure (2)	-0.28	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
318-319 Remove Guard Structure (3)	-0.31	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
319-320 Shift Guard Structure (1)	-0.02	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. No noxious weeds identified here, although there have been some noxious weeds (Brassica tournefortii) found along existing access roads in the area. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area. Additional plant salvage not likely based on site reconnaissance.
319-320 Shift Guard Structure (2)	-0.02	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift. No new environmental concerns. No noxious weeds identified here, although there have been some noxious weeds (Brassica tournefortii) found along existing access roads in the area. This area is categorized as Category 3 desert tortoise habitat but the change is along an existing access road and no burrows have been found in the disturbance area. Additional plant salvage not likely based on site reconnaissance.
320-321 Remove Guard Structure	-0.32	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
320-321 Shift Guard Structure (1)	-0.06	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift to move the guard pole closer to the existing access road. No new environmental concerns. No noxious weeds found here but there have been some identified along existing access roads in the area. There is also an ephemeral wash here, but all guard pole disturbances will be reclaimed during post-construction. Additional plant salvage not likely based on site reconnaissance.
320-321 Shift Guard Structure (2)	0.02	BLM	Shifted the guard pole areas closer to the public road for better coverage.	Would need to add a small spur road to guard pole site	Minor shift to move guard pole closer to the existing access road. No new environmental concerns. Some noxious weeds already present here. There is also an ephemeral wash here, but the requested change will move the guard pole area further out of the wash, and all guard pole disturbances will be reclaimed during post-construction. Some additional plant salvage may be necessary based on site reconnaissance.

325- 326 Remove Guard Structure	-0.30	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
326 Remove Guard Structure	-0.29	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
326- 327 Remove Guard Structure	-0.27	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
326- 327 Remove Access Road and Turn Radius	-0.05	BLM	Access Road/Turn Radius not needed. Remove from mapping.	N/A	N/A
326- 327 Shift Guard Structure	0.01	BLM	Move the guard pole area into the ROW boundaries. It was showing outside the boundaries for some reason.	Leave as is and build the guard pole as shown, extending outside the ROW.	Minor shift. No new environmental concerns and no sensitive resources impacted. This area has a lot of previous disturbance from recreational users.
332- 333 Remove Guard Structure (1)	-0.32	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
332- 333 Remove Guard Structure (2)	-0.25	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
332- 333 Remove Access Road and Turn Radius	-0.05	BLM	Access Road/Turn Radius not needed. Remove from mapping.	N/A	N/A
333- 334 Remove Guard Structure	-0.27	BLM	Guard Pole area not needed. Remove from mapping.	N/A	N/A
419-420 Shift Guard Structure	-0.17	BLM	This guard pole area was reduced and moved slightly closer to the overhead crossing to provide adequate coverage during wire stringing.	No other alternatives identified without decreased protection of overhead line being crossed.	No additional plant salvage needed. Zones of pre-existing <i>Salsola paulsenii</i> and <i>Brassica tournefortii</i> in this area. The only other sensitive features here are some species habitat (Mojave fringe-toed lizard, Mojave desert tortoise, ribbed cryptantha, Harwood's eriastrum, and sensitive vegetation alliances (big galleta shrub-steppe)). Special notes on mitigation: Biological clearance surveys and monitoring will take place as described by the POD which minimize or avoid direct impacts to these features. There are three weed wash areas strategically planned in the California area to prevent the introduction of new weed populations. Additionally, weed treatment and other management strategies will take place as described in the Vegetation Management Plan, Appendix F-6 of the Plan of Development, and as authorized by BLM's Pesticide Use Permit (CA-2021-060-002 and DOI-BLM-CA-D060-2021-0026-EA).
419-420 New Guard Structure	0.26	BLM	Add guard pole area on the south side of the transmission line to box in that crossing during wire stringing.	No other alternatives identified without decreased protection of overhead line being crossed.	No additional plant salvage needed. Zones of pre-existing <i>Salsola paulsenii</i> and <i>Brassica tournefortii</i> in this area. The only other sensitive features here are some species habitat (Mojave fringe-toed lizard, Mojave desert tortoise, ribbed cryptantha, Harwood's eriastrum, and sensitive vegetation alliances (big galleta shrub-steppe)). Special notes on mitigation: Biological clearance surveys and monitoring will take place as described by the POD which minimize or avoid direct impacts to these features. There are three weed wash areas strategically planned in the California area to prevent the introduction of new weed populations. Additionally, weed treatment and other management strategies will take place as described in the Vegetation Management Plan, Appendix F-6 of the Plan of Development, and as authorized by BLM's Pesticide Use Permit (CA-2021-060-002 and DOI-BLM-CA-D060-2021-0026-EA).
TOTAL	-8.00				

VARIANCE REQUEST FORM

Ten West Link 500 kV Transmission Line Project

CIC USE ONLY

Variance Request Number: _____

Date Received by CIC: _____

Section A – Owner/Contractor to Complete

Descriptive Title: _____ Requested Start Work Date: _____

Variance Level Type: ☐ Level 1 ☐ Level 2 ☐ Level 3 Date Submitted to CIC: _____

Land Jurisdiction: ☐ BLM ☐ Other: _____

BLM Field Office ☐ Lower Sonoran ☐ Lake Havasu ☐ Yuma ☐ Palm Springs ☐ Hassayampa

Purpose and Need Statement:

Description of Request:

Alternatives Considered:

Resource Analysis:

The Affected Area is Analyzed within the EIS: ☐ Yes ☐ No Document Citation: _____

Cultural Resources

Activity is Within Previously Surveyed Areas: ☐ Yes ☐ No Impact to Eligible Site: ☐ Yes ☐ No

Paleontological Impact: ☐ Yes ☐ No Name of Additional Report: _____

Brief Summary:

Proposed Mitigation:

Biological Resources

Activity is Within Previously Surveyed Areas: ☐ Yes ☐ No

Noxious Weeds Present: ☐ Yes ☐ No

Impact to Sensitive Resource: ☐ Yes ☐ No

Name of Biological
Variance Plan Write-Up: _____

Brief Summary:

Proposed Mitigation:

Other Resources (Potential Impacts to Other Sensitive Resources Analyzed in the EIS)

Brief Summary:

Proposed Mitigation:

Disturbance Assessment:

Does the Request Result in Additional Disturbance Not Addressed in the POD? ☐ Yes ☐ No ☐ N/A

Disturbance Not Accounted for in POD:

Activity	Additional Temporary Disturbance (acres)	Additional Permanent Disturbance (acres)
Total (acres):		

Disturbance Notes:

Support Materials:

Provide a map (required), supporting graphic, information, and resource reports that support or explain the proposed activity, as needed.

☐ Map/Drawing ☐ Engineering Drawing ☐ Photos ☒ Additional Resource Reports

Owner Authorization:

- ☐ DCR Transmission, LLC confirms that this variance has been reviewed and is needed to complete the Project, provide Project documentation, and/or reduce resource impacts of the Ten West Link 500 kV Transmission Line Project. It has been thoroughly vetted for completeness and addresses potential impacts to resources analyzed in the EIS.

Section B - Compliance Inspection Contractor Review/Comments/Recommendations

NEPA:

Biological Resources:

Cultural Resources:

Other Sensitive Resources:

Additional Comments/Notes:

Section C - Agency Decision

Decision: _____

BLM Project Manager: _____ Date: _____ N/A: ☐BLM Hassayampa FO Manager: _____ Date: _____ N/A: ☐BLM Yuma FO Manager: _____ Date: _____ N/A: ☐BLM Palm Springs FO Manager: _____ Date: _____ N/A: ☐BLM Lower Sonoran FO Manager: _____ Date: _____ N/A: ☐BLM Lake Havasu FO Manager: _____ Date: _____ N/A: ☐CIC Project Manager (Field Variances): _____ Date: _____ N/A: ☐**Stipulations:**

Triple Transmission Line Crossing - Guard Structure Update

Two additional guard pole areas, one revised guard pole area

Legend

- Centerline
- Cryptobiotic Soil point
- Feature 3
- New Guard Pole Areas
- Pulling/Tensioning Sites
- Revised Guard Pole Area - new
- Revised Guard Pole Area - old
- ROW
- Tower Location
- Type B Access Road
- Type C Access Road
- Type D access Road

Section 7, Township 7S, Range 22E



ATTACHMENT F: SENSITIVE SPECIES MEMORANDUM



Attachment F: Memorandum to the Compensatory Mitigation Plan

RE: Update of Impacts to Sensitive Species Resulting from Project Refinements

Date: January 19, 2022

From: DCRT

This memorandum describes the results of current project refinements on temporary and permanent impacts to sensitive species listed in Table 1 below. This table compares the impacts in California presented in the February 2021 version of the Compensatory Mitigation Plan (CMP) with the impacts presented in the February 2022 Plan of Development (POD). For all but one species, the temporary and permanent impacts have decreased. The project refinements have resulted from fine tuning of the project components, refinements to access roads located primarily on non-federal lands and responding to private land owner input and requests and feasibility and safety issues. Although the current impacts for all but one sensitive species, i.e., Couch's spadefoot toad, have decreased over the impacts presenting in Tables 2-1 and 2-2 of the February 2021 version of the CMP, all previously approved off-site compensatory mitigation acreages remain the same.

Table 1 - Comparison of Impact Area from Compensatory Mitigation Plan and Current Project Refinements

Impacts Presented in the February 2021 Compensatory Mitigation Plan (Tables 2-1 and 2-2)	Refined Project Impacts February 2022	Change in Impact Areas
Mojave Desert Tortoise Temporary 88.6 Permanent 18.8	Mojave Desert Tortoise Temporary 84.5 Permanent 16.8	Temporary -4.1 Permanent -2
Couch's Spadefoot Toad – Agricultural Area Temporary 0 Permanent 0	Couch's Spadefoot Toad – Agricultural Area Temporary 9.8 Permanent 0	Temporary +9.8 Permanent 0
Couch's Spadefoot Toad – Non-Agricultural Area Temporary 36.8 Permanent 6.4	Couch's Spadefoot Toad – Non-Agricultural Area Temporary 31.5 Permanent 5.3	Temporary -5.3 Permanent -1.1
Mojave Fringe Toed Lizard Temporary 64.0 Permanent 15.4	Mojave Fringe Toed Lizard Temporary 54.9 Permanent 12.8	Temporary -9.1 Permanent -2.6
Harwood's Milkvetch	Harwood's Milkvetch	



Impacts Presented in the February 2021 Compensatory Mitigation Plan (Tables 2-1 and 2-2)	Refined Project Impacts February 2022	Change in Impact Areas
Temporary 23.5 Permanent 4.9	Temporary 22.1 Permanent 3.7	Temporary -1.4 Permanent -1.2
Big Galleta Temporary 34.0 Permanent 7.8	Big Galleta Temporary 27.3 Permanent 6.2	Temporary -6.7 Permanent -1.6
Harwood's Eriastrum Temporary 40.7 Permanent 9.8	Harwood's Eriastrum Temporary 33.5 Permanent 8.2	Temporary -7.2 Permanent -1.6

The estimated impacts to Couch's spadefoot toad modeled habitat have resulted from having to make minor improvements to existing access roads in the California agricultural area. These roads are not located on federal land and the required improvements have been primarily driven by private land owner requests. The net increase in impact acreage to potential Couch's spadefoot toad habitat in California is 4.5 acres. This figure takes into consideration an increase in temporary impacts in the agricultural area of 9.8 acres and a decrease in temporary impacts west of the agricultural area of 5.3 acres, giving a net increase in temporary impacts in California of 4.5 acres. All impacts will be temporary and located on non-federal lands; all of the construction disturbance areas in the California agricultural area will ultimately be restored to pre-construction conditions.

Compensation for temporary impacts to potential modeled Couch's spadefoot toad habitat would include habitat restoration or enhancement with similar species compositions to those present prior to construction at a ratio of 1:1 on Bureau of Land Management (BLM) managed lands, and 1.5:1 (MM WIL-CEQA-9) for lands subject to CPUC/CEQA requirements where restoration of conditions of the impacted areas within the Project footprint shall be at 1:1; and creation, restoration, or enhancement of similar vegetation communities offsite shall be 0.5:1, as approved by CDFW and CPUC. Permanent impacts would be mitigated at a ratio of 1:1 on BLM-managed lands and 3:1 for lands subject to CPUC/CEQA requirements, where compensation will include: a) off-site creation, enhancement, and/or preservation; and/or b) participation in an established mitigation bank program. As part of refinements made to the project, there will be a decrease in permanent impacts to modeled Couch's spadefoot toad habitat west of the agricultural area of 1.1 acres. Since these impacts are currently being offset at a 3:1 ratio, the decrease in permanent impacts would offset 3.3 acres of required offsite compensatory mitigation. As such, and given the 0.5:1 compensation ratio for temporary impacts that would require approximately 2.25 additional offsite compensatory mitigation, DCRT would not need to acquire any additional offsite compensatory mitigation acres for the additional impacts to Couch's spadefoot toad modeled habitat resulting from the mapping changes.

In closing, this memorandum clearly shows that impacts to all but one sensitive species requiring compensatory mitigation have decreased based on current project refinements presented in the January 2022 POD. All previously approved off-site compensatory acreages will remain the same as presented in Tables 2-1 and 2-2 of the CMP.



Although there will be a net increase of 4.5 acres in temporary impacts to Couch's spadefoot toad modeled habitat on non-federal lands, the off-site compensatory mitigation for this increase will be offset by a decrease of 1.1 acres of permanent impact to this species.