

Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-02

To: ENERGY DIVISION
Prepared by: Paul Yamazaki
Title: Senior Biologist
Dated: 04/02/2014

Question BIO-02:

Biological Resources

BIO-2 The ROW passes through four Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) conservation areas. Conservation objectives for each of them include sand source, sand transport, or both. Please indicate how the project could affect sand source and sand transport and any measures that will be taken to avoid or mitigate impacts.

Response to Question BIO-02:

The Proposed Project would not have a measurable or significant impact on sand transport other than to potentially contribute to a slight increase in total sand volume being transported during construction, due to exposure of soils and loose sand to windy conditions during construction activities. In general, the project would not create impediments to sand transport and would not significantly alter the existing conditions through Segments 5 & 6.

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Prepared by: Paul Yamazaki
Title: Senior Biologist
Dated: 04/02/2014

Question BIO-06a:

Biological Resources

BIO-6 Botanical Resources survey report (BRC 2013).

a. The Botanical Resources survey report states that LSA performed botanical surveys of the ten staging yards, rather than BRC. It is not clear if the LSA data is included in the BRC report. Please verify that the botanical survey results for the staging yards are included in the BRC report, or provide these results.

Response to Question BIO-06a:

A stand-alone botanical report was not prepared for the 10 staging yards as the yards were highly disturbed and plant species were primarily ruderal with no special-status species detected. Botanical Survey results for the 10 staging yards were included in the PEA and discussed in Section 4.4.5.1 Impact Assessment by Project Component and shown on Figure 4.4-3 – Land Cover and Figure 4.4-4 – Special-Status Species Observations. In the BRTR, results were depicted on figures in Appendix O, Land Cover and Appendix P, Special-Status Species Observations. The results were incorporated into these documents directly.

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Question BIO-06e:

Biological Resources

BIO-6 Botanical Resources survey report (BRC 2013).

e. Please indicate if botanical surveys will be done to determine if any rare fire-followers are found in the recent Summit Fire burn area.

Response to Question BIO-06e:

None of the special-status plant species with a potential to occur in the Project area are considered strict fire follower species (Chester 2013). Fire follower species bloom only immediately after a fire, or appear only after a fire and then persist for a few years. Plummer's mariposa lily (*Calochortus plummerae*), Payson's jewel flower (*Caulanthus simulans*), and Latimer's woodland gilia (*Saltugilia latimeri*) may be more abundant after fire due to reduced competition from shrub species and more sunlight, but are not dependent on fire (Sanders pers. comm.).

During the 2012 and 2013 surveys, mariposa lilies were observed prior to the 2013 fire; however, Plummer's mariposa lily was not positively identified. Payson's jewel flower and Latimer's woodland gilia were not observed during the 2012 and 2013 surveys. Based on the lack of pre-fire observations and absence of records for Latimer's woodland gilia and Payson's jewel flower, additional surveys in 2014 are not recommended. Due to the pre-fire occurrence of the unidentified mariposa lily species, surveys within the burn area in 2014 to positively identify if the mariposa lily species observed are indeed Plummer's mariposa lily have been recommended. However, it should be noted that Plummer's mariposa lily has been downgraded from CNPS Rare Plan Rank 1B (plant rare, threatened, or endangered in California and elsewhere) to CNPS Rare Plan Rank 4 (plant of limited distribution) and therefore definitive identification may no longer be of importance. The suitable survey time would be May through July, but given that drought conditions may persist through 2014, the probability of the species blooming in 2014 may be low.

Chester, T. 2013. Plants of Southern California: Fire-Followers. Native and Introduced Plants of Southern California. < <http://tchester.org/plants/analysis/fire/followers.html> > Accessed

March 2014.

Sanders, A. 2014. Personal communication. Botany Curator of University of California, Riverside Herbarium.

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Dated: 04/02/2014

Question BIO-09b:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

b. The Botanical Resources Assessment

Report (BRC 2012) states on page 3 that the buffer is 500 feet; the same report states on page 4 that the buffer is 100 feet. Please indicate which is correct.

Response to Question BIO-09b:

The Survey Area in the Botanical Resources Assessment Report (BRC 2012) for vegetation mapping included a 500-foot buffer from the edge of the ROW as described on page 3 of the report. However, as described on page 4, the 2012 focused special-status plant species survey area included only a 100-foot buffer from the edge of the ROW. As described later on page 4, the 2013 surveys included a 100-ft buffer for all elements except for access roads. In the case of access roads, the 2013 survey area included 200-foot buffers from the centerline for existing roads, and 250-foot buffers from the centerline for proposed roads.

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Question BIO-09c:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

c. The Botanical Resources Assessment Report (BRC 2013) states that the buffer used was 200-250 feet rather than 100 feet as stated in the PEA. Please indicate which is correct.

Response to Question BIO-09c:

To clarify, the 200–250-foot buffer used in the Botanical Resources Assessment Report (BRC 2013) was only for surveys along the access roads surveyed in 2013.

The following list is provided to help clarify the various buffer types used:

- In 2012, a 100-foot buffer from the edge of the ROW was used for the focused special-status plant species survey and a 500-ft buffer from the edge of the ROW was used for the vegetation mapping.
- In 2013, a 100-foot buffer from the edge of the disturbance areas was used for both the vegetation mapping and the focused special-status plant species survey for underground telecom lines, overhead telecom lines, and staging yards. As an exception, the surveys for the Hathaway 1 and Hathaway 2 proposed staging yards included a survey of the yard with no buffer.
- In 2013, a 200-foot buffer (for existing roads) or 250-foot buffer (for proposed roads) from the road centerline were used for the focused special-status plant species survey for access roads extending outside of the 500-ft ROW buffer, but the vegetation mapping included the entire route of all access roads.

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Dated: 04/02/2014

Question BIO-09d:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

d. The Botanical Resources Assessment Report (BRC 2013) does not provide the buffer used for survey of the transmission line alternative. Please provide this information.

Response to Question BIO-09d:

The Botanical Resources Assessment Report (BRC 2013) included a 100-ft buffer from the edge of the proposed ROW for the alternative transmission line segment and was used for both the focused special-status plant species survey and the vegetation mapping along the alternative transmission line segment.

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Dated: 04/02/2014

Question BIO-09e:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

e. The Botanical Resources Assessment Report (BRC 2013) states that the 2013 survey only covered areas outside of the 2012 survey buffer of 500 feet. If the buffer was actually 100 feet for the surveys in 2012 (as stated in the 2012 report; see question b), then a portion of the areas added to the project footprint in 2013 would not have been surveyed. Please indicate whether all areas added in 2013 and appropriate buffer areas were surveyed.

Response to Question BIO-09e:

Vegetation mapping and special status species surveys conducted in 2013 covered all areas identified as having a potential to be disturbed by construction, including those that extended more than 500 feet outside the ROW. However, they did not include an additional 100-foot buffer. The area between the 100-foot buffer and the 500-foot buffer was not surveyed for special-status plant species. The 2013 special-status plant species surveys included a 100-foot buffer for all other disturbance areas outside the ROW (e.g., telecom lines) regardless of their location in relation to the 500-foot ROW buffer with the exception of Hathaway 1 and Hathaway 2 staging yards, which did not include a 100-foot buffer.

The access roads added in 2013 were not formally surveyed for special-status plant species using a transect method between the original 100-foot 2012 plant survey buffer and the 500-foot ROW buffer. However, spot checks of suitable habitat for special-status plant species were conducted along the access roads. Vegetation mapping for this area was also completed. Please see PEA, Figure 4.4-3 - Land Cover and the BRTR Appendix O - Land Cover, which show the vegetation mapping. Beyond the 500-foot buffer, all access road special-status plant species surveys included either 200-foot or 250-foot buffers from the road centerlines.

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Prepared by: Paul Yamazaki
Title: Senior Biologist
Dated: 04/02/2014

Question BIO-09f:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

f. The 2013 California gnatcatcher (CAGN) report states that areas surveyed in 2013 included the same areas surveyed in 2012. Page 4.4-17 in the PEA, sixth bullet on the page, states "...the coastal California gnatcatcher survey included the areas surveyed in 2012, which included most of the suitable habitat within the additional identified disturbance areas." This seems to imply that the CAGN survey area was not expanded to cover the new disturbance areas added to the project in 2013, and some of these areas may have suitable habitat that has not been surveyed. Please indicate whether all areas of suitable habitat have been surveyed.

Response to Question BIO-09f:

All potentially suitable habitat patch areas within the 500-foot buffer of the proposed project elements were surveyed. Based on field visits and review of vegetation mapping, no additional potentially suitable CAGN habitat was identified within a 500-foot buffer of the added 2013 features (e.g., access roads, telecom lines, staging yards, etc.) that was not already within the 2012 survey buffer.

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Dated: 04/02/2014

Question BIO-09g:

Biological Resources

BIO-9 Survey areas, PEA pp. 4.4-16 and 17

g. The small mammal report (2012) states that the buffer is 100 feet, but the PEA says 100 to 500 feet. Please indicate which is correct.

Response to Question BIO-09g:

The 2012 Small Mammal Survey Report states that surveys “focused on the project ROW plus a 100-foot buffer.” The intent was to limit surveys to within 100 feet of the ROW, however, surveys extended further out than planned in some areas, resulting in the 100-500 feet range that was noted. In 2013, all trapping occurred within the 100-foot buffer, as indicated.

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To: ENERGY DIVISION
Prepared by: Scott Lacy, P.E.
Title: Project Engineer
Dated: 04/02/2014

Question BIO-11a:

Biological Resources

BIO-11 a. Please provide information on the existing transmission lines (height, configuration, etc.) and compare with the new transmission lines, in terms of potential collision hazards for birds.

Response to Question BIO-11a:

The new transmission lines would be installed on structures that are essentially similar (in height and configuration) to the existing double-circuit lattice steel towers that support the existing transmission lines. As such, and as described in response to Question No. BIO-11b, the potential collision hazard for birds would not be increased from the current condition. Moreover, the larger conductors will be more readily visible to avian species and would likely further reduce the expected low collision risk.

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Prepared by: Paul Yamazaki (With input from Kara Donohue)

Title: Senior Biologist

Dated: 04/02/2014

Question BIO-11b:

Biological Resources

BIO-11 b. SCE indicates that it will analyze avian collision risk (p. 4.4-114). Has the analysis been completed? If not, when will this analysis be conducted? Does SCE propose to install bird flight diverters?

Response to Question BIO-11b:

A preliminary desktop analysis of avian collision risk for the Proposed Project has been performed. The Proposed Project presents a low collision risk, based on SCE's mortality database, the line location and orientation, and the surrounding habitat. Birds on a north-south/south-north migration route would likely follow the mountains and pass over, high above the existing and proposed transmission lines. Birds flying through the pass from east to west/west to east would be flying parallel to the lines, decreasing the likelihood of collision. Habitat in the area of the project does not support species with higher collision risk such as waterfowl and shorebirds, nor does the Proposed Project bisect feeding and roosting areas for these species. Mortality records tracked by SCE do not show any known collision mortality along the existing 220 kV Transmission lines.

No markers or diverters are proposed to be installed in any segment of this project.

Also, please note the following text sections from the PEA and BRTR and comments presented along with these text sections:

PEA Biological Resources Section 4.4.5.2, CEQA Impact Assessment:

“All transmission facilities would be designed to be avian-safe, following the intent of the Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006 (Avian Power Line Interaction Committee 2006). All transmission facilities would be evaluated for potential collision risk and, where determined to be high risk, lines would be marked with collision reduction devices in accordance with Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (Avian Power Line Interaction

Committee 2012).”

As noted above, the transmission lines associated with the Proposed Project are deemed to present a low risk of collision, thus no marking would be warranted.

BRTR Section 5.6 Migrating Birds:

“Additionally, although mortality from power line collisions is possible, the probability of this occurrence would not be substantially different from current conditions, as the Proposed Project involves the removal and replacement of existing transmission lines within an existing transmission line ROW. Therefore, this possible effect is not expected to be significant.”

It is important to recognize that the Proposed Project involves replacement of existing transmission lines with new, double-bundled conductors. Rather than increasing the risk of collision, the larger conductors will be more readily visible to avian species, and therefore would further reduce the expected low collision risk.

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Dated: 04/02/2014

Question BIO-12:

Biological Resources

BIO-12 Desert kit fox is protected under California Fish and Game code, is a species of public interest, and has recently suffered losses due to distemper. The eastern part of the route is in kit fox range, but the PEA does not address this species. Please estimate the number of desert kit fox pairs that may occur on the project alignment.

Response to Question BIO-12:

The desert kit fox of the Coachella Valley (*Vulpes macrotis arsipus* , depending upon which taxonomy is followed; although subspecies generally are no longer recognized within the kit fox taxa) does not appear on the State of California's Special Animals list and so was not included in the list of target species addressed in the PEA or previous studies. This species is not normally addressed in environmental documents covering areas in the Coachella Valley, but is mentioned in the CV-MSHCP along with coyote and other species that use corridors or linkages. Only the subspecies *V.m. mutica* of the San Joaquin Valley is included on the Special Animals list as it is considered Endangered and Threatened by the Federal and State wildlife agencies, respectively. However, the desert kit fox is protected under California Fish and Game Code Chapter 5 §460 as a fur-bearing mammal and "may not be taken at any time."

Desert kit fox has been recorded historically at Palm Springs and Morongo Pass and may still occur within the West of Devers study area, although no evidence of the species' presence was found during the current surveys or been reported in recent environmental documents for this project. This species is not known from the Project area based on CNDDDB records or field surveys. Therefore, estimating population size is not possible due to lack of sufficient data.

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Question BIO-13:

Biological Resources

BIO-13 Has SCE initiated its permitting processes with the California Department of Fish and Wildlife (CDFW; Lake and Streambed Alteration Agreement and California Endangered Species Act Incidental Take Permit), Regional Water Quality Control Board (Clean Water Act [CWA] Section 401), U.S. Army Corps of Engineers (CWA Section 404) or Bureau of Land Management and U.S. Fish and Wildlife Service (Endangered Species Act Section 7)? Please provide copies of project-related correspondence with each agency.

Response to Question BIO-13:

SCE has not initiated the permit processes for the biological and water quality permits listed in this question. The permitting process may be initiated following the engineering refinements scheduled to be completed in June 2014, or after the completion of final engineering. SCE would initiate the permit process once the engineering design allows for a more precise calculation of impacts in the permit applications.