

Environmental Minor Project Refinement Form



Project Name: West of Devers Upgrade Project Request Prepared By: Sylvia Granados

Date Approval Required: _____ Variance Request No.: 55

Date Submitted: November 1, 2023 Location: Project-wide; Segments 1-6 - RESTORATION.

Features, Landowners, Associated Parcel Numbers:

Affected Supersite	Property Owner	Assessor's Parcel Number
All Sites		

Current Vegetative Cover/Land Use: All native habitat types being restored/revegetated per the HRRP following temporary impacts: Alluvial Scrub, Coast Live Oak Woodland, Coastal Sage Scrub, Chaparral, Desert Scrub, Riparian Woodland Habitat Types

Existing Sensitive Resource? YES Specify: All habitat types as listed above

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

Specify Source (e.g., Mitigation Measure B.5): Success Criteria, HRRP Section 4.2.2

Description of Change and Justification (Attach additional sheets if needed.)

Attachments:

CONSTRUCTION DRAWING ADDITIONAL ENVIRONMENTAL ANALYSIS CORRESPONDENCE OTHER:

Proposed MPR Areas and Associated Disturbances:

A Minor Project Refinement (MPR) is requested to update the habitat restoration success criteria in the West of Devers Habitat Restoration and Revegetation Plan (HRRP) and the Invasive Weed Management Plan (IWMP) for the West of Devers Upgrade Project. Specifically, the success criteria listed in HRRP Section 4.2.2 and IWMP Section 4.3.2 refers to relative amounts of native and non-native cover within a given restoration area. While the success criteria has good merit, the goal is not achievable, given pre-construction site conditions exceed the criteria, high levels of ambient weed levels of surrounding areas influence the restoration sites, and the sites cannot support the maximum density of native plants required to meet the criteria.

Resources:

Biological NO SENSITIVE RESOURCES PRESENT SENSITIVE RESOURCES PRESENT N/A

New Survey Report Attached: YES NO N/A

If No, Previous Biological Survey Reference:

Cultural: NO RESOURCES PRESENT RESOURCES PRESENT WITH PROJECT APE: YES NO N/A

Other Potential Impacts: (Check any potential changes to permitted impacts and provide details below. Attach additional sheets if needed.)

AIR QUALITY LAND USE TRAFFIC
 BIOLOGICAL RESOURCES NOISE VISUAL

- CONTAMINATED SOILS
- CULTURAL RESOURCES
- HAZARDOUS MATERIALS

- PALEO RESOURCES
- SOCIOECONOMIC
- STORM WATER (SWPPP)

- WATER RESOURCES
- WETLANDS

NA

CEQA and Permitting: (Provide details for any “Yes” answer and attach additional information if needed.)

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

Conditions of Approval or Reasons for Denial: (Attach additional information if needed.)

ISSUE

Text from HRRP Section 4.2.2 and IWMP Section 4.3.2:

Success Criteria from HRRP Table 4-3.

Vegetation Type	Success Criteria Native Vegetation
Alluvial Scrub	80 percent of vegetation cover or equivalent to pre-disturbance or reference cover, whichever is greater, shall be native species that occur naturally in local native habitats.
Coast Live Oak Woodland	
Coastal Sage Scrub	
Chaparral	
Desert Scrub	
Riparian Woodland	

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up the majority (80 percent) of vegetation cover, while recognizing the fact that non-native species will invade the site and will realistically comprise a portion (limited to 20 percent or less) of the total cover. This criteria compares native and non-native cover within a site but it does not compare a revegetation site to reference sites or pre-disturbance condition.

For example, if a 10,000-square-foot revegetation site has total (i.e., absolute) vegetation cover of 60 percent (i.e., 6,000 square feet of the site covered by plants), comprising 4,800 square feet of native plants and 1,200 square feet of non-native plants, this criteria would be met.

HRRP Table 4-4. Success Criteria Scenarios
 Revegetation site absolute cover

Reference Site Absolute Native Cover	Required Minimum Native Cover (60% x Reference Native Cover)	Maximum Non-Native Cover	Total Absolute Cover
100%	60%	15%	75%
90%	54%	13.5%	67.5%
80%	48%	12%	60%
70%	42%	10.5%	52.5%
60%	36%	9%	45%
50%	30%	7.5%	37.5%
40%	24%	6%	30%
30%	18%	4.5%	22.5%

20%	12%	3%	15%
10%	6%	1.5%	7.5%

^a Assumes minimum required native cover from column 2.

^b Assumes minimum native cover + 20% max non-native relative cover. For all rows, the ratio of native to non-native cover is 80:20

ANALYSIS

Pre-project conditions are not consistent with the HRRP and IWMP success criteria and would not meet the success criteria prior to disturbance.

Pre-project native and non-native vegetation cover was collected for each restoration area. This pre-project data also reflects the native and non-native cover of areas surrounding the restoration areas (reference sites) both pre- and post-project. Analysis of pre-project restoration area conditions indicates only 10 percent (27 of 268) of the restoration areas would meet the 80 percent relative native to 20 percent non-native cover success criteria. This shortfall is largely due to temporarily impacted project areas (restoration areas) including disturbed habitats with higher non-native cover. When grouped into vegetation types, pre-project native plant cover averages 53 percent- *Coastal sage scrub vegetation types*, 50 percent- *Chaparral habitat types*, and 32 percent- *Desert vegetation types*, with non-native plant cover averaging 33 percent, 38 percent, and 30 percent, respectively (See table below). On average, bare ground in these habitat types accounts for 14 percent- *Coastal sage scrub vegetation types*, 13 percent- *Chaparral habitat types*, and 39 percent- *Desert vegetation types*.

Pre-Project Native: Non-Native Relative Cover by Vegetation Type

Vegetation Type	Native Cover	Non-Native Cover	Relative Cover
Coastal Sage Scrub	53	33	62:38
Chaparral	50	38	57:43
Desert	32	30	52:48

As a result, if the 80:20 success criteria were to be applied, restoration areas would, on average, need to have a post-restoration reduction in **absolute** non-native cover of 25 percent- *coastal sage scrub vegetation types*, 30.5 percent- *chaparral habitat types*, and 25.2 percent- *desert vegetation types* when compared to pre-project conditions and adjacent non-native plant cover (see table-below). Because of the high non-native cover and constant influence of non-native species encroachment into the revegetation areas, this success criteria is likely not achievable.

Non-Native Cover Reduction Required by Habitat Type

Vegetation Type	Native Cover Success Criteria (60% of Pre-Project Native Cover)	Non-Native Cover Maximum Tolerance with 80:20 Success Criteria	Reduction in Non-Native Cover compared to Pre-Project Conditions
Coastal Sage Scrub	31.8	8	-25%
Chaparral	30	7.5	-30.5
Desert	19.2	4.8	-25.2

PROPOSED REVISION

SCE proposes adjusting the success criteria to have the restoration areas relative native cover to non-native cover ratio **equivalent or better** than pre-project site conditions, on a site-by-site basis. Under this criteria, habitats with higher native cover and lower non-native cover pre-project, will be restored to similar or better conditions. For example, sites with 70 percent native cover and 10 percent non-native cover would be restored to a relative cover of 87.5:12.5 or better, While areas with high non-native cover would have a greater tolerance for non-native species and be restored to similar or better conditions compared to pre-project. For example, sites with 30 percent native cover and 20 percent non-native cover would be restored to a relative cover of 60:40 or better, which is lower than the current criteria.

Specifically, restoration site M12-T2, classified pre-project as *Acacia greggii* shrubland had 42 percent native cover and 28 percent non-native cover; a native to non-native ratio of 60:40 (See Table 5 below). To meet success criteria, the restoration site would need to have a minimum of 25.2 percent native cover (60% native cover compared to pre-project conditions) and 16.8 percent non-native cover to meet the 60:40 native to non-native cover ratio, an 11.2 percent reduction in non-native cover compared to pre-project conditions.

Restoration Area M12-T2

Site ID	Vegetation Type	Pre-Project Conditions			Restoration Success Criteria	
		Native Cover (%)	Non-Native Cover (%)	Native: Non-Native Ratio	Native Cover (%)	Maximum Non-Native Cover (%)
M12-T2	<i>Acacia greggii</i> shrubland	42	28	60:40	25.2	16.8

REVISED SUCCESS CRITERIA

Revised Success Criteria from HRRP Table 4-3.

Vegetation Type	Success Criteria Native Vegetation
Alluvial Scrub	Relative native cover to non-native cover ratio must be equivalent or better than pre-project site conditions, on a site-by-site basis.
Coast Live Oak Woodland	
Coastal Sage Scrub	
Chaparral	
Desert Scrub	
Riparian Woodland	

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up a similar or greater proportion of vegetation cover than was present prior to the project disturbance.

For example, if a revegetation site has an absolute native vegetation cover of 60 percent, and non-native vegetation cover of 10 percent; a relative vegetation cover of 86 percent native to 14 percent non-native cover or greater must be achieved to meet the success criteria.

DETAILED REVISION

Success Criteria from HRRP Table 4-3.

Vegetation Type	Success Criteria Native Vegetation
Alluvial Scrub	<u>Relative native cover to non-native cover ratio must be equivalent or better than pre-project site conditions, on a site-by-site basis.</u> 80 percent of vegetation cover or equivalent to pre-disturbance or reference cover, whichever is greater, shall be native species that occur naturally in local native habitats.
Coast Live Oak Woodland	
Coastal Sage Scrub	
Chaparral	
Desert Scrub	
Riparian Woodland	

The success criteria refers to relative amounts of native and non-native cover within a given revegetation area. The criteria requires that native species make up a similar or greater proportion ~~the majority (80 percent)~~ of vegetation cover than was present prior

to the project disturbance, while recognizing the fact that non-native species will invade the site and will realistically comprise a portion (limited to 20 percent or less) of the total cover. This criteria compares native and non-native cover within a site but it does not compare a revegetation site to reference sites or pre-disturbance condition.

For example, if a 10,000-square-foot revegetation site has an total (i.e., absolute) native vegetation cover of 60 percent, and non-native vegetation cover of 10 percent; a relative vegetation cover of 86 percent native to 14 percent non-native cover or greater must be achieved to meet the success criteria. (i.e., 6,000-square feet of the site covered by plants), comprising 4,800 square feet of native plants and 1,200 square feet of non-native plants, this criteria would be met.

HRRP Table 4-4. Success Criteria Scenarios

~~Revegetation site absolute cover~~

Reference Site Absolute Native Cover	Required Minimum Native Cover (60% x Reference Native Cover)	Maximum Non-Native Cover	Total Absolute Cover
100%	60%	15%	75%
90%	54%	13.5%	67.5%
80%	48%	12%	60%
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~~a Assumes minimum required native cover from column 2.~~

~~b Assumes minimum native cover + 20% max non-native relative cover. For all rows, the ratio of native to non-native cover is 80:20.~~

Required Signatures: (Attached email approvals may be used in lieu of signatures.)

Environmental Compliance Lead: APPROVED APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) DENIED

Name: Sylvia Granados Signature: *Sylvia Granados* Date: 11/01/2023