CALIFORNIA PUBLIC UTILITIES COMMISSION

HORIZON WEST TRANSMISSION, LLC'S IRONWOOD TRANSMISSION LINE PROJECT

Scoping Report

November 2026



Application No.: A.25-09-008
State Clearinghouse No.: 2026080073

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TABLE OF CONTENTS

1.0 INTRODUCTION 1-1

2.0 DESCRIPTION OF THE PROJECT 2-1

2.1 Project Summary 2-1

2.2 Project Location 2-1

3.0 SCOPING PROCESS 3-1

3.1 Notification 3-1

3.2 Opportunities for Comment 3-1

3.2.1 Scoping Meetings 3-1

3.2.2 Agency Consultation 3-2

4.0 SCOPING COMMENTS 4-1

4.1 Issues to be Considered under CEQA 4-3

4.1.1 Aesthetics 4-3

4.1.2 Air Quality 4-4

4.1.3 Biological Resources 4-4

4.1.4 Cultural Resources 4-7

4.1.5 Geology and Soils 4-8

4.1.6 Hazards and Hazardous Materials 4-8

4.1.7 Land Use and Planning 4-9

4.1.8 Noise 4-9

4.1.9 Recreation 4-10

4.1.10 Transportation 4-13

4.1.11 Tribal Cultural Resources 4-14

4.1.12 Wildfire 4-16

4.1.13 Alternatives 4-16

4.1.14 Cumulative Impacts 4-17

4.2 Issues Not to be Analyzed under CEQA 4-17

4.2.1 Electric and Magnetic Fields 4-18

4.2.2 Economics-Related Comments Received 4-18

4.2.3 Project Need-Related Comments Received 4-19

4.2.4 General Comments Received....4-19

LIST OF TABLES

Table 4-1. Parties that Submitted EIR Scoping Comments.... 4-1

LIST OF APPENDICES

Appendix A – State Clearinghouse Documentation and Notice of Preparation Mailing Lists

Appendix B – Notice of Preparation and Scoping Meeting Notice

Appendix C – County Clerk Posting and Newspaper Proof of Publication

Appendix D – Scoping Meeting Presentation

Appendix E – Scoping Meeting Transcripts

Appendix F – Written Scoping Comments

1.0 INTRODUCTION

Horizon West Transmission, LLC (HWT, or the Applicant), in its application (A.25-09-008) filed on September 22, 2025 with the California Public Utilities Commission (CPUC), requested a Certificate for Public Convenience and Necessity (CPCN) for the Ironwood Transmission Line Project (Project). The CPUC is the lead agency for the purposes of California Environmental Quality Act (CEQA) review. Based on its review of the application and the Proponent's Environmental Assessment (PEA), the CPUC is preparing an Environmental Impact Report (EIR) to evaluate the potential effects of the Project, pursuant to CEQA.

The CPUC issued a Notice of Preparation (NOP) of an EIR for the Project on August 7, 2026 to solicit agency consultation and public input on the scope and content of information that will be assessed in the EIR (Public Resources Code [PRC] Section 21080.4(a); CEQA Guidelines Sections 15082(b), 15083). This public and agency participation process is known as *scoping*. CEQA Guidelines Section 15083 provides that a "Lead Agency may…consult directly with any person…it believes will be concerned with the environmental effects of the project." Section 15083(a) states that scoping can be "helpful to agencies in identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important." Scoping is "an effective way to bring together and consider the concerns of affected federal, state, and local agencies, the proponent of the action, and other interested persons" (CEQA Guidelines Section 15083(b)).

This scoping report provides an overview of the scoping activities conducted for the Project as well as a summary of all written and oral comments provided by agencies and individuals during the 45-day scoping period, which commenced with the publication of the NOP on August 7, 2026 and closed on September 21, 2026. Input received during this scoping period will be used to inform the preparation of the Draft EIR. Pursuant to CEQA Guidelines Section 15082, all public comments within the scope of CEQA will be considered in the EIR process.

Because portions of the Project would cross federal lands administered by the U.S. Bureau of Land Management (BLM), the Project is also subject to review under the National Environmental Policy Act (NEPA). The BLM will be the federal lead agency for the NEPA review process. The CPUC and BLM will coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review will remain separate decision-making processes. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA. This scoping report only covers the results of the CEQA scoping process.

2.0 DESCRIPTION OF THE PROJECT

2.1 Project Summary

The Project would involve the construction, operation, and maintenance of a new approximately 86-mile-long 500 kilovolt (kV) transmission line between the Arizona Public Service Company's (APS) North Gila Substation in western Yuma County, Arizona and San Diego Gas and Electric Company's (SDG&E) Imperial Valley Substation in Imperial County, California. The Project would traverse a combination of federal, state, and private lands, including lands administered by the BLM.

Major Project components would include installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, and related activities. The Project would also include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities.

Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary work facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system. Construction is estimated to take approximately 19 months.

2.2 Project Location

The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County, California.

3.0 SCOPING PROCESS

3.1 Notification

The CPUC circulated the NOP for the Project on August 7, 2026, beginning a 45-day comment period on the scope and content of the EIR and announcing two public scoping meetings. The NOP was provided to the State Clearinghouse (SCH) of the Governor's Office of Land Use and Climate Innovation (LCI) which assigned SCH No. 2026080073 as the Project's unique State identification number for the CEQA review. The NOP was mailed to responsible and trustee agencies, other agencies, tribes, organizations, and property owners within 300 feet of existing and proposed project right-of-way in accordance with the requirements of CEQA Guidelines Sections 15082(a) and 15082(c)(2). The NOP provided a brief description of the Project and location, identified potential areas of environmental impacts, and provided a notice for two virtual public scoping meetings, which were held on Thursday, August 27, 2026. Appendix A includes documentation of the State Clearinghouse submittal and the mailing list of agencies and organizations that were directly mailed the NOP to street or electronic addresses. Appendix B includes a copy of the NOP and scoping meeting notice.

The NOP was also posted on August 6, 2026 with the Imperial County Clerk-Recorder. To announce the release of the NOP and provide details about the public scoping meetings, the CPUC published legal notices in the following newspapers: Adelante Valley, Calexico Chronicle, Holtville Tribune, Imperial Valley Weekly, and Imperial Valley Press. Proof of the postings and newspaper publications are provided in Appendix C. The meeting announcement and an electronic copy of the NOP was also posted on the CPUC's website for the Project at: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html.

3.2 Opportunities for Comment

3.2.1 Scoping Meetings

The CPUC conducted two virtual scoping meetings on August 27, 2026. The meetings were held at 3:00 p.m. and 6:30 p.m. Attendance was 44 people at the 3:00 p.m. meeting and 21 people at the 6:30 p.m. meeting. Michelle Wilson of the CPUC; Anne Surdzial of ECORP Consulting, Inc. (ECORP), consultant to the CPUC; and Joan Isaacson of Kearns & West, subconsultant to ECORP hosted the meetings. Spanish interpretation was provided.

During the meetings, the CPUC, supported by ECORP, gave a presentation that summarized the lead agency's decision and environmental review process and noted the opportunities for public participation within the CEQA process. A brief description of the Project identified by HWT in its PEA was presented and the range of environmental issue areas to be addressed in the EIR was provided. The scoping meeting presentation also included a discussion about the types of alternatives that can be considered in the EIR and the next steps in the environmental review process. Following the presentation, the public was provided with an opportunity to submit oral and/or written comments. A copy of the scoping meeting presentation is included in Appendix D.

3.2.2 Agency Consultation

The CPUC has conducted early outreach to local agencies and officials and resource agencies to inform them about the upcoming Project and its scoping period. Agencies and officials contacted included the BLM, California Department of Fish and Wildlife (CDFW), and California Department of Parks and Recreation (CDPR). The CPUC conducted regular meetings with BLM before and during the scoping period and will continue to conduct regular meetings with the BLM throughout the CEQA process. The CPUC met with CDPR on May 5, 2026 and CDFW on September 9, 2026 to receive input on the scope of the EIR analysis.

The CPUC met with the Fort Yuma Quechan Indian Tribe (Kwatsáan) on June 18, 2026 and August 3, 2026 and will continue tribal consultation with the Tribe pursuant to Assembly Bill 52.

4.0 SCOPING COMMENTS

Four members of the public provided oral comments on the Project during the August 27, 2026 scoping meetings. Transcripts from the virtual scoping meetings are included in Appendix E.

The CPUC received 45 written comments during the scoping period. Copies of the written comments are provided in Appendix F. Commenting parties are listed in Table 4-1 and summaries of the issues identified by the commenters are provided in Section 4.1, Issues to be Considered under CEQA, and Section 4.2, Issues Not Analyzed under CEQA.

Table 4-1. Parties that Submitted EIR Scoping Comments

Name	Organization/Affiliation*	Date
Oral Comments		
Reece Pettersen	Community Member	08/27/2026
Gail Overton	Resident, Imperial County; Sierra Club Member	08/27/2026
Nicholas Heatwole	U.S. Bureau of Reclamation (USBR), Yuma Area Office	08/27/2026
Daniel Steward	U.S. Army, Yuma Proving Ground (YPG)	08/27/2026
Written Comments		
Lisa Cumper	Tribal Historic Preservation Officer (THPO), Jamul Indian Village of California	08/05/2026
Roger Bushong Jr.	Community Member	08/19/2026
Nelson Wallace	Community Member	08/20/2026
Reece Pettersen (Letter 1)	Community Member	08/21/2026
Reece Pettersen (Letter 2)	Community Member	08/21/2026
Don Wilson	Community Member	08/22/2026
Gail Overton	Community Member	09/01/2026
Andrew Green	Native American Heritage Commission	09/02/2026
Timothy Hawk	Community Member	09/07/2026
Don Amador	Motorcycle Industry Council (MIC), Specialty Vehicle Institute of America (SVIA), Recreational Off-Highway Vehicle Association (ROHVA)	09/16/2026
Paul Aguirre	Resident, Riverside, CA	09/16/2026
Daniel French	Resident, Los Angeles, CA	09/16/2026
Gael Garcia	Resident, Imperial Valley, CA; Imperial Valley Equity & Justice	09/16/2026
Isamay Sandoval Pasillas	Resident, Imperial County, CA	09/16/2026
Tierra Shelmire	Resident, Orange, CA	09/16/2026
Carrie Brown	Resident, Bishop Paiute Tribe	09/17/2026

Table 4-1. Parties that Submitted EIR Scoping Comments		
Name	**Organization/Affiliation***	**Date**
Gabby Emerson	Resident, Kwatsan Reservation	09/17/2026
Sherri Levek	Resident, Yuma, AZ	09/17/2026
Abigail Maze	Resident, Yuma, AZ	09/17/2026
Rosalinda McDonald	Resident, Winterhaven, CA	09/17/2026
Alena Pastores	Resident, Riverside, CA	09/17/2026
Janeen Powers	Quechan Tribe Member; Realty Specialist, Reno Sparks Indian Colony	09/17/2026
Kris Urbanrezlife Longoria	Resident, San Leandro, CA	09/17/2026
Edith Weber	Resident, Yuma, AZ	09/17/2026
Lycia Ortega	Resident, Fort Yuma Quechan Indian Tribe Citizen	09/18/2026
Nicolette Gomez	Resident, Yuma, AZ	09/19/2026
Nathaniel James	Community Member	09/19/2026
Alex Ray	Resident, Clatskanie, OR	09/19/2026
Kacy Strong	Quechan Tribe Member; Resident, Red Lodge, MT	09/19/2026
Sisko Stargazer	Resident, Yuma, AZ	09/20/2026
Daniel Steward and Dan Carter	U.S. Army Garrison Yuma Proving Ground	09/20/2026
Xia Cachora	Resident, Yuma, AZ	09/21/2026
Andie Cuesta	Resident, El Centro, CA	09/21/2026
Paula Jacoby-Garrett	Friends of Avi Kwa Ame National Monument	09/21/2026
Mary Ann Jessen	Community Member	09/21/2026
Robert Johnson	Resident, Yuma County, AZ	09/21/2026
Benjamin Kantner	Resident, Los Angeles, CA	09/21/2026
Sara Lockett and Ray Lennox	California State Parks, Ocotillo Wells District	09/21/2026
José Manzo	Resident, Mecca, CA	09/21/2026
H. Jill McCormick (Letter 1)	Historic Preservation Office, Fort Yuma Quechan Tribe	09/21/2026
H. Jill McCormick (Letter 2)	Fort Yuma Quechan Tribe	09/21/2026
Morgan Sjogren	Resident, Escalante, UT	09/21/2026
Bea Vizcarra	Community Member	09/21/2026
Rose Winn	California Four Wheel Drive Association (Cal4Wheel)	09/21/2026
Magdalena Rodriguez and Brandy Wood	California Department of Fish and Wildlife	09/21/2026

* Organization/Affiliation information is stated as provided by the commenter in the oral or written comment

4.1 Issues to be Considered under CEQA

The following discussions are summaries of the issues identified by the public that will be considered under CEQA in the EIR. The summaries are grouped by topic as outlined in the CEQA Guidelines Appendix G Environmental Checklist Form, which will be used to prepare the Project's Draft EIR.

4.1.1 Aesthetics

Three commenters noted concern for the visual impact of new transmission towers, access roads, vegetation clearing, staging areas, and associated infrastructure across the desert landscape. One commenter noted that the area's open visual character is integral to the dune experience.

Two commenters requested that a visual simulation/visual resource analysis be integrated into the recreational analysis of the Draft EIR. The commenters requested the preparation of visual simulations from representative recreation viewpoints, including overlooks, public roads, major BLM Off-Highway Vehicle (OHV) routes, Dune Buggy Flats, Buttercup, campground approaches, Heber Dunes State Vehicular Recreation Area (SVRA), and other locations identified through stakeholder ground-truthing. One commenter stated the Draft EIR should evaluate whether the Project would substantially change the character of a recreation area by reducing scenic qualities that contribute to its recreational value.

One commenter, the MIC/SVIA/ROHVA Associations, recommended that the Draft EIR evaluate visual impacts from the perspective of recreation users, including motorcycle, ATV, side-by-side and four-wheel-drive users traveling through the affected landscapes.

One commenter, the MIC/SVIA/ROHVA Associations, requested that the Draft EIR include the following mitigation measure related to aesthetics:

- Visual Mitigation. Require additional consideration of structure placement, alignment, color, design, vegetation treatment and other measures that can reduce visual contrast from recreation areas and travel corridors.

One commenter, the Friends of Avi Kwa Ame National Monument, requested the CPUC to fully evaluate and avoid potential impacts on scenic values. Two commenters noted that the integrity of sacred places and sensitive cultural landscapes depend on their setting, viewsheds, quietude, access, and relationships to surrounding sacred locations.

One commenter, the Fort Yuma Quechan Indian Tribe, stated that the proposed transmission line, new and improved roads, grading, vegetation clearing, construction and staging areas, equipment access, maintenance routes, and other project components will create disturbances, including visual intrusion, across the landscape.

One commenter, California State Parks, noted that the proposed trellis design of the transmission towers on the proposed route increases the on-site footprint and visibility of the proposed transmission line at Heber Dunes SVRA. All options, including alternative routes and pole design alternatives, should be fully evaluated during environmental review, particularly for impacts on day use facilities.

4.1.2 Air Quality

One commenter requests that the Draft EIR independently quantify and evaluate regulated particulate matter (PM_{10} and $PM_{2.5}$) from grading, excavation, disturbed sand, and travel on unpaved roads; diesel particulate matter; emissions from helicopters, trucks, and construction equipment; maximum daily emissions from crews operating concurrently; localized pollutant concentrations near camping and gathering areas; and dust generation or re-entrained after construction.

One commenter states the Draft EIR should consider enforceable dust-control measures, monitoring at occupied camping areas, and stop-work thresholds based on wind, visibility, and measured particulate levels.

One commenter, California State Parks, requested that Project Applicant establish a project-specific Dust Control Plan to meet local and state air quality standards. California State Parks also noted that dune stabilization should not be considered within Heber Dune SVRA as natural sand transport is a crucial ecological process, and stabilization would also adversely affect recreational experience. Unexpected substrate changes can also be hazardous to OHV recreationalists as vehicle handling changes across different terrain.

4.1.3 Biological Resources

Two commenters provided information regarding the presence of bats near the proposed transmission line route through the Cargo Muchacho Mountains. One commenter noted concern regarding a large colony of California endangered bats that live within abandoned mine areas along the Cargo Muchacho Mountains. Another commenter, a wildlife and bat biologist with field experience in the desert southwest and lower Colorado River region, noted the presence of the California leaf-nosed bat (*Macrotus californicus*) within the Cargo Muchacho Mountains. The commenter requested that the Draft EIR identify, evaluate, and protect known and potential roosting, maternity, foraging, and movement habitats for the California leaf-nosed bat in the Cargo Muchacho Mountains.

Two commenters provided information and recommendations regarding the flat-tailed horned lizard. The USBR noted that HWT's preferred route is proposed to cross the East Mesa Management Area for the flat-tailed horned lizard. The USBR is a signatory to the conservation agreement that implements the range-wide management strategy for the flat-tailed horned lizard, and a federal land management agency with lands within the footprint of the project. Under the USBR's range-wide management strategy, every attempt shall be made to locate projects outside of management areas and new rights-of-way may only be permitted along the boundaries of management areas only if impacts can be mitigated to avoid long-term effects to the flat-tailed horned lizards in management areas. Other new authorizations may be permitted if habitat disturbance does not pose a significant barrier to lizard movement and disturbances are 10 acres or less. If individual disturbances over 10 acres are necessary, the Interagency Coordinating Committee and the Management Oversight Group shall be contacted to provide suggestions for minimizing potential impacts to flat-tailed horned lizards. The USBR requested that a route that avoids the East Mesa Management Area be developed, carried forward, and fully analyzed within the CEQA Draft EIR.

California State Parks noted that they are broadly a signatory agency to the Flat-tailed Horned Lizard Rangewide Management Strategy. The Heber Dunes SVRA is not a signatory, and the species is not currently found at the park; however, they recommend early coordination with agencies administering Management Areas and the Flat-tailed Horned Lizard Interagency Coordinating Committee for species specific avoidance and mitigation.

One commenter requests that the EIR identify all federal- and state-listed, candidate, BLM-sensitive, and other special-status species that could be affected by the Project. The analysis should include protocol-level surveys; quantification of temporary and permanent habitat impacts; effects on flat-tailed horned lizard, Peirson's milk-vetch, desert tortoise, burrowing owl, protected riparian birds, raptors, and other special-status species; habitat fragmentation; interference with wildlife movement; bird and bat collision and electrocution risks; effects from noise, lighting, wildfire, invasive weeds, and increased predator access; indirect effects from OHV activity in sensitive habitat; and dune habitat disturbance.

One commenter, the Friends of Avi Kwa Ame National Monument, requested the CPUC to fully evaluate and avoid potential impacts on wildlife habitat as cultural landscapes are interconnected networks encompassing mountains, rivers, springs, trails, flora, fauna, ceremonial locations, stories, and traditional practices.

One commenter, the Fort Yuma Quechan Indian Tribe, noted concern for environmental degradation and wildlife habitat disruption resulting from the proposed transmission line, new and improved roads, grading, vegetation clearing, construction and staging areas, equipment access, maintenance routes, and other project components.

One commenter, the Fort Yuma Quechan Indian Tribe, noted that the Project would conflict with the proposed Protect Kw'tsán Campaign, an initiative lead by the Quechan Tribe. The initiative's goals are to protect desert landscapes, wildlife habitats and culturally significant sites within its boundaries. The Tribe noted that this desert landscape is home to several protected species and critical wildlife habitats that will be directly impacted through the creation of the transmission line and permanent access roads.

One commenter noted concern that the Project would negatively affect the desert ecosystems in Yuma, Arizona.

One commenter, California State Parks, stated that the proposed route would bisect native vegetation communities within the Heber Dunes SVRA. While these vegetation communities are not considered sensitive by the CDFW, vegetation within the California State Park System is typically protected (California Code of Regulations Title 14, Section 4306). The commenter stated avoidance or minimization should be prioritized for the 70.74 acres of native vegetation that is overlain by the proposed transmission line. Additionally, control measures for invasive species should be incorporated into the Project to avoid the transport and spread of species that could threaten or harm native species in the park.

One commenter, California State Parks, noted that construction and operation of the proposed transmission line would affect the long-standing habitat monitoring plots within the Heber Dunes SVRA, which include surveys for perennial vegetation, birds, reptiles, and small mammals. The commenter stated that work within and adjacent to Heber Dunes SVRA will need to carefully consider the potential impacts

of work on special-status species and implementation of the park's Wildlife Habitat Protection Plan (WHPP), including both temporary and permanent impacts. California State Parks' comment letter provides a list of special-status wildlife observed at Heber Dunes SVRA.

One commenter requests that the EIR consider the following mitigation measures regarding biological resources:

- Independent biological and environmental compliance monitors
- Restoration standards with multi-year monitoring and corrective action
- A publicly available complaint and incident-reporting process

One commenter, CDFW, recommended the Draft EIR include the following:

- An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type.
- A complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species.
- Discussion of special status species that the Project footprint has the potential to support including, but not limited to burrowing owl (*Athene cunicularia*), Crotch's bumble bee (*Bombus crotchii*), flat-tailed horned lizard (*Phrynosoma mcallii*), desert tortoise (*Gopherus agassizii*), pallid bat (*Antrozous pallidus*) (SSC), Townsend's big-eared bat (*Corynorhinus townsendii*) (SSC), western mastiff bat (*Eumops perotis*) (SSC), western red bat (*Lasiurus blossevillii*) (SSC), western yellow bat (*Lasiurus xanthinus*) (SSC), hoary bat (*Lasiurus cinereus*) (SSC), California myotis (*Myotis californicus*), Arizona myotis (*Myotis occultus*) (SSC), Cave myotis (*Myotis velifer*) (SSC), Yuma myotis (*Myotis yumanensis*) (SSC), Pocketed free-tailed bat (*Myctinopops ferosaccus*) (SSC), desert kit fox (*Vulpes macrotis*), American badger (*Taxidea taxus*), Crissal thrasher (*Toxostoma crissale*), Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), vermillion flycatcher (*Pyrocephalus rubinus*), summer tanager (*Piranga rubra*), California black rail (*Laterallus jamaicensis coturniculus*), least bittern (*Ixobrychus exilis*), peregrine falcon (*peregrinus anatum*), ferruginous hawk (*Buteo regalis*), Cooper's hawk (*Accipiter cooperii*), Gila woodpecker (*Melanerpes uropygialis*), double-crested cormorant (*Nannopterum auritum*), osprey (*Pandion haliaetus*), black-tailed gnatcatcher (*Polioptila melanura*), yellow warbler (*Setophaga petechia*), Colorado fringe-toed lizard (*Uma notata*), and desert bighorn sheep (*Ovis canadensis nelsoni*).
- A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.
- Species-specific surveys for special status species that the Project footprint has the potential to support, including burrowing owl, Crotch's bumble bee, flat-tailed horned lizard, desert tortoise,

Yuma Ridgway's rail, California black rail, bats, desert kit fox, American badger, desert bighorn sheep, and western spadefoot (*Spea hammondii*).

- Avian surveys and specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur.
- Discussion of foreseeable potential for impacts to wildlife corridors and habitat connectivity
- Discussion of drainage features that traverse the site
- Analysis of direct, indirect, and cumulative impacts to biological resources
- Mitigation measures for adverse Project-related impacts to biological resources

4.1.4 Cultural Resources

One commenter noted concern for cultural and spiritual land that would be affected by the proposed route.

One commenter, the Friends of Avi Kwa Ame National Monument, requested the CPUC to fully evaluate and avoid potential impacts on cultural resources. The commenter stated that the cultural significance of this region could be underestimated if the Draft EIR evaluates cultural resources merely as individual archaeological sites or discrete locations. For Indigenous communities, cultural landscapes are interconnected networks encompassing mountains, rivers, springs, trails, flora, fauna, ceremonial locations, stories, and traditional practices. A transmission corridor can profoundly affect a cultural landscape even without physically disturbing a specific archaeological site.

One commenter, the Fort Yuma Quechan Indian Tribe, noted that the Project's proposed transmission line and permanent access roads would conflict with the proposed Protect Kw'tsán Campaign, an initiative lead by the Quechan Tribe. The initiative's goals are to protect desert landscapes, wildlife habitats and culturally significant sites within its boundaries.

One commenter requested the CPUC to fully evaluate and establish avoidance as the preferred approach wherever Tribal Nations identify sacred places, sensitive cultural landscapes, or areas where development would interfere with cultural practices.

One commenter, California State Parks, noted that temporary protection measures have been established for a cultural resources site that has been identified within Heber Dunes SVRA and that California State Parks is currently consulting with local California Native American tribes to protect the resources in the long-term. California State Parks states the Project's proposed transmission corridor and access roads would impact a site that is culturally significant and should be classified as a Tribal Cultural Resource under CEQA. It is probable that additional cultural resources are present under the existing sand dunes; measures for inadvertent discovery of cultural resources, including ancestral remains, must be incorporated into the Project to address potentially significant impacts to cultural resources. Additionally, California State Parks recommended including tribal cultural resource monitors for the Project, particularly during ground disturbance, clearing of sand, brush, or similar cover that would expose new soils, and other activities that could adversely affect cultural resources.

One commenter requested that the Draft EIR include detailed consideration of the Valley of Names and other remote desert recreation areas as they contain primitive roads, historic sites, and geologic features. The commenter states the Plank Road historic marker as an area that combines historic, scenic, educational, and recreational values that can be affected by the proposed transmission structures.

The summary of comments related to Tribal Cultural Resources is provided in Section 4.1.11. Some of the Tribal Cultural Resources described in Section 4.1.11 may also be Cultural Resources and some of the cultural resources described in this section may also be Tribal Cultural Resources as defined by CEQA.

4.1.5 Geology and Soils

Two commenters noted concerns with dune morphology. One commenter noted that the soft moving sand of the sand dunes can cause issues for any structure placed in the sand and prevent heavy equipment to move in and out of the sand dunes. The commenter also noted that blowing sand will undermine the stability of concrete platforms and result in more maintenance to the towers. One commenter stated the Draft EIR should evaluate whether roads, foundations, grading, and stabilization would alter natural dune movement, sand transport, erosion patterns, or the area's geologic character.

One commenter, California State Parks, noted that Heber Dunes SVRA is composed of lacustrine deposits from ancient Lake Cahuilla, with late Holocene dune sands covering portions of these deposits. A 2024 paleontological survey conducted by the San Diego Natural History Museum indicates that the proposed transmission route is within an area considered to have low paleontological potential, although areas immediately north are classified as moderate (Mueller et al., 2024). If the Project includes work in areas with moderate paleontological potential at the park, specifically in Lake Cahuilla deposits, potential impacts to paleontological resources should be mitigated. California State Park's recommendations included paleontological monitors during ground disturbance, documentation of both stratigraphic and geographic context, recovery and identification of paleontological resources, and curation of recovered fossils at an appropriate location.

One commenter, California State Parks, stated that further assessment is needed to determine site suitability and conformance with appropriate building codes given the proposed transmission route's proximity to the Imperial Fault, an Alquist-Priolo Earthquake Fault Zone mapped along the southern part of the Heber Dunes SVRA.

4.1.6 Hazards and Hazardous Materials

Three commenters noted concern that the proposed transmission towers within or adjacent to active motorized terrain could create collision and visibility issues. One commenter requested that the infrastructure be made sufficiently visible to avoid collisions.

Two commenters representing the YPG noted that a portion of Alternative Route 1A is in proximity to the Laguna Army Airfield, training, and testing facilities on the installation. This could jeopardize testing, training, and safety on YPG. The YPG stated that Alternative Route 1A would affect safety of flight, spectrum interference for test items, spectrum interference for instrumentation, operations security, and

range communication as well as the following YPG facilities: Fording Basin, Training Area Bravo, and Military Free Fall School.

One commenter noted the EIR should evaluate the health and safety of people who camp and recreate near the alignment, including families with young children. The commenter stated that campgrounds, dispersed camping areas, and other locations where visitors remain overnight should be treated as temporary sensitive-receptor locations for hazards and public-safety analysis. Potential hazards include conflicts between construction equipment and OHVs, open excavations, active work zones, helicopter construction, placement of electrical infrastructure within active riding areas, reduced visibility from dust, displacement of users, and long-term changes in dune elevations that could affect Project components.

One commenter stated the Draft EIR's public safety analysis should consider if long-term dune movement could affect foundations, guy-wire anchors, access roads, and conductor clearance.

One commenter noted that the Draft EIR should evaluate the Project's effect on emergency response, evacuation, law enforcement, firefighting, and search-and-rescue services. The commenter also noted the Draft EIR should disclose response times during peak recreational periods; emergency service capacity; delays or restrictions to emergency routes; impact of construction activities on fire, medical, or rescue demand; and methods to maintain emergency access during construction and operation.

One commenter, California State Parks, stated that the Draft EIR should consider public safety measures to reduce the likelihood of unauthorized public access, including climbing or other improper use, of Project facilities in Heber Dunes SVRA.

4.1.7 Land Use and Planning

One commenter, Cal4Wheel, requested for the CPUC and Project Applicant to treat designated OHV recreation areas as established public uses and develop a transmission route around recreation areas rather than through them. The commenter stated that SVRAs are not open space available for industrial conversion.

One commenter, Cal4Wheel, stated that Heber Dunes is a designated SVRA and the installation of major high-voltage transmission infrastructure inside Heber Dunes SVRA would introduce an industrial land use fundamentally different from the recreation and resource-management purposes for which the property is administered. The commenter requested further evaluation regarding the Project's land use compatibility to determine if the proposed transmission route would impair the purposes of Public Resources Code Sections 5090.02, 5090.32, and 5090.35; conflict with the adopted Heber Dunes General Plan; require discretionary authorization from California State Parks; diminish public recreation investment in the SVRA; or establish a precedent under which designated recreational acreage can be consumed by unrelated infrastructure.

4.1.8 Noise

One commenter noted the Draft EIR's noise analysis should include camping areas and concentrations of recreational users as sensitive locations and evaluate helicopters, blasting, drilling, grading, heavy

equipment, and construction traffic. The commenter stated that seasonal, weekend, nighttime, and holiday construction restrictions should be considered as mitigation.

One commenter noted that the Draft EIR should address the impact of noise from high voltage lines on people camping in the recreational areas that would be crossed by the proposed alignment.

One commenter noted that the Draft EIR should evaluate operational corona noise and sleep disturbance that would occur due to the Project's placement of high-voltage infrastructure in proximity to camping areas. The commenter noted the EIR should analyze objectively measurable corona noise, sleep disturbance, public-health effects of environmental noise, or alternatives and setbacks that reduce exposure of overnight visitors.

One commenter noted that several proposed access routes would require travel through Fort Yuma Quechan Reservation which creates additional noise impacts that would be sustained fully by the Tribe.

One commenter, California State Parks, stated that the Project has the potential to increase noise levels at Heber Dunes SVRA, particularly during construction. Short-term monitoring conducted at Heber Dunes SVRA between May 2022 and May 2025 observed no off-site noise exceedance and the average noise level was 53.6 A weighted decibel (dBA) and long-term monitoring found that the modeled noise level was 60 dBA at the monitoring site and no off-site noise exceedance was observed. Construction noise may exceed the County's noise ordinance limit of 75 dBA, which would require consideration of mitigation measures. California State Parks stated that construction and long-term noise analysis conducted for the Draft EIR should consider park visitors. Additionally, one residence on the north end of the Heber Dunes SVRA should be considered as a sensitive receptor.

4.1.9 Recreation

Three commenters noted the Project's proposed alignment runs directly through an established camping area and open recreational areas, including Imperial Sand Dunes Recreation Management Area (ISDRA), Heber Dunes SVRA, and Dune Buggy Flats camping area. These commenters stated the Draft EIR should consider the Project's impact on recreation, safety, and health.

Three commenters noted concerns that recreational areas will not be accessible for recreation, including camping and OHV use, during construction, operation, and maintenance of the proposed transmission line.

Two commenters noted that the Draft EIR should evaluate the Project's impact to recreational areas, such as the ISDRA, under peak-use conditions, including weekends and holidays, rather than using average annual visitation, weekday conditions, permanent residences, or conventional roadway usage.

Two commenters stated that the Draft EIR should analyze potential impacts to recreation and public access in Heber Dunes SVRA resulting from the construction and implementation of transmission towers and related infrastructure.

Two commenters recommended early engagement with OHV stakeholders that use the ISDRA and other recreation resources in the study area to gather feedback that can be considered during the evaluation and selection of project route and alternatives, identification of impacts, and development of mitigation

measures for the Draft EIR. The commenters stated OHV stakeholders should include MIC/SVIA/ROHVA Associations, Cal4Wheel, ASA, other relevant motorized recreation organizations, California State Parks OHMVR staff, BLM recreation staff, local clubs, Imperial County representatives, and other knowledgeable stakeholders.

Two commenters requested that the Draft EIR include the following mitigation measures related to recreation:

- Peak-Use Restrictions. Avoid, where reasonably feasible, major construction closures and high-volume construction traffic during periods of concentrated OHV visitation, including seasonal and holiday peaks.
- Public Access Protection. Establish enforceable provisions maintaining public access to existing roads and routes that are incorporated into the project access system where compatible with public safety.
- Functional Detours. Require replacement or alternative access that provides functionally equivalent recreational connectivity whenever a public route must be restricted.
- Maintenance Notification. Establish procedures for advance notification of planned maintenance and immediate notification of emergency closures affecting recreation routes.

Two commenters requested that a visual simulation/visual-resource analysis be integrated into the recreational analysis of the Draft EIR. The commenters requested the preparation of visual simulations from representative recreation viewpoints, including overlooks, public roads, major BLM Off-Highway Vehicle (OHV) routes, Dune Buggy Flats, Buttercup, campground approaches, Heber Dunes SVRA, and other locations identified through stakeholder ground-truthing. One commenter stated the Draft EIR should evaluate whether the Project would substantially change the character of a recreation area by reducing scenic qualities that contribute to its recreational value.

One commenter, the MIC/SVIA/ROHVA Associations, requested that the Draft EIR recreation analysis recognize the OHV Transportation Network. The commenter requested that preparation of the Draft EIR include a route-by-route OHV connectivity analysis to identify existing designated OHV routes, informal and established routes for recreational access, and utility roads as well as proposed construction access routes, recreational routes subject to temporary restrictions, recreational routes that would be crossed by the proposed transmission corridor, and recreational routes that could conflict with public OHV use.

One commenter, the MIC/SVIA/ROHVA Associations, stated that Applicant Proposed Measure (APM) REC-1, which requires coordination with recreation facility managers when closures of recreational facilities or roads are necessary, is too narrowly framed. The commenter requested that the Draft EIR require that any proposed detour during construction, emergency repair, and long-term maintenance be evaluated for legality, vehicle accessibility, safety, distance, terrain, seasonal availability, connectivity, capacity, compatibility with different types of OHVs, and whether it provides substantially equivalent recreational access.

One commenter requested that the Draft EIR consider the following mitigation measures related to recreation:

- Setbacks from camping and gathering areas
- Restrictions on guyed structures in active riding areas

One commenter, the MIC/SVIA/ROHVA Associations, requested that the Draft EIR include the following mitigation measures related to recreation:

- Recreation Route Inventory. Complete a route-by-route GIS inventory of formal and informal motorized recreation routes and connectors affected by the Project.
- Recreation Traffic Management Plan. Prepare a project-specific plan addressing construction traffic conflicts with OHV users, including seasonal and high-visitation periods.
- Restoration. Require post-construction restoration of temporary construction areas and any recreational routes disturbed by construction to standards acceptable to the applicable land manager.

One commenter, Cal4Wheel, requested that the Draft EIR examine if the Project would create a functional loss of recreation opportunity at Heber Dunes SVRA by: severing or redirecting existing OHV riding patterns, constraining usable open terrain, introducing permanent fixed obstacles, altering narrow-trail circulation, affecting beginner or family-oriented riding areas, creating OHV-maintenance vehicle conflicts, displacing recreation into a smaller usable footprint, and altering the setting of a valuable local public recreation resource.

One commenter, Cal4Wheel, stated that the CPUC's analysis should include an equal level of analysis for all sensitive recreation resources within the study area, including the ISDRA, Dunes Vista/Dune Buggy Flats Campground, Buttercup Campground, Grays Well Camping, Midway Campground, Gordon's Well, Valley of Names, Ogilby Camp Area, the Plank Road historic marker, Holtville Hot Springs, and Hot Springs Long Term Visitor Area, as they form an interconnected recreation landscape.

One commenter, Cal4Wheel, requested that the Draft EIR include a detailed analysis of the Valley of Names and other dispersed public-land destinations within the Project's sphere of influence. The commenter stated the Draft EIR should identify whether construction or operation could alter the routes used to reach the Valley of Names; affect adjacent dispersed camping; introduce gates, restricted utility roads, or construction closures; change the visual setting; or concentrate use onto fewer remaining access corridors.

One commenter, California State Parks, noted the Draft EIR should evaluate the proposed route and all alternative routes for consistency with the park-specific management plans developed for the Heber Dunes SVRA, including the 2012 Heber Dunes SVRA General Plan, Heber Dunes SVRA WHPP, Heber Dunes SVRA Soil Conservation Plan, and the Dust Control Plan for Ocotillo Wells and Heber Dunes SVRAs.

One commenter requested that the Draft EIR include a discussion of federal land-management and recreational opportunities under the Federal Land Policy and Management Act, Imperial Sand Dunes

Recreation Area Management Plan, California Desert Conservation Area Plan Amendment, Desert Renewable Energy Conservation Plan, Expanding Public Lands Outdoor Recreation Experiences Act, and Executive Order 14313.

One commenter requested CPUC to apply an avoidance-first, mitigation-second framework to recreation impacts. The commenter stated the hierarchy should be first to avoid designated recreation areas, second to minimize impacts to recreation resources outside those areas, and third to mitigate unavoidable residual impacts.

4.1.10 Transportation

Two commenters noted that Project construction would temporarily impact circulation and traffic. One commenter, the MIC/SVIA/ROHVA Associations, noted that the Project construction could involve up to 154 workers along the alignment on a given day, with construction occurring for approximately 19 months and requests that the Draft EIR analyze recreational traffic conflicts, not only vehicle miles traveled.

Two commenters noted that the Project's construction traffic controls should account for seasonal and event-related concentrations of OHV use, rather than treating recreation as a uniform year-round activity.

Two commenters requested that the Draft EIR include the following mitigation measures related to transportation:

- Peak-Use Restrictions. Avoid, where reasonably feasible, major construction closures and high-volume construction traffic during periods of concentrated OHV visitation. Consider seasonal and holiday construction restrictions.
- Functional Detours. Require replacement or alternative access that provides functionally equivalent recreational connectivity whenever a public route must be restricted.
- Public Access Protection. Establish enforceable provisions maintaining public access to existing roads and routes that are incorporated into the project access system where compatible with public safety.
- Maintenance Notification. Establish procedures for advance notification of planned maintenance and immediate notification of emergency closures affecting recreation routes.

One commenter noted that several proposed access routes would require travel through Fort Yuma Quechan Reservation which creates additional traffic and impacts on surface roads. The commenter stated these impacts would be sustained fully by the Tribe.

One commenter stated the Draft EIR document should include an enforceable Recreation Construction Access and Traffic Management Plan developed in consultation with BLM, California State Parks, the OHMVR Commission and affected OHV stakeholders.

One commenter noted that analysis for the Draft EIR should consider that proposed permanent access roads may redirect existing travel patterns.

One commenter requested that the Draft EIR map the relationship between the proposed transmission corridor, existing riding areas, campgrounds, major circulation corridors, emergency-access routes, and the patterns by which recreationists move between camps and open dunes.

One commenter, Cal4Wheel, requested enforceable provisions prohibiting the conversion of currently lawful public routes into permanent utility-only access roads solely because the route has been improved, widened, hardened, gated, or incorporated into the proposed transmission line's maintenance system. The commenter also stated that temporary closures necessary for public safety during construction should be geographically narrow, limited to the shortest feasible duration, scheduled to avoid peak recreation periods where practicable, accompanied by functionally equivalent temporary access, and terminated immediately when the underlying safety condition ends.

One commenter requested the Draft EIR consider a mitigation measure requiring on-site traffic and OHV safety personnel.

One commenter, the MIC/SVIA/ROHVA Associations, requested that the Draft EIR include the following mitigation measures related to transportation:

- Recreation Route Inventory. Complete a route-by-route GIS inventory of formal and informal motorized recreation routes and connectors affected by the Project.
- Recreation Traffic Management Plan. Prepare a project-specific plan addressing construction traffic conflicts with OHV users, including seasonal and high-visitation periods.
- Restoration. Require post-construction restoration of temporary construction areas and any recreational routes disturbed by construction to standards acceptable to the applicable land manager.

4.1.11 Tribal Cultural Resources

Twenty-four (24) commenters requested that the EIR treat cultural resources as a full impact category with the Quechan Tribe as a consulting party throughout route refinement.

Two commenters, the Friends of Avi Kwa Ame National Monument and the Fort Yuma Quechan Indian Tribe, stated that the cultural significance of this region could be underestimated if the Draft EIR evaluates cultural resources merely as individual archaeological sites or discrete locations. For Indigenous communities, cultural landscapes are interconnected networks encompassing mountains, rivers, springs, trails, flora, fauna, ceremonial locations, stories, and traditional practices. A transmission corridor can profoundly affect a cultural landscape even without physically disturbing a specific archaeological site.

One commenter, the Native American Heritage Commission, stated that consultation with California Native American Tribes traditionally and culturally affiliated with the geographic area of the Project should occur as early as possible. The commenter stated consultation will assist in developing a plan to protect tribal cultural resources and avoid inadvertent discoveries of Native American human remains.

One commenter, the Friends of Avi Kwa Ame National Monument, requested the CPUC to fully evaluate and establish avoidance as the preferred approach wherever Tribal Nations identify sacred places, sensitive cultural landscapes, or areas where development would interfere with cultural practices.

One commenter, the THPO for Jamul Indian Village of California, noted that the proposed alignment should be evaluated in relation to previously identified Kumeyaay cultural resources, archaeological sites, traditional cultural landscapes, sacred places, gathering areas, and traditional travel corridors.

One commenter, the Fort Yuma Quechan Indian Tribe, opposed the proposed alignment through the Cargo Muchacho Mountains, which are sacred to the Quechan Tribe.

One commenter, the Fort Yuma Quechan Indian Tribe, noted that the proposed transmission line corridor intersects with the traditional territory of the Quechan Tribe, encompassing sacred sites, Traditional Cultural Properties (TCPs), cultural landscapes, and ancestral resources of deep religious importance. The commenter states that avoidance of reservation lands is not considered avoidance of impacts to Quechan cultural resources or culturally significant landscape as the Tribe's traditional territory and cultural connections extend beyond the present-day boundary of the Fort Yuma Quechan Reservation. The Tribe requests consultation and collaboration to establish a route that is preferrable to the Quechan Tribe and ensure best management practices for the life of the Project.

One commenter, the Fort Yuma Quechan Indian Tribe, noted that the Project's proposed transmission line and permanent access roads would conflict with the proposed Protect Kw'tsán Campaign, an initiative lead by the Quechan Tribe. The initiative's goals are to protect desert landscapes, wildlife habitats and culturally significant sites within its boundaries.

One commenter noted concern for cultural and spiritual land that would be affected by the proposed route.

One commenter stated that the proposed transmission line will harm Fort Yuma Quechan Indian Tribe sacred lands and requests further studies to review alternative routes that would protect the Tribe's sacred landscape.

One commenter, California State Parks, noted that temporary protection measures have been established for a cultural resources site that has been identified within Heber Dunes SVRA and that California State Parks is currently consulting with local California Native American tribes to protect the resources in the long-term. California State Parks states the Project's proposed transmission corridor and access roads would impact a site that is culturally significant and should be classified as a Tribal Cultural Resource under CEQA. It is probable that additional cultural resources are present under the existing sand dunes; measures for inadvertent discovery of cultural resources, including ancestral remains, must be incorporated into the Project to address potentially significant impacts to cultural resources. Additionally, California State Parks recommended including tribal cultural resource monitors for the Project, particularly during ground disturbance, clearing of sand, brush, or similar cover that would expose new soils, and other activities that could adversely affect cultural resources.

4.1.12 Wildfire

One commenter, California State Parks, noted concern for wildfire related to transmission line construction and operation in Heber Dunes SVRA. The commenter recommended that the Draft EIR include vegetation management activities given the height and density of vegetation within the proposed transmission line route. California State Parks also recommended that the Draft EIR assess neighboring lands of the proposed and alternative routes for offsite activities that could alter fire likelihood at Heber Dunes SVRA.

4.1.13 Alternatives

Twenty-four (24) commenters noted the proposed route parallels the northern border of the Fort Yuma Quechan Reservation and requests that the EIR study the full southern alternative route proposed by the Fort Yuma Quechan Tribe. One commenter requests further studies to review alternative routes that would protect the sacred landscape of the Fort Yuma Quechan Tribe.

Seven commenters generally suggested that the Draft EIR analyze alternative routes for the transmission line that avoid recreational dune areas, including the Dune Buggy Flats, ISDRA, and Heber Dunes SVRA.

Four commenters suggested further consideration of an alternative route that parallels the existing transmission line along I-8.

Three commenters suggested an alternative route that utilizes the Southwest Power Link footprint. One commenter suggested utilizing the Southwest Power Link footprint to avoid impacts to the Colorado River and Cargo Muchacho Mountains. Two commenters also stated that an alternative in the Southwest Power Link footprint would avoid the Quechan tribal boundary.

Two commenters suggested that the Draft EIR consider the alternative route proposed by the American Sand Association (ASA) which would redirect the lines to the south of Dune Buggy Flats, removing the transmission lines from the camping areas. The proposed ASA route would direct the transmission line south of the riding areas using the old path of the All-American Canal.

One commenter suggested that the Draft EIR consider an alternative route using a railroad corridor to avoid environmental impacts to the Colorado River and the Cargo Muchacho Mountains.

One commenter suggested that the Draft EIR explore an alternative where the proposed transmission line is a double circuit transmission line.

One commenter suggested an alternative route that is a hybrid of the suggested alternative routes to parallel I-8 and to use the path of the All-American Canal. Under this suggested hybrid route, the path of the proposed transmission line to the west of the Dune Buggy Flats could remain and once the lines reach the flats, they could turn south and follow the suggested path shown by the ASA until they reach the canal. At this point, instead of turning east the lines could continue south until they meet up with the exiting transmission lines near the U.S. border. From there, the new lines could parallel the path of the old lines through the ISDRA and out the east side. From there, the lines could be separated, and the new lines could follow the proposed path east to Yuma, Arizona.

One commenter noted that the Applicant's conclusion of an alternative route as infeasible should be the beginning of the CPUC's independent evaluation of the route.

One commenter requested the CPUC to require development and comparative analysis of one or more routing concepts that remain outside Heber Dunes SVRA; avoid open and concentrated-use ISDRA OHV areas; avoid Dune Buggy Flats and other high-intensity camping and staging areas; minimize impacts to Buttercup, Grays Well, Midway, Gordon's Well, Ogilby-area recreation, Valley of Names, and other established recreation destinations; preserve existing BLM route connectivity; maximize use of already-disturbed utility corridors; and avoid the conversion of public recreation routes into restricted utility access.

4.1.14 Cumulative Impacts

Two commenters requested that the Draft EIR cumulative impact analysis examine the broader pattern of energy, transmission, transportation, conservation, and land-use actions affecting recreation across the Imperial Valley and California Desert. The commenters requested that the cumulative impacts analysis address the following: progressive industrialization and fragmentation of available recreational acreage; fragmentation or degradation of wildlife habitat; increase of dust, noise, traffic, and emergency-service demand; and degradation of the scenic character of the sand dunes.

One commenter requests that the Draft EIR quantify and evaluate cumulative dust from Project activities, existing OHV use, and other regional projects.

One commenter, the MIC/SVIA/ROHVA Associations, requested that the Draft EIR consider the cumulative effect of industrial developments on the State's public recreation system. Energy projects to consider include the Coyote Creek Agrivoltaic Ranch adjacent to Prairie City SVRA, White Rock North Mine and its potential conflicts with Prairie City SVRA, and the proposed Golden Pacific Powerlink through the Anza-Borrego Desert State Park.

One commenter, California State Parks, recommended evaluating the potential cumulative impacts to the California State Park System from the proposed Ironwood Transmission Line and Golden Pacific Powerlink. Both projects include routing through multiple California State Park System units, including Anza-Borrego Desert State Park, Heber Dunes SVRA, Ocotillo Wells SVRA (adjacent), Salton Sea State Recreation Area, and Indio Hills Palms.

4.2 Issues Not to be Analyzed under CEQA

The EIR will be used to guide Project decision-making by the CPUC by providing an assessment of the potential environmental impacts that would result from the Project. The weighing of Project benefits (environmental, economic, or otherwise) against adverse environmental effects is outside the scope of the EIR. When the CPUC considers whether to approve HWT's application for the Project, it will consider the EIR along with economic and other considerations. Summaries of the scoping comments received on issues that will not be analyzed under the CEQA review for the Project as well as the associated discussions are presented below.

4.2.1 Electric and Magnetic Fields

One commenter noted that the Draft EIR should address the impact of electromagnetic fields (EMFs) from high voltage lines on people camping in the recreational areas that would be crossed by the proposed alignment. The commenter noted the CPUC should require the Applicant to prepare a project-specific EMF Field Management Plan and apply all feasible no-cost and low-cost EMF-reduction measures, the use of which is affirmed by CPUC Decision D.06-01-042.

4.2.1.1 Discussion

The EIR will not consider EMFs that would be generated by the Project in the context of the CEQA analysis of potential environmental impacts, for two reasons: (1) There is no agreement among scientists that EMFs create a potential health risk; and (2) there are no defined or adopted CEQA standards for defining health risk from EMFs.

4.2.2 Economics-Related Comments Received

One commenter stated the Project would only bring temporary jobs to the Yuma, Arizona community and would be a financial burden on the people of Yuma County. The commenter states the Project would raise rates for Yuma County residents.

One commenter stated that the CPUC should consider that the California State Park System contributes approximately $6.8 billion to the State's economy and 56,000 jobs. Construction of the Project may cause reductions to public access, impact park facilities, and alter viewsheds, resources, and recreation.

One commenter stated that the Draft EIR should undertake an economic analysis of recreation and include discussion of economic activity such as visitor volume, visitor spending, recreation-related employment, permit and fee revenue, fuel and retail expenditures, lodging and restaurant spending, powersports and repair expenditures.

4.2.2.1 Discussion

Under CEQA, the analysis of potential impacts "shall be limited to substantial, or potentially substantial, adverse changes in physical conditions" in the environment (Pub. Res. Code §21151(b); CEQA Guidelines §15358(b)). CEQA's definition of the environment includes "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance" (Pub. Res. Code §21060.5). CEQA's definition of the environment does not include economic or social effects (including psychological or social impacts on community character) unless those effects result in a change in the physical environment. The CEQA Guidelines are clear in emphasizing this point. Pursuant to CEQA Guidelines Section 15131, subdivision (a):

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate

> economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Additionally, CEQA Guidelines Section 15064 states, "Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment."

4.2.3 Project Need-Related Comments Received

Twenty-four (24) commenters requested that the Project's purpose and need be examined against current conditions.

4.2.3.1 Discussion

The EIR will not consider comments that pertain to Project need. The CEQA process does not require the EIR to assess Project need. In addition, CPUC General Order 131-E does not require an affirmative showing purpose or need for projects. The EIR will include analysis of a "No Project Alternative," which will examine the environmental impacts of not building the Project. Thus, the analysis of the No Project Alternative will consider what would happen if the Project objectives were not met.

4.2.4 General Comments Received

Correspondence received with general questions about meetings, scoping process, CEQA process, etc. or to confirm receipt of the NOP are not considered scoping comments. These letters are therefore not included in this document but are a part of the Project's administrative record.

LIST OF APPENDICES

Appendix A – State Clearinghouse Documentation and Notice of Preparation Mailing Lists

Appendix B – Notice of Preparation and Scoping Meeting Notice

Appendix C – County Clerk Posting and Newspaper Proof of Publication

Appendix D – Scoping Meeting Presentation

Appendix E – Scoping Meeting Transcripts

Appendix F – Written Scoping Comments

APPENDIX A

State Clearinghouse Documentation and Notice of Preparation Mailing Lists

Ironwood Transmission Line Project

Summary

SCH Number
2026080073

Lead Agency
California Public Utilities Commission (CPUC)

Document Title
Ironwood Transmission Line Project

Document Type
NOP - Notice of Preparation of a Draft EIR

Received
8/4/2026

Present Land Use
Imperial County Land Uses: LA, MA, HA, ROS, SPA, UR. City of Calexico Land Use: IND. Yuma County Land Uses: A-RR, OS/RR.

Document Description
The Project would involve construction, operation, and maintenance of a new approximately 86-mile-long 500 kV transmission line extending between the APS North Gila Substation in western Yuma County, Arizona and SDGE's Imperial Valley Substation in Imperial County, California. The Project would traverse a combination of federal, state, and private lands, including lands administered by the BLM.

Major Project components would include installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, and related activities. The Project would also include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities.

Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary work facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

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Location

Coordinates

32°42'31.41"N 115°5'11.45"W

Cities

Calexico, El Centro

Counties

Imperial

Regions

Southern California

State Highways

SR-111, SR-98, SR-86, SR-7

Railways

UPRR El Centro, UPRR Yuma

Schools

Kennedy Gardens ES, Cesar Chaves ES

Waterways

Colorado River, Numerous Imperial Irrigation District Canals

Other Location Info

The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County, California.

Notice of Completion

State Review Period Start

8/7/2026

State Review Period End

9/21/2026

State Reviewing Agencies

California Air Resources Board (ARB), California Department of Conservation (DOC), California Department of Fish and Wildlife, Inland Deserts Region 6 (CDFW), California Department of Parks and Recreation, California Department of Toxic Substances Control (DTSC), California Department of Transportation, District 11 (DOT), California Department of Water Resources (DWR), California Energy Commission, California Fish and Game Commission (CDFGC), California Governor's Office of Emergency Services (OES), California Highway Patrol (CHP), California Natural Resources Agency, California Public Utilities Commission (CPUC), California Regional Water Quality Control Board, Colorado River Basin Region 7 (RWQCB), California State Lands Commission (SLC), Colorado River Board, Department of General Services (DGS), Office of Historic Preservation, State Water Resources Control Board, Division of Drinking Water, State Water Resources Control Board, Division of Water Quality, State Water Resources Control Board, Division of Water Rights, California Native American Heritage Commission (NAHC)

State Reviewing Agency Comments
California Native American Heritage Commission (NAHC)

Development Types
Power:Electric Transmission Lines (500 kV Transmission Line)(Megawatts 10000)

Local Actions
Certificate of Public Convenience and Necessity (CPCN)

Project Issues
Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Cumulative Effects, Drainage/Absorption, Energy, Flood Plain/Flooding, Geology/Soils, Greenhouse Gas Emissions, Growth Inducement, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Mandatory Findings of Significance, Mineral Resources, Noise, Population/Housing, Public Services, Recreation, Schools/Universities, Solid Waste, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Vegetation, Wetland/Riparian, Wildfire

Public Review Period Start
8/7/2026

Public Review Period End
9/21/2026

Attachments

Draft Environmental Document [Draft IS, NOI_NOA_Public notices, OPR Summary Form, Appx,]

__Memo PDF 202 K | _CPUC Notice of Preparation - Ironwood ZIP 4491 K | Ironwood NOP PDF 9209 K

Notice of Completion [NOC] Transmittal form

Notice of Completion & Environmental Document Transmittal PDF 1149 K

State Comment Letters [Comments from State Reviewing Agency(ies)]

2026080073_NAHC Comment PDF 183 K

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Horizon Ironwood Mailing List – Agencies	
Category	**Agency**
Federal	Bureau of Land Management (Yuma Field Office)
Federal	Bureau of Land Management (El Centro Field Office)
Federal	Bureau of Land Management (California Desert District)
Federal	Bureau of Reclamation, Yuma Office
Federal	Department of Navy - Naval Air Facility El Centro
Federal	Department of the Army - U.S. Army Corps of Engineers
Federal	Department of the Army Yuma Proving Ground
Federal	United States Fish and Wildlife Service (FWS)
Federal	US Customs and Border Patrol (El Centro Sector)
Federal	US Customs and Border Patrol (Yuma Sector)
Federal	US Environmental Protection Agency
Federal	US Customs and Border Patrol (HQ)
State	Arizona Game and Fish Department
State	California Department of Fish and Wildlife
State	California Department of Parks and Recreation
State	California Department of Parks and Recreation (Heber Dunes State Recreational Vehicle Area)
State	California Department of Parks and Recreation Colorado Desert District Headquarters
State	California Department of Transportation District 11
Local	Calexico, CA (Planning Department)
Local	El Centro, CA (Community Development Department)
Local	Heber Elementary School District
Local	Heber Public Utility District
Local	Imperial County Supervisors Districts 1-5
Local	Imperial County Agriculture Commissioner's Office
Local	Imperial County APCD
Local	Imperial County Clerk
Local	Imperial County Planning Department
Local	Imperial Irrigation District
Local	San Diego County Planning Department
Local	Yuma County Planning Department
Tribe	Barona Group of the Capitan Grande
Tribe	Campo Band of Diegueno Mission Indians

Horizon Ironwood Mailing List – Agencies	
Category	**Agency**
Tribe	Cocopah Indian Tribe
Tribe	Colorado River Indian Tribes
Tribe	Ewiiaapaayp Band of Kumeyaay Indians
Tribe	Fort Mojave Indian Tribe
Tribe	Iipay Nation of Santa Ysabel
Tribe	Inaja-Cosmit Band of Indians
Tribe	Jamul Indian Village
Tribe	Kwaaymii Laguna Band of Indians
Tribe	La Posta Band of Diegueno Mission Indians
Tribe	Manzanita Band of Kumeyaay Nation
Tribe	Mesa Grande Band of Diegueno Mission Indians
Tribe	Quechan Indian Tribe of the Fort Yuma Reservation
Tribe	San Pasqual Band of Diegueno Mission Indians
Tribe	Sycuan band of the Kumeyaay Nation
Tribe	Torres-Martinez Desert Cahuilla Indians
Tribe	Viejas Band of Kumeyaay Indians

Horizon Ironwood Mailing List – Organizations
A Farmer Service Corp
American Sand Association
Audubon
Brooks of Harrison Family Farms
Calexico Wellness Center
Campesinos Unidos
Chavez Ranch
Coalition of Labor, Agriculture, & Business (COLAB)
Comite Civico Del Valle
Greater Yuma Economic Development Corporation
Greenlight America
Heber Public Schools Superintendent
Imperial County America's Job Center of California
Imperial County Farm Bureau
Imperial Valley Economic Development Corporation
Imperial Valley Economic Development Corporation Energy Summit
Imperial Valley Equity & Justice
Imperial Valley Regional Chamber of Commerce
Imperial Valley Trails and Land Conservancy
Imperial Valley Vegetable Growers Association (IVVGA)
IV Economic Development Corporation / Imperial Valley Business Resource Center
Pacific Coast Conservation Alliance
President of the Yuma Valley Rod and Gun Club
Sierra Club
The Chamber of Commerce for Greater Brawley

APPENDIX B

Notice of Preparation and Scoping Meeting Notice

To: **State Clearinghouse, Responsible and Trustee Agencies, Property Owners & Interested Parties**

From: **Mr. Boris Sanchez, CPUC Project Manager**

Subject: **NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT (EIR) AND NOTICE OF PUBLIC SCOPING MEETING FOR THE IRONWOOD TRANSMISSION LINE PROJECT (A.25-09-008)**

Date: **August 7, 2026**

INTRODUCTION

Horizon West Transmission, LLC (HWT) has filed an application (A.25-09-008) with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN) for the proposed Ironwood Transmission Line Project (Project). The Project would involve construction of a new approximately 86-mile-long 500 kilovolt (kV) transmission line extending between Arizona Public Service Company's (APS) North Gila Substation in Arizona and San Diego Gas & Electric Company's (SDG&E) Imperial Valley Substation in California. The Project is proposed to improve regional transmission reliability and increase transmission system capacity between Arizona and California. Portions of the Project would cross lands administered by the U.S. Bureau of Land Management (BLM).

The CPUC, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to evaluate the potential environmental effects of the proposed Project in compliance with CEQA. The CPUC has reviewed the application submitted by HWT and determined the application is complete. In order to obtain early feedback regarding the environmental issues to be addressed in the EIR, the CPUC is initiating the scoping process for the Project. The scoping process is intended to inform the scope and content of the CEQA environmental review, including environmental issues, alternatives, and potential mitigation measures to be evaluated in the EIR.

PUBLIC SCOPING MEETINGS NOTICE

(See details on the last page of this notice)

Two meetings will be held via Zoom (and accessible by phone):

August 27, 2026 at 3:00 p.m.

August 27, 2026 at 6:30 p.m.

Scoping Comments are due by September 21, 2026

WHAT IS SCOPING?

The purpose of this NOP is to inform recipients that the CPUC is beginning the scoping process and preparing an EIR for the proposed Project. Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation. Pursuant to CEQA, the CPUC is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in the EIR.

This notice includes a brief description of the Project, a brief summary of the anticipated potential impacts, information on public meetings, and how to provide input on the scope and content of the EIR. After the public scoping period has ended, a Scoping Report will be prepared to summarize the comments received. This NOP and the Scoping Report will be included as an appendix to the EIR and is also available on the CPUC's website for the Project along with other Project documents and reports, including HWT's application and Proponent's Environmental Assessment (PEA), at the following link:

https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html

SEPARATE NEPA REVIEW

Portions of the Project would cross federal lands administered by the BLM. Accordingly, the Project is also subject to environmental review under the National Environmental Policy Act (NEPA). The BLM will serve as the lead federal agency for the NEPA review process. The CPUC will review the Project under CEQA. The CPUC and BLM are anticipated to coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review processes will remain separate decision-making processes under their respective legal authorities. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA.

PROJECT LOCATION

The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County, California. Figure 1, Project Location, depicts an overview of the proposed Project in the context of regional jurisdictions.

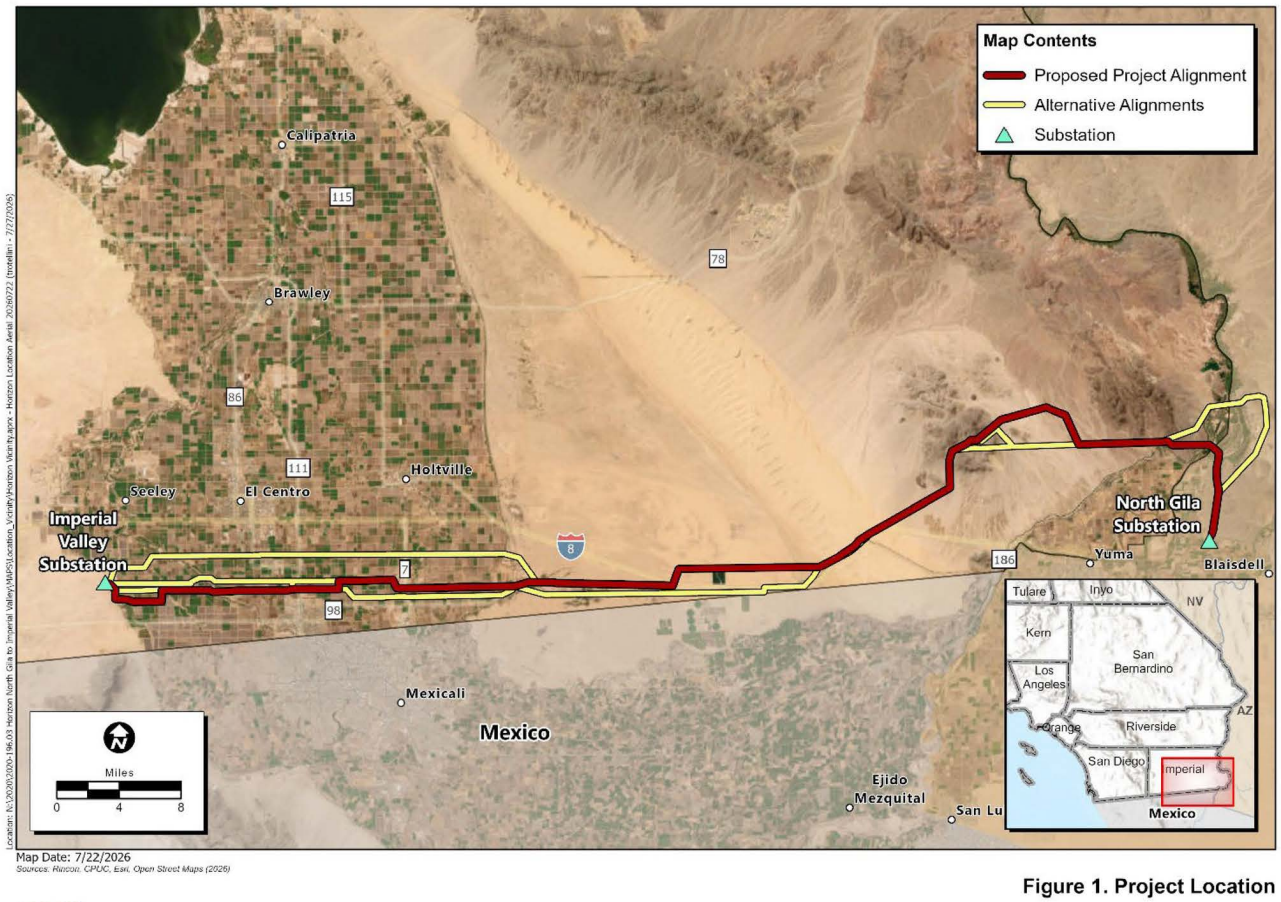

Figure 1. Project Location

2020-196.03 Horizon North Gila to Imperial Valley

ECORP Consulting, Inc.
ENVIRONMENTAL CONSULTANTS

PROJECT DESCRIPTION

The Project would involve construction, operation, and maintenance of a new approximately 86-mile-long 500 kV transmission line extending between the APS North Gila Substation in western Yuma County, Arizona and SDG&E's) Imperial Valley Substation in Imperial County, California. The Project would traverse a combination of federal, state, and private lands, including lands administered by the BLM.

Major Project components would include installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, site restoration, and related activities. The Project would also

include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities.

Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary workforce facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

Applicant Proposed Measures

As part of the Project, HWT has committed to implementing Applicant Proposed Measures (APMs) intended to avoid, minimize, or reduce potential environmental impacts associated with construction, operation, and maintenance of the Project. The proposed APMs address a range of environmental resource areas, including, but not limited to, biological resources, cultural and tribal cultural resources, air quality, hydrology and water quality, hazardous materials, noise, wildfire prevention, traffic and public safety, and restoration of temporary disturbance areas. The EIR will evaluate these measures as part of the proposed Project, and the CPUC may identify additional mitigation measures, where necessary and feasible, to avoid or reduce potentially significant environmental impacts identified during the CEQA review process.

Project Objectives

HWT states that the purpose of the Project is to improve regional electric transmission reliability and increase transmission system capacity between Arizona and California. The Project is intended to support the transfer of electricity across the regional transmission system and address existing and forecast transmission constraints identified through regional transmission planning processes.

HWT has identified the following primary objectives for the Project:

- Improve transmission system reliability between Arizona and California;
- Increase regional transmission capacity and operational flexibility within the bulk electric transmission system;
- Support delivery of electricity across the regional transmission network;
- Respond to existing and forecast transmission system needs identified through regional planning processes; and
- Construct and operate a new 500 kV transmission line connecting APS's North Gila Substation and SDG&E's Imperial Valley Substation.

As lead agency under CEQA, the CPUC is responsible for identifying appropriate CEQA project objectives, which may differ from HWT's objectives described above, to inform the CEQA review process, including the evaluation of alternatives and mitigation measures. The CPUC has not yet finalized the CEQA objectives for the Project.

ISSUES TO BE ADDRESSED IN THE EIR

It has been determined that an EIR is required for the CEQA review because the Project could result in potentially significant impacts to environmental resources. The EIR will address all of the issues identified in the CEQA Environmental Checklist Form (see CEQA Guidelines Appendix G), including aesthetics, air quality, biological resources, cultural and tribal resources, energy conservation, geology and soils (including paleontology), greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

Probable Environmental Effects

HWT has indicated that the Project's most substantial environmental impacts would likely be associated with aesthetics and visual resources, biological resources, cultural and tribal cultural resources, hydrology and water quality, air quality, noise, recreation, transportation, wildfire, and hazards and hazardous materials. These impacts are summarized below.

- ***Aesthetics and Visual Resources:*** Construction and operation of the proposed 500 kV transmission line and associated infrastructure could substantially alter visual character and scenic views in portions of the Project area, including views from public roads, recreational areas, and public lands administered by BLM.

- ***Air Quality:*** Construction activities could result in temporary emissions of criteria pollutants and dust from grading, excavation, vehicle travel, and operation of heavy equipment, which could affect nearby sensitive receptors and contribute to regional emissions.

- ***Biological Resources:*** Construction and operation of the Project could result in temporary and permanent impacts to desert habitats, sensitive vegetation communities, jurisdictional waters and washes, wildlife movement, and special-status plant and wildlife species, including federally and state-listed species and designated critical habitat.

- ***Cultural and Tribal Cultural Resources:*** Ground-disturbing activities associated with Project construction could result in disturbance or damage to known or previously undiscovered archaeological resources, historic resources, tribal cultural resources, or human remains.

• ***Geology, Soils, and Paleontological Resources: Construction*** activities, including grading and excavation, could result in erosion, soil disturbance, and impacts to paleontological resources or unique geologic features.

• ***Hazards and Hazardous Materials:*** Construction, operation, and maintenance activities could involve the transport, use, or disposal of hazardous materials and could create risks associated with accidental releases, wildfire ignition, or public safety hazards.

• ***Hydrology and Water Quality:*** Construction activities could temporarily or permanently affect washes, drainage features, and other potentially jurisdictional waters and could result in erosion, sedimentation, runoff, or degradation of surface water or groundwater quality.

• ***Noise:*** Construction activities could generate temporary increases in noise and vibration levels from heavy equipment, vehicle traffic, and transmission line construction activities in the vicinity of sensitive receptors and recreational areas.

• ***Recreation:*** Temporary construction activities could disrupt or limit access to recreational resources and public lands within portions of the Project area.

• ***Transportation and Traffic:*** Construction-related vehicle trips, oversized equipment transport, and temporary lane or access restrictions could affect local and regional roadway operations and access.

• ***Wildfire:*** Construction and operation of transmission facilities could increase wildfire risk through ignition sources associated with equipment operation, vehicles, or transmission infrastructure.

Mitigation Measures, Cumulative Impacts, and Alternatives

The EIR will include the CPUC's independent evaluation of the environmental effects identified above, as well as other potentially significant environmental impacts associated with construction, operation, maintenance, and eventual decommissioning of the Project. Where necessary and feasible, the CPUC may recommend mitigation measures, in addition to or in place of HWT's APMs, to avoid, minimize, or reduce potentially significant environmental impacts identified during the CEQA review process.

The EIR will also evaluate cumulative environmental impacts associated with the Project when considered together with past, present, and reasonably foreseeable future projects in the region. The cumulative analysis will consider projects and activities occurring within Imperial County, California, Yuma County, Arizona, and surrounding areas that could contribute to cumulative effects on environmental resources.

Alternatives identified to date include those evaluated in the PEA, including alternative transmission corridors, route segment variations, and substation interconnection configurations. These alternatives represent different feasible alignments between the North Gila Substation and the Imperial Valley Substation and reflect engineering, environmental, and land use considerations.

Consistent with CEQA, the EIR will evaluate a reasonable range of alternatives to the proposed Project, including a No Project Alternative, that could feasibly attain most of the Project's basic objectives while avoiding or substantially reducing significant environmental impacts. The EIR will also consider additional alternatives or route variations identified through agency consultation, public comments received during the scoping process, or environmental analysis conducted during preparation of the EIR.

Public Resources Code Section 21092.6(a)

Per Public Resources Code Section 21092.6(a), if the Project site or any Project alternative site to be analyzed is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), that information must be included in the NOP. According to the PEA, several known hazardous materials release sites are located within one mile of portions of the proposed Project in California; however, no known release sites included on the Cortese List are located within the proposed Project footprint or alignment.

ISSUES THAT WILL NOT BE ADDRESSED IN THE EIR

Non-environmental issues such as economic impacts and assessment of Project need are outside the scope of CEQA and will not be addressed in the EIR, but those issues may be addressed through the CPUC's concurrent proceeding for the Project. The EIR will also not consider electric and magnetic fields (EMFs) that would be generated by the Project in the context of the CEQA analysis of potential environmental impacts, for two reasons: (1) there is no agreement among scientists that EMFs create a potential health risk; and (2) there are no defined or adopted CEQA standards for defining health risk from EMFs.

PUBLIC SCOPING PERIOD FOR THIS NOTICE OF PREPARATION

Pursuant to CEQA, the scoping period will be 45 days following the release of this NOP. The scoping period for this Project begins on Monday, August 7, 2026, and closes at 5:00 p.m. on Friday, September 21, 2026. Please include the name, organization or agency (if applicable), mailing address, and e-mail address of the contact person if you would like to receive future notifications related to this process. Public comments will become part of the public record and will be published in a Scoping Report on the CPUC website.

Please send your comments by mail to:

Boris Sanchez, CPUC
Ironwood Transmission Line Project; Attn. A. Surdzial
c/o ECORP Consulting, Inc.
215 North 5th Street, Redlands, CA 92374

or via electronic mail: CEQA@IronwoodTransmissionProject.com

SCOPING MEETINGS

In order for the public and regulatory agencies to have an opportunity to submit comments on the scope of the EIR for the Project, virtual meetings will be held during the EIR scoping period. Information about the virtual meetings is included in the table below. For the first half hour of the meetings, CPUC will present information to clarify a) the CPUC's process for reviewing the application; b) the environmental review process; and c) details on how the public can become involved with each of these processes. Following the educational presentation, the CPUC will hold the official scoping meeting beginning with a brief presentation providing an overview of the Project and alternatives identified to date. Following this presentation, agencies and the public will have an opportunity to provide verbal comments to inform the scope of the environmental review. Written comments will be accepted throughout the NOP scoping period to the address and/or email provided above.

REMINDER: comments will be accepted by e-mail, or mail postmarked through September 21, 2026 Please include the name, organization or agency (if applicable), mailing address, and e-mail address of the contact person if you would like to receive future notifications related to this process. Note that comments become public record.

PUBLIC SCOPING MEETINGS

Meeting Information	Virtual Meeting No. 1	Virtual Meeting No. 2
Day and Date	Thursday, August 27, 2026	Thursday, August 27, 2026
Time	3:00 p.m.	6:30 p.m.
Register to attend the meeting at this link	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

California Public Utilities Commission

Notice of Scoping Meetings and Release of Notice of Preparation of an Environmental Impact Report for the Ironwood Transmission Line Project

Notice is hereby given that the California Public Utilities Commission (CPUC), as lead agency for the purposes of the California Environmental Quality Act (CEQA) review, has released a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and will be hosting scoping meetings for the proposed Ironwood Transmission Line Project (Project). Horizon West Transmission, LLC (HWT) has filed an application (A.25-09-008) with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN) for the Proposed Project. The Project would involve construction of a new approximately 86-mile-long 500 kilovolt (kV) transmission line extending between Arizona Public Service Company's (APS) North Gila Substation in Arizona, and San Diego Gas & Electric Company's (SDG&E) Imperial Valley Substation in California. The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County.

The Project would improve regional electric transmission reliability and increase transmission system capacity between Arizona and California. The Project is intended to support the transfer of electricity across the regional transmission system and address existing and forecast transmission constraints identified through regional transmission planning processes. Major project components would include the installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support the construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, site restoration, and related activities. The Project would also include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities. Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary workforce facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

Portions of the Project would cross federal lands administered by the BLM. Accordingly, the Project is also subject to environmental review under the National Environmental Policy Act (NEPA). The BLM will be the lead federal agency for the NEPA review process. The CPUC will review the Project under CEQA. The CPUC and BLM will coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review will remain separate decision-making processes. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA.

Pursuant to CEQA, the CPUC is preparing an EIR for the Project and is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in it. The NOP may be accessed online at the CPUC's website for the Project: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html. Initiated by the release of the NOP, the 45-day scoping period is from **Friday August 7, 2026 through 5:00 p.m Monday September 21, 2026**. Scoping comments may be submitted in writing during the 45-day EIR scoping period by mail to: Boris Sanchez, CPUC Ironwood Transmission Line Project; Attn. A. Surdzial c/o ECORP Consulting, Inc. 215 North 5th, Street Redlands, CA 92374; or by email to CEQA@IronwoodTransmissionProject.com. The CPUC will hold two virtual meetings to allow the public and regulatory agencies to have an opportunity to submit verbal comments on the scope of the EIR. Meeting information is provided below.

Meeting Information	**Virtual Meeting No. 1**	**Virtual Meeting No. 2**
Day and Date	Thursday, August 27, 2026	Thursday, August 27, 2026
Time	3:00 p.m.	6:30 p.m.
Register to attend the meeting at this link	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

Comisión de Servicios Públicos de California

Notificación de Reuniones Públicas y Publicación de la Notificación de Preparación de un Informe de Impacto Ambiental para el Proyecto de Línea de Transmisión Ironwood

Se informa de que la Comisión de Servicios Públicos de California (CPUC, por sus siglas en inglés), como Agencia Líder según la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés), ha publicado una Notificación de Preparación (NOP, por sus siglas en inglés) de un Informe de Impacto Ambiental (EIR, por sus siglas en inglés) y organizarán reuniones públicas para el Proyecto de Línea de Transmisión Ironwood (el Proyecto). Horizon West Transmission, LLC (HWT, por sus siglas en inglés) ha presentado una solicitud (A.25-09-008) ante la CPUC para obtener un Certificado de Conveniencia y Necesidad Pública (CPCN, por sus siglas en inglés) para el Proyecto. El Proyecto envolvería la construcción de una nueva línea de transmisión de 500 kilovoltios (kV) de aproximadamente 86 millas de largo que se extendería entre la Subestación North Gila de Arizona Public Service Company (APS, por sus siglas en inglés) en Arizona y ya Subestación Imperial Valley de San Diego Gas & Electric (SDG&E, por sus siglas en inglés) en California. El Proyecto se ubicará en el Condado de Imperial en California y en el Condado de Yuma en Arizona. El Proyecto está ubicado generalmente al sur de la Interestatal 8 y al este de las comunidades de El Centro, Heber, y Calexico en el Condado de Imperial.

El Proyecto mejoraría la confiabilidad regional de la transmisión eléctrica y aumentaría la capacidad del sistema de transmisión entre California y Arizona. El objetivo del Proyecto es apoyar la transferencia de electricidad a través del sistema de transmisión regional y abordar las limitaciones de transmisión existentes y previstas, identificadas a través de los procesos de planificación regional de la transmisión. Los componentes principales incluirían la instalación de nuevas líneas aéreas de transmisión de 500 kV, estructuras y cimientos de transmisión, líneas de comunicación de conductores y fibra óptica, vías de acceso temporales y permanentes, sitios de encordado y acopio, áreas de trabajo, y mejoras asociadas e infraestructura necesarias para apoyar la construcción, operación, y mantenimiento de la línea de transmisión. Las actividades de construcción incluirían el desbroce de vegetación, nivelación de terreno, excavación, instalación de cimientos, ensamblaje de estructuras, encordado de conductores, restauración del sitio, y actividades relacionadas. El Proyecto también incluiría el uso y la mejora de las vías de acceso existentes y el desarrollo de áreas de trabajo y áreas de preparación temporales para apoyar las actividades de construcción. La construcción del Proyecto ocurrirá en fases y requerirá el uso de maquinaria pesada, vehículos de construcción, instalaciones temporales para los trabajadores, y medidas de control de tráfico. Después de la construcción, se restaurarían las áreas de trabajo temporales en la medida de lo posible, mientras que las instalaciones permanentes permanecerían en funcionamiento como parte del sistema regional de transmisión eléctrica.

Partes del Proyecto cruzarían tierras federales administradas por la Oficina de Administración de Tierras (BLM, por sus siglas en inglés). Respectivamente, el Proyecto también está sujeto a revisión ambiental bajo de la Ley Nacional de Política Ambiental (NEPA, por sus siglas en inglés). La BLM será la Agencia Líder Federal para el proceso de revisión de NEPA. La CPUC revisará el Proyecto bajo CEQA. La CPUC y la BLM coordinarán los esfuerzos de revisión ambiental en la medida de lo posible; pero la revisión de CEQA y NEPA serán procesos de decisiones separados. Notificaciones y documentos separados, con periodos de revisión y comentarios separados, serán publicados por la CPUC para cumplir con CEQA y por la BLM para cumplir con NEPA.

De conformidad con CEQA, la CPUC está preparando un EIR para el Proyecto y está pidiendo comentarios para informar el alcance y contenido del EIR y ayudar a identificar las acciones, alternativas, medidas de mitigación, y efectos ambientales que se analizarán en el documento. Se puede acceder el NOP en línea en el sitio web de la CPUC para el Proyecto: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html. Iniciado con la publicación del NOP, el periodo de 45 días para la definición del alcance del EIR es desde **el viernes, el 7 de agosto de 2026 hasta las 5:00 p.m. del lunes, el 21 de septiembre de 2026**. Puede enviar sus comentarios sobre el alcance del EIR por escrito durante estos 45 días por correo a: Boris Sanchez, CPUC Ironwood Transmission Line Project; Attn. A. Surdzial c/o ECORP Consulting, Inc., 215 North 5th, Street, Redlands, CA 92374 o por correo electrónico a: CEQA@IronwoodTransmissionProject.com. La CPUC tendrá dos reuniones virtuales para darle la oportunidad al público y a las agencias reguladoras de presentar comentarios verbales sobre el alcance del EIR. A continuación, se proporciona información sobre las reuniones:

Información de la Reunión	**Reunión Virtual 1**	**Reunión Virtual 2**
Día y Fecha	Jueves 27 de agosto 2026	Jueves 27 de agosto 2026
Hora	3:00 p.m.	6:30 p.m.
Registrarse en esta liga	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

APPENDIX C

County Clerk Posting and Newspaper Proof of Publication

California Public Utilities Commission

To: **State Clearinghouse, Responsible and Trustee Agencies, Property Owners & Interested Parties**

From: **Mr. Boris Sanchez, CPUC Project Manager**

Subject: **NOTICE OF PREPARATION (NOP) OF AN ENVIRONMENTAL IMPACT REPORT (EIR) AND NOTICE OF PUBLIC SCOPING MEETING FOR THE IRONWOOD TRANSMISSION LINE PROJECT (A.25-09-008)**

Date: **August 7, 2026**

INTRODUCTION

Horizon West Transmission, LLC (HWT) has filed an application (A.25-09-008) with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN) for the proposed Ironwood Transmission Line Project (Project). The Project would involve construction of a new approximately 86-mile-long 500 kilovolt (kV) transmission line extending between Arizona Public Service Company's (APS) North Gila Substation in Arizona and San Diego Gas & Electric Company's (SDG&E) Imperial Valley Substation in California. The Project is proposed to improve regional transmission reliability and increase transmission system capacity between Arizona and California. Portions of the Project would cross lands administered by the U.S. Bureau of Land Management (BLM).

The CPUC, as lead agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to evaluate the potential environmental effects of the proposed Project in compliance with CEQA. The CPUC has reviewed the application submitted by HWT and determined the application is complete. In order to obtain early feedback regarding the environmental issues to be addressed in the EIR, the CPUC is initiating the scoping process for the Project. The scoping process is intended to inform the scope and content of the CEQA environmental review, including environmental issues, alternatives, and potential mitigation measures to be evaluated in the EIR.

PUBLIC SCOPING MEETINGS NOTICE

(See details on the last page of this notice)

Two meetings will be held via Zoom (and accessible by phone):

August 27, 2026 at 3:00 p.m.

August 27, 2026 at 6:30 p.m.

Scoping Comments are due by September 21, 2026

13-2026-088

FILED
IMPERIAL COUNTY
Aug 06 2026
CHUCK STOREY, County Clerk
By _____ Deputy Clerk

POSTED
AUG 06 2026
Imperial County Clerk-Recorder
California

POST FOR 30 DAYS

WHAT IS SCOPING?

The purpose of this NOP is to inform recipients that the CPUC is beginning the scoping process and preparing an EIR for the proposed Project. Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation. Pursuant to CEQA, the CPUC is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in the EIR.

This notice includes a brief description of the Project, a brief summary of the anticipated potential impacts, information on public meetings, and how to provide input on the scope and content of the EIR. After the public scoping period has ended, a Scoping Report will be prepared to summarize the comments received. This NOP and the Scoping Report will be included as an appendix to the EIR and is also available on the CPUC's website for the Project along with other Project documents and reports, including HWT's application and Proponent's Environmental Assessment (PEA), at the following link:

https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html

SEPARATE NEPA REVIEW

Portions of the Project would cross federal lands administered by the BLM. Accordingly, the Project is also subject to environmental review under the National Environmental Policy Act (NEPA). The BLM will serve as the lead federal agency for the NEPA review process. The CPUC will review the Project under CEQA. The CPUC and BLM are anticipated to coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review processes will remain separate decision-making processes under their respective legal authorities. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA.

PROJECT LOCATION

The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County, California. Figure 1, Project Location, depicts an overview of the proposed Project in the context of regional jurisdictions.

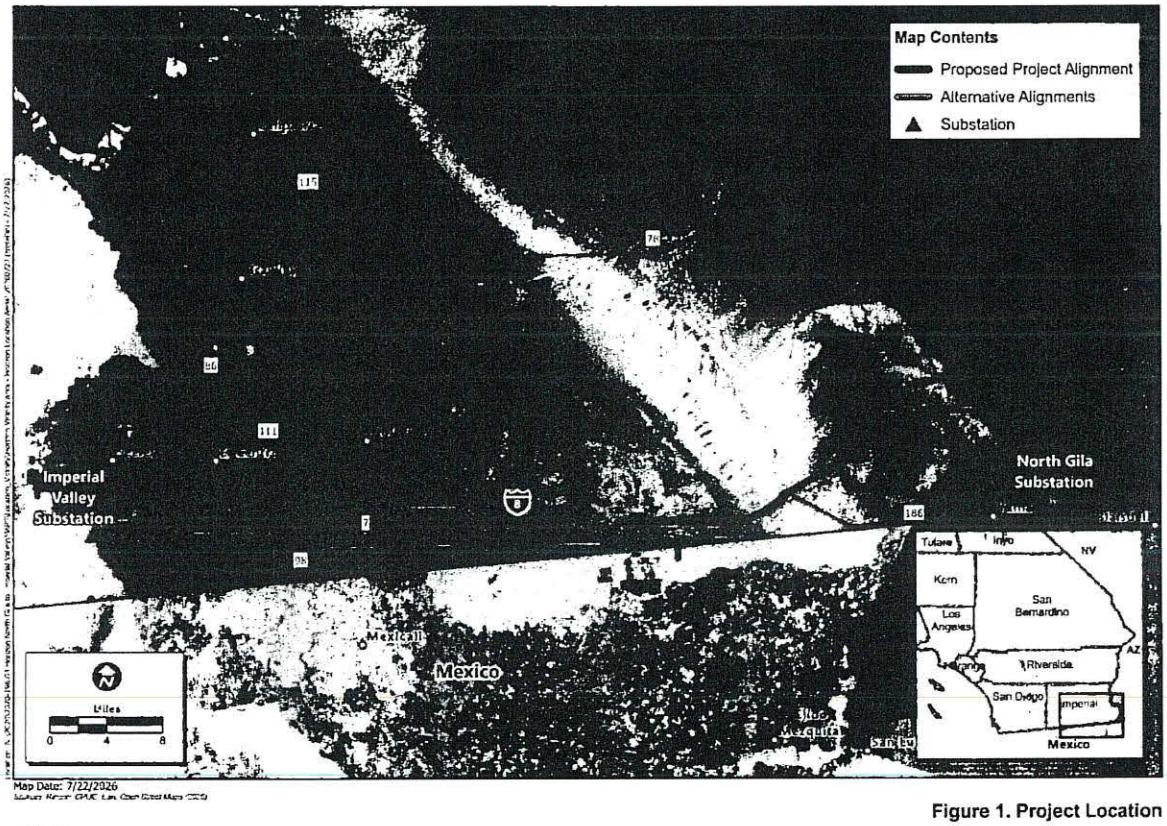

Figure 1. Project Location

ECORP Consulting, Inc.

2020-196.03 Horizon North Gila to Imperial Valley

PROJECT DESCRIPTION

The Project would involve construction, operation, and maintenance of a new approximately 86-mile-long 500 kV transmission line extending between the APS North Gila Substation in western Yuma County, Arizona and SDG&E's) Imperial Valley Substation in Imperial County, California. The Project would traverse a combination of federal, state, and private lands, including lands administered by the BLM.

Major Project components would include installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, site restoration, and related activities. The Project would also

include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities.

Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary workforce facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

Applicant Proposed Measures

As part of the Project, HWT has committed to implementing Applicant Proposed Measures (APMs) intended to avoid, minimize, or reduce potential environmental impacts associated with construction, operation, and maintenance of the Project. The proposed APMs address a range of environmental resource areas, including, but not limited to, biological resources, cultural and tribal cultural resources, air quality, hydrology and water quality, hazardous materials, noise, wildfire prevention, traffic and public safety, and restoration of temporary disturbance areas. The EIR will evaluate these measures as part of the proposed Project, and the CPUC may identify additional mitigation measures, where necessary and feasible, to avoid or reduce potentially significant environmental impacts identified during the CEQA review process.

Project Objectives

HWT states that the purpose of the Project is to improve regional electric transmission reliability and increase transmission system capacity between Arizona and California. The Project is intended to support the transfer of electricity across the regional transmission system and address existing and forecast transmission constraints identified through regional transmission planning processes.

HWT has identified the following primary objectives for the Project:

- Improve transmission system reliability between Arizona and California;
- Increase regional transmission capacity and operational flexibility within the bulk electric transmission system;
- Support delivery of electricity across the regional transmission network;
- Respond to existing and forecast transmission system needs identified through regional planning processes; and
- Construct and operate a new 500 kV transmission line connecting APS's North Gila Substation and SDG&E's Imperial Valley Substation.

As lead agency under CEQA, the CPUC is responsible for identifying appropriate CEQA project objectives, which may differ from HWT's objectives described above, to inform the CEQA review process, including the evaluation of alternatives and mitigation measures. The CPUC has not yet finalized the CEQA objectives for the Project.

ISSUES TO BE ADDRESSED IN THE EIR

It has been determined that an EIR is required for the CEQA review because the Project could result in potentially significant impacts to environmental resources. The EIR will address all of the issues identified in the CEQA Environmental Checklist Form (see CEQA Guidelines Appendix G), including aesthetics, air quality, biological resources, cultural and tribal resources, energy conservation, geology and soils (including paleontology), greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

Probable Environmental Effects

HWT has indicated that the Project's most substantial environmental impacts would likely be associated with aesthetics and visual resources, biological resources, cultural and tribal cultural resources, hydrology and water quality, air quality, noise, recreation, transportation, wildfire, and hazards and hazardous materials. These impacts are summarized below.

- ***Aesthetics and Visual Resources:*** Construction and operation of the proposed 500 kV transmission line and associated infrastructure could substantially alter visual character and scenic views in portions of the Project area, including views from public roads, recreational areas, and public lands administered by BLM.

- ***Air Quality:*** Construction activities could result in temporary emissions of criteria pollutants and dust from grading, excavation, vehicle travel, and operation of heavy equipment, which could affect nearby sensitive receptors and contribute to regional emissions.

- ***Biological Resources:*** Construction and operation of the Project could result in temporary and permanent impacts to desert habitats, sensitive vegetation communities, jurisdictional waters and washes, wildlife movement, and special-status plant and wildlife species, including federally and state-listed species and designated critical habitat.

- ***Cultural and Tribal Cultural Resources:*** Ground-disturbing activities associated with Project construction could result in disturbance or damage to known or previously undiscovered archaeological resources, historic resources, tribal cultural resources, or human remains.

• ***Geology, Soils, and Paleontological Resources: Construction*** activities, including grading and excavation, could result in erosion, soil disturbance, and impacts to paleontological resources or unique geologic features.

• ***Hazards and Hazardous Materials:*** Construction, operation, and maintenance activities could involve the transport, use, or disposal of hazardous materials and could create risks associated with accidental releases, wildfire ignition, or public safety hazards.

• ***Hydrology and Water Quality:*** Construction activities could temporarily or permanently affect washes, drainage features, and other potentially jurisdictional waters and could result in erosion, sedimentation, runoff, or degradation of surface water or groundwater quality.

• ***Noise:*** Construction activities could generate temporary increases in noise and vibration levels from heavy equipment, vehicle traffic, and transmission line construction activities in the vicinity of sensitive receptors and recreational areas.

• ***Recreation:*** Temporary construction activities could disrupt or limit access to recreational resources and public lands within portions of the Project area.

• ***Transportation and Traffic:*** Construction-related vehicle trips, oversized equipment transport, and temporary lane or access restrictions could affect local and regional roadway operations and access.

• ***Wildfire:*** Construction and operation of transmission facilities could increase wildfire risk through ignition sources associated with equipment operation, vehicles, or transmission infrastructure.

Mitigation Measures, Cumulative Impacts, and Alternatives

The EIR will include the CPUC's independent evaluation of the environmental effects identified above, as well as other potentially significant environmental impacts associated with construction, operation, maintenance, and eventual decommissioning of the Project. Where necessary and feasible, the CPUC may recommend mitigation measures, in addition to or in place of HWT's APMs, to avoid, minimize, or reduce potentially significant environmental impacts identified during the CEQA review process.

The EIR will also evaluate cumulative environmental impacts associated with the Project when considered together with past, present, and reasonably foreseeable future projects in the region. The cumulative analysis will consider projects and activities occurring within Imperial County, California, Yuma County, Arizona, and surrounding areas that could contribute to cumulative effects on environmental resources.

Alternatives identified to date include those evaluated in the PEA, including alternative transmission corridors, route segment variations, and substation interconnection configurations. These alternatives represent different feasible alignments between the North Gila Substation and the Imperial Valley Substation and reflect engineering, environmental, and land use considerations.

Consistent with CEQA, the EIR will evaluate a reasonable range of alternatives to the proposed Project, including a No Project Alternative, that could feasibly attain most of the Project's basic objectives while avoiding or substantially reducing significant environmental impacts. The EIR will also consider additional alternatives or route variations identified through agency consultation, public comments received during the scoping process, or environmental analysis conducted during preparation of the EIR.

Public Resources Code Section 21092.6(a)

Per Public Resources Code Section 21092.6(a), if the Project site or any Project alternative site to be analyzed is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List), that information must be included in the NOP. According to the PEA, several known hazardous materials release sites are located within one mile of portions of the proposed Project in California; however, no known release sites included on the Cortese List are located within the proposed Project footprint or alignment.

ISSUES THAT WILL NOT BE ADDRESSED IN THE EIR

Non-environmental issues such as economic impacts and assessment of Project need are outside the scope of CEQA and will not be addressed in the EIR, but those issues may be addressed through the CPUC's concurrent proceeding for the Project. The EIR will also not consider electric and magnetic fields (EMFs) that would be generated by the Project in the context of the CEQA analysis of potential environmental impacts, for two reasons: (1) there is no agreement among scientists that EMFs create a potential health risk; and (2) there are no defined or adopted CEQA standards for defining health risk from EMFs.

PUBLIC SCOPING PERIOD FOR THIS NOTICE OF PREPARATION

Pursuant to CEQA, the scoping period will be 45 days following the release of this NOP. The scoping period for this Project begins on Monday, August 7, 2026, and closes at 5:00 p.m. on Friday, September 21, 2026. Please include the name, organization or agency (if applicable), mailing address, and e-mail address of the contact person if you would like to receive future notifications related to this process. Public comments will become part of the public record and will be published in a Scoping Report on the CPUC website.

Please send your comments by mail to:

Boris Sanchez, CPUC
Ironwood Transmission Line Project; Attn. A. Surdzial
c/o ECORP Consulting, Inc.
215 North 5th Street, Redlands, CA 92374

or via electronic mail: CEQA@IronwoodTransmissionProject.com

SCOPING MEETINGS

In order for the public and regulatory agencies to have an opportunity to submit comments on the scope of the EIR for the Project, virtual meetings will be held during the EIR scoping period. Information about the virtual meetings is included in the table below. For the first half hour of the meetings, CPUC will present information to clarify a) the CPUC's process for reviewing the application; b) the environmental review process; and c) details on how the public can become involved with each of these processes. Following the educational presentation, the CPUC will hold the official scoping meeting beginning with a brief presentation providing an overview of the Project and alternatives identified to date. Following this presentation, agencies and the public will have an opportunity to provide verbal comments to inform the scope of the environmental review. Written comments will be accepted throughout the NOP scoping period to the address and/or email provided above.

REMINDER: comments will be accepted by e-mail, or mail postmarked through September 21, 2026 Please include the name, organization or agency (if applicable), mailing address, and e-mail address of the contact person if you would like to receive future notifications related to this process. Note that comments become public record.

PUBLIC SCOPING MEETINGS

Meeting Information	Virtual Meeting No. 1	Virtual Meeting No. 2
Day and Date	Thursday, August 27, 2026	Thursday, August 27, 2026
Time	3:00 p.m.	6:30 p.m.
Register to attend the meeting at this link	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

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Transaction Time:	10:45 AM
Transaction Total:	No Fee
Transaction Fee:	No Fee
Total Amount Due:	$0.00

Total Paid

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Amount Due: $0.00

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Comisión de Servicios Públicos de California

Notificación de Reuniones Públicas y Publicación de la Notificación de Preparación de un Informe de Impacto Ambiental para el Proyecto de Línea de Transmisión Ironwood

Se informa de que la Comisión de Servicios Públicos de California (CPUC, por sus siglas en inglés), como Agencia Líder según la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés), ha publicado una Notificación de Preparación (NOP, por sus siglas en inglés) de un Informe de Impacto Ambiental (EIR, por sus siglas en inglés) y organizarán reuniones públicas para el Proyecto de Línea de Transmisión Ironwood (el Proyecto). Horizon West Transmission, LLC (HWT, por sus siglas en inglés) ha presentado una solicitud (A.25-09-008) ante la CPUC para obtener un Certificado de Conveniencia y Necesidad Pública (CPCN, por sus siglas en inglés) para el Proyecto. El Proyecto envolvería la construcción de una nueva línea de transmisión de 500 kilovoltios (kV) de aproximadamente 86 millas de largo que se extendería entre la Subestación North Gila de Arizona Public Service Company (APS, por sus siglas en inglés) en Arizona y ya Subestación Imperial Valley de San Diego Gas & Electric (SDG&E, por sus siglas en inglés) en California. El Proyecto se ubicará en el Condado de Imperial en California y en el Condado de Yuma en Arizona. El Proyecto está ubicado generalmente al sur de la Interestatal 8 y al este de las comunidades de El Centro, Heber, y Calexico en el Condado de Imperial.

El Proyecto mejoraría la confiabilidad regional de la transmisión eléctrica y aumentaría la capacidad del sistema de transmisión entre California y Arizona. El objetivo del Proyecto es apoyar la transferencia de electricidad a través del sistema de transmisión regional y abordar las limitaciones de transmisión existentes y previstas, identificadas a través de los procesos de planificación regional de la transmisión. Los componentes principales incluirían la instalación de nuevas líneas aéreas de transmisión de 500 kV, estructuras y cimientos de transmisión, líneas de comunicación de conductores y fibra óptica, vías de acceso temporales y permanentes, sitios de encordado y acopio, áreas de trabajo, y mejoras asociadas e infraestructura necesarias para apoyar la construcción, operación, y mantenimiento de la línea de transmisión. Las actividades de construcción incluirían el desbroce de vegetación, nivelación de terreno, excavación, instalación de cimientos, ensamblaje de estructuras, encordado de conductores, restauración del sitio, y actividades relacionadas. El Proyecto también incluiría el uso y la mejora de las vías de acceso existentes y el desarrollo de áreas de trabajo y áreas de preparación temporales para apoyar las actividades de construcción. La construcción del Proyecto ocurrirá en fases y requerirá el uso de maquinaria pesada, vehículos de construcción, instalaciones temporales para los trabajadores, y medidas de control de tráfico. Después de la construcción, se restaurarían las áreas de trabajo temporales en la medida de lo posible, mientras que las instalaciones permanentes permanecerían en funcionamiento como parte del sistema regional de transmisión eléctrica.

Partes del Proyecto cruzarían tierras federales administradas por la Oficina de Administración de Tierras (BLM, por sus siglas en inglés). Respectivamente, el Proyecto también está sujeto a revisión ambiental bajo de la Ley Nacional de Política Ambiental (NEPA, por sus siglas en inglés). La BLM será la Agencia Líder Federal para el proceso de revisión de NEPA. La CPUC revisará el Proyecto bajo CEQA. La CPUC y la BLM coordinarán los esfuerzos de revisión ambiental en la medida de lo posible; pero la revisión de CEQA y NEPA serán procesos de decisiones separados. Notificaciones y documentos separados, con periodos de revisión y comentarios separados, serán publicados por la CPUC para cumplir con CEQA y por la BLM para cumplir con NEPA.

De conformidad con CEQA, la CPUC está preparando un EIR para el Proyecto y está pidiendo comentarios para informar el alcance y contenido del EIR y ayudar a identificar las acciones, alternativas, medidas de mitigación, y efectos ambientales que se analizarán en el documento. Se puede acceder el NOP en línea en el sitio web de la CPUC para el Proyecto: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html. Iniciado con la publicación del NOP, el periodo de 45 días para la definición del alcance del EIR es desde el viernes, el 7 de agosto de 2026 hasta las 5:00 p.m. del lunes, el 21 de septiembre de 2026. Puede enviar sus comentarios sobre el alcance del EIR por escrito durante estos 45 días por correo a: Boris Sanchez, CPUC Ironwood Transmission Line Project; Attn. A. Surdzial c/o ECORP Consulting, Inc., 215 North 5th, Street, Redlands, CA 92374 o por correo electrónico a: CEQA@IronwoodTransmissionProject.com. La CPUC tendrá dos reuniones virtuales para darle la oportunidad al público y a las agencias reguladoras de presentar comentarios verbales sobre el alcance del EIR. A continuación, se proporciona información sobre las reuniones:

Información de la Reunión	Reunión Virtual 1	Reunión Virtual 2
Fecha y Hora	Jueves 27 de agosto 2026, 3:00 p.m.	Jueves 27 de agosto 2026, 6:30 p.m.
Registrarse en esta liga	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

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PUBLIC NOTICE

California Public Utilities Commission

Notice of Scoping Meetings and Release of Notice of Preparation of an Environmental Impact Report for the Ironwood Transmission Line Project

Notice is hereby given that the California Public Utilities Commission (CPUC), as lead agency for the purposes of the California Environmental Quality Act (CEQA) review, has released a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and will be hosting scoping meetings for the proposed Ironwood Transmission Line Project (Project). Horizon West Transmission, LLC (HWT) has filed an application (A.25-09-008) with the California Public Utilities Commission (CPUC) for a Certificate of Public Convenience and Necessity (CPCN) for the Proposed Project. The Project would involve construction of a new approximately 86-mile-long 500 kilovolt (kV) transmission line extending between Arizona Public Service Company's (APS) North Gila Substation in Arizona, and San Diego Gas & Electric Company's (SDG&E) Imperial Valley Substation in California. The Project would be located in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County.

The Project would improve regional electric transmission reliability and increase transmission system capacity between Arizona and California. The Project is intended to support the transfer of electricity across the regional transmission system and address existing and forecast transmission constraints identified through regional transmission planning processes. Major project components would include the installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support the construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, site restoration, and related activities. The Project would also include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities. Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary workforce facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

Portions of the Project would cross federal lands administered by the BLM. Accordingly, the Project is also subject to environmental review under the National Environmental Policy Act (NEPA). The BLM will be the lead federal agency for the NEPA review process. The CPUC will review the Project under CEQA. The CPUC and BLM will coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review will remain separate decision-making processes. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA.

Pursuant to CEQA, the CPUC is preparing an EIR for the Project and is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in it. The NOP may be accessed online at the CPUC's website for the Project: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html. Initiated by the release of the NOP, the 45-day scoping period is from Friday August 7, 2026 through 5:00 p.m Monday September 21, 2026. Scoping comments may be submitted in writing during the 45-day EIR scoping period by mail to: Boris Sanchez, CPUC Ironwood Transmission Line Project; Attn. A. Surdzial c/o ECORP Consulting, Inc. 215 North 5th, Street Redlands, CA 92374; or by email to CEQA@IronwoodTransmissionProject.com. The CPUC will hold two virtual meetings to allow the public and regulatory agencies to have an opportunity to submit verbal comments on the scope of the EIR. Meeting information is provided below.

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Date and Time	Thursday, August 27, 2026, 3:00 p.m.	Thursday, August 27, 2026, 6:30 p.m.
Register to attend the meeting at this link	https://tinyurl.com/IronwoodTLscoping1	https://tinyurl.com/IronwoodTLscoping2

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Publish: August 6, 2026

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Comisión de Servicios Públicos de California

Notificación de Reuniones Públicas y Publicación de la Notificación de Preparación de un Informe de Impacto Ambiental para el Proyecto de Línea de Transmisión Ironwood

Se informa de que la Comisión de Servicios Públicos de California (CPUC, por sus siglas en inglés), como Agencia Líder según la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés), ha publicado una Notificación de Preparación (NOP, por sus siglas en inglés) de un Informe de Impacto Ambiental (EIR, por sus siglas en inglés) y organizarán reuniones públicas para el Proyecto de Línea de Transmisión Ironwood (el Proyecto). Horizon West Transmission, LLC (HWT, por sus siglas en inglés) ha presentado una solicitud (A.25-09-008) ante la CPUC para obtener un Certificado de Conveniencia y Necesidad Pública (CPCN, por sus siglas en inglés) para el Proyecto. El Proyecto envolvería la construcción de una nueva línea de transmisión de 500 kilovoltios (kV) de aproximadamente 86 millas de largo que se extendería entre la Subestación North Gila de Arizona Public Service Company (APS, por sus siglas en inglés) en Arizona y ya Subestación Imperial Valley de San Diego Gas & Electric (SDG&E, por sus siglas en inglés) en California. El Proyecto se ubicará en el Condado de Imperial en California y en el Condado de Yuma en Arizona. El Proyecto está ubicado generalmente al sur de la Interestatal 8 y al este de las comunidades de El Centro, Heber, y Calexico en el Condado de Imperial.

El Proyecto mejoraría la confiabilidad regional de la transmisión eléctrica y aumentaría la capacidad del sistema de transmisión entre California y Arizona. El objetivo del Proyecto es apoyar la transferencia de electricidad a través del sistema de transmisión regional y abordar las limitaciones de transmisión existentes y previstas, identificadas a través de los procesos de planificación regional de la transmisión. Los componentes principales incluirían la instalación de nuevas líneas aéreas de transmisión de 500 kV, estructuras y cimientos de transmisión, líneas de comunicación de conductores y fibra óptica, vías de acceso temporales y permanentes, sitios de encordado y acopio, áreas de trabajo, y mejoras asociadas e infraestructura necesarias para apoyar la construcción, operación, y mantenimiento de la línea de transmisión. Las actividades de construcción incluirían el desbroce de vegetación, nivelación de terreno, excavación, instalación de cimientos, ensamblaje de estructuras, encordado de conductores, restauración del sitio, y actividades relacionadas. El Proyecto también incluiría el uso y la mejora de las vías de acceso existentes y el desarrollo de áreas de trabajo y áreas de preparación temporales para apoyar las actividades de construcción. La construcción del Proyecto ocurrirá en fases y requerirá el uso de maquinaria pesada, vehículos de construcción, instalaciones temporales para los trabajadores, y medidas de control de tráfico. Después de la construcción, se restaurarían las áreas de trabajo temporales en la medida de lo posible, mientras que las instalaciones permanentes permanecerían en funcionamiento como parte del sistema regional de transmisión eléctrica.

Partes del Proyecto cruzarían tierras federales administradas por la Oficina de Administración de Tierras (BLM, por sus siglas en inglés). Respectivamente, el Proyecto también está sujeto a revisión ambiental bajo de la Ley Nacional de Política Ambiental (NEPA, por sus siglas en inglés). La BLM será la Agencia Líder Federal para el proceso de revisión de NEPA. La CPUC revisará el Proyecto bajo CEQA. La CPUC y la BLM coordinarán los esfuerzos de revisión ambiental en la medida de lo posible; pero la revisión de CEQA y NEPA serán procesos de decisiones separados. Notificaciones y documentos separados, con periodos de revisión y comentarios separados, serán publicados por la CPUC para cumplir con CEQA y por la BLM para cumplir con NEPA.

De conformidad con CEQA, la CPUC está preparando un EIR para el Proyecto y está pidiendo comentarios para informar el alcance y contenido del EIR y ayudar a identificar las acciones, alternativas, medidas de mitigación, y efectos ambientales que se analizarán en el documento. Se puede acceder el NOP en línea en el sitio web de la CPUC para el Proyecto: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html. Iniciado con la publicación del NOP, el periodo de 45 días para la definición del alcance del EIR es desde el viernes, el 7 de agosto de 2026 hasta las 5:00 p.m. del lunes, el 21 de septiembre de 2026. Puede enviar sus comentarios sobre el alcance del EIR por escrito durante estos 45 días por correo a: Boris Sanchez, CPUC Ironwood Transmission Line Project; Attn. A. Surdzial c/o ECORP Consulting, Inc., 215 North 5th, Street, Redlands, CA 92374 o por correo electrónico a: CEQA@IronwoodTransmissionProject.com. La CPUC tendrá dos reuniones virtuales para darle la oportunidad al público y a las agencias reguladoras de presentar comentarios verbales sobre el alcance del EIR. A continuación, se proporciona información sobre las reuniones:

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PUBLIC NOTICE

California Public Utilities Commission

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The Project would improve regional electric transmission reliability and increase transmission system capacity between Arizona and California. The Project is intended to support the transfer of electricity across the regional transmission system and address existing and forecast transmission constraints identified through regional transmission planning processes. Major project components would include the installation of new overhead 500 kV transmission line facilities, transmission structures and foundations, conductor and fiber optic communication lines, temporary and permanent access roads, staging and pulling sites, work areas, and associated improvements and infrastructure necessary to support the construction, operation, and maintenance of the transmission line. Construction activities would include vegetation clearing, grading, excavation, foundation installation, structure assembly, conductor stringing, site restoration, and related activities. The Project would also include use and improvement of existing access routes and development of temporary work areas and staging areas to support construction activities. Construction of the Project would occur in phases and would require use of heavy equipment, construction vehicles, temporary workforce facilities, and traffic control measures. Following construction, temporary work areas would be restored to the extent feasible, while permanent facilities would remain in operation as part of the regional electrical transmission system.

PUBLIC NOTICE

Portions of the Project would cross federal lands administered by the BLM. Accordingly, the Project is also subject to environmental review under the National Environmental Policy Act (NEPA). The BLM will be the lead federal agency for the NEPA review process. The CPUC will review the Project under CEQA. The CPUC and BLM will coordinate environmental review efforts to the extent feasible; however, the CEQA and NEPA review will remain separate decision-making processes. Separate notices and documents, with separate review and comment periods, will be published by CPUC to comply with CEQA and BLM to comply with NEPA.

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Legal 9464
Publish: August 6, 2026

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APPENDIX D

Scoping Meeting Presentation

CPUC Transmission Permitting Process

Scoping Meeting on Horizon West Transmission's (HWT) Ironwood Transmission Project (Certificate of Public Convenience and Necessity [CPCN] Application No. A.25-09-008)

Proceso de Permisos de Transmisión de CPUC

Reunión Pública del Proyecto de Línea de Transmisión Ironwood de Horizon West Transmission (HWT, por sus siglas en inglés) (Certificado de Conveniencia y Necesidad Pública [CPCN, por sus siglas en inglés] Solicitud No. A.25-09-008)

Presentation by
California Public Utilities Commission
Energy Division, CEQA and FERC Branch

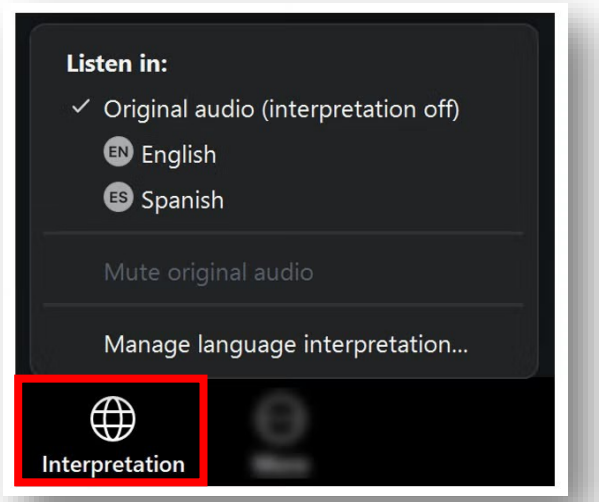
August 27, 2026

Presentación de la
Comisión de Servicios Públicos de California
División de Energía, Subdivisión de CEQA y FERC

27 de agosto de 2026

Interpretation

- For Desktop users,
  1. Click **Interpretation**
  2. Select the language
  3. (Optional) Click **Mute Original Audio,** to only hear Spanish translation
- For smart phone users,
  1. Tap **More**
  2. Tap **Language Interpretation**
  3. Select the language
  4. (Optional) Tap the toggle to **Mute Original Audio**



Interpretación

- Para usuarios de computadora,
  1. Haga clic en **Interpretation**
  2. Seleccione el idioma
  3. (Opcional) Haga clic en **Mute Original Audio** para escuchar solo la traducción al español
- Para usuarios de teléfono inteligente,
  1. Pulse **More**
  2. Pulse **Language Interpretation**
  3. Seleccione el idioma
  4. (Opcional) Pulse **Mute Original Audio**

This meeting is being recorded

- To support the preparation of the Draft Environmental Impact Report, we will be recording the meeting.
- The recording will only be used for internal purposes and will not be made publicly available.

Esta reunión se está grabando

- Para apoyar la preparación del Borrador del Informe de Impacto Ambiental, estaremos grabando la reunión.
- Solo se utilizará la grabación para fines internos y no estará disponible públicamente.

CPUC Transmission Permitting Process

Scoping Meeting on Horizon West Transmission's (HWT) Ironwood Transmission Project (Certificate of Public Convenience and Necessity [CPCN] Application No. A.25-09-008)

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Meeting Agenda

- Introductions
- Purpose of the Meeting
- Presentation
  - Project Overview
  - Application and Permitting Process
  - Environmental Review Process (CEQA)
  - Scoping: Environmental Impacts and Alternatives
- Public Comments
- Next Steps

Agenda de la Reunión

- Introducciones
- Propósito de la Reunión
- Presentación
  - Resumen del Proyecto
  - Proceso de Solicitud y Permisos
  - Proceso de Evaluación Ambiental (CEQA)
  - Alcance: Efectos Ambientales y Alternativas
- Comentarios Públicos
- Próximos Pasos

Introductions

- Boris Sanchez, CPUC Project Manager
- Michelle Wilson, CPUC Supervisor
- Anne Surdzial, ECORP Consulting, Inc. (CPUC consultant)
- Joan Isaacson, Kearns & West

Introducciones

- Boris Sanchez, Gerente de Proyecto de CPUC
- Michelle Wilson, Supervisora de CPUC
- Anne Surdzial, ECORP Consulting, Inc. (Consultor de CPUC)
- Joan Isaacson, Kearns & West

Meeting Purpose

- Provide an overview of the proposed Ironwood Transmission Line Project
- Explain the CPUC's environmental review process under CEQA
- Describe the purpose and scope of the Environmental Impact Report (EIR)
- Provide an opportunity for the public to submit scoping comments
- Gather input to help inform the scope and content of the EIR
- The US Bureau of Land Management (BLM) is the federal lead for the project and will have a separate process and meetings. CPUC is coordinating closely with BLM.

Propósito de la Reunión

- Proporcionar un resumen del Proyecto de Línea de Transmisión Ironwood propuesto
- Explicar el proceso de evaluación ambiental de la CPUC conforme a CEQA
- Describir el propósito y alcance del Informe de Impacto Ambiental (EIR, por sus siglas en inglés)
- Proporcionar la oportunidad al público de presentar comentarios de alcance
- Solicitar opiniones para ayudar a informar el alcance y contenido del EIR
- La Oficina de Administración de Tierras de los Estados Unidos (BLM, por sus siglas en inglés) es la agencia federal del proyecto y tendrá un proceso y reuniones por separado. La CPUC está coordinando estrechamente con la BLM.

Electrical Infrastructure

Infraestructura Eléctrica



Typical distribution line (<50 kilovolts [kV])

Línea de distribución típica (<50 kilovoltios [kV])



Typical substation

Subestación típica



Typical power line (50-200 kilovolts)

Línea eléctrica típica (50-200 kilovoltios)



Typical transmission line (>200 kilovolts)

Línea de transmisión típica (>200 kilovoltios)

CEQA: Project Description

- The project involves the construction, operation, and maintenance of a new approximately 86-mile-long 500 kilovolt (kV) transmission line between the Arizona Public Service Company's North Gila Substation in Arizona to San Diego Gas & Electric's Imperial Valley Substation in California
- The project would involve installation of approximately 307 steel tubular poles or lattice structures with heights typically ranging between 105 to 155 feet but not exceeding 200 feet
- The new transmission line, or what is known as conductor, would be strung between each structure spaced approximately 1,200 to 1,600 feet between structures

CEQA: Descripción del Proyecto

- El proyecto incluye la construcción, operación, y mantenimiento de una línea nueva de transmisión de 500 kilovoltios (kV) de aproximadamente 86 millas de largo entre la Subestación North Gila de Arizona Public Service Company en Arizona y la Subestación Imperial Valley de San Diego Gas & Electric en California
- El proyecto incluye la instalación de aproximadamente 307 postes tubulares de acero o estructuras de celosía con alturas típicamente entre 105 y 155 pies, sin exceder los 200 pies
- La nueva línea de transmisión, o lo que se conoce como conductor, se tendería entre las estructuras, las cuales estarían separadas por una distancia aproximada de 1,200 a 1,600 pies

CEQA: Project Description (cont.)

- The new line would require a 250-foot-wide corridor of new right-of-way acquired by Horizon West Transmission to be able to access the line for operations and maintenance
- The new structures and conductor would be installed using helicopters and heavy equipment on the ground
- Construction of the new line would involve new permanent and temporary access roads, areas for equipment and material staging, and helicopter takeoff and landing areas
- Construction is estimated to take approximately 19 months

CEQA: Descripción del Proyecto (cont.)

- La nueva línea requeriría un corredor de 250 pies adquirido por Horizon West Transmission para poder acceder a la línea para operaciones y mantenimiento
- Se instalarían las nuevas estructuras y el conductor utilizando helicópteros y maquinaria pesada
- La construcción de la nueva línea incluiría nuevas carreteras de acceso permanentes y temporales, áreas de preparación para equipos y materiales, y áreas para el despegue y aterrizaje de helicópteros
- Se estima que la construcción durará aproximadamente 19 meses

Figure 1. Project Location



Figura 1. Ubicación del Proyecto

Contenido del Mapa

- **Ruta del Proyecto Propuesto**
- **Rutas Alternativas**
- **Subestación**

Project Objectives

- Respond to existing and forecast transmission system needs identified through regional planning processes performed by the California Independent System Operator (CAISO), CPUC, and the California Energy Commission
- The project is needed to address thermal overloads on the existing transmission system in this region and to meet projected demand for electricity
- The project would also supplement the existing 500 kV Southwest Powerlink transmission line and add redundancy to the system, which would enable power transfers between the systems in the event of an outage
- Overall, the project would increase the capacity and reliability of the electrical grid in this area and improve operational flexibility

Objetivos del Proyecto

- Responder a las necesidades existentes y previstas del sistema de transmisión identificadas a través de los procesos de planificación regional realizados por el Operador Independiente del Sistema de California (CAISO, por sus siglas en inglés), la CPUC, y la Comisión de Energía de California
- El proyecto es necesario para abordar las sobrecargas térmicas en el sistema de transmisión existente en esta región y para satisfacer la demanda proyectada de electricidad
- El proyecto también complementaría la línea de transmisión existente de 500 kV de Southwest Powerlink y agregaría redundancia al sistema, lo que permitiría transferencias de energía entre los sistemas en caso de un apagón
- En general, el proyecto aumentaría la capacidad y fiabilidad de la red eléctrica en esta área y mejoraría la flexibilidad operativa

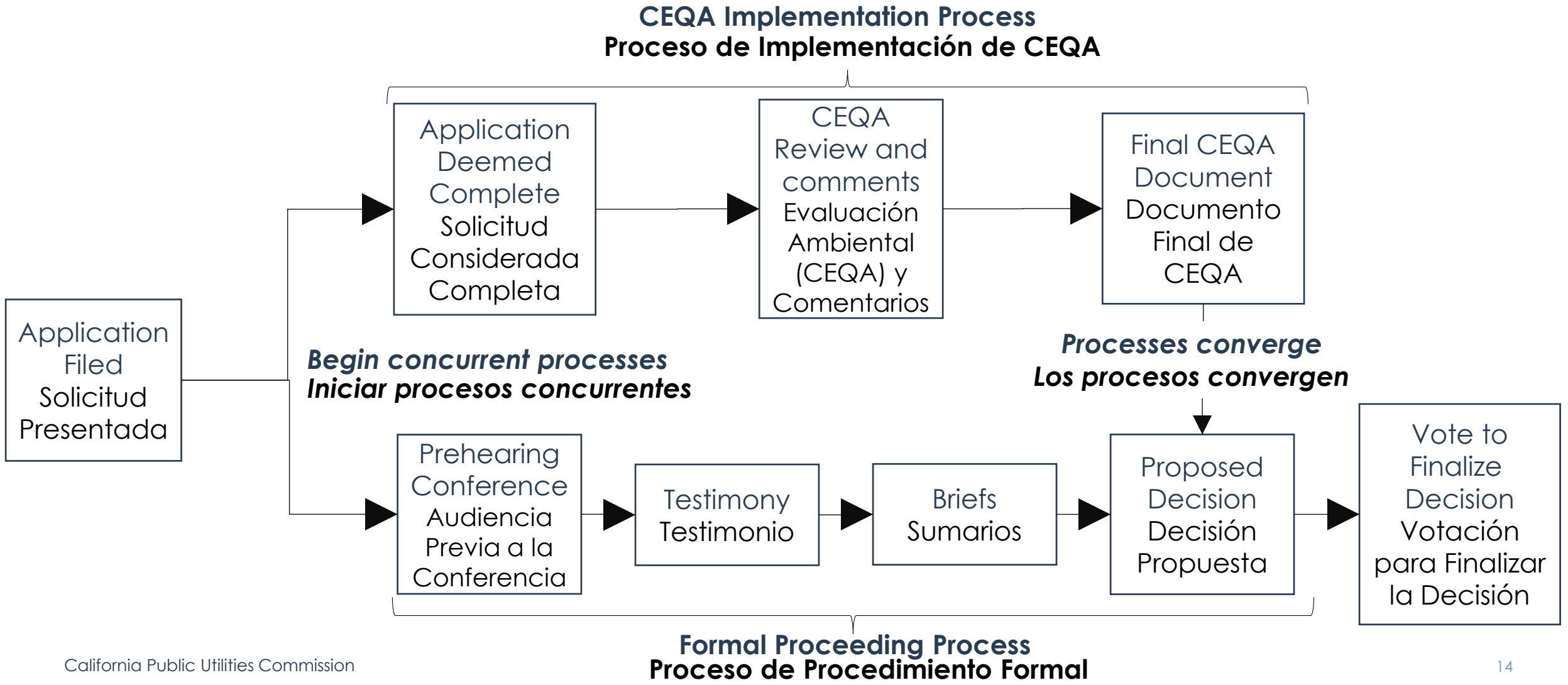
Permit Process for New Electrical Infrastructure

- The filing of a permit application triggers:
- Formal legal proceeding leading to a CPUC voting meeting
- Environmental review under the California Environmental Quality Act (CEQA) and Tribal consultation under Assembly Bill 52 (AB 52)

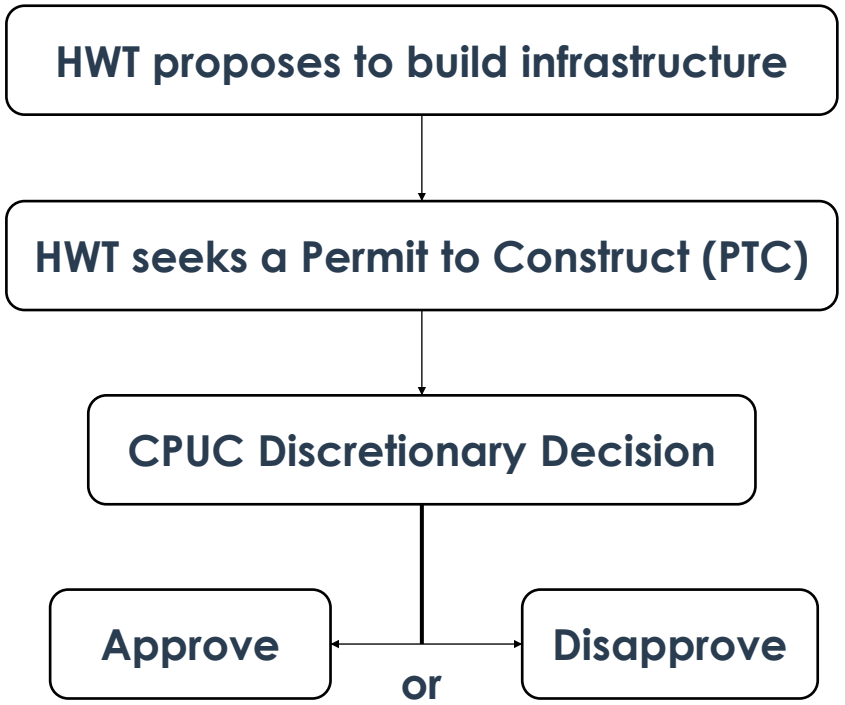
Proceso de Permisos para Nueva Infraestructura Eléctrica

- La presentación de una solicitud de permiso desencadena:
- Procedimiento legal formal que conduce a una reunión de votación de la CPUC
- Evaluación ambiental conforme a Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés) y consulta con tribus conforme al Proyecto de Ley de la Asamblea 52 (AB 52, por sus siglas en inglés)

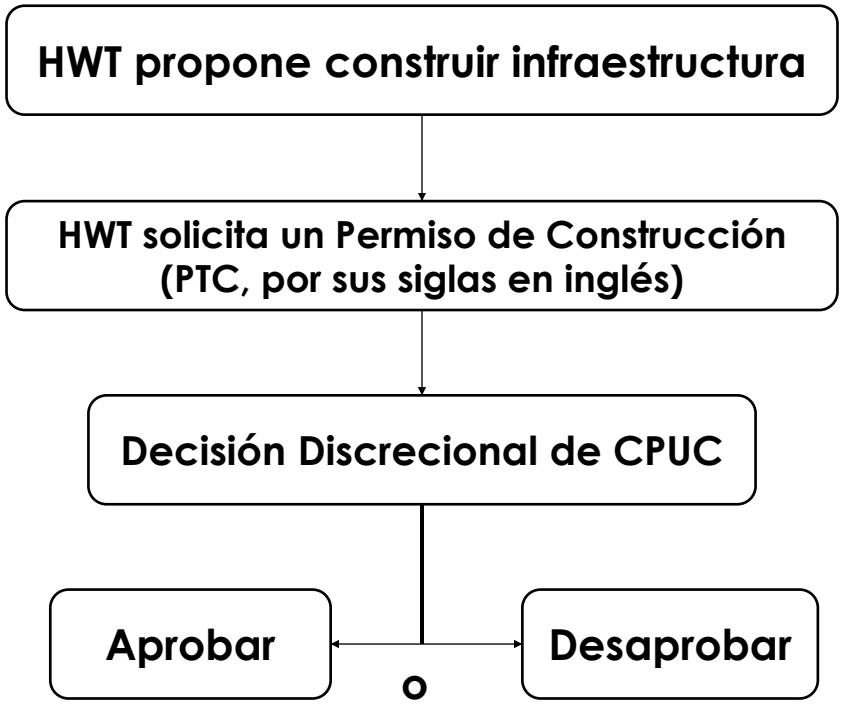
CPUC Proceedings: Concurrent Processes
Procedimientos de CPUC: Procesos Concurrentes



Application Process



Proceso de Solicitud



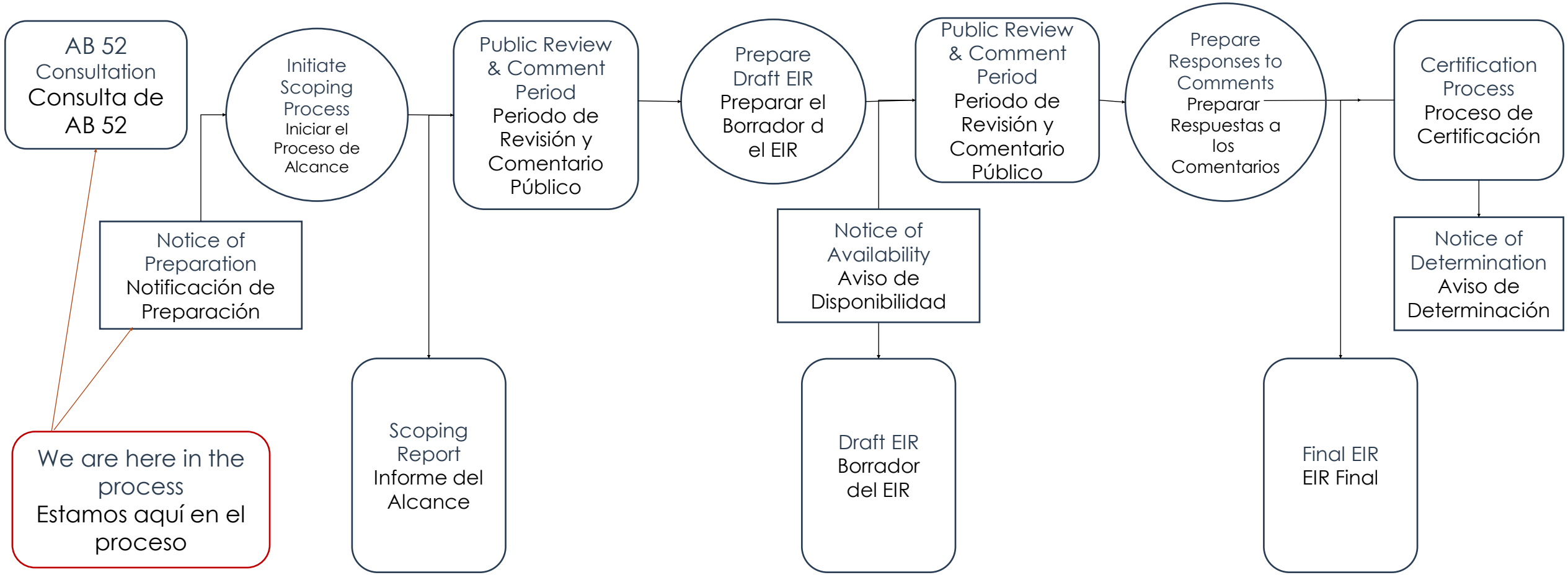
CEQA Overview

- The California Environmental Quality Act
  - Inform decision makers and the public about the potential significant environmental effects of a proposed project
  - Identify ways that environmental damage can be avoided or significantly reduced
  - Prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures
  - Disclose to the public the reasons why a governmental agency approved the project if significant environmental effects remain after mitigation
- Focus on physical impacts to the environment

Resumen de CEQA

- La Ley de Calidad Ambiental de California
  - Informar a las personas responsables de la toma de decisiones y al público sobre los posibles efectos ambientales significativos de un proyecto propuesto
  - Identificar maneras de evitar o reducir significativamente los daños ambientales
  - Prevenir daños significativos y evitables al medio ambiente a través del uso de alternativas o medidas de mitigación
  - Revelar al público las razones por las que una agencia gubernamental aprobó el proyecto si hay efectos ambientales significativos después de mitigación
- CEQA se enfoca en los impactos físicos de un proyecto al medio ambiente

CEQA EIR Process
Proceso de EIR de CEQA



What is Scoping?

- Scoping is the process of soliciting public and agency input regarding the scope and content of an EIR, in advance of its preparation.
- CPUC is requesting comments to inform the scope and content of the EIR and help identify the actions, alternatives, mitigation measures, and environmental effects to be analyzed in the EIR.

¿Qué es el Alcance?

- El alcance ambiental es el proceso de solicitar aportaciones del público y de agencias sobre el alcance y contenido de un EIR antes de su preparación.
- La CPUC está solicitando comentarios para informar el alcance y contenido del EIR y para ayudar identificar las acciones, alternativas, medidas de mitigación, y efectos ambientales que se analizarán en el EIR.

CEQA: Environmental Resource Areas

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality

CEQA: Áreas de Recursos Ambientales

- Estéticos
- Recursos Agrícolas y Forestales
- Calidad del Aire
- Recursos Biológicos
- Recursos Culturales
- Energía
- Geología y Suelos
- Emisiones de Gases de Efecto Invernadero
- Peligros y Materiales Peligrosos
- Hidrología y Calidad de Agua

CEQA: Environmental Resource Areas (cont.)

- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

CEQA: Áreas de Recursos Ambientales (cont.)

- Uso y Planificación Territorial
- Recursos Minerales
- Ruido
- Población y Alojamiento
- Servicios Públicos
- Recreación
- Transportación y Trafico
- Recursos Culturales Tribales
- Servicios Públicos y Sistemas de Servicio
- Incendio Forestal

For Each Resource Area

- Define and Describe Existing Setting
  - Environmental setting
  - Regulatory setting
- Establish Thresholds of Significance
  - What defines a “significant” impact
- Identify Project Impacts and Mitigation
  - CPUC Mitigation Measures
  - Significance after mitigation
- Evaluate Cumulative Impacts
- Impacts of Alternatives

Para Cada Área de Recursos

- Define y describe el entorno ambiental existente
  - Entorno ambiental
  - Entorno regulatorio
- Establece umbrales de significatividad
  - Que define un impacto "significativo"
- Identifica impactos del Proyecto y mitigación
  - Medidas de Mitigación de CPUC
  - Significatividad después de la implementación de la mitigación
- Evalúa los impactos acumulativos
- Impactos de las alternativas

CEQA Project Alternatives

- Identify a range of reasonable alternatives to avoid or substantially lessen significant effects of the project
- Feasible
  - Legal, regulatory, technical
- Meet most basic project objectives

Alternativas del Proyecto de CEQA

- Identificar una serie de alternativas razonables para evitar o reducir sustancialmente los efectos significativos del proyecto
- Viabilidad
  - Legal, regulatoria, técnica
- Cumplir con la mayoría de los objetivos básicos del proyecto

Alternatives

- The EIR will consider alternatives to the proposed Project
- Alternatives may include different routes or locations
- A No Project Alternative will also be considered
- Alternatives will be evaluated for their potential to reduce environmental impacts

Alternativas

- El EIR considerará alternativas al proyecto propuesto
- Las alternativas pueden incluir diferentes rutas o ubicaciones
- También se considerará una Alternativa Sin Proyecto
- Se evaluará el potencial de las alternativas para reducir los impactos ambientales

To Get Involved in the CEQA Process

- You're on the right track!
  - Please stay on and provide your scoping input
- Scoping Process
  - Scoping Period started on August 7, 2026 and closes on September 21, 2026, at 5:00 p.m.
- How to comment:
  - Verbally at this Scoping Meeting and/or
  - Submit a Comment Letter via Mail, or via Email

Para Participar en el Proceso de CEQA

- ¡Vas por buen camino!
  - Por favor permanezca en esta reunión y aporte sus comentarios sobre el alcance
- Proceso de Alcance
  - El periodo de alcance comenzó el 7 de agosto de 2026 y se termina el 21 de septiembre de 2026, a las 5:00 p.m.
- Cómo comentar:
  - Verbalmente en esta reunión y/o
  - Enviar una carta de comentario por correo postal o correo electrónico

CPUC Project Webpage / El Sitio Web del Proyecto de CPUC
https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html

Comments CPUC is Seeking

- CPUC is seeking input regarding:
  - Potential environmental impacts that should be evaluated
  - Alternatives that should be considered
  - Mitigation measures that could reduce environmental impacts
  - Local environmental conditions or resources CPUC should be aware of

Comentarios que CPUC está Solicitando

- La CPUC está pidiendo comentarios sobre:
  - Posibles impactos ambientales que deben ser evaluados
  - Alternativas que deben ser consideradas
  - Medidas de mitigación que puedan reducir los impactos ambientales
  - Condiciones o recursos ambientales locales que la CPUC debería tener en cuenta

How to Submit a Written Scoping Comment
Como Enviar un Comentario Escrito de Alcance

Public Comment Mailing Address / Dirección Postal de Comentarios Públicos

California Public Utilities Commission

Boris Sanchez, Ironwood Transmission Line Project

c/o ECORP Consulting, Inc.

215 North 5th Street

Redlands, CA 92374

E-mail: CEQA@IronwoodTransmissionProject.com

CPUC Project Webpage / El Sitio Web del Proyecto de CPUC
https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html

Scoping Comment Deadline: (5 p.m.) September 21, 2026
Fecha Límite de Comentarios: (5 p.m.) 21 de septiembre de 2026

Provide Scoping Comments in the Meeting

- **To provide a scoping comment today, please use the Zoom raise hand function to join the virtual queue.** You will be called on by the facilitator in the order you raise your hand.
- Each person will have **2 minutes**
- **Questions about the CPUC application and environmental process can be submitted in the Q&A pod**

Proporcionar Comentarios de Alcance en la Reunión

- **Para proporcionar un comentario de alcance hoy, por favor utilice la función de Zoom de levantar la mano para unirse a la fila virtual.** El facilitador le llamará en el orden en que levanto la mano.
- Cada persona tendrá **2 minutos**
- **Se pueden envirar preguntas sobre el proceso de solicitud de CPUC y el proceso de evaluación ambiental en la sección de preguntas y respuestas (Q&A, por sus siglas en inglés)**

Provide Scoping Comments After Meeting
Proporcionar Comentarios de Alcance Después de la Reunión

Public Comment Mailing Address / Dirección Postal de Comentarios Públicos

California Public Utilities Commission

Boris Sanchez, Ironwood Transmission Line Project

c/o ECORP Consulting, Inc.

215 North 5th Street

Redlands, CA 92374

Email / Correo Electrónico

CEQA@IronwoodTransmissionProject.com

CPUC Project Webpage / El Sitio Web del Proyecto de CPUC

https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html

Scoping Comment Deadline: (5 p.m.) September 21, 2026

Fecha Límite de Comentarios: (5 p.m.) 21 de septiembre de 2026

For Additional Information

To request additional information, please contact CPUC's Project Manager:

Para Información Adicional

Para solicitar información adicional, por favor comuníquese con el Gerente del Proyecto de CPUC:

Public Comment Mailing Address / Dirección Postal de Comentarios Públicos

California Public Utilities Commission

Boris Sanchez, Ironwood Transmission Line Project

c/o ECORP Consulting, Inc.

215 North 5th Street

Redlands, CA 92374

Thank You!

APPENDIX E

Scoping Meeting Transcripts

WEBVTT

1
00:00:12.420 --> 00:00:23.719
Joan Isaacson, Kearns & West: Good afternoon, everyone. Thank you for joining this meeting. It looks like people are still coming into the Zoom platform, and so we'll… we'll wait just a moment before we start.

2
00:00:59.600 --> 00:01:12.990
Joan Isaacson, Kearns & West: Once again, good afternoon, and if you've just joined, we're holding off just a minute before we start, so that everyone has a chance to get connected up. So we'll start in just about a minute. Thank you.

3
00:01:35.140 --> 00:01:37.280
Joan Isaacson, Kearns & West: Alright, I think we can go ahead and start.

4
00:01:37.380 --> 00:01:45.190
Joan Isaacson, Kearns & West: So, this is a meeting that is being held by the California Public Utility Commission, the CPUC, and

5
00:01:45.200 --> 00:01:59.009
Joan Isaacson, Kearns & West: I'm going to hand this off to our Spanish interpreter, who will give information about how to connect to the interpretation channel, and then I'll come back and we'll talk more about the purpose of this meeting. So, Mariana, over to you.

6
00:01:59.530 --> 00:02:05.350
Mariana Lopez Spanish interpreter 2: Gracias, muy buenas tardes, estaremos ofreciendo interpretacion simultane al espanol durante esta reunion.

7
00:02:05.520 --> 00:02:17.030
Mariana Lopez Spanish interpreter 2: Si desea escuchar la interpretacion en ingles en espanol, aga click en el boton de interpreteracion en la parte inferior derecha de la pantalla sum, pera un iconicono informa de globo terracio.

8
00:02:17.280 --> 00:02:20.710
Mariana Lopez Spanish interpreter 2: Este aparecer a justo despues de estas instrucciones.

9
00:02:21.000 --> 00:02:31.499
Mariana Lopez Spanish interpreter 2: Sinos acompana traves de la aplicacion son para telefono intelligente, seleccione su idioma haciendo

click en donde dice mas, buenos 3 puntos en la esquin inferior derecha de su pantalla.

10
00:02:31.740 --> 00:02:45.059
Mariana Lopez Spanish interpreter 2: Seleccion de interpretacion del idioma, el hija espanol, o ingles, y aga click en donde diselisto. Si descuchar solo al interprete y no a los presentadores a segure se hacer click en silenciar audio originar.

11
00:02:45.410 --> 00:03:02.089
Mariana Lopez Spanish interpreter 2: Good afternoon, everyone. We'll be offering simultaneous interpretation in English and Spanish during this meeting. If you wish to hear the speakers in English or Spanish, please click the interpretation button at the bottom right corner of your Zoom screen. You'll see a globe icon that will appear right after these instructions.

12
00:03:02.350 --> 00:03:10.399
Mariana Lopez Spanish interpreter 2: If you're joining us via the Zoom smartphone app, select your language by clicking More, or the three dots in the bottom right corner of your Zoom screen.

13
00:03:10.450 --> 00:03:22.720
Mariana Lopez Spanish interpreter 2: Select language interpretation, then choose English or Spanish, and click Done. If you wish to hear only the interpreter and not the original speakers, be sure to click Mute Original Audio. Back to you, Joan.

14
00:03:25.170 --> 00:03:32.180
Joan Isaacson, Kearns & West: Thank you so much. And everyone, we will be seeing the globe on the bottom of our screen soon.

15
00:03:32.720 --> 00:03:43.470
Joan Isaacson, Kearns & West: And it's important that all of us click either English or Spanish, and that way, if interpretation is going back and forth, we'll all be able to hear

16
00:03:43.550 --> 00:03:52.730
Joan Isaacson, Kearns & West: We'll be able to hear that. So, and my screen, the way I found it is I needed to go under more. It's the circle on the far right that has the three dots.

17
00:03:53.270 --> 00:04:03.069
Joan Isaacson, Kearns & West: So I click there, and then that screen opens up, and then that globe for interpretation, shows up as one of the icons there. So I'm going to click that for myself.

18
00:04:04.630 --> 00:04:09.509
Joan Isaacson, Kearns & West: All right, so let me tell you a little bit more about this meeting. We'll go to the next slide, please.

19
00:04:12.210 --> 00:04:18.019
Joan Isaacson, Kearns & West: And I just… before I go forward, I just want to let everyone know that the meeting is being recorded, too.

20
00:04:20.100 --> 00:04:29.600
Joan Isaacson, Kearns & West: All right, so this is a meeting that's being conducted by the California Public Utility Commission as part of the transmission permitting process.

21
00:04:29.790 --> 00:04:40.300
Joan Isaacson, Kearns & West: for the Ironwood West Transmission Project. And it's… it's a scoping meeting, so this is an important phase of the environmental review process.

22
00:04:40.300 --> 00:04:51.840
Joan Isaacson, Kearns & West: And the primary purpose of this meeting is to hear input from the public about the types of issues and questions that you would like addressed during the environmental review process.

23
00:04:53.280 --> 00:04:54.520
Joan Isaacson, Kearns & West: Next slide, please.

24
00:04:55.380 --> 00:05:09.410
Joan Isaacson, Kearns & West: On the screen right now is the agenda for the meeting, so, we're going to do some introductions, you'll hear about… more about the purpose of the meeting, and then a presentation that'll provide information to you about the proposed project.

25
00:05:09.670 --> 00:05:19.130
Joan Isaacson, Kearns & West: the permitting process and the application process that's conducted by the California Public Utility Commission, the environmental review process, which is conducted

26
00:05:19.260 --> 00:05:28.440
Joan Isaacson, Kearns & West: per the California Environmental Quality Act, which you'll hear called CEQA for short, and then also information about the scoping process itself.

27
00:05:29.250 --> 00:05:38.680

Joan Isaacson, Kearns & West: Then, the most important part of the meeting is the portion where we will be hearing public comments, and then we'll wrap up with next steps. And I'll make a note that

28
00:05:38.780 --> 00:05:51.810
Joan Isaacson, Kearns & West: This is not the only time to provide scoping comments, so this is… this is, the scoping period will go on for a while after we have this meeting. There'll be plenty of time to submit comments.

29
00:05:51.930 --> 00:05:57.269
Joan Isaacson, Kearns & West: And while we are taking verbal comments during this meeting, the CPUC

30
00:05:57.610 --> 00:06:06.650
Joan Isaacson, Kearns & West: which stands for the California Public Utilities Commission. You'll hear them referred to as CPUC. They really encourage people to submit

31
00:06:07.100 --> 00:06:08.540
Joan Isaacson, Kearns & West: written comments.

32
00:06:09.010 --> 00:06:21.330
Joan Isaacson, Kearns & West: So that they have, like, the best understanding possible of the questions and the comments that you want to contribute to this process. So we'll talk more about how to submit comments later on in this meeting.

33
00:06:24.640 --> 00:06:26.160
Joan Isaacson, Kearns & West: All right, next slide, please.

34
00:06:27.640 --> 00:06:35.160
Michelle Wilson, CPUC: And hello, everyone. I'd like to introduce myself. I'm Michelle Wilson, a supervisor with the CPUC.

35
00:06:35.400 --> 00:06:45.300
Michelle Wilson, CPUC: And Boris Sanchez is the project manager for CPUC, and he's not able to attend this meeting, so I'll be giving this presentation in his place.

36
00:06:45.700 --> 00:06:50.179
Michelle Wilson, CPUC: Also, I'd like to introduce Ann Sergil with ECOR Consulting.

37

00:06:50.290 --> 00:06:56.989
Michelle Wilson, CPUC: who is our environmental consultant, responsible for preparing the CEQA document for this project.

38
00:06:57.390 --> 00:07:03.220
Michelle Wilson, CPUC: And Joan Isaacson with Kearns & West, and the Kearns & West team here to assist us.

39
00:07:04.380 --> 00:07:08.420
Michelle Wilson, CPUC: The CPC is responsible for permitting

40
00:07:08.580 --> 00:07:16.330
Michelle Wilson, CPUC: New infrastructure for transmission, as well as other infrastructure owned and operated by a public utility.

41
00:07:17.750 --> 00:07:19.550
Michelle Wilson, CPUC: Next slide.

42
00:07:23.810 --> 00:07:26.809
Michelle Wilson, CPUC: So I'd like to go over the meeting purpose for today.

43
00:07:27.270 --> 00:07:36.899
Michelle Wilson, CPUC: It's to provide an overview of the proposed Ironwood Transmission Line project, to explain CPUC's environmental review process under CEQA,

44
00:07:37.520 --> 00:07:44.810
Michelle Wilson, CPUC: To describe the purpose and scope of the environmental impact report that will be prepared in accordance with CEQA,

45
00:07:45.450 --> 00:07:49.789
Michelle Wilson, CPUC: To provide an opportunity for the public to submit scoping comments.

46
00:07:50.290 --> 00:07:57.400
Michelle Wilson, CPUC: To gather input to help inform the scope and content of the EIR, or Environmental Impact Report.

47
00:07:57.860 --> 00:08:07.239
Michelle Wilson, CPUC: And I want to make a special note that the U.S. Bureau of Land Management is a federal lead agency for this project, and has a separate process

48
00:08:07.370 --> 00:08:10.309
Michelle Wilson, CPUC: And we'll be having separate meetings for this project.

49
00:08:10.550 --> 00:08:15.350
Michelle Wilson, CPUC: But CPC is coordinating closely with BLM throughout this process.

50
00:08:16.290 --> 00:08:17.390
Michelle Wilson, CPUC: Next slide.

51
00:08:19.760 --> 00:08:24.959
Michelle Wilson, CPUC: So, first, I'd like to describe the type of infrastructure that's being proposed.

52
00:08:25.090 --> 00:08:29.250
Michelle Wilson, CPUC: and CPUC's role in permitting this infrastructure.

53
00:08:29.610 --> 00:08:39.220
Michelle Wilson, CPUC: So, to give an overview, these four pictures show types of electrical infrastructure constructed by a public utility.

54
00:08:39.429 --> 00:08:45.810
Michelle Wilson, CPUC: On the top left screen is shown typical distribution lines.

55
00:08:46.020 --> 00:08:53.790
Michelle Wilson, CPUC: These are less than 50 kilovolts, and typically are the lines you see that run to homes and businesses.

56
00:08:54.210 --> 00:09:00.630
Michelle Wilson, CPUC: CPC does not issue permits for these types of, improvements.

57
00:09:01.170 --> 00:09:11.789
Michelle Wilson, CPUC: However, CPC does issue permits for the larger power lines and transmission lines and substations shown in the remaining three.

58
00:09:12.100 --> 00:09:14.169
Michelle Wilson, CPUC: Pictures on your screen.

59
00:09:14.500 --> 00:09:19.309
Michelle Wilson, CPUC: Those have, voltages greater than 50 kilovolts.

60
00:09:19.500 --> 00:09:27.120
Michelle Wilson, CPUC: And those lines are important to transmit electricity over long distances, in… within the region.

61
00:09:28.820 --> 00:09:29.920
Michelle Wilson, CPUC: Next slide.

62
00:09:33.280 --> 00:09:41.569
Michelle Wilson, CPUC: So now I'll go over the project description, and a little bit later, I'll show you a map of the proposed new transmission line route.

63
00:09:42.280 --> 00:09:52.410
Michelle Wilson, CPUC: The project involves construction, operation, and maintenance of a new, approximately 86-mile-long 500 kilovolt transmission line.

64
00:09:52.810 --> 00:09:59.730
Michelle Wilson, CPUC: Between Arizona Public Service Company's North Gila Substation in Arizona.

65
00:10:00.280 --> 00:10:06.069
Michelle Wilson, CPUC: to San Diego Gas and Electric's Imperial Valley Substation in California.

66
00:10:07.460 --> 00:10:10.970
Michelle Wilson, CPUC: The project would involve installation of approximately

67
00:10:11.110 --> 00:10:16.689
Michelle Wilson, CPUC: 307 new steel tubular poles, or lattice structures.

68
00:10:17.100 --> 00:10:25.750
Michelle Wilson, CPUC: With heights typically ranging between 105 to 155 feet, But not exceeding 200 feet.

69
00:10:26.600 --> 00:10:31.299
Michelle Wilson, CPUC: Some examples of these structures were on the slide previous to this one.

70
00:10:32.430 --> 00:10:40.780
Michelle Wilson, CPUC: A new transmission line, or what is known as conductor, would be strung between each structure, Spaced approximately…

71
00:10:41.130 --> 00:10:44.880
Michelle Wilson, CPUC: 1,200 to 1600 feet between structures.

72
00:10:45.870 --> 00:10:47.020
Michelle Wilson, CPUC: Next slide.

73
00:10:51.920 --> 00:11:00.889
Michelle Wilson, CPUC: The new line would require an approximately 200-foot-wide corridor of new right-of-way acquired by Horizon West Transmission.

74
00:11:01.030 --> 00:11:03.780
Michelle Wilson, CPUC: The public utility proposing this project.

75
00:11:04.110 --> 00:11:09.540
Michelle Wilson, CPUC: This would enable access to the line for operations and maintenance of the line in the future.

76
00:11:10.590 --> 00:11:17.079
Michelle Wilson, CPUC: The new structures and conductor would be installed using helicopters and heavy equipment on the ground.

77
00:11:17.810 --> 00:11:26.309
Michelle Wilson, CPUC: Construction of the new line would involve new, permanent, and temporary access roads, areas for equipment and material staging.

78
00:11:26.500 --> 00:11:30.290
Michelle Wilson, CPUC: And the helicopter takeoff and landing areas.

79
00:11:30.790 --> 00:11:34.939
Michelle Wilson, CPUC: Construction is estimated to take approximately 19 months.

80
00:11:36.000 --> 00:11:37.090
Michelle Wilson, CPUC: Next slide.

81

00:11:39.510 --> 00:11:44.689
Michelle Wilson, CPUC: This figure depicts the proposed alignment, shown in red.

82
00:11:45.460 --> 00:11:52.620
Michelle Wilson, CPUC: As well as yellow lines showing alternative alignments considered, that will be considered

83
00:11:52.720 --> 00:11:55.700
Michelle Wilson, CPUC: by the CPUC in our CAQA document.

84
00:11:56.540 --> 00:12:07.990
Michelle Wilson, CPUC: I will note that this purpose, or one purpose for this meeting is to solicit public comment on the alternative alignments, so we will be looking for the public to provide input

85
00:12:08.120 --> 00:12:10.960
Michelle Wilson, CPUC: On this route, shown here in this figure.

86
00:12:11.270 --> 00:12:13.609
Michelle Wilson, CPUC: And I'll describe it briefly.

87
00:12:14.140 --> 00:12:17.779
Michelle Wilson, CPUC: The substations are shown with green triangles.

88
00:12:18.160 --> 00:12:22.629
Michelle Wilson, CPUC: The Imperial Valley substation is shown on the far left of the figure.

89
00:12:22.770 --> 00:12:27.309
Michelle Wilson, CPUC: And the North Gila substation is shown on the far right of the figure.

90
00:12:27.590 --> 00:12:36.419
Michelle Wilson, CPUC: The proposed line would run from the Imperial Valley substation near the communities of El Centro, Calexico, and Heber.

91
00:12:36.600 --> 00:12:48.540
Michelle Wilson, CPUC: generally paralleling the Highway 8 alignment, as well as paralleling an existing 500 kilovolt transmission line called the Southwest Power Link.

92
00:12:48.810 --> 00:12:50.329

Michelle Wilson, CPUC: Transmission line.

93
00:12:51.300 --> 00:12:54.029
Michelle Wilson, CPUC: This line would then, once it's…

94
00:12:54.180 --> 00:13:03.229
Michelle Wilson, CPUC: Once it's passed the communities of El Centro, Hebra, and Calexico, it would run further east through the Algadones Dunes.

95
00:13:03.670 --> 00:13:09.000
Michelle Wilson, CPUC: And then further east from there, across the Cargo Muchacho Mountains.

96
00:13:09.470 --> 00:13:14.820
Michelle Wilson, CPUC: It would run north of the Fort Yuma Kwitsan, reservation.

97
00:13:15.960 --> 00:13:23.899
Michelle Wilson, CPUC: Further east, Where it would then cross the Colorado River, generally near the Midtree Lake area.

98
00:13:24.680 --> 00:13:33.490
Michelle Wilson, CPUC: Then, the transmission line would run directly south through the Laguna Mountains to interconnect to the North Gila substation.

99
00:13:34.960 --> 00:13:47.679
Michelle Wilson, CPUC: I want to note that there are more detailed maps located on CPUC's website, which will be shown at the end of this presentation, where you can see detailed maps of the alignment.

100
00:13:47.930 --> 00:13:56.840
Michelle Wilson, CPUC: in what is called Attachment A of the proponent's Environmental Assessment, submitted with the application for this project.

101
00:13:58.250 --> 00:13:59.300
Michelle Wilson, CPUC: Next slide.

102
00:14:03.010 --> 00:14:05.720
Michelle Wilson, CPUC: Next, I'd like to go over the project objectives.

103

00:14:05.940 --> 00:14:13.720
Michelle Wilson, CPUC: this project is being proposed in response to existing and forecast transmission system

104
00:14:13.840 --> 00:14:18.619
Michelle Wilson, CPUC: Needs identified through regional planning processes performed by

105
00:14:18.730 --> 00:14:24.689
Michelle Wilson, CPUC: what is known as the California Independent System Operator, or CAISO for short.

106
00:14:25.230 --> 00:14:28.649
Michelle Wilson, CPUC: The CPC and California Energy Commission.

107
00:14:29.280 --> 00:14:37.849
Michelle Wilson, CPUC: The project is needed to address thermal overloads on the existing transmission system in this region, and to meet projected demand for electricity.

108
00:14:38.560 --> 00:14:47.270
Michelle Wilson, CPUC: The project would also supplement the existing 500 kilovolt Southwest PowerLink Transmission line and add redundancy to the system.

109
00:14:47.420 --> 00:14:52.150
Michelle Wilson, CPUC: Which would enable power transfers between the systems in the event of an outage.

110
00:14:52.680 --> 00:15:00.579
Michelle Wilson, CPUC: Overall, the project would increase the capacity and reliability of the electrical grid in the area and improve operational flexibility.

111
00:15:01.760 --> 00:15:02.859
Michelle Wilson, CPUC: Next slide.

112
00:15:05.810 --> 00:15:11.639
Michelle Wilson, CPUC: Next, I will go over the permit process for this new electrical infrastructure.

113
00:15:12.040 --> 00:15:18.909
Michelle Wilson, CPUC: The process starts with filing of a permit application by a public utility, which is Horizon West Transmission.

114
00:15:19.510 --> 00:15:22.130
Michelle Wilson, CPUC: This kicks off two processes.

115
00:15:22.580 --> 00:15:25.670
Michelle Wilson, CPUC: One is a formal legal proceeding.

116
00:15:25.910 --> 00:15:33.330
Michelle Wilson, CPUC: Leading to a CPUC voting meeting before the CPUC's 5-member commission.

117
00:15:34.440 --> 00:15:40.240
Michelle Wilson, CPUC: And it also triggers environmental review under this… under the California Environmental Quality Act.

118
00:15:40.580 --> 00:15:47.220
Michelle Wilson, CPUC: and tribal consultation under Assembly Bill 52 associated with CEQA review.

119
00:15:47.760 --> 00:15:51.369
Michelle Wilson, CPUC: And the next slide, I'll show you a figure of this permit process.

120
00:15:53.610 --> 00:15:54.610
Michelle Wilson, CPUC: Next slide.

121
00:15:55.030 --> 00:16:00.269
Michelle Wilson, CPUC: So this is a graph showing those two processes, which run in parallel with each other.

122
00:16:01.890 --> 00:16:04.899
Michelle Wilson, CPUC: The public can participate in both processes.

123
00:16:05.350 --> 00:16:14.120
Michelle Wilson, CPUC: The process on the top of this graph is showing the CEQA process, and the process for the legal proceeding is shown on the bottom.

124
00:16:14.810 --> 00:16:18.910
Michelle Wilson, CPUC: To participate in the legal proceeding, a member of the public must

125

00:16:19.020 --> 00:16:22.539
Michelle Wilson, CPUC: File a motion to become a party to the proceeding.

126
00:16:22.690 --> 00:16:25.629
Michelle Wilson, CPUC: It's a much more formal legal process.

127
00:16:26.190 --> 00:16:35.270
Michelle Wilson, CPUC: More information can be obtained on this process by contacting Boris Sanchez, and his contact information will be at the end of this slide.

128
00:16:36.370 --> 00:16:45.020
Michelle Wilson, CPUC: The purpose of this meeting is to describe how to participate in the CEQA process, and that's our focus for the remainder of this meeting.

129
00:16:45.390 --> 00:16:48.789
Michelle Wilson, CPUC: But I wanted to let everyone know there are these two processes.

130
00:16:48.960 --> 00:16:50.699
Michelle Wilson, CPUC: That you can participate in.

131
00:16:52.100 --> 00:16:53.409
Michelle Wilson, CPUC: And next slide.

132
00:16:54.800 --> 00:17:02.010
Michelle Wilson, CPUC: This graph shows a little bit more of a simple, simple process, the breakdown of the application process.

133
00:17:02.540 --> 00:17:13.509
Michelle Wilson, CPUC: Essentially, the public utility will submit an application, which is, shown… it's actually called a Certificate of Public Necessity and Convenience.

134
00:17:13.680 --> 00:17:19.260
Michelle Wilson, CPUC: Not a permit to construct on this slide, but, either way, both are permits that

135
00:17:19.390 --> 00:17:24.209
Michelle Wilson, CPUC: The public utility must obtain from the Commission to implement the project.

136

00:17:24.550 --> 00:17:27.190
Michelle Wilson, CPUC: This goes through a decision process.

137
00:17:27.300 --> 00:17:36.730
Michelle Wilson, CPUC: held by the CPC, and ultimately leading to a vote by the Commission whether to approve or disapprove the project.

138
00:17:37.280 --> 00:17:43.499
Michelle Wilson, CPUC: I'll make a note that the Commission also makes a decision on which alternative to select if

139
00:17:43.640 --> 00:17:46.229
Michelle Wilson, CPUC: They do opt to approve the project.

140
00:17:46.650 --> 00:17:50.100
Michelle Wilson, CPUC: So, input into the alternatives is very important.

141
00:17:51.430 --> 00:17:52.690
Michelle Wilson, CPUC: Next slide.

142
00:17:55.440 --> 00:18:00.810
Michelle Wilson, CPUC: And now, I will turn the presentation over to Anne Sargill, who will go over the CEQA process.

143
00:18:02.870 --> 00:18:03.989
Anne Surdzial, ECORP: Thanks, Michelle.

144
00:18:04.130 --> 00:18:23.159
Anne Surdzial, ECORP: The purpose of CEQA is to inform agency decision makers, and in this case that is the CPUC, and the public about the potential environmental effects that may be caused by a project, so that they can be considered in the lead agency's decision to approve or deny the project's permit.

145
00:18:23.580 --> 00:18:32.650
Anne Surdzial, ECORP: The agency that has the main decision-making authority for the project is called the lead agency, and in this case, that is the CPUC.

146
00:18:32.960 --> 00:18:42.860
Anne Surdzial, ECORP: If a significant impact is identified, the lead agency must identify mitigation measures and alternatives that would reduce or avoid the impact.

147
00:18:43.110 --> 00:18:52.349
Anne Surdzial, ECORP: If the available mitigation will not reduce the impact to a less than significant level, and the lead agency decides to approve the project's permit.

148
00:18:52.690 --> 00:18:57.759
Anne Surdzial, ECORP: The lead agency must disclose to the public the reasons why that decision was made.

149
00:18:58.400 --> 00:19:08.710
Anne Surdzial, ECORP: The analysis in the CEQA document focuses on physical changes to the environment that could occur from construction or operation of a project.

150
00:19:08.990 --> 00:19:19.850
Anne Surdzial, ECORP: The description and disclosure of environmental impacts can happen in several different types of documents, one of which is called an environmental impact report.

151
00:19:20.910 --> 00:19:22.530
Anne Surdzial, ECORP: Next slide, please.

152
00:19:25.800 --> 00:19:37.860
Anne Surdzial, ECORP: This is a flowchart of the EIR process. An EIR is the most comprehensive type of CEQA document with the most opportunities for public input.

153
00:19:38.060 --> 00:19:45.950
Anne Surdzial, ECORP: We're currently in that far left, light blue portion of the process, which is the very beginning of the process.

154
00:19:46.190 --> 00:19:55.159
Anne Surdzial, ECORP: CPUC has already started the Native American consultation process that is required by CEQA and by AB52.

155
00:19:55.710 --> 00:20:05.639
Anne Surdzial, ECORP: This… at this beginning portion of the process, CPU is asking for input that you may have about impacts the project could have on the environment.

156
00:20:05.930 --> 00:20:15.589
Anne Surdzial, ECORP: and suggestions on alternatives or mitigation measures that could avoid these impacts. This is what's called scoping, or defining the scope of the EIR.

157
00:20:16.360 --> 00:20:26.980
Anne Surdzial, ECORP: After the scoping period ends on September 21st, the CPUC will publish a scoping report that summarizes all of the input received during the scoping period.

158
00:20:27.130 --> 00:20:34.649
Anne Surdzial, ECORP: And then we'll move on to the draft EIR, which is the dark green portion of the flow chart, in the middle of the flowchart.

159
00:20:35.160 --> 00:20:46.139
Anne Surdzial, ECORP: The draft EIR will be prepared, taking into account this input received during the scoping period, as well as project-specific technical studies.

160
00:20:46.550 --> 00:20:57.800
Anne Surdzial, ECORP: The EIR is expected to be published in mid-2027, and there will be a minimum 45-day public comment and review period for the draft EIR.

161
00:20:57.930 --> 00:21:00.549
Anne Surdzial, ECORP: During which there will be additional meetings.

162
00:21:01.440 --> 00:21:11.149
Anne Surdzial, ECORP: Finally, CPUC will consider all comments received on the draft EIR and move on to that dark blue portion of the flowchart to the far right.

163
00:21:11.510 --> 00:21:18.439
Anne Surdzial, ECORP: And, during that process, we'll prepare responses to the comments.

164
00:21:18.620 --> 00:21:25.570
Anne Surdzial, ECORP: That will be published in a final EIR, and that is estimated to occur likely in early 2028.

165
00:21:27.460 --> 00:21:28.970
Anne Surdzial, ECORP: Next slide, please.

166
00:21:33.440 --> 00:21:42.259
Anne Surdzial, ECORP: As I described on the previous slide, the CPUC is at the very beginning of the CEQA process. This process is… this is called scoping.

167
00:21:42.400 --> 00:21:50.530
Anne Surdzial, ECORP: The Scoping period started on August 7th, with newspaper notifications, mailings, and posting on the CPUC webpage.

168
00:21:50.940 --> 00:22:02.259
Anne Surdzial, ECORP: The typical scoping period lasts 30 days, but due to the complex nature of this project, CPUC has elected to extend the scoping period to 45 days.

169
00:22:02.390 --> 00:22:07.489
Anne Surdzial, ECORP: Which will end on September 21st, to give extra time for input.

170
00:22:08.140 --> 00:22:22.719
Anne Surdzial, ECORP: During this time, CPUC is asking for your input on the scope of the EIR, in particular the potential environmental impacts that the project may have, and mitigation measures or alternatives that would reduce those impacts.

171
00:22:24.490 --> 00:22:25.920
Anne Surdzial, ECORP: Next slide, please.

172
00:22:29.020 --> 00:22:38.840
Anne Surdzial, ECORP: CEQA evaluates impacts in 20 environmental resource areas that are shown on this slide… shown on this slide and the next slide. These are aesthetics.

173
00:22:39.300 --> 00:22:51.910
Anne Surdzial, ECORP: Agriculture and Forestry Resources, air quality Biological resources, cultural resources, Energy, Geology and soils.

174
00:22:52.200 --> 00:22:54.480
Anne Surdzial, ECORP: Greenhouse gas emissions.

175
00:22:54.800 --> 00:22:57.310
Anne Surdzial, ECORP: Hazards and hazardous materials.

176
00:22:57.600 --> 00:22:59.990
Anne Surdzial, ECORP: Hydrology and water quality.

177
00:23:00.790 --> 00:23:02.010
Anne Surdzial, ECORP: Next slide.

178
00:23:04.310 --> 00:23:06.179
Anne Surdzial, ECORP: Land Use and Planning.

179
00:23:06.480 --> 00:23:09.700
Anne Surdzial, ECORP: Mineral resources, Noise.

180
00:23:09.810 --> 00:23:15.510
Anne Surdzial, ECORP: Population and housing, public services, Recreation.

181
00:23:15.680 --> 00:23:17.660
Anne Surdzial, ECORP: Transportation and traffic.

182
00:23:17.840 --> 00:23:23.379
Anne Surdzial, ECORP: Tribal Cultural Resources, Utilities and service systems, and wildfire.

183
00:23:25.380 --> 00:23:26.409
Anne Surdzial, ECORP: Next slide.

184
00:23:29.900 --> 00:23:38.519
Anne Surdzial, ECORP: The EIR will contain a section for each one of those resource areas that will describe the environmental setting or the existing conditions.

185
00:23:38.700 --> 00:23:48.980
Anne Surdzial, ECORP: Provide background on the laws and regulations that apply to that resource. Describe the threshold of significance, or what defines if an impact is significant or not.

186
00:23:49.460 --> 00:23:53.830
Anne Surdzial, ECORP: Then the section will describe the project's impacts to those resources.

187
00:23:54.200 --> 00:24:01.779
Anne Surdzial, ECORP: If the impacts are significant, then the CPUC must require mitigation measures to reduce or avoid the impact.

188
00:24:01.920 --> 00:24:08.589
Anne Surdzial, ECORP: The EIR will also describe cumulative impacts, or the impacts of the project in combination with other projects.

189

00:24:10.240 --> 00:24:11.330
Anne Surdzial, ECORP: Next slide.

190
00:24:14.630 --> 00:24:25.139
Anne Surdzial, ECORP: For each resource, if significant project impacts are identified, an EIR must identify alternatives that would avoid or substantially lessen those impacts.

191
00:24:25.820 --> 00:24:39.820
Anne Surdzial, ECORP: CEQA requires that the alternatives are allowed by applicable laws and regulations and are technically feasible. The alternatives must also meet most of the project objectives which were presented on a previous slide.

192
00:24:42.050 --> 00:24:43.280
Anne Surdzial, ECORP: Okay, next slide.

193
00:24:48.610 --> 00:24:54.550
Anne Surdzial, ECORP: CPUC is currently gathering information to develop project alternatives.

194
00:24:54.780 --> 00:25:02.830
Anne Surdzial, ECORP: Alternatives that are typically evaluated in an EIR can include different routes or locations of project components.

195
00:25:03.060 --> 00:25:11.060
Anne Surdzial, ECORP: Additionally, CEQA requires the inclusion of a no-project alternative, which is what would happen if the project is not built.

196
00:25:11.380 --> 00:25:18.949
Anne Surdzial, ECORP: The impacts of each alternative will be evaluated for those same 20 environmental resources as the proposed project.

197
00:25:19.060 --> 00:25:25.290
Anne Surdzial, ECORP: And the EIR will describe how the alternatives will reduce or avoid impacts to resources.

198
00:25:25.590 --> 00:25:36.589
Anne Surdzial, ECORP: If impacts would be relatively the same as the proposed project, or if the alternative would cause new or more severe impacts to other resources when compared to the proposed project.

199
00:25:37.400 --> 00:25:38.600

Anne Surdzial, ECORP: Next slide.

200
00:25:41.690 --> 00:25:48.050
Anne Surdzial, ECORP: If you are interested in providing input on the scope of the EIR and are here at this meeting, you are on the right track.

201
00:25:48.380 --> 00:25:59.240
Anne Surdzial, ECORP: The address at the bottom of the slide is the webpage where project documents are available, and we will continue updating that website as the CEQA process continues.

202
00:25:59.620 --> 00:26:12.199
Anne Surdzial, ECORP: You can make a verbal comment at this meeting, but we really encourage you to submit your comments via email or regular U.S. mail so that your input is accurately conveyed to the CPUC.

203
00:26:12.380 --> 00:26:17.160
Anne Surdzial, ECORP: The email and mailing address for comments will be provided on the last slide.

204
00:26:17.360 --> 00:26:26.620
Anne Surdzial, ECORP: The comment period closes September 21st. An email should be sent by 5pm on that date, and U.S. mail should be postmarked by that date.

205
00:26:29.070 --> 00:26:30.090
Anne Surdzial, ECORP: Next slide.

206
00:26:31.810 --> 00:26:50.890
Anne Surdzial, ECORP: So, as a reminder, CPUC is seeking input on the potential environmental impacts of the project, mitigation measures or alternatives that could avoid or reduce those environmental impacts, and any local environmental conditions or resources that CPUC should be aware of as it prepares the EIR.

207
00:26:51.260 --> 00:26:56.400
Anne Surdzial, ECORP: Also, as a reminder, the BLM is the lead agency for federal approvals.

208
00:26:56.540 --> 00:27:08.839
Anne Surdzial, ECORP: And that has its own separate environmental process called NEPA. The NEPA process is similar, but different than the CEQA process, and BLM will be having their own separate meetings for the project.

209
00:27:09.540 --> 00:27:10.710
Anne Surdzial, ECORP: Next slide.

210
00:27:23.820 --> 00:27:24.840
Joan Isaacson, Kearns & West: And I can jump in here.

211
00:27:24.840 --> 00:27:27.359
Anne Surdzial, ECORP: Yeah, I was gonna say, I think that one's yours.

212
00:27:27.360 --> 00:27:37.570
Joan Isaacson, Kearns & West: Okay, yes, Ann and Michelle, thank you so much for providing information about the proposed transmission line, the CPUC process.

213
00:27:37.710 --> 00:27:48.069
Joan Isaacson, Kearns & West: and the environmental review process. So, the most important part of this scoping Meeting is to hear scoping comments from the public.

214
00:27:48.610 --> 00:27:50.630
Joan Isaacson, Kearns & West: And, again.

215
00:27:50.950 --> 00:28:10.460
Joan Isaacson, Kearns & West: you can… you can mail those comments in, and that information is shown here on the slide, and we will be taking verbal comments in this meeting. And, I will… I just want to pause here, because if anybody just wants to do, like, a screenshot of this, or did I click it with your phone so you have that address information?

216
00:28:10.480 --> 00:28:12.860
Joan Isaacson, Kearns & West: This would be a good time to do it.

217
00:28:13.530 --> 00:28:25.259
Joan Isaacson, Kearns & West: And it's… it is located on the CPUC website as well, and Jaz from our team just dropped information into chat on where to find that website.

218
00:28:28.030 --> 00:28:30.099
Joan Isaacson, Kearns & West: Okay, I think we can go to the next slide.

219
00:28:36.560 --> 00:28:40.329

Joan Isaacson, Kearns & West: Alright, so we've reached that point in the meeting for comment.

220
00:28:41.090 --> 00:28:59.350
Joan Isaacson, Kearns & West: There are, so you can provide verbal comment, and the way we'll do that today is you can raise… you can use the raise hand feature. It's in that toolbar at the bottom of your screen. It looks like a hand, and so you could click on that. That'll put you in the queue for providing comment.

221
00:28:59.830 --> 00:29:10.309
Joan Isaacson, Kearns & West: If you have questions, we can also take your questions, and if you could enter them in the, what we call the Q&A pod, it's just marked as Q&A.

222
00:29:10.420 --> 00:29:16.160
Joan Isaacson, Kearns & West: But it's either in that toolbar at the bottom of your screen. You might have to go into that more.

223
00:29:16.290 --> 00:29:24.469
Joan Isaacson, Kearns & West: part of your toolbar at the bottom, and click on that to find the Q&A pod. It's, again, it's just marked Q&A, so you can enter questions there.

224
00:29:24.990 --> 00:29:39.749
Joan Isaacson, Kearns & West: what we're gonna do is we're gonna hear the public comment first, and then, we'll look at the questions that we have, and then we'll review questions and hear answers from Michelle. So we'll do that after we receive the public comment.

225
00:29:40.340 --> 00:29:58.670
Joan Isaacson, Kearns & West: For those of you whose primary language is Spanish, the interpreters will be able to interpret your verbal comment in Spanish. They will interpret that back into English, so that all of us will hear your verbal comment here on this meeting.

226
00:30:00.140 --> 00:30:10.789
Joan Isaacson, Kearns & West: And just to underscore that even if you provide verbal comments here today, we really appreciate that. And again, we're just encouraging you, even if you provide verbal comment here.

227
00:30:10.930 --> 00:30:16.640
Joan Isaacson, Kearns & West: We encourage you to go ahead and also submit those comments in writing. It really helps the team a lot.

228

00:30:17.200 --> 00:30:28.339
Joan Isaacson, Kearns & West: All the comments we receive here today will be documented and entered into the collection of scoping comments that will be part of the environmental review process.

229
00:30:29.240 --> 00:30:43.819
Joan Isaacson, Kearns & West: I'll note that we are going to put a timer up on the screen for 2 minutes, so we're asking that each person keep their comments to 2 minutes or less. The timer will help everyone to monitor their own time, and if anyone, exceeds that

230
00:30:43.820 --> 00:30:50.460
Joan Isaacson, Kearns & West: amount of time, the 2 minutes, I'll remind you that, you're past 2 minutes, and ask you to wrap up.

231
00:30:51.540 --> 00:30:58.850
Joan Isaacson, Kearns & West: That'll help to make sure that all of our… our participants today will be able to have a chance to provide comment.

232
00:31:00.810 --> 00:31:10.069
Joan Isaacson, Kearns & West: Okay, so I think we're ready to start just checking my notes. I think I hit all of the important notes, and again, those, I just want to note that

233
00:31:10.200 --> 00:31:17.039
Joan Isaacson, Kearns & West: that… we'll provide that address information again before we wrap up.

234
00:31:18.380 --> 00:31:25.889
Joan Isaacson, Kearns & West: Okay, so if you… Would like to provide comments, you can go ahead and use the raise hand function.

235
00:31:34.270 --> 00:31:37.050
Joan Isaacson, Kearns & West: I'm not seeing anyone yet.

236
00:31:45.440 --> 00:31:47.170
Jas King (they/them), Kearns & West: We have a couple folks, Joan.

237
00:31:47.170 --> 00:31:51.009
Joan Isaacson, Kearns & West: Oh, I do. Okay, I'm not seeing them on my screen.

238
00:31:51.360 --> 00:31:54.879

Joan Isaacson, Kearns & West: I know I might need to just open up a different window.

239
00:31:57.260 --> 00:32:00.910
Joan Isaacson, Kearns & West: Jas, maybe can you call their names? Because for some reason, I'm not.

240
00:32:00.910 --> 00:32:03.160
Jas King (they/them), Kearns & West: Yeah, it should be under Participants.

241
00:32:06.560 --> 00:32:07.519
Joan Isaacson, Kearns & West: There we go.

242
00:32:07.780 --> 00:32:08.660
Jas King (they/them), Kearns & West: You see him now?

243
00:32:10.220 --> 00:32:13.000
Joan Isaacson, Kearns & West: Yes, thank you so much. Okay,

244
00:32:13.290 --> 00:32:29.229
Joan Isaacson, Kearns & West: All right, so what I've… the order I… of people I see on my screen are Reece Pettersen, or Pettersen, and so Reece, you'll go first, followed by Gail Overton, and then Nicholas, Heatwole. And so,

245
00:32:29.640 --> 00:32:41.890
Joan Isaacson, Kearns & West: And by all means, like, if you… if you decide that you want to provide comment and you haven't done so, you haven't raised your hand yet, you can just raise your hand. That's fine. All right, Reece, we will call you first.

246
00:32:46.880 --> 00:32:48.620
Reece Pettersen: Good evening, can you guys hear me?

247
00:32:48.620 --> 00:32:49.240
Joan Isaacson, Kearns & West: Yes.

248
00:32:49.570 --> 00:32:50.270
Reece Pettersen: Great.

249
00:32:50.350 --> 00:33:03.750

Reece Pettersen: My name's Reece Pettersen. I've camped at the Imperial Sand Dunes with my family since 1994, and I still bring my kids out there today. I'm submitting… I submitted detailed rent and comments on this project on August 21st, and I'm here to highlight those key points.

250
00:33:03.750 --> 00:33:12.029
Reece Pettersen: The… this desert is not empty. They're one of the most heavily used recreational areas in the state, with nearly a million visitors and almost 200,000.

251
00:33:12.030 --> 00:33:21.080
Reece Pettersen: visitors on a busy holiday weekend. This isn't a network of designated routes, it's an open recreational area where people camp and ride wherever they choose across the dunes.

252
00:33:21.080 --> 00:33:35.740
Reece Pettersen: I'm asking this EIR be built around that reality, not average weekday traffic, and based on the maps currently available, both the proposed route and alternatives under consideration run directly through the established camping area and open recreational areas.

253
00:33:35.790 --> 00:33:45.679
Reece Pettersen: Given that, I'm asking that these routes and alternatives be significantly and rigorously studied for their impacts on recreation, safety, and health before any route is selected.

254
00:33:45.800 --> 00:34:08.359
Reece Pettersen: Three quick points. First, recreation and safety, mapping the camping area and area of open recreation use and a project footprint, and study how many people get displaced and where they will go. Camping and open riding areas should be treated as sensitive receptor sites, since families sleep there overnight. BLM's own data shows that visitation goes up 21%,

255
00:34:08.360 --> 00:34:16.079
Reece Pettersen: Followed by emergency and rescues going up by 42%, nearly double. This project displaces campers and riders into a smaller area.

256
00:34:16.080 --> 00:34:22.280
Reece Pettersen: That's, that's a problem. It's a predictable increase in injuries and emergency calls.

257
00:34:22.280 --> 00:34:38.679
Reece Pettersen: That needs to be studied and addressed. Secondly, noise and EMF. Personally, camp near, high voltage lines. If California already

requires new schools to be set back at least 350 feet, then they should also be, studied for

258
00:34:38.679 --> 00:34:41.829
Reece Pettersen: Distance for families sleep at night.

259
00:34:41.830 --> 00:35:05.169
Reece Pettersen: And then alternatives. I'm asking the EIR, regular, seriously evaluate a route along or adjacent to the Interstate 8 in an already disturbed corridor instead of running new lines through the dunes themselves, and avoid all recreation areas entirely where feasible. That avoids camping and riding areas sensitive habitat and visual impact of new towers across the landscape. If the alternative is rejected.

260
00:35:05.170 --> 00:35:13.799
Reece Pettersen: It should be evidence-based, not just cost or preference. This is a place my family has returned to for 30 years, and I'd like my kids to be able to bring their kids here, too. Thank you.

261
00:35:15.550 --> 00:35:16.560
Joan Isaacson, Kearns & West: Alright, thanks, Reece.

262
00:35:16.880 --> 00:35:26.019
Joan Isaacson, Kearns & West: All right, and, appreciate your comment, and thanks for going first, as well. Gail Overton, over to you. We'll go ahead and unmute you so you can…

263
00:35:26.590 --> 00:35:28.340
Joan Isaacson, Kearns & West: you know, speak live.

264
00:35:35.650 --> 00:35:36.269
Gail Overton: Can you hear me?

265
00:35:36.270 --> 00:35:38.249
Joan Isaacson, Kearns & West: Gail, there you go, you're unmuted.

266
00:35:40.910 --> 00:35:50.590
Gail Overton: Okay, yes, I'm Gail Overton, I'm also a resident of Imperial County, and a recent Sierra Club member.

267
00:35:50.590 --> 00:36:05.000
Gail Overton: My concerns primarily, as your previous, person talked about, is I would hope that alternatives would be explored, you know, very heavily, not based on,

268
00:36:05.000 --> 00:36:18.849
Gail Overton: you know, interests of Horizon West, but rather interests of the environment. Right now, the current path, has two areas where it primarily diversges from the Southwest Power Link.

269
00:36:19.110 --> 00:36:25.100
Gail Overton: And that first path goes over an entirely new section of the Colorado River.

270
00:36:25.250 --> 00:36:34.430
Gail Overton: And the second part of that path deviates in… within the Cargo Muchacho Mountains, and it deviates,

271
00:36:34.430 --> 00:36:52.090
Gail Overton: you know, in quite an amazing way, and I think that has to do with, according to Horizon West Project Manager, that had to do with tribal consultation, and the tribe not wanting to have this power line run through their tribal lands is the reason that it was routed.

272
00:36:52.230 --> 00:37:02.440
Gail Overton: the way it was to deviate from the Southwest Power Link. So, I would hope the tribes would be consulted to try to figure out an alternative where

273
00:37:02.440 --> 00:37:18.439
Gail Overton: the existing footprint of the Southwest Power Link could be used, and as your other person said, along Highway 8, or the railroad corridor. If those two routes would be used, they would not impact the environment

274
00:37:18.440 --> 00:37:33.200
Gail Overton: In any way compared to the existing, you know, lines and infrastructure. So the major concern with the deviation, along the Cargo Muchacho Mountains is there's a few mine,

275
00:37:33.210 --> 00:37:46.970
Gail Overton: abandoned mine areas there that house very huge colonies of California endangered bats, and I'm not sure that this group is aware of that fact.

276
00:37:47.080 --> 00:38:01.720
Gail Overton: So I was hoping in this meeting we could at least have a little discussion about how aware this group is and the CPUC is of that particular bat colony and the studies that have been done, so far.

277
00:38:02.510 --> 00:38:06.219
Gail Overton: So I think those are my two, yeah, issues of that.

278
00:38:06.220 --> 00:38:07.230
Joan Isaacson, Kearns & West: Thank you so much.

279
00:38:09.140 --> 00:38:13.309
Joan Isaacson, Kearns & West: Okay, and then, next up is, Nicholas Heatwole.

280
00:38:23.300 --> 00:38:26.730
Joan Isaacson, Kearns & West: Nicholas, we will go ahead and unmute. Looks like you're unmuted now.

281
00:38:26.730 --> 00:38:38.580
Nicholas Heatwole: Hi, good afternoon. This is Nicholas Heatwole. I work for the Bureau of Reclamation at the Yuma Area Office. The Bureau of Reclamation is a cooperating agency for the Ironwood Transmission Lighting Project under NEPA.

282
00:38:38.590 --> 00:38:47.170
Nicholas Heatwole: The preferred route identified by the Horizon Rest Transmission is proposed to cross the East Mesa Management Area for the flat-Tilled Horned lizard.

283
00:38:47.200 --> 00:38:58.479
Nicholas Heatwole: As a signatory to the conservation agreement that implements the range-wide management strategy for the flat-tailed horned lizard, and a federal land management agency with lands within the footprint of the project.

284
00:38:58.520 --> 00:39:01.889
Nicholas Heatwole: We'd like to voice our concern with the portion of the preferred route.

285
00:39:02.110 --> 00:39:09.749
Nicholas Heatwole: According to our range-wide management strategy, every attempt shall be made to locate projects outside of management areas.

286
00:39:09.940 --> 00:39:21.649
Nicholas Heatwole: New right-of-ways may only be permitted along the boundaries of management areas, and only if impacts can be mitigated to

avoid long-term effects to the flat-tailed horned lizards in management areas.

287
00:39:21.720 --> 00:39:35.869
Nicholas Heatwole: Where discretionary, other new authorizations may be permitted if the habitat disturbance does not pose a significant barrier to lizard movements. Disturbances shall be limited to 10 acres or less per authorization, if possible.

288
00:39:35.980 --> 00:39:48.329
Nicholas Heatwole: If individual disturbances over 10 acres are necessary, the Interagency Coordinating Committee and the Management Oversight Group shall be contacted to provide suggestions for minimizing potential impacts to flat-toe horn lizards.

289
00:39:48.480 --> 00:39:56.730
Nicholas Heatwole: The cumulative new disturbance per management area since 1997 may not exceed 1% of the total acreage of the federal land.

290
00:39:56.980 --> 00:40:13.939
Nicholas Heatwole: The Bureau of Reclamation requests that a route that avoids the East Mesa Management Area be developed, carried forward, and fully analyzed within the CEQA EIR and the NEPA EIS for this project. And we do plan on submitting comments, in writing as well.

291
00:40:14.330 --> 00:40:17.370
Nicholas Heatwole: And we're happy to take any questions with that regard.

292
00:40:17.550 --> 00:40:18.370
Nicholas Heatwole: Thank you.

293
00:40:19.020 --> 00:40:20.210
Joan Isaacson, Kearns & West: Thank you very much.

294
00:40:25.240 --> 00:40:37.149
Joan Isaacson, Kearns & West: Would anyone else like to provide verbal comment at this time? I know we do have a couple of questions, and we will get to those in just a moment, but I do want to make sure if there's anyone else

295
00:40:37.290 --> 00:40:39.490
Joan Isaacson, Kearns & West: Who wants to provide comment at this time?

296

00:40:39.820 --> 00:40:43.600
Joan Isaacson, Kearns & West: I'll mention that we are having a second meeting this evening.

297
00:40:43.720 --> 00:40:49.840
Joan Isaacson, Kearns & West: So, if you know of others who are interested but could not attend a meeting at this time.

298
00:40:50.160 --> 00:40:55.009
Joan Isaacson, Kearns & West: We're going to repeat this scoping Meeting with the same format again this evening.

299
00:40:58.570 --> 00:41:06.739
Joan Isaacson, Kearns & West: All right, I see, another hand's come up, and I'll ask our team to unmute Daniel Steward, please.

300
00:41:13.940 --> 00:41:15.290
Daniel Steward: Hi, can y'all hear me?

301
00:41:15.290 --> 00:41:16.259
Joan Isaacson, Kearns & West: We sure can.

302
00:41:16.450 --> 00:41:31.810
Daniel Steward: Daniel Steward with the U.S. Army Unimproving Ground, and I believe y'all have received the copy of the letter we sent to you with concerns that we have with Alternative 1A, which brings the line onto Proving Ground.

303
00:41:31.810 --> 00:41:43.099
Daniel Steward: Specific concerns we have about that portion of the line is it brings it in proximity to our Laguna Army Airfield and a number of other testing facilities that we have on the installation.

304
00:41:43.170 --> 00:41:50.610
Daniel Steward: And, with the nature of military testing, we have experimental aircraft, and other sensitive,

305
00:41:50.750 --> 00:42:07.940
Daniel Steward: instrumentation and things like that that, that can be affected by, the electrical output and stuff from the lines. So we'll also be submitting, written comments and, as well. But, Alternative 1A is definitely a,

306
00:42:08.270 --> 00:42:09.790

Daniel Steward: a concern for the Army.

307
00:42:12.630 --> 00:42:13.909
Daniel Steward: Thank you very much.

308
00:42:19.920 --> 00:42:39.689
Joan Isaacson, Kearns & West: Well, we do have a couple of questions, and, so Michelle Wilson from the CPC is going to answer questions, and, we're particularly going to be focusing on questions about the environmental process, or if there are specific questions about the proposed project.

309
00:42:39.700 --> 00:42:45.100
Joan Isaacson, Kearns & West: There… I haven't looked at the questions yet, but if there's… if there's a question about

310
00:42:45.180 --> 00:43:01.400
Joan Isaacson, Kearns & West: any particular kind of impact, that may be a type of question that the CPUC can't answer yet, because the environmental analysis hasn't been initiated or completed yet. So, we're going to look at the questions, and we will go from there. So.

311
00:43:01.400 --> 00:43:05.779
Joan Isaacson, Kearns & West: I'm gonna… there's one that is in chat, so I'm gonna go to that one first.

312
00:43:05.960 --> 00:43:12.399
Joan Isaacson, Kearns & West: Michelle, and it's… Is there a map that shows the preferred route for the power line?

313
00:43:13.920 --> 00:43:23.489
Michelle Wilson, CPUC: Okay, yes, there is a map. In this presentation, it is the red line. I know it's very small and maybe difficult to see.

314
00:43:23.790 --> 00:43:34.180
Michelle Wilson, CPUC: To see it a little bit more up-closed, or be able to download it yourself, there's our CPC project webpage, which is shown on the slide.

315
00:43:34.500 --> 00:43:40.300
Michelle Wilson, CPUC: In front of you, at the top… at the bottom corner, bottom right corner.

316
00:43:40.780 --> 00:43:50.369

Michelle Wilson, CPUC: You can access that link, and there are more detailed maps in what's called the Proponent's Environmental Assessment in Attachment A.

317
00:43:53.880 --> 00:44:05.740
Joan Isaacson, Kearns & West: I will say, too, if there are additional questions, you know, about the route, or, like, where to find the maps, you can also send those questions to that email address, and that'll be another way we can follow up with you.

318
00:44:07.190 --> 00:44:20.830
Joan Isaacson, Kearns & West: Okay, I just want to make note in chat that, there's a note about the Campbell Band of Mission Indians. We'll be providing comments to during, as part of the CEQA consultation.

319
00:44:21.490 --> 00:44:24.990
Joan Isaacson, Kearns & West: Okay, so let's look at the questions we have in the Q&A pod.

320
00:44:30.770 --> 00:44:39.230
Joan Isaacson, Kearns & West: reorganizing my screen a bit. So, Michelle, the one question has, to do with alternatives.

321
00:44:39.650 --> 00:44:40.630
Joan Isaacson, Kearns & West: And…

322
00:44:40.740 --> 00:44:52.440
Joan Isaacson, Kearns & West: The question is, will the CPUC consider other alternatives that are not provided by the project sponsor, but could lessen impacts to cultural and environmental resources?

323
00:44:54.230 --> 00:45:09.599
Michelle Wilson, CPUC: And the answer is yes. On the figure in the slide presentation, there are yellow alternative alignments proposed by the project sponsor. We are going to be considering those, but we will be considering additional alternatives.

324
00:45:09.720 --> 00:45:16.700
Michelle Wilson, CPUC: And one big goal of the scoping period that we are in right now on the CEQA document, as well as this meeting.

325
00:45:16.810 --> 00:45:24.870
Michelle Wilson, CPUC: Is to obtain input on alternative alignments that members of the public wish to see us analyze.

326
00:45:26.340 --> 00:45:44.189
Joan Isaacson, Kearns & West: All right, thank you for that. This next question has to do with the portion of the proposed line that is within the state of Arizona. And the question is, what entity will be in charge of permitting that portion that is within the Arizona state line?

327
00:45:45.790 --> 00:45:58.470
Michelle Wilson, CPUC: The Arizona Public Service Company is the public utility owning the North Gila substation, and they are subject to the Arizona Public Utility Commission's regulations.

328
00:45:58.820 --> 00:46:07.700
Michelle Wilson, CPUC: BLM will also be responsible for evaluating the project on BLM land within the state of Arizona.

329
00:46:10.970 --> 00:46:21.580
Joan Isaacson, Kearns & West: All right, we'll go to the next question. And, this has to do with the, Imperial Valley north of Songs transmission line.

330
00:46:21.940 --> 00:46:27.030
Joan Isaacson, Kearns & West: And the question is, how dependent are the objectives for this project

331
00:46:27.780 --> 00:46:36.890
Joan Isaacson, Kearns & West: How dependent are they on the completion of the related Imperial Valley north of Song's 500KB Transmission Line?

332
00:46:38.500 --> 00:46:45.279
Joan Isaacson, Kearns & West: In other words, I'll keep going in case there's a little bit more explanation. In other words, if the… if the North of Songs

333
00:46:45.650 --> 00:46:48.160
Joan Isaacson, Kearns & West: Line is not completed.

334
00:46:48.320 --> 00:46:52.500
Joan Isaacson, Kearns & West: Will this project still meet its objectives that were stated in the first slide?

335
00:46:54.460 --> 00:47:01.199
Michelle Wilson, CPUC: And the answer is yes. This project before us now, the Ironwood project.

336
00:47:01.640 --> 00:47:11.839
Michelle Wilson, CPUC: is independent from another project that is being proposed, which is leading north from the Imperial Valley substation.

337
00:47:12.590 --> 00:47:23.249
Michelle Wilson, CPUC: Through San Diego County, which is referred to as the Imperial Valley to north of Song's 500 kilovolt Transmission Line.

338
00:47:23.820 --> 00:47:31.899
Michelle Wilson, CPUC: In ISO's transmission planning process, Or CAICSO's TPP.

339
00:47:32.580 --> 00:47:44.000
Michelle Wilson, CPUC: So there were several projects proposed in CAISO's plan. This project is one of them. They're all proposed to address regional reliability issues.

340
00:47:46.120 --> 00:47:55.660
Joan Isaacson, Kearns & West: All right, thank you. The next question, is also asking about the relationship of this to some other things. So, this question is.

341
00:47:56.240 --> 00:48:04.849
Joan Isaacson, Kearns & West: would this Ironwood line not be required if the Golden Pacific Power Link and the Imperial Data Center are not developed? So…

342
00:48:04.970 --> 00:48:12.779
Joan Isaacson, Kearns & West: would it… would this be needed if those two things, were not developed? The Pacific Power Link and the Imperial Data Center?

343
00:48:13.590 --> 00:48:15.249
Michelle Wilson, CPUC: And the answer is yes.

344
00:48:15.630 --> 00:48:20.900
Joan Isaacson, Kearns & West: Okay, and, there was a follow-up question, has the CPUC considered that alternative?

345
00:48:24.730 --> 00:48:35.129
Michelle Wilson, CPUC: I'm… The no action alternative is… is… will be considered, so the no project will be evaluated.

346

00:48:35.820 --> 00:48:38.750
Michelle Wilson, CPUC: I think if I'm answering that question correctly…

347
00:48:42.030 --> 00:48:43.030
Joan Isaacson, Kearns & West: Thanks, Michelle.

348
00:48:45.310 --> 00:48:48.819
Joan Isaacson, Kearns & West: Oh, there is one more. Okay. And by all means.

349
00:48:48.950 --> 00:48:58.629
Joan Isaacson, Kearns & West: keep sending in additional questions if you have them, and we'll go ahead and answer them right now. So, this question is…

350
00:48:58.870 --> 00:49:02.189
Joan Isaacson, Kearns & West: Where can I download a copy of this scoping presentation?

351
00:49:02.390 --> 00:49:08.909
Joan Isaacson, Kearns & West: And also, I cannot locate an online map for the alternative location, which was presented in this meeting.

352
00:49:12.190 --> 00:49:20.230
Michelle Wilson, CPUC: I can add that you can download a copy of this scoping presentation once. We will be posting it on our webpage.

353
00:49:20.600 --> 00:49:30.550
Michelle Wilson, CPUC: Along with the scoping report, And the… Alternative location, maybe…

354
00:49:30.990 --> 00:49:35.290
Michelle Wilson, CPUC: Not on the same level of granularity as the proposed alignment.

355
00:49:35.640 --> 00:49:40.749
Michelle Wilson, CPUC: But it is located within what's called an alternative screening report.

356
00:49:41.040 --> 00:49:43.139
Michelle Wilson, CPUC: Or routing report?

357
00:49:43.580 --> 00:49:52.460

Michelle Wilson, CPUC: contained within the proponent's environmental assessment. It is likely… it is in one of the attachments, I cannot recall which attachment, but…

358
00:49:52.610 --> 00:49:55.059
Michelle Wilson, CPUC: It is within the routing report.

359
00:49:56.840 --> 00:50:05.449
Joan Isaacson, Kearns & West: Michelle, in addition to the, like, like, in the routing report, in addition to the map, is there also, like, a narrative description, too?

360
00:50:06.470 --> 00:50:11.760
Michelle Wilson, CPUC: And the narrative description would be contained within the proponent's environmental assessment.

361
00:50:16.720 --> 00:50:24.749
Joan Isaacson, Kearns & West: All right, another question's been submitted. It's a question about the notification process for scoping for this… for this project.

362
00:50:24.880 --> 00:50:28.209
Joan Isaacson, Kearns & West: For Ironwood, mailers were sent out as part of the scoping.

363
00:50:28.360 --> 00:50:31.880
Joan Isaacson, Kearns & West: Who were those mailers sent to in order to solicit input?

364
00:50:33.460 --> 00:50:39.099
Michelle Wilson, CPUC: Yes, good question. So, we sent mailers out to all, individual

365
00:50:39.290 --> 00:50:43.769
Michelle Wilson, CPUC: Owners and occupants within 300 feet of the alignment.

366
00:50:43.890 --> 00:50:46.349
Michelle Wilson, CPUC: As well as a number of

367
00:50:46.490 --> 00:50:54.760
Michelle Wilson, CPUC: State, local, state and local federal governments, as well as tribes, within the area.

368
00:50:55.390 --> 00:51:00.450
Michelle Wilson, CPUC: And also interested parties that requested to receive input to date.

369
00:51:06.560 --> 00:51:07.230
Joan Isaacson, Kearns & West: Hey.

370
00:51:12.900 --> 00:51:16.010
Joan Isaacson, Kearns & West: I think we've answered all the questions that are in the Q&A.

371
00:51:17.080 --> 00:51:31.979
Michelle Wilson, CPUC: I think… I want to point out one, comment in the chat by our, our counterpart at BLM actually correctly cited the name of the Arizona's… Arizona's Public Utility Commission, so I just wanted to make a note of that.

372
00:51:32.140 --> 00:51:33.360
Michelle Wilson, CPUC: Thank you, Derek.

373
00:51:33.580 --> 00:51:34.660
Michelle Wilson, CPUC: For that.

374
00:51:36.710 --> 00:51:40.239
Joan Isaacson, Kearns & West: And another question's been put into the pod.

375
00:51:41.020 --> 00:51:44.140
Joan Isaacson, Kearns & West: It's about the BLM's NEPA process.

376
00:51:44.940 --> 00:51:53.009
Joan Isaacson, Kearns & West: And the timing. Does the BLM NEPA process begin after the CPUC's EIR process?

377
00:51:54.310 --> 00:51:58.139
Michelle Wilson, CPUC: We will be running our processes concurrently with each other.

378
00:51:58.330 --> 00:52:06.210
Michelle Wilson, CPUC: So we'll be running them at the same time, and are working really closely together to coordinate our two processes.

379

00:52:19.650 --> 00:52:26.950
Joan Isaacson, Kearns & West: One more here. Will you send receipt confirmation of written scoping comments submitted by email?

380
00:52:34.460 --> 00:52:40.250
Michelle Wilson, CPUC: We will be… Yes, you shall receive…

381
00:52:40.790 --> 00:52:43.540
Michelle Wilson, CPUC: The response that we received, your comments?

382
00:52:43.960 --> 00:52:46.829
Michelle Wilson, CPUC: And we will also be putting comments

383
00:52:47.030 --> 00:52:51.999
Michelle Wilson, CPUC: That are received on… during the scoping period in our scoping report.

384
00:52:52.580 --> 00:52:55.709
Michelle Wilson, CPUC: Personal information will be redacted.

385
00:52:56.520 --> 00:53:00.669
Michelle Wilson, CPUC: But that… your comments will be reflected in the scoping report.

386
00:53:08.380 --> 00:53:12.580
Anne Surdzial, ECORP: I just wanted to say we have both of your comments, too, Mr. Pettersen.

387
00:53:12.950 --> 00:53:14.379
Anne Surdzial, ECORP: We do, we do have them.

388
00:53:24.310 --> 00:53:28.529
Joan Isaacson, Kearns & West: I think we can probably… Go ahead and wrap up.

389
00:53:29.830 --> 00:53:35.719
Michelle Wilson, CPUC: I did see a comment in the chat, I'm not sure if all of us are seeing that, or if it's just the panelists.

390
00:53:36.260 --> 00:53:41.570
Joan Isaacson, Kearns & West: Oh yeah, there's a new one. Okay, let's see. I'll read it.

391
00:53:42.760 --> 00:53:46.050
Joan Isaacson, Kearns & West: I'm not sure if this alignment overlaps with the proposed

392
00:53:46.180 --> 00:53:52.910
Joan Isaacson, Kearns & West: I'm not… forgive me for not… I'm probably going to mispronounce it, but then it's Kitzwan National Monument.

393
00:53:53.050 --> 00:53:54.560
Joan Isaacson, Kearns & West: But I think it might.

394
00:53:54.940 --> 00:54:00.759
Joan Isaacson, Kearns & West: Has there been any conversations on this project with the Fort Yuma Kichwan Indian Tribe?

395
00:54:02.360 --> 00:54:14.079
Michelle Wilson, CPUC: The answer is yes, it does, lie within the proposed Kwitsan National Monument, and we have been working very closely with the Fort Yuma Quitan tribe.

396
00:54:14.340 --> 00:54:15.649
Michelle Wilson, CPUC: on this topic.

397
00:54:21.240 --> 00:54:24.010
Michelle Wilson, CPUC: And I see another comment in the Q&A also.

398
00:54:31.250 --> 00:54:36.039
Joan Isaacson, Kearns & West: The question is, does this project have a required percentage of renewable energy?

399
00:54:38.300 --> 00:54:39.869
Michelle Wilson, CPUC: The answer is…

400
00:54:40.590 --> 00:54:49.400
Michelle Wilson, CPUC: This project was identified in CAISO's PPP to support development of renewable energy, but there is no percent

401
00:54:49.840 --> 00:54:51.110
Michelle Wilson, CPUC: Requirement.

402
00:54:59.440 --> 00:55:06.870

Joan Isaacson, Kearns & West: I want to assure you all, too, that the questions that we're receiving, they will… we will… they will be also included in the scoping comments.

403
00:55:13.600 --> 00:55:14.400
Joan Isaacson, Kearns & West: Okay.

404
00:55:19.560 --> 00:55:22.430
Joan Isaacson, Kearns & West: Is anyone seeing any additional questions?

405
00:55:29.480 --> 00:55:42.360
Joan Isaacson, Kearns & West: Okay, I think we could go ahead and wrap up. We'll be having that meeting again later this evening, so if something else comes to mind, anyone to join us again, we would love to have you there. And,

406
00:55:43.740 --> 00:55:51.479
Joan Isaacson, Kearns & West: Ann or Michelle, if you just… if you could, provide the information one more time about the timing for submitting scoping comments, I think that'd be a good way to wrap up.

407
00:55:53.210 --> 00:56:01.530
Joan Isaacson, Kearns & West: And, Jas, can you put the slide back on, too, that has information on how to submit comments?

408
00:56:06.390 --> 00:56:11.100
Joan Isaacson, Kearns & West: I just want to make sure that everyone who would like that information has a chance to grab it.

409
00:56:12.930 --> 00:56:17.360
Michelle Wilson, CPUC: And yes, just to summarize, comments are due September 21st.

410
00:56:17.680 --> 00:56:22.459
Michelle Wilson, CPUC: by 5PM, according to this, the slide here.

411
00:56:22.650 --> 00:56:25.679
Michelle Wilson, CPUC: At this address? Email address?

412
00:56:26.120 --> 00:56:30.779
Michelle Wilson, CPUC: Physical address, as well as, the email address shown.

413

00:56:31.130 --> 00:56:33.140
Michelle Wilson, CPUC: And I'd also like to…

414
00:56:33.250 --> 00:56:41.159
Michelle Wilson, CPUC: Let everyone know that if you have comments on the… on the BLMs process, to please reach out to BLM to,

415
00:56:41.380 --> 00:56:45.000
Michelle Wilson, CPUC: We'll be hearing from them through their formal process as well.

416
00:56:46.600 --> 00:56:52.099
Anne Surdzial, ECORP: I wanted to say that the, the U.S. mail Deadline as a postmark bike.

417
00:56:52.210 --> 00:56:53.130
Anne Surdzial, ECORP: Deadline.

418
00:56:57.440 --> 00:57:01.660
Michelle Wilson, CPUC: And we appreciate your comments and feedback, throughout this process.

419
00:57:02.730 --> 00:57:04.330
Joan Isaacson, Kearns & West: Yeah.

420
00:57:04.640 --> 00:57:12.820
Joan Isaacson, Kearns & West: Gail Overton, I see you have a hand up. Is it just, is it another question? Because of the comment portion of the meeting is… has been wrapped up.

421
00:57:17.730 --> 00:57:19.649
Joan Isaacson, Kearns & West: But we can go ahead and unmute you.

422
00:57:27.680 --> 00:57:29.889
Joan Isaacson, Kearns & West: Oh, hands down. Okay.

423
00:57:30.780 --> 00:57:39.619
Joan Isaacson, Kearns & West: All right, thank you all so much, and we really appreciate you being here and sharing your perspectives, your knowledge.

424
00:57:39.720 --> 00:57:51.500

Joan Isaacson, Kearns & West: And, and being part of the scoping process, it's… that's one of the things that's so interesting and important about the CEQA process, is involvement of the public in helping to identify

425
00:57:51.610 --> 00:57:59.289
Joan Isaacson, Kearns & West: those issues that need to be addressed as part of the environmental review process. So thank you so much for joining and being part of it. And Michelle, over to you.

426
00:58:00.040 --> 00:58:06.100
Michelle Wilson, CPUC: Yes, I see one more, comment in the Q&A. I'll just…

427
00:58:06.540 --> 00:58:07.480
Joan Isaacson, Kearns & West: Yeah, let's make sure we.

428
00:58:07.480 --> 00:58:16.690
Michelle Wilson, CPUC: Sorry, yes, let me just read this out. Is there a template for published guidelines for the format and or length of submitted comments via email?

429
00:58:16.850 --> 00:58:19.350
Michelle Wilson, CPUC: There is no format requirement.

430
00:58:19.650 --> 00:58:21.979
Michelle Wilson, CPUC: Or guidelines on this.

431
00:58:24.000 --> 00:58:26.329
Anne Surdzial, ECORP: I wanted to do say, though, that

432
00:58:26.440 --> 00:58:39.349
Anne Surdzial, ECORP: Comments related to, environmental impacts, alternatives, and mitigation measures are of the most interest, so if the comments could be focused on… on those.

433
00:58:39.520 --> 00:58:41.790
Anne Surdzial, ECORP: Issues, that would be helpful.

434
00:58:42.640 --> 00:58:47.670
Anne Surdzial, ECORP: And as specific as possible is very helpful, but any comment is welcome.

435
00:58:54.010 --> 00:58:57.379

Joan Isaacson, Kearns & West: Alright, thank you all very much. Thank you for being part of this.

436
00:58:57.660 --> 00:58:59.670
Joan Isaacson, Kearns & West: Enjoy the rest of your afternoon, too.

437
00:59:01.810 --> 00:59:02.700
Michelle Wilson, CPUC: Thank you, everybody.

WEBVTT

1
00:00:29.790 --> 00:00:39.040
Joan Isaacson, Kearns & West: Hi, everyone! Good evening, and thanks for joining us. We are going to officially start the meeting in about a minute. Looks like people are still connecting in.

2
00:00:46.580 --> 00:00:49.799
Joan Isaacson, Kearns & West: And Jas or Briana, we can probably get the slides up, too.

3
00:00:52.100 --> 00:00:57.760
Jas King (they/them): Be able to see them if you click on the tab at the top of your screen with my picture.

4
00:01:07.070 --> 00:01:09.030
Joan Isaacson, Kearns & West: Yep, just like magic.

5
00:01:09.180 --> 00:01:10.139
Joan Isaacson, Kearns & West: Thank you.

6
00:01:20.950 --> 00:01:36.349
Joan Isaacson, Kearns & West: I think we can go ahead and get started. Once again, welcome, and this is a meeting that is being conducted by the California Public Utilities Commission. I'm Joan Isaacs, and I'll be the facilitator for the meeting, and I'll tell you more about the meeting in just a moment, but first.

7
00:01:36.390 --> 00:01:42.969
Joan Isaacson, Kearns & West: I invite our Spanish interpreter to make an announcement about the availability of interpretation.

8
00:01:43.460 --> 00:01:45.250
Joan Isaacson, Kearns & West: Mariana, over to you.

9
00:01:45.250 --> 00:01:52.539
Mariana Lopez: Thank you very much. Muy van a tardes a todos. Estaremos ofreciendo interpretacion simultania al inglesia el espanol durante esta reunion.

10
00:01:52.630 --> 00:02:06.919
Mariana Lopez: Si de se escucho la interpretacion al ingleso al espanol, aga click en el boton de interpretacion en la parte inferior derecho de

la pantalla Zoom, peraun icono en forma de globo terrachio. Este aparecera justo despues de estas instrucciones.

11
00:02:07.220 --> 00:02:17.299
Mariana Lopez: Si nos acompana traves de la aplicacion son para telefono intelligente, seleccione su idio masiendo click en donde dice mas, buenos 3 puntos en la skin inferior derecha de la pantalla.

12
00:02:17.440 --> 00:02:23.409
Mariana Lopez: Seleccione interpretacion del idioma, el y espanol lo ingles y haga clique en donde diselisto.

13
00:02:23.570 --> 00:02:33.579
Mariana Lopez: Si dese escuchar solo al interprete y no a los presentadores originales, asegore se hacia de hacer click en donde dice silenciar el audio original.

14
00:02:34.240 --> 00:02:51.329
Mariana Lopez: Good afternoon, everyone. We'll be offering simultaneous interpretation in English and Spanish during this meeting. If you wish to hear the speakers in English or Spanish, please click the interpretation button at the bottom right corner of your Zoom screen. You will see a globe icon that will appear right after these instructions.

15
00:02:51.760 --> 00:02:59.950
Mariana Lopez: If you're joining us via the Zoom smartphone app, select your language by clicking More, or the three dots in the bottom right corner of your screen.

16
00:03:00.110 --> 00:03:12.209
Mariana Lopez: Select language interpretation, then choose English or Spanish, and click Done. If you wish to hear only the interpreters and not the original speakers, be sure to click Mute Original Audio. Back to you, Joan.

17
00:03:12.680 --> 00:03:19.430
Joan Isaacson, Kearns & West: Alright, thank you so much. And to everyone, I encourage you to go ahead and

18
00:03:19.560 --> 00:03:35.670
Joan Isaacson, Kearns & West: find the interpretation icon, and click on it, and then you can select English or Spanish. And that way, we can… we'll be able to hear the interpreters be going back and forth in English and Spanish. So, to find it,

19

00:03:35.970 --> 00:03:44.099
Joan Isaacson, Kearns & West: go, just like we hear from Mariana, go to your toolbar at the bottom, and then there's a circle on the right with three dots.

20
00:03:44.540 --> 00:04:03.280
Joan Isaacson, Kearns & West: click on that, and that's where you'll see that… that globe for interpretation pop up. So, I'm clicking on the More button, I'm clicking on interpretation right now, and then I have, selected English. So, again, I just want to make sure everyone gets a chance to do that.

21
00:04:06.520 --> 00:04:13.599
Joan Isaacson, Kearns & West: All right, we'll go to the next slide. Just another housekeeping note, and then I'll tell you more about what to expect this evening.

22
00:04:13.770 --> 00:04:29.220
Joan Isaacson, Kearns & West: So this meeting is being recorded, and the contents will be, considered as part of the preparation of the Environmental Impact Report. So that's why we're recording it, so we have a good record of the verbal comments that we hear this evening.

23
00:04:30.380 --> 00:04:32.160
Joan Isaacson, Kearns & West: Okay, next slide.

24
00:04:32.390 --> 00:04:45.990
Joan Isaacson, Kearns & West: So, once again, welcome. This is a meeting that's being held by the California Public Utilities Commission. You'll hear them referred to the CPUC for shorthand, and it is a scoping meeting

25
00:04:46.010 --> 00:04:53.710
Joan Isaacson, Kearns & West: for the Ironwood Transmission Project, which is being proposed by the Horizon West Transmission.

26
00:04:54.020 --> 00:05:01.969
Joan Isaacson, Kearns & West: And, this scoping Meeting is being conducted as part of the environmental review process.

27
00:05:02.080 --> 00:05:04.009
Joan Isaacson, Kearns & West: It's one of the first steps.

28
00:05:04.210 --> 00:05:07.140
Joan Isaacson, Kearns & West: You'll hear much more about this process.

29
00:05:07.970 --> 00:05:15.470
Joan Isaacson, Kearns & West: The important part of this meeting is to tell you about the environmental review process.

30
00:05:15.490 --> 00:05:34.530
Joan Isaacson, Kearns & West: tell you about the project, and then also to share with you how to provide comment during scoping, and then we'll be having a verbal comment opportunity during this meeting to provide comments. So, we're at the beginning of the environmental review process. Really important is

31
00:05:34.610 --> 00:05:41.089
Joan Isaacson, Kearns & West: Everyone can provide comments in scoping after this meeting, so this is not your only opportunity.

32
00:05:42.170 --> 00:05:46.790
Joan Isaacson, Kearns & West: Next slide. Here we have… The agenda listed out.

33
00:05:47.250 --> 00:06:03.499
Joan Isaacson, Kearns & West: So we'll do some introductions for a minute, you'll hear more about the purpose of the meeting, and then we'll get into different presentation materials. And first, we'll give an overview of the proposed transmission project, including a map that shows the location of it.

34
00:06:03.680 --> 00:06:08.699
Joan Isaacson, Kearns & West: Then you'll hear information about the application and the permitting process.

35
00:06:08.840 --> 00:06:11.689
Joan Isaacson, Kearns & West: For the proposed transmission project.

36
00:06:12.390 --> 00:06:20.590
Joan Isaacson, Kearns & West: After that, we'll talk about the environmental review that is occurring pursuant to the California Environmental Quality Act.

37
00:06:20.830 --> 00:06:23.470
Joan Isaacson, Kearns & West: And that often gets shortened to CEQA.

38
00:06:24.580 --> 00:06:34.499

Joan Isaacson, Kearns & West: And we'll then talk about the scoping process and the types of issues that the team is anticipating to study as part of the analysis.

39
00:06:34.880 --> 00:06:43.790
Joan Isaacson, Kearns & West: Then we'll get to the most important part of the meeting, which I said is the public comment portion, and you'll have that opportunity to provide verbal comments.

40
00:06:44.100 --> 00:07:06.949
Joan Isaacson, Kearns & West: Then we'll wrap up with some next steps. So, we want to encourage everyone to submit written comments. Even if you give verbal comments tonight, it's very helpful for the team to have the written comments from you. It usually provides a more complete picture of your question, or your concern, or your idea when they're provided in writing, and we'll give you more information later on how to submit those.

41
00:07:09.110 --> 00:07:10.519
Joan Isaacson, Kearns & West: Okay, next slide.

42
00:07:12.370 --> 00:07:17.220
Joan Isaacson, Kearns & West: And this is where I hand it over to Michelle Wilson with the California Public Utility Commission.

43
00:07:18.110 --> 00:07:25.230
Michelle Wilson, CPUC: Thank you, Joan, and hello, everyone. My name is Michelle Wilson. I am a supervisor with the CPUC.

44
00:07:25.780 --> 00:07:36.889
Michelle Wilson, CPUC: Boris Sanchez is actually the project manager on this project, but is not able to attend these meetings, so I'm in… standing in his place.

45
00:07:37.300 --> 00:07:46.870
Michelle Wilson, CPUC: And I'm also joined by Ann Sergil with ECOR Consulting and her team, which is our environmental consultant for the project.

46
00:07:47.160 --> 00:07:53.950
Michelle Wilson, CPUC: And then… Joined by Joan Isaacson with Kearnsid West and her team supporting these meetings.

47
00:07:55.270 --> 00:07:56.579
Michelle Wilson, CPUC: Next slide.

48
00:07:59.740 --> 00:08:08.489
Michelle Wilson, CPUC: So I'm going to go over the meeting purpose today, which is to provide an overview of the proposed Ironwood Transmission Line project.

49
00:08:09.010 --> 00:08:13.529
Michelle Wilson, CPUC: To explain the CPC's environmental review process under CEQA,

50
00:08:14.190 --> 00:08:20.989
Michelle Wilson, CPUC: To describe the purpose and scope of the environmental impact report that will be prepared for CEQA,

51
00:08:21.950 --> 00:08:26.229
Michelle Wilson, CPUC: Provide an opportunity for the public to submit scoping comments.

52
00:08:26.620 --> 00:08:31.730
Michelle Wilson, CPUC: Gather input to help inform the scope and content of the EIR.

53
00:08:33.010 --> 00:08:41.609
Michelle Wilson, CPUC: And also, I just want to make a special note that this meeting is to support CPUC's process and the CEQA process.

54
00:08:42.030 --> 00:08:48.489
Michelle Wilson, CPUC: The U.S. Bureau of Land Management, or BLM, is a federal lead for the project.

55
00:08:48.660 --> 00:08:53.060
Michelle Wilson, CPUC: And we'll have a separate process and separate meetings for this project.

56
00:08:53.370 --> 00:08:59.489
Michelle Wilson, CPUC: However, CPC is coordinating very closely with BLM throughout the process.

57
00:09:00.240 --> 00:09:01.370
Michelle Wilson, CPUC: Next slide.

58
00:09:04.090 --> 00:09:09.259

Michelle Wilson, CPUC: And here in the slide, I would like to give you, some pictures of

59
00:09:09.400 --> 00:09:13.800
Michelle Wilson, CPUC: what CPUC infrastructure we permit?

60
00:09:14.000 --> 00:09:22.319
Michelle Wilson, CPUC: So, CPUC regulates the construction of new infrastructure by public utilities, including electrical infrastructure.

61
00:09:22.450 --> 00:09:28.289
Michelle Wilson, CPUC: And on this slide, there are four pictures showing different types of electrical infrastructure.

62
00:09:28.700 --> 00:09:33.549
Michelle Wilson, CPUC: The picture on the top left is a typical distribution line.

63
00:09:33.760 --> 00:09:38.719
Michelle Wilson, CPUC: Which is what you typically see leading into individual homes or businesses.

64
00:09:39.160 --> 00:09:43.559
Michelle Wilson, CPUC: These distribution lines contain the lowest voltage.

65
00:09:43.840 --> 00:09:46.969
Michelle Wilson, CPUC: Typically less than 50 kilovolts.

66
00:09:47.140 --> 00:09:52.410
Michelle Wilson, CPUC: CPUC does not require permits for installation of these lines.

67
00:09:53.330 --> 00:09:56.579
Michelle Wilson, CPUC: For the other three slides, these…

68
00:09:56.760 --> 00:10:07.379
Michelle Wilson, CPUC: This infrastructure carries voltages in larger quantities, so we have typical power lines, Between 50 and 200 kilovolts.

69
00:10:07.570 --> 00:10:10.950
Michelle Wilson, CPUC: Transmission lines are greater than 200 kilovolts.

70
00:10:11.090 --> 00:10:17.700
Michelle Wilson, CPUC: And substations are used to transform high voltage electricity to lower voltages.

71
00:10:18.300 --> 00:10:23.470
Michelle Wilson, CPUC: Those three types of infrastructure require permits from the CPUC.

72
00:10:25.030 --> 00:10:31.720
Michelle Wilson, CPUC: And I'd like to mention there are no substations proposed in this… application.

73
00:10:32.220 --> 00:10:33.300
Michelle Wilson, CPUC: Next slide.

74
00:10:36.310 --> 00:10:39.869
Michelle Wilson, CPUC: So now I'm going to go over the project description.

75
00:10:41.240 --> 00:10:51.020
Michelle Wilson, CPUC: The project involves the construction, operation, and maintenance of a new approximately 86-mile-long, 500 kilovolt transmission line.

76
00:10:51.310 --> 00:10:57.510
Michelle Wilson, CPUC: Between Arizona Public Service Company's North Gila substation in Arizona.

77
00:10:57.880 --> 00:11:03.070
Michelle Wilson, CPUC: The San Diego Gas and Electric's Imperial Valley Substation in California.

78
00:11:04.200 --> 00:11:10.090
Michelle Wilson, CPUC: The project would involve installation of approximately 307

79
00:11:10.210 --> 00:11:13.890
Michelle Wilson, CPUC: Feel tubular poles, or lattice structures.

80
00:11:14.040 --> 00:11:20.350
Michelle Wilson, CPUC: With heights typically ranging between 105 to 155,

81

00:11:20.480 --> 00:11:23.240
Michelle Wilson, CPUC: Feet, but not exceeding 200 feet.

82
00:11:24.180 --> 00:11:36.449
Michelle Wilson, CPUC: The new transmission line, or what is known as conductor, would be strung between structures spaced approximately 1,200 to 1600 feet between structures.

83
00:11:37.370 --> 00:11:38.470
Michelle Wilson, CPUC: Next slide.

84
00:11:41.830 --> 00:11:52.260
Michelle Wilson, CPUC: The new line would require a 250-foot-wide corridor of new right-of-way, acquired by Horizon West Transmission, the public utility proposing this project.

85
00:11:52.580 --> 00:11:57.430
Michelle Wilson, CPUC: And this would enable them to be able to access the line for operations and maintenance.

86
00:11:57.820 --> 00:12:05.949
Michelle Wilson, CPUC: The new structures and conductor would be installed using helicopters and heavy equipment on the ground.

87
00:12:06.570 --> 00:12:12.120
Michelle Wilson, CPUC: Instruction of the new line would involve new permanent and temporary access roads.

88
00:12:12.450 --> 00:12:18.900
Michelle Wilson, CPUC: Areas for equipment and material staging, and helicopter takeoff and landing areas.

89
00:12:19.280 --> 00:12:23.620
Michelle Wilson, CPUC: Construction is estimated to take approximately 19 months.

90
00:12:24.670 --> 00:12:25.780
Michelle Wilson, CPUC: Next slide.

91
00:12:28.520 --> 00:12:36.950
Michelle Wilson, CPUC: And here is a map of the proposed line location. Shown in red, that is the proposed alignment.

92

00:12:37.770 --> 00:12:51.799
Michelle Wilson, CPUC: The green triangles on the screen are substations, with the Imperial Valley substation on the left-hand part of the figure, and the North Gila substation on the right-hand side of the figure.

93
00:12:53.200 --> 00:12:58.010
Michelle Wilson, CPUC: We show yellow lines here, which are alternative routes for the project.

94
00:12:58.460 --> 00:13:08.419
Michelle Wilson, CPUC: Generally, the line would run east from Imperial Valley Substation, near the communities of El Centro, Haver, and Calexico.

95
00:13:08.670 --> 00:13:19.069
Michelle Wilson, CPUC: generally paralleling Highway 8, and also generally paralleling an existing 500 kilovolt transmission line called the Southwest Power Link.

96
00:13:20.310 --> 00:13:26.290
Michelle Wilson, CPUC: As the project, exits the communities of El Centro, Hebra, and Calexico.

97
00:13:26.500 --> 00:13:29.579
Michelle Wilson, CPUC: It then crosses the Algonis Dunes.

98
00:13:30.010 --> 00:13:33.659
Michelle Wilson, CPUC: Followed by crossing of the Cargo Muchachas Mountains.

99
00:13:34.020 --> 00:13:39.129
Michelle Wilson, CPUC: It runs generally north of the Fort Yuma Kwitsan Reservation.

100
00:13:39.650 --> 00:13:43.309
Michelle Wilson, CPUC: And then crosses the Colorado River near Metry Lake.

101
00:13:43.960 --> 00:13:51.140
Michelle Wilson, CPUC: The alignment then runs south through the Laguna Mountains to interconnect with the North Gila substation.

102
00:13:52.040 --> 00:13:57.679

Michelle Wilson, CPUC: And I want to mention now that there are more detailed maps on CPC's webpage.

103
00:13:57.800 --> 00:14:02.860
Michelle Wilson, CPUC: Our webpage will be, contained in a slide at the end of this presentation.

104
00:14:03.020 --> 00:14:07.119
Michelle Wilson, CPUC: Where you can see more detailed maps of the alignment.

105
00:14:07.280 --> 00:14:15.029
Michelle Wilson, CPUC: contained in the proponent's environmental assessment submitted by the applicant, and I believe it's contained in Attachment A.

106
00:14:15.790 --> 00:14:19.710
Michelle Wilson, CPUC: The alternative alignments are also shown in a routing report.

107
00:14:20.790 --> 00:14:23.540
Michelle Wilson, CPUC: Contained in the proponent's environmental assessment.

108
00:14:24.170 --> 00:14:30.660
Michelle Wilson, CPUC: I want to mention here also that these are alternatives proposed by Verizon West Transmission.

109
00:14:30.820 --> 00:14:41.480
Michelle Wilson, CPUC: CPUC will be analyzing additional alternatives, and we're soliciting public input on those alternatives now, today, and through this public scoping process.

110
00:14:42.860 --> 00:14:44.090
Michelle Wilson, CPUC: Next slide.

111
00:14:47.700 --> 00:14:51.100
Michelle Wilson, CPUC: So, I'd like to go over the project objectives next.

112
00:14:51.530 --> 00:14:56.370
Michelle Wilson, CPUC: They, the project is in response to existing and forecast

113
00:14:56.600 --> 00:15:07.419
Michelle Wilson, CPUC: Transmission system needs identified through regional planning processes performed by the California Independent System Operator, otherwise known as CAISO,

114
00:15:07.730 --> 00:15:11.169
Michelle Wilson, CPUC: CPUC and the California Energy Commission.

115
00:15:12.130 --> 00:15:21.230
Michelle Wilson, CPUC: The project is needed to address thermal overloads on the existing transmission system in this region, and to meet projected demand for electricity.

116
00:15:21.670 --> 00:15:34.949
Michelle Wilson, CPUC: The project would also supplement the existing 500 kilovolt Southwest PowerLink transmission line and add redundancy to the system, which would enable power transfers between systems in the event of an outage.

117
00:15:35.590 --> 00:15:37.879
Michelle Wilson, CPUC: Overall, the project would increase

118
00:15:38.000 --> 00:15:44.290
Michelle Wilson, CPUC: The capacity and reliability of the electrical grid in the area and improve operational flexibility.

119
00:15:45.410 --> 00:15:46.430
Michelle Wilson, CPUC: Next slide.

120
00:15:49.190 --> 00:15:53.410
Michelle Wilson, CPUC: Next, I'm going to go over the permit process for this project.

121
00:15:53.980 --> 00:16:00.019
Michelle Wilson, CPUC: The project starts the CPUC's permit process with the filing of a permit application.

122
00:16:00.220 --> 00:16:03.490
Michelle Wilson, CPUC: This triggers two parallel processes.

123
00:16:03.700 --> 00:16:12.700
Michelle Wilson, CPUC: The first is a formal legal proceeding, which leads to a CPC voting meeting before our five-member commission.

124
00:16:13.860 --> 00:16:23.420
Michelle Wilson, CPUC: This also triggers a separate and parallel process, the Environmental Review under the California Environmental Quality Act, or CEQA.

125
00:16:24.120 --> 00:16:28.260
Michelle Wilson, CPUC: As well as tribal consultation under Assembly Bill 52.

126
00:16:29.270 --> 00:16:30.530
Michelle Wilson, CPUC: Next slide.

127
00:16:32.800 --> 00:16:38.289
Michelle Wilson, CPUC: And this is a diagram of these two processes. They run in parallel, the top

128
00:16:38.490 --> 00:16:47.309
Michelle Wilson, CPUC: row of boxes shows the CEQA process, and the bottom row of boxes shows, generally, the process for the legal proceeding.

129
00:16:47.950 --> 00:16:50.609
Michelle Wilson, CPUC: Members of the public can participate in both.

130
00:16:51.200 --> 00:16:58.679
Michelle Wilson, CPUC: But to participate in the legal proceeding, a member of the public must file a motion to become a party to that legal proceeding.

131
00:16:59.860 --> 00:17:08.579
Michelle Wilson, CPUC: The focus of this Scoping Meeting today is to describe how the public can participate in the CEQA process, which is the top row of boxes.

132
00:17:09.099 --> 00:17:13.000
Michelle Wilson, CPUC: And that will be the focus of the rest of this meeting.

133
00:17:13.710 --> 00:17:19.490
Michelle Wilson, CPUC: For questions on how to participate in the legal proceeding, you can contact Boris Sanchez.

134

00:17:19.630 --> 00:17:25.499
Michelle Wilson, CPUC: at the email address in the slide, in the final slides in this PowerPoint presentation.

135
00:17:26.890 --> 00:17:28.809
Michelle Wilson, CPUC: Next slide.

136
00:17:31.350 --> 00:17:37.199
Michelle Wilson, CPUC: And this, again, is a little bit more simplified version of what the application process looks like.

137
00:17:37.460 --> 00:17:40.069
Michelle Wilson, CPUC: It starts with a permit application.

138
00:17:40.520 --> 00:17:51.169
Michelle Wilson, CPUC: The owner, the public utility, seeks a permit. In this case, it's a Certificate of Public Convenience and Necessity, or CPCN.

139
00:17:51.590 --> 00:17:59.489
Michelle Wilson, CPUC: We have another permit process called the Permit to Construct, which is a separate permit, and so this one is undergoing a CPCN.

140
00:17:59.880 --> 00:18:11.060
Michelle Wilson, CPUC: And then this permit process leads to a discretionary decision by the CPUC, where the CPUC can either approve or disapprove the project.

141
00:18:11.660 --> 00:18:20.189
Michelle Wilson, CPUC: If CPC approves the project, the Commission would then also select an alternative, for approval.

142
00:18:21.950 --> 00:18:23.709
Michelle Wilson, CPUC: And I'll go to the next slide.

143
00:18:25.340 --> 00:18:29.559
Michelle Wilson, CPUC: And now I'd like to introduce Anne, who will go over the CWA process.

144
00:18:30.770 --> 00:18:31.929
Anne Surdzial, ECORP: Thanks, Michelle.

145

00:18:32.640 --> 00:18:45.059
Anne Surdzial, ECORP: The purpose of CEQA is to inform agency decision makers, in this case the CPUC, as well as the public, about the potential environmental effects that may be caused by a project.

146
00:18:45.250 --> 00:18:51.650
Anne Surdzial, ECORP: So that they can be considered in the lead agency's decision to approve or deny the project's permit.

147
00:18:52.110 --> 00:18:57.869
Anne Surdzial, ECORP: The agency that has the main decision-making authority for the project is called the lead agency.

148
00:18:58.220 --> 00:19:08.329
Anne Surdzial, ECORP: And if a significant impact is identified, the lead agency must identify mitigation measures and alternatives that would reduce or avoid the impact.

149
00:19:09.370 --> 00:19:13.240
Anne Surdzial, ECORP: Cpuc is the lead agency in this case.

150
00:19:13.680 --> 00:19:22.960
Anne Surdzial, ECORP: If the available mitigation will not reduce the impact to a less than significant level, and the lead agency decides to approve the project's permit.

151
00:19:23.310 --> 00:19:28.549
Anne Surdzial, ECORP: The agency must disclose to the public the reasons why that decision was made.

152
00:19:28.870 --> 00:19:37.749
Anne Surdzial, ECORP: The analysis in the CEQA document focuses on physical changes to the environment that could occur from construction or operation of a project.

153
00:19:38.040 --> 00:19:48.649
Anne Surdzial, ECORP: The description and disclosure of environmental impacts can happen in several different types of documents, one of which is called an environmental impact report, or an EIR.

154
00:19:49.730 --> 00:19:50.839
Anne Surdzial, ECORP: Next slide.

155
00:19:54.010 --> 00:20:02.840

Anne Surdzial, ECORP: This slide shows a flow chart of the EIR process. We are at the very beginning of the process in those light blue boxes on the left.

156
00:20:03.350 --> 00:20:13.180
Anne Surdzial, ECORP: And an EIR is the most comprehensive type of CEQA document with the most opportunities for public input.

157
00:20:13.810 --> 00:20:25.089
Anne Surdzial, ECORP: You can see on the left, CPUC has already started the Native American consultation process that is required during the CEQA process by AB52,

158
00:20:25.300 --> 00:20:36.139
Anne Surdzial, ECORP: And we are now within the scoping process, where CPUC is asking for input that you may have about the scope of the EIR.

159
00:20:36.140 --> 00:20:50.250
Anne Surdzial, ECORP: or about what environmental impacts the project may have, and suggestions on the alternatives or mitigation measures that could avoid those impacts. After the scoping period ends on September 21st.

160
00:20:50.250 --> 00:20:56.700
Anne Surdzial, ECORP: CPUC will publish a scoping report that will summarize all of the input received during the scoping period.

161
00:20:57.270 --> 00:21:04.900
Anne Surdzial, ECORP: And then we will move into that center section, the dark green section, which is preparation and publication of the draft EIR.

162
00:21:05.060 --> 00:21:14.339
Anne Surdzial, ECORP: The draft EIR will be prepared, taking into account the input from the scoping period, as well as project-specific technical studies.

163
00:21:14.480 --> 00:21:19.229
Anne Surdzial, ECORP: The EIR is expected to be published in mid-2027.

164
00:21:19.390 --> 00:21:27.479
Anne Surdzial, ECORP: And at that time, there will be a minimum 45-day public comment and review period, during which there will be additional public meetings.

165
00:21:27.910 --> 00:21:40.960
Anne Surdzial, ECORP: CPUC will consider all comments received on the draft EIR, and we'll move into that dark blue, part on the far right of the slide, which is the final EIR process.

166
00:21:41.090 --> 00:21:56.479
Anne Surdzial, ECORP: Cpuc will consider all comments received on the draft EIR, and will prepare responses to those comments that will be published in the final EIR. We expect the final EIR to be published in early 2028.

167
00:21:58.970 --> 00:21:59.980
Anne Surdzial, ECORP: Next slide.

168
00:22:01.650 --> 00:22:09.280
Anne Surdzial, ECORP: As I described on the previous slide, we're currently at the very beginning of the CEQA process, which is called scoping.

169
00:22:09.450 --> 00:22:16.770
Anne Surdzial, ECORP: The scoping period started on August 7th, with newspaper notifications, mailings, and posting on the CPUC webpage.

170
00:22:17.070 --> 00:22:31.990
Anne Surdzial, ECORP: A Scoping period typically lasts 30 days, but due to the complex nature of this project, CPUC has decided to extend the scoping period to 45 days, which will end on September 21st, to give extra time for input.

171
00:22:32.460 --> 00:22:48.479
Anne Surdzial, ECORP: During this time, CPUC is asking for your input on the scope of the EIR, in particular, the potential environmental impacts this project may have, mitigation measures, and mitigation measures are alternatives that would reduce or avoid those impacts.

172
00:22:50.870 --> 00:22:52.029
Anne Surdzial, ECORP: Next slide.

173
00:22:53.750 --> 00:23:02.799
Anne Surdzial, ECORP: CEQA evaluates impacts in 20 environmental resource areas that are shown on this slide and the next slide, and these are aesthetics.

174
00:23:02.990 --> 00:23:18.649

Anne Surdzial, ECORP: Agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials.

175
00:23:18.780 --> 00:23:21.030
Anne Surdzial, ECORP: Hydrology and water quality.

176
00:23:21.250 --> 00:23:22.380
Anne Surdzial, ECORP: Next slide.

177
00:23:24.030 --> 00:23:32.790
Anne Surdzial, ECORP: Land use and planning, mineral resources, noise, Population and housing, Public services.

178
00:23:32.910 --> 00:23:41.769
Anne Surdzial, ECORP: Recreation, transportation and Traffic, Tribal Cultural Resources, Utilities and service systems, and wildfire.

179
00:23:42.880 --> 00:23:43.930
Anne Surdzial, ECORP: Next slide.

180
00:23:46.240 --> 00:24:04.219
Anne Surdzial, ECORP: The EIR will contain a section for each one of these resource areas that will describe the environmental setting or existing conditions, provide background on the laws and regulations that apply to that resource, describe the threshold of significance, or what defines if an impact is significant or not.

181
00:24:04.580 --> 00:24:15.540
Anne Surdzial, ECORP: Then the section will describe the project's impacts to these resources. If the impacts are significant, then the CPUC must require mitigation measures to reduce or avoid the impact.

182
00:24:15.880 --> 00:24:22.779
Anne Surdzial, ECORP: The EIR will also describe cumulative impacts, or the impacts of the project in combination with other projects.

183
00:24:23.990 --> 00:24:25.030
Anne Surdzial, ECORP: Next slide.

184
00:24:27.190 --> 00:24:35.749
Anne Surdzial, ECORP: If significant project impacts are identified, an EIR must identify alternatives that would avoid or substantially lessen those impacts.

185
00:24:35.940 --> 00:24:50.239
Anne Surdzial, ECORP: CEQA requires that the alternatives must be allowed by applicable laws and regulations, and are also technically feasible. The alternatives must also meet most of the project objectives, which were described on a previous slide.

186
00:24:51.720 --> 00:24:52.580
Anne Surdzial, ECORP: Next slide.

187
00:24:55.460 --> 00:25:09.649
Anne Surdzial, ECORP: During the scoping period, CPUC is currently gathering information to develop project alternatives. Alternatives that are typically evaluated in an EIR can include different routes or location of project components.

188
00:25:09.790 --> 00:25:17.559
Anne Surdzial, ECORP: Additionally, CECOR requires the inclusion of the no project alternative, which is what would happen if the project is not built.

189
00:25:17.760 --> 00:25:24.809
Anne Surdzial, ECORP: The impacts of each alternative will be evaluated for the same 20 environmental resources as the proposed project.

190
00:25:25.180 --> 00:25:43.250
Anne Surdzial, ECORP: The EIR will describe how that alternative will reduce or avoid impacts to resources, if impacts would be relatively the same as the proposed project, or if the alternative would cause new or more severe impacts to other resources when compared to the proposed project.

191
00:25:44.550 --> 00:25:45.610
Anne Surdzial, ECORP: Next slide.

192
00:25:47.870 --> 00:25:54.459
Anne Surdzial, ECORP: If you're interested in providing input on the scope of the EIR, and you're here at this meeting, you're on the right track.

193
00:25:54.590 --> 00:26:04.799
Anne Surdzial, ECORP: The address at the bottom of the slide is the webpage where project documents are available, and we will continue updating that website throughout the CPU process.

194
00:26:05.240 --> 00:26:15.269
Anne Surdzial, ECORP: You can make a verbal comment at this meeting, but we encourage you to submit your comments via mail or email so that your input is accurately conveyed to CPUC.

195
00:26:15.540 --> 00:26:20.129
Anne Surdzial, ECORP: The email and mailing address for comments will be provided on the last slide.

196
00:26:20.370 --> 00:26:29.049
Anne Surdzial, ECORP: The comment period closes September 21st, an email should be sent by 5pm on that date, and U.S. mail should be postmarked by that date.

197
00:26:31.590 --> 00:26:32.630
Anne Surdzial, ECORP: Next slide.

198
00:26:34.200 --> 00:26:40.470
Anne Surdzial, ECORP: So, as a reminder, CPUC is seeking input on the potential environmental impacts of the project.

199
00:26:40.700 --> 00:26:53.229
Anne Surdzial, ECORP: mitigation measures or alternatives that could avoid or reduce environmental impacts, and any local environmental conditions or resources that CPUC should be aware of as it prepares the EIR.

200
00:26:53.690 --> 00:27:02.399
Anne Surdzial, ECORP: Also, as a reminder, the BLM is the lead agency for federal approvals, which has its own separate environmental process called NEPA.

201
00:27:02.890 --> 00:27:11.730
Anne Surdzial, ECORP: The NEPA process is similar, but different than the CEQA process, and they will have… the BLM will be having their own separate meetings on the project.

202
00:27:13.330 --> 00:27:14.250
Anne Surdzial, ECORP: Next slide.

203
00:27:20.010 --> 00:27:26.689
Joan Isaacson, Kearns & West: All right, I think it's back over to me. Anne and Michelle, thank you so much for the information about the proposed project.

204
00:27:26.860 --> 00:27:42.899
Joan Isaacson, Kearns & West: the CPUC process for considering the permit for the proposed process, and of course, the environmental review and scoping, which is why we're here right now. On the slide right now, everyone, is information about where to send

205
00:27:43.040 --> 00:27:44.990
Joan Isaacson, Kearns & West: Comments during Scoping?

206
00:27:45.340 --> 00:27:49.100
Joan Isaacson, Kearns & West: And there's also the Gickenson and Via

207
00:27:49.290 --> 00:28:05.849
Joan Isaacson, Kearns & West: U.S. mail or email, and, you can take a snapshot of… or a screenshot of this slide right now, if you'd like, so you have that information. But, also, Jazz on our team just put the website address

208
00:28:06.200 --> 00:28:12.059
Joan Isaacson, Kearns & West: In chat, so you can click on… on that, and that'll take you to the same information.

209
00:28:12.430 --> 00:28:20.819
Joan Isaacson, Kearns & West: And to reiterate the scoping deadline, scoping does close on September 21st, 2026, so it's still a couple weeks away.

210
00:28:23.040 --> 00:28:24.430
Joan Isaacson, Kearns & West: Next slide, please.

211
00:28:30.300 --> 00:28:35.249
Joan Isaacson, Kearns & West: We're now going to enter into the public comment portion of the meeting.

212
00:28:35.500 --> 00:28:40.780
Joan Isaacson, Kearns & West: And I'll give you some information about… about public comment. So,

213
00:28:40.920 --> 00:28:56.979
Joan Isaacson, Kearns & West: The way this is going to work on the platform we're using today is if you would like to provide verbal comment during this meeting, you can use the raise hand function, and it's at the

bottom of your screen on that toolbar, and it looks like a hand, and you can click on that.

214
00:28:56.980 --> 00:29:02.179
Joan Isaacson, Kearns & West: And then I'll see your raised hand, and then, I'll call on people one by one.

215
00:29:02.830 --> 00:29:13.630
Joan Isaacson, Kearns & West: We're asking that people keep your comments to 2 minutes or less, and when we start the comment, you'll see that there's a time clock.

216
00:29:13.630 --> 00:29:23.099
Joan Isaacson, Kearns & West: on the screen that you'll see, and that way everyone can monitor their own time. And, if people… if anyone starts going over, I'll just give you a quick reminder.

217
00:29:23.340 --> 00:29:30.959
Joan Isaacson, Kearns & West: That way, everybody gets the same amount of time, and we make sure that everyone who wants to participate and comment gets that chance to do so.

218
00:29:32.020 --> 00:29:43.990
Joan Isaacson, Kearns & West: Also, you can submit comments, and we are going to look at the questions… I'm sorry, you can submit questions, and

219
00:29:44.150 --> 00:29:47.180
Joan Isaacson, Kearns & West: You can ask questions about the proposed project.

220
00:29:47.290 --> 00:29:57.969
Joan Isaacson, Kearns & West: about the CPUC process, the CEQA process, and the way to submit comment… I'm sorry, I keep saying that… the way to submit questions is to use the Q&A

221
00:29:58.600 --> 00:29:59.889
Joan Isaacson, Kearns & West: Module.

222
00:30:00.210 --> 00:30:10.600
Joan Isaacson, Kearns & West: And, you'll find that, again, at the bottom of your screen. Go to… on the far right, that circle that has the three dots that says More.

223
00:30:10.600 --> 00:30:21.780

Joan Isaacson, Kearns & West: So click on More, and then you'll see multiple, options, and you'll click on the icon that says Q&A. That will take you to the Q&A function, and you can submit

224
00:30:22.260 --> 00:30:27.289
Joan Isaacson, Kearns & West: questions through that portal. So what we're going to do is we're gonna hear comments first.

225
00:30:27.570 --> 00:30:40.280
Joan Isaacson, Kearns & West: And, and then after everyone who wants to participate in providing verbal comment, we'll then go to the questions, and we'll wrap up with the questions, and then answering the questions, too.

226
00:30:43.480 --> 00:31:02.719
Joan Isaacson, Kearns & West: I think with that, oh, I also just want to say that if for our participants this evening whose primary language in Spanish, you can participate in the verbal comment portion in Spanish, and our interpreters will interpret what you say back into English.

227
00:31:02.870 --> 00:31:09.690
Joan Isaacson, Kearns & West: And that way, everyone who's in the meeting will get to hear your comment in Spanish and English.

228
00:31:12.050 --> 00:31:14.310
Joan Isaacson, Kearns & West: So, at this point…

229
00:31:14.610 --> 00:31:20.759
Joan Isaacson, Kearns & West: We're going to invite people to raise your hand for the verbal comment portion of the meeting.

230
00:31:21.740 --> 00:31:32.460
Joan Isaacson, Kearns & West: And what'll happen is I'll see your hand, I'll call on your name, and then we'll unmute you, and you'll be able to… to step up and provide your comment.

231
00:31:38.970 --> 00:31:41.920
Joan Isaacson, Kearns & West: I'm gonna open up my box. I see we have…

232
00:31:42.780 --> 00:31:47.100
Joan Isaacson, Kearns & West: Excellent. We have someone who's ready to go first, and that's Timothy Hawk.

233
00:31:47.800 --> 00:31:51.970

Joan Isaacson, Kearns & West: Timothy, we're going to unmute you, and you can provide your comments.

234
00:32:03.160 --> 00:32:04.310
Joan Isaacson, Kearns & West: Looks like…

235
00:32:04.750 --> 00:32:11.340
Joan Isaacson, Kearns & West: Jess, Briana, can you just check? It looks like he's still muted, so we're gonna unmute Timothy Hawk.

236
00:32:13.430 --> 00:32:15.180
Joan Isaacson, Kearns & West: There we go. Boop.

237
00:32:17.340 --> 00:32:18.580
Joan Isaacson, Kearns & West: One more time.

238
00:32:30.970 --> 00:32:32.730
Joan Isaacson, Kearns & West: Jas, is there a…

239
00:32:32.730 --> 00:32:37.339
Jas King (they/them): Yeah, I've asked, asked him to unmute, so…

240
00:32:37.500 --> 00:32:38.120
Joan Isaacson, Kearns & West: Okay.

241
00:32:38.270 --> 00:32:43.539
Joan Isaacson, Kearns & West: So, Tiffany, it looks like you may need… oh, there we go. Okay, we're set.

242
00:32:45.640 --> 00:32:47.479
Joan Isaacson, Kearns & West: Kimby, thanks for your patience.

243
00:32:53.100 --> 00:32:55.710
Joan Isaacson, Kearns & West: Yeah, if you're speaking, we can't hear you.

244
00:33:13.920 --> 00:33:19.449
Joan Isaacson, Kearns & West: Timothy, if you can hear… if you're speaking, could you just let us know in chat, because

245
00:33:19.860 --> 00:33:22.210
Joan Isaacson, Kearns & West: We're not… we're not able to hear you.

246
00:33:39.510 --> 00:33:42.629
Joan Isaacson, Kearns & West: Why don't we,

247
00:33:43.340 --> 00:33:50.640
Joan Isaacson, Kearns & West: see if anyone else wants to go first, and we'll try to figure out the technology so that we can… we can hear Timothy.

248
00:33:53.180 --> 00:33:56.379
Joan Isaacson, Kearns & West: Would anyone else this evening like to provide verbal comment?

249
00:34:09.120 --> 00:34:09.909
Joan Isaacson, Kearns & West: Okay.

250
00:34:10.730 --> 00:34:12.540
Joan Isaacson, Kearns & West: We have,

251
00:34:15.750 --> 00:34:17.650
Joan Isaacson, Kearns & West: It looks like we are…

252
00:34:17.760 --> 00:34:23.339
Joan Isaacson, Kearns & West: sending some technical assistance to Mr. Hawk, so I think we'll get that figured out.

253
00:34:26.699 --> 00:34:32.349
Joan Isaacson, Kearns & West: In the meantime, Gail Overton, I see your hand up, so let's unmute.

254
00:34:33.340 --> 00:34:34.800
Joan Isaacson, Kearns & West: Gail Overton.

255
00:34:35.449 --> 00:34:38.330
Joan Isaacson, Kearns & West: And then Gail can go ahead and provide comment.

256
00:34:49.400 --> 00:34:53.849
Gail Overton: Hello, it's, Gail Overton. I was in your previous, can you hear me okay?

257
00:34:53.850 --> 00:34:55.280

Joan Isaacson, Kearns & West: Yes, we can. Yes.

258
00:34:56.230 --> 00:35:15.819
Gail Overton: Yeah, I was in your previous, 3PM meeting and did, you know, provide my comments, and I'll also provide a written comment. But I was curious, usually these, Zoom meetings show, like, how many people… I mean, are there multiple people in the meeting with comments? Because,

259
00:35:15.890 --> 00:35:20.709
Gail Overton: Yeah, usually they show how many people are online at the moment.

260
00:35:22.450 --> 00:35:30.460
Joan Isaacson, Kearns & West: Yes, I can tell you, we have… about…

261
00:35:30.990 --> 00:35:36.719
Joan Isaacson, Kearns & West: 14 members of the public on this meeting, and then we had a greater number during the afternoon meeting.

262
00:35:38.520 --> 00:35:39.470
Gail Overton: Okay, yeah.

263
00:35:39.470 --> 00:35:41.879
Joan Isaacson, Kearns & West: Closed to twice as many in the afternoon meeting.

264
00:35:44.020 --> 00:35:57.959
Gail Overton: Yeah, I probably have more questions about the project than an additional comment, but my concerns were, as my previous discussion was about, the path that it was taking over the Colorado River and through the…

265
00:35:58.020 --> 00:36:15.729
Gail Overton: cargo muchachos and the wildlife that would be, you know, impacted by that. Specifically, there's a large bat colony, within, the cargo mine area, which is right where the power line deviates from the southwest power link.

266
00:36:16.040 --> 00:36:30.960
Gail Overton: And I was curious, the deviation from the southwest power link, at the northwest corner of the Kwitsan tribal boundary, was there a reason for that large deviation away from

267
00:36:31.230 --> 00:36:35.969

Gail Overton: the… the existing 500KV line that's already there.

268
00:36:41.670 --> 00:36:47.069
Joan Isaacson, Kearns & West: Ms. Overton, what we'll do is we'll take that question, and we'll come back to it after the public comment.

269
00:36:47.580 --> 00:36:48.830
Gail Overton: Okay, great, thank you.

270
00:36:48.830 --> 00:36:52.780
Joan Isaacson, Kearns & West: And thanks… thanks for joining both meetings. We appreciate it. Thank you.

271
00:36:58.730 --> 00:36:59.700
Joan Isaacson, Kearns & West: Okay.

272
00:37:00.070 --> 00:37:05.239
Joan Isaacson, Kearns & West: Let's try Timothy Hawk again. It looks like you're unmuted on our end.

273
00:37:15.470 --> 00:37:18.279
Joan Isaacson, Kearns & West: Yeah, we still can't hear you.

274
00:37:19.480 --> 00:37:30.730
Joan Isaacson, Kearns & West: Mr. Hawk, what I suggest is if you want to type your comment into the Q&A portal, that way we'll see it, and I'll read it out loud for you.

275
00:37:45.260 --> 00:37:49.419
Joan Isaacson, Kearns & West: Would anyone else like to provide verbal comment during this portion of the meeting?

276
00:38:05.610 --> 00:38:16.990
Joan Isaacson, Kearns & West: I don't see any of their hands raised right now, so let's go to answering, some questions, and again, you can enter your questions through the Q&A portal.

277
00:38:17.780 --> 00:38:31.460
Joan Isaacson, Kearns & West: And one of the questions that's been submitted is asking for Michelle Wilson's email address, and that they had tried to reach Forrest, but no reply, and Michelle had explained that he's out right now. So,

278

00:38:32.380 --> 00:38:39.320
Joan Isaacson, Kearns & West: The way to contact the project team is through the email address that's been set up for the project.

279
00:38:39.580 --> 00:38:57.479
Joan Isaacson, Kearns & West: And what we could do, it's on the screen right now, and maybe, Jazz, if I could please ask you to drop that into chat, just to make it as convenient as people as possible. And as soon as those emails come in, they are sent.

280
00:38:57.600 --> 00:39:01.069
Joan Isaacson, Kearns & West: to the project team. Just, I'm gonna assure you of that.

281
00:39:03.070 --> 00:39:11.420
Joan Isaacson, Kearns & West: Thanks, Jas, I see the… I see the email address in chat now. So it's sequa at… IronwoodTransmissionProject.com.

282
00:39:13.330 --> 00:39:14.300
Joan Isaacson, Kearns & West: Michelle?

283
00:39:14.510 --> 00:39:24.940
Michelle Wilson, CPUC: And, my recommendation would be to check your junk folder just in case any replies from that email address ended up

284
00:39:25.050 --> 00:39:29.010
Michelle Wilson, CPUC: Going to your spam folder, or junk folder.

285
00:39:29.370 --> 00:39:32.050
Michelle Wilson, CPUC: As a… as a start.

286
00:39:34.760 --> 00:39:36.550
Joan Isaacson, Kearns & West: Yes, good, good advice.

287
00:39:38.620 --> 00:39:49.480
Joan Isaacson, Kearns & West: Okay, Michelle, I know you are a point person for questions, so I've got a couple more for you. There's a question about whether or not the recording of this presentation will be available on the project website.

288
00:39:52.160 --> 00:40:02.660
Michelle Wilson, CPUC: We typically do, will be publishing a public scoping report that will contain public comments received during the public comment… the scoping period.

289
00:40:03.090 --> 00:40:07.400
Michelle Wilson, CPUC: It will contain a copy of the PowerPoint presentation,

290
00:40:08.490 --> 00:40:13.650
Michelle Wilson, CPUC: I would have to get back to you specifically about the recording of the presentation.

291
00:40:13.900 --> 00:40:22.280
Michelle Wilson, CPUC: So I think what might be helpful is if you're able to send us an email with your contact information, we can respond back to that question.

292
00:40:24.820 --> 00:40:37.049
Joan Isaacson, Kearns & West: Great, thank you. And another question that's in the Q&A pod is, can Ironwood… can the Ironwood Transmission proposal be incorporated into the Southwest Power Link right-of-way?

293
00:40:39.980 --> 00:40:42.820
Michelle Wilson, CPUC: Currently… there's…

294
00:40:43.410 --> 00:40:52.199
Michelle Wilson, CPUC: Not enough space to install a new power line within the right-of-way for the Southwest Powerline project.

295
00:40:53.490 --> 00:40:58.060
Michelle Wilson, CPUC: The Southwest PowerLink project is,

296
00:40:58.540 --> 00:41:04.240
Michelle Wilson, CPUC: owned and operated by San Diego Gas and Electric, but

297
00:41:04.720 --> 00:41:07.769
Michelle Wilson, CPUC: I think that there's a limitation on space.

298
00:41:12.900 --> 00:41:14.020
Joan Isaacson, Kearns & West: Alright, thanks, Michelle.

299
00:41:23.510 --> 00:41:31.729
Joan Isaacson, Kearns & West: We're not seeing any more hands raised for public comment still, and no additional questions have been submitted, but maybe we'll just…

300
00:41:32.620 --> 00:41:36.609
Joan Isaacson, Kearns & West: Wait another moment, give everyone a chance to think through if they want to…

301
00:41:36.730 --> 00:41:39.190
Joan Isaacson, Kearns & West: Participate in this portion of the meeting.

302
00:41:41.180 --> 00:41:44.580
Joan Isaacson, Kearns & West: And if not, we can wrap up, but just… we'll just wait a moment.

303
00:42:00.060 --> 00:42:02.160
Joan Isaacson, Kearns & West: Alright,

304
00:42:05.350 --> 00:42:06.360
Joan Isaacson, Kearns & West: Oh, sorry.

305
00:42:06.360 --> 00:42:14.169
Michelle Wilson, CPUC: Yes. I can answer the question from Gail Overton regarding the deviation from the Southwest Power Link.

306
00:42:14.170 --> 00:42:17.030
Joan Isaacson, Kearns & West: Oh, yes, yes, we wanted to go back to that, yes.

307
00:42:17.030 --> 00:42:19.529
Michelle Wilson, CPUC: Yes, so I'll answer that now.

308
00:42:19.800 --> 00:42:23.090
Michelle Wilson, CPUC: The question, again, is…

309
00:42:23.610 --> 00:42:33.870
Michelle Wilson, CPUC: Why did the… is the line proposed to deviate from the Southwest Power Link transmission line near the cargo Machacho Mountains?

310
00:42:34.660 --> 00:42:43.599
Michelle Wilson, CPUC: I will say that that alignment follows what's called a Section 368 Energy Corridor, designated by BLM.

311
00:42:43.990 --> 00:42:46.120

Michelle Wilson, CPUC: And that could be one reason.

312
00:42:46.540 --> 00:42:48.930
Michelle Wilson, CPUC: for that alignment.

313
00:42:55.940 --> 00:42:58.279
Joan Isaacson, Kearns & West: Alright, good. I'm glad we got one back to that question.

314
00:43:09.440 --> 00:43:15.639
Joan Isaacson, Kearns & West: Alright, I think we can… We can probably go ahead and wrap up.

315
00:43:16.760 --> 00:43:25.030
Joan Isaacson, Kearns & West: Just want to thank everyone for joining and being part of the meeting this evening. The information on…

316
00:43:25.170 --> 00:43:40.870
Joan Isaacson, Kearns & West: how to participate is still on the screen, and, public scoping, this public scoping process goes on until September 21st, so there's time to submit written comments. And,

317
00:43:41.250 --> 00:43:48.719
Joan Isaacson, Kearns & West: We really appreciate your involvement here this evening in sharing your knowledge and your questions about the project.

318
00:43:50.010 --> 00:43:54.110
Joan Isaacson, Kearns & West: Gail, I see your hand up. Do you have, another question?

319
00:43:54.620 --> 00:43:56.919
Joan Isaacson, Kearns & West: And we'll… we can go ahead and unmute you.

320
00:44:06.880 --> 00:44:09.490
Joan Isaacson, Kearns & West: Okay, looks like you're muted. If you have another question, we can answer it.

321
00:44:09.490 --> 00:44:28.959
Gail Overton: Yeah, yeah, hi, I'm sorry, I did try to type it in the Q&A, but I think I could just say it faster since we're… Yeah, go for it. It's really just a follow-up to what you said about the deviation from the Southwest Power Link due to the BLM energy corridor. I think it's like the BLM…

322
00:44:29.090 --> 00:44:38.249
Gail Overton: 386 Energy Corridor. That still kind of doesn't answer the question why the, the, you know, the Southwest Power Link

323
00:44:38.390 --> 00:44:50.510
Gail Overton: The current line is really kind of a 90-degree turn in that, you know, northwest corner, and the path that the 386 corridor follows

324
00:44:50.840 --> 00:45:09.260
Gail Overton: kind of deviates over, like, an entire mountain range, and then through another canyon area in the Cargo Muchacho Mountains. But that 386 corridor is also, you know, could encompass the area just north of the existing Southwest Power Link.

325
00:45:09.450 --> 00:45:23.979
Gail Overton: So what is the reason for the big, you know, the huge deviation? Or I guess, who could I talk to about why it deviates so much and just doesn't parallel the existing line to the north?

326
00:45:24.760 --> 00:45:26.260
Gail Overton: You know, and the West.

327
00:45:27.440 --> 00:45:29.520
Michelle Wilson, CPUC: Yes, E.

328
00:45:29.520 --> 00:45:31.620
Gail Overton: That energy corridor, I think.

329
00:45:33.170 --> 00:45:41.319
Michelle Wilson, CPUC: I think if I'm understanding your question correctly, if the line were to parallel the Southwest Power Link.

330
00:45:42.270 --> 00:45:50.979
Michelle Wilson, CPUC: through near the Cargo Machato Mountains, it would cross land owned by Fort Yuma Kwatson Tribe.

331
00:45:52.890 --> 00:46:00.930
Gail Overton: Well, wouldn't that be true if it passed to the south? Because I think the current SW PowerLink,

332
00:46:01.050 --> 00:46:05.590

Gail Overton: does run just to the north of the Kwitsan tribal boundary.

333
00:46:05.980 --> 00:46:15.929
Gail Overton: But if… if the Southwest… if the Ironwood link could run parallel to the SWPL to the north of it.

334
00:46:16.130 --> 00:46:23.999
Gail Overton: Rather than the huge deviation that kind of goes, you know, like a half a mile north, even a mile north.

335
00:46:24.360 --> 00:46:30.750
Gail Overton: What is the reason it can't just parallel the path to the north and avoid the reservation boundary?

336
00:46:31.630 --> 00:46:38.570
Michelle Wilson, CPUC: I think I understand your question, and I would need to get back to you about that specific detail.

337
00:46:38.570 --> 00:46:44.119
Gail Overton: Okay, yeah, I'm I'm curious, because I haven't been able to get an answer, really, from anyone about that.

338
00:46:46.140 --> 00:46:59.890
Joan Isaacson, Kearns & West: Yeah, Gail will take that as scoping comment, too. So, it's something the environmental team can consider as they're thinking about, the different types of analyses that they'll be doing for the EIR.

339
00:47:00.480 --> 00:47:01.930
Gail Overton: Okay, great, thank you.

340
00:47:01.930 --> 00:47:03.150
Joan Isaacson, Kearns & West: Yeah, thank you.

341
00:47:09.770 --> 00:47:19.550
Joan Isaacson, Kearns & West: Okay, we're gonna wrap up, and, thank you for being here, and on behalf of the team, we hope that you have a pleasant evening in front of you.

342
00:47:21.020 --> 00:47:21.400
Gail Overton: Thank you.

343
00:47:23.040 --> 00:47:24.650

Michelle Wilson, CPUC: Thank you, everyone, for attending.

344
00:47:25.220 --> 00:47:26.100
Gail Overton: Thank you.

APPENDIX F

Written Scoping Comments

Name	Organization/Affiliation*	Date
Lisa Cumper	Tribal Historic Preservation Officer (THPO), Jamul Indian Village of California	08/05/2026
Roger Bushong Jr.	Community Member	08/19/2026
Nelson Wallace	Community Member	08/20/2026
Reece Pettersen (Letter 1)	Community Member	08/21/2026
Reece Pettersen (Letter 2)	Community Member	08/21/2026
Don Wilson	Community Member	08/22/2026
Gail Overton	Community Member	09/01/2026
Andrew Green	Native American Heritage Commission	09/02/2026
Timothy Hawk	Community Member	09/07/2026
Don Amador	Motorcycle Industry Council (MIC), Specialty Vehicle Institute of America (SVIA), Recreational Off-Highway Vehicle Association (ROHVA)	09/16/2026
Paul Aguirre	Resident, Riverside, CA	09/16/2026
Daniel French	Resident, Los Angeles, CA	09/16/2026
Gael Garcia	Resident, Imperial Valley, CA; Imperial Valley Equity & Justice	09/16/2026
Isamay Sandoval Pasillas	Resident, Imperial County, CA	09/16/2026
Tierra Shelmire	Resident, Orange, CA	09/16/2026
Carrie Brown	Resident, Bishop Paiute Tribe	09/17/2026
Gabby Emerson	Resident, Kwatsan Reservation	09/17/2026
Sherri Levek	Resident, Yuma, AZ	09/17/2026
Abigail Maze	Resident, Yuma, AZ	09/17/2026

Name	Organization/Affiliation*	Date
Rosalinda McDonald	Resident, Winterhaven, CA	09/17/2026
Alena Pastores	Resident, Riverside, CA	09/17/2026
Janeen Powers	Quechan Tribe Member; Realty Specialist, Reno Sparks Indian Colony	09/17/2026
Kris Urbanrezlife Longoria	Resident, San Leandro, CA	09/17/2026
Edith Weber	Resident, Yuma, AZ	09/17/2026
Lycia Ortega	Resident, Fort Yuma Quechan Indian Tribe Citizen	09/18/2026
Nicolette Gomez	Resident, Yuma, AZ	09/19/2026
Nathaniel James	Community Member	09/19/2026
Alex Ray	Resident, Clatskanie, OR	09/19/2026
Kacy Strong	Quechan Tribe Member; Resident, Red Lodge, MT	09/19/2026
Sisko Stargazer	Resident, Yuma, AZ	09/20/2026
Daniel Steward and Dan Carter	U.S. Army Garrison Yuma Proving Ground	09/20/2026
Xia Cachora	Resident, Yuma, AZ	09/21/2026
Andie Cuesta	Resident, El Centro, CA	09/21/2026
Paula Jacoby-Garrett	Friends of Avi Kwa Ame National Monument	09/21/2026
Mary Ann Jessen	Community Member	09/21/2026
Robert Johnson	Resident, Yuma County, AZ	09/21/2026
Benjamin Kantner	Resident, Los Angeles, CA	09/21/2026
Sara Lockett and Ray Lennox	California State Parks, Ocotillo Wells District	09/21/2026

Name	Organization/Affiliation*	Date
José Manzo	Resident, Mecca, CA	09/21/2026
H. Jill McCormick (Letter 1)	Historic Preservation Office, Fort Yuma Quechan Tribe	09/21/2026
H. Jill McCormick (Letter 2)	Fort Yuma Quechan Tribe	09/21/2026
Morgan Sjogren	Resident, Escalante, UT	09/21/2026
Bea Vizcarra	Community Member	09/21/2026
Rose Winn	California Four Wheel Drive Association (Cal4Wheel)	09/21/2026
Magdalena Rodriguez and Brandy Wood	California Department of Fish and Wildlife	09/21/2026

* Organization/Affiliation information is stated as provided by the commenter in the oral or written comment.

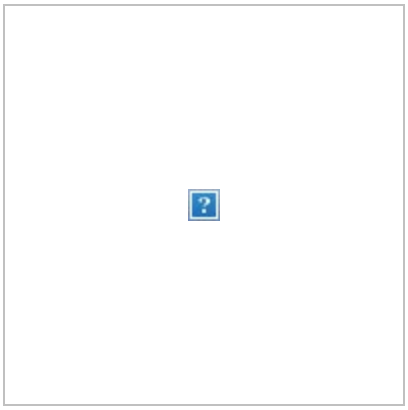
Lisa Cumper, Tribal Historic Preservation Officer (THPO), Jamul Indian Village of California, 8/05/2026

From:	Lisa Cumper
To:	Anne Surdzial
Cc:	epinto@jiv-nsn.gov; boris.sanchez; Wilson, Michelle
Subject:	Re: California Environmental Quality Act Notice of Scoping Meeting and Release of Notice of Preparation for the Ironwood Transmission Line Project
Date:	Wednesday, August 5, 2026 11:49:56 AM

Hi Anne,

Because this is a major transmission project extending through Imperial County, the proposed alignment should be carefully evaluated in relation to previously identified Kumeyaay cultural resources, archaeological sites, traditional cultural landscapes, sacred places, gathering areas, and traditional travel corridors. This review should occur before scoping comments are finalized and should also inform any subsequent government-to-government consultation under AB 52 and the CPUC's Tribal Consultation Policy.

Kind Regards,
Lisa K. Cumper



Lisa K. Cumper, THPO
Cultural Resources Director
Tribal Historic Preservation Officer
NAGPRA Coordinator
Alternate Board Member
KCC, KDLC, KHPC
Jamul Indian Village of California
P.O. Box 612, Jamul CA 91935
desk: 619.669.4855
cell: 619.928.8689
fax: 619.669.4817

email: lcumper@jiv-nsn.gov
web: www.jamulindianvillage.com

The ground on which we stand is sacred ground, it is the blood of our ancestors. Chief Plenty Coups,

Crow

This e-mail message including attachments, if any may contain confidential cultural resource location information; distribution should be restricted to those with a need to know. Cultural resources are nonrenewable, and their cultural, scientific, and aesthetic values can be significantly reduced by disturbance. To deter vandalism, artifact collection, and other activities that can damage cultural resources, their locations should be kept confidential. The legal authority to restrict cultural resource information is in the National Historic Preservation Act of 1966, Section 304; the Archaeological Resource Protection Act of 1979, Section 9(a); and California Government Code 6254.10.

Roger Bushong Jr., Community Member, 08/19/2026

From: Roger Bushong Jr. [redacted]
Sent: Wednesday, August 19, 2026 9:37 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Proposed Ironwood Transmission Line Comment

Comment on the routing of the Ironwood Transmission Line:

Interesting to see the route through the dunes that is being considered. This route goes directly across sand dunes. We know that power line crews that install and maintain these power lines are pretty resourceful in getting equipment in to help with this activity. With that said, if you are not a person that frequents sand dunes as the OHV community does, you can not comprehend the challenges of soft moving sand can cause for ANY structure placed on a dune. This is also to say the size of the heavy equipment eg. large cranes will be about impossible to move in and out of a sand dune platform. If the intention is to use a big bulldozer to carve a path, the environmentalist will come out in groves to stop that from happening. As OHV user of the sand dunes, I can tell you they are adamant about anything of that magnitude that would change the dunes. As the sand moves, there will be plenty of maintenance on any tower in the dunes. Blowing sand will undermine the concrete platform's stability. The access to and from a site will be costly and difficult. Any pathway that is created will have been covered by sand and that will require maintenance as well. You can talk to the rangers in the sand dune as to how much maintenance they do on the road due to blowing sand.

On the south side of Highway 8 is a power line already installed. It parallels the Gray Wells Road, making access to installation and maintenance to the power line much much easier. The wisdom of the engineers that installed those lines in that location should not be overlooked. The area between the dune along the Hwy 8 corridor makes a lot of sense. It is wide, it has access, it is maintained by the water channel group, CalTran crews maintain the highways and the shoulders, it is on ground that is much more stable and less likely to affect a tower's stability.

I suggest that this committee consider changing the route of the power line to parallel or maybe upgrade the current power lines for the above reasons.

Regards, Roger Bushong

Nelson Wallace, Community Member, 08/20/2026

From: Nelson Wallace [redacted]
Sent: Thursday, August 20, 2026 12:45 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Ironwood Transmission Line Project (A.25-09-008) Comments

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To whom it may concern,

My name is Nelson Wallace, and I am deeply concerned about the currently proposed routing for the Ironwood Transmission Line Project around Dune Buggy Flats.

Some background about me. I am a second generation duner, I have been camping at Gordon's Well (also known as Dune Buggy Flats) for my entire life. This has always been a family activity, I bring my children to camp here in the winter months, and many people in our group bring their grandchildren here as well. I have a deep attachment to Gordon's Well as it is where we have always camped, and we generally don't like all the noise & large number of people that go to Glamis. That is what makes Gordon's Well a great place to visit.

The currently proposed route shows the new transmission lines will be going straight through the middle of Dune Buggy Flats, then continuing to the East and cutting straight through the main section of dunes available for recreation at Gordon's Well. There is no reason for these transmission lines to take this route as it will cause several issues I can see.

The first issue being the risks and inconvenience to campers in the Dune Buggy Flats camping area. The camping area in the flats is generally open with no major obstacles. I can see the danger in building large transmission towers in an area where people often ride at night and they would be difficult to see. Duners often travel from Glamis down to the restaurant Duner's Diner, they could potentially be at risk of hitting one of these towers in the dark. There are lots of routes that people can take, but all of them could potentially be blocked by the current proposed route for the new transmission lines through the flats.

Second, these towers would be built in areas where people camp and would force people to camp in other locations than they might be used to. Depending on rainfall, thecamping area can already be difficult to navigate without getting stuck, and adding transmission towers would add even more obstacles that would have to be avoided. This would be even worse if the towers were fenced off or barricaded, which would keep people from passing under them. I also am concerned that depending on when the construction is taking place, access to the camping areas may be restricted. There is only one main road and bridge to enter the camping area, and if it is blocked for any reason by construction crews then nobody can get in or out of the flats.

Another reason they should not be built here is 500Kv lines often produce electrical noise, which would be annoying to camp next to. Many people go camping in the Flats to get away from all the noise of the city and enjoy nature, not to listen to HV electrical lines.

An additional reason that the route should be redirected is focused on the areas to the East of Dune Buggy Flats. The proposed path has the lines running straight through the recreation areas that people are currently able to ride in. Running these lines through here would be dangerous for people riding in this area. This would be the equivalent of placing a pole in the middle of a racetrack and expecting nobody to hit it. This situation would be better to avoid for both the risk of physical injury, as well as damage to the towers. One of the areas that may be affected by these transmission lines is known as "Test Hill" or "Highway Hill" on the South edge of the dunes.

This is a very popular spot for people to gather, and the proposed route goes right through that area. I am concerned that areas like this may no longer be able to be accessed if the route is not carefully planned out, and that would be a major blow to people who frequently visit this area.

Continuing my reasons, these lines would also be difficult to build and maintain, as there is no way to easily get construction equipment in this area. The dunes can be extremely steep and soft, and short of bulldozing a path straight through the dunes there would be no way to access them. There are protected areas in the ISDRA that would have to be avoided, which means sticking to the larger part of the dunes to place the towers. There is no reason to go straight through this area when there are other options available.

I also have concerns over both temporary closures during construction, and long term maintenance of the transmission lines affecting both camping and riding in this area of the ISDRA. I hope that CPUC will look into those impacts while making their decisions and share their plans with the public so we may be informed of how those plans may affect users of the ISDRA.

After looking at the proposed plan, I can see three options which would alleviate all of the issues I have listed above.

#1, American Sand Association proposed route

The American Sand Association (ASA) has already proposed redirecting the lines to the South of Dune Buggy Flats. This would remove the transmission lines from the camping areas and direct them to the South of the riding areas using the old path of the All American Canal. I completely agree with this route as I feel it preserves the camping and riding areas of Gordon's Well, without causing major diversions to the transmission line owners.

#2, Redirect South to parallel existing transmission lines

There is already a set of large power lines running from a substation near El Centro, CA. It would be relatively easy to have the new transmission lines follow these lines on a parallel path. The existing lines have been in place for a long time and already have many miles of access roads in place. This would aid in both construction and maintenance as those roads would not have to be built before the towers could be constructed. The existing lines already pass through the ISDRA on the South side of I8 in an area that cannot be ridden in, so that is a bonus as well.

#3, a Hybrid of the two options above

My final suggestion of an alternative route would be to combine parts of my other two route options. If desired, the path of the transmission line to the West of the flats cloud be left alone. Once the lines reach the flats, they could turn South and follow the suggested path shown by the ASA until they reach the canal. At this point, instead of turning East the lines could continue South until they meet up with the exiting transmission lines near the US border. From there, the new lines could parallel the path of the old lines through the ISDRA and out the East side. From there, the lines could be separated, and the new lines could follow the proposed path East to Yuma.

I sincerely hope that comments like mine are taken into consideration by the people in charge of this program. I understand the need for new infrastructure for utilities, but I also say that having this infrastructure interfere with recreation areas that have been around for decades is not fair to the people that utilize them. If all parties work together, I'm sure a solution that is acceptable to all parties can be found.

Thank you for your time.

Nelson Wallace

Reece Petterson (Letter 1), Community Member, 08/21/2026

From: Reece Pettersen [redacted]
Sent: Friday, August 21, 2026 2:47 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Ironwood Transmission Line Project – EIR Scoping Comments (A.25-09-008)

Dear Mr. Sanchez and Ironwood EIR Team:

Please accept the following comments regarding the scope and content of the Environmental Impact Report for the Ironwood Transmission Line Project, Application No. A.25-09-008.

I have recreated at the Imperial Sand Dunes since childhood and now bring my own young family to camp and ride there. My primary concern is that the Imperial Sand Dunes not be treated as vacant or unoccupied desert. They are an intensively used recreational area where families camp overnight and operate off-highway vehicles throughout the surrounding landscape. According to the Bureau of Land Management's 2024 Imperial Sand Dunes Recreation Area Business Plan, the area has recently averaged approximately one million visitors annually, with nearly 200,000 visitors during the busiest holiday weekend.

The EIR should evaluate the Project under actual peak-use conditions, including weekends and holidays, rather than relying solely on average annual visitation, weekday conditions, permanent residences, or conventional roadway usage. The analysis should address direct, indirect, and cumulative impacts during construction, operation, maintenance, and eventual decommissioning.

I respectfully request that the EIR include the following:

1. Recreation access, displacement, and overcrowding

The EIR should identify and map all developed and dispersed camping areas, OHV routes, gathering locations, staging areas, trails, and recreational access points within and surrounding the Project area.

For each Project segment and construction phase, the EIR should quantify:

- The acreage and miles of recreational land that would be closed, restricted, or otherwise affected.
- The duration and timing of each closure or restriction.
- Permanent restrictions associated with towers, foundations, guy wires, access roads, maintenance areas, fencing, and required safety setbacks.
- The number of recreational users who may be displaced.
- Where displaced campers and OHV riders would likely relocate.
- Whether displacement would concentrate users into smaller areas and increase collisions, conflicts, dust, noise, emergency calls, or physical deterioration of remaining recreational areas.

The analysis should specifically address whether construction or permanent Project facilities would reduce or prevent recreational access, damage trails or riding areas, or substantially change the scenic, biological, geologic, or recreational characteristics that make this area valuable.

2. Health and safety of campers and recreational users

The EIR should evaluate the health and safety of people who camp and recreate near the alignment, including families with young children. Campgrounds, dispersed camping areas, and other locations where visitors remain overnight should be treated as temporary sensitive-receptor locations for air quality, noise, hazards, and public-safety analysis.

Potential hazards requiring analysis include:

- Conflicts between OHVs and construction vehicles, oversized trucks, cranes, and maintenance vehicles.
- Open excavations, stored materials, temporary barriers, detours, and active work zones.
- Helicopter construction and suspended loads.
- Towers, foundations, guy wires, anchors, fencing, and other fixed objects within active riding areas.
- Permanent access roads and their interaction with OHV travel.
- Reduced visibility from dust.
- Displacement of users into smaller, more congested, or unfamiliar areas.
- Long-term changes in dune elevations that could expose or bury foundations, anchors, or other Project components or affect conductor clearances.

The EIR should analyze these risks under peak holiday and weekend conditions and identify enforceable measures to separate construction and maintenance activities from camping and OHV use.

3. Emergency access and public services

The EIR should evaluate the Project's effect on emergency response, evacuation, law enforcement, firefighting, and search-and-rescue services. This analysis should be prepared in consultation with BLM rangers, Imperial County fire and law enforcement agencies, the California Highway Patrol, ambulance and air-medical providers, and regional hospitals.

The analysis should disclose:

- Existing calls for service and response times during peak recreational periods.
- Available emergency-service capacity.
- Construction-related delays or restrictions on emergency routes.

- Whether recreational displacement and overcrowding would increase emergency calls.
- Whether construction activities would increase fire, medical, or rescue demand. How
- continuous emergency access would be maintained during construction and operation.

BLM has previously reported that a 21% increase in visitation corresponded with a 42% increase in emergency medical and rescue calls. The EIR should therefore evaluate the relationship between visitor concentration and emergency-service demand rather than assuming displacement would have no physical effect.

4. Construction and operational air quality

The EIR should independently quantify and evaluate:

- PM10 and PM2.5 emissions from grading, excavation, disturbed sand, and travel on unpaved roads.
- Diesel particulate matter and other toxic air contaminants.
- Emissions from helicopters, trucks, and heavy construction equipment.
- Maximum daily emissions from all crews that may operate concurrently.
- Localized pollutant concentrations near camping and gathering areas.
- Dust generated or re-entrained after construction.
- Operational and maintenance emissions, including helicopters and travel on permanent access roads.
- Cumulative dust from Project activities, existing OHV use, and other regional projects.

The conclusion that a health-risk assessment is unnecessary because construction would move along a linear alignment should be independently reconsidered where construction may occur near large concentrations of overnight visitors or where multiple crews could operate concurrently.

The EIR should consider enforceable dust-control measures, monitoring at occupied camping areas, and stop-work thresholds based on wind, visibility, and measured particulate levels.

5. Biological resources and special-status species

The EIR should identify all federal- and state-listed, candidate, BLM-sensitive, and other special-status species that could be affected by the Project. The study area should include the entire disturbance footprint, including access roads, structure work areas, staging areas, pulling sites, helicopter landing areas, and maintenance areas.

The analysis should include:

- Appropriately timed, protocol-level field surveys.
- Separate quantification of temporary and permanent habitat impacts.
- Effects on flat-tailed horned lizard and its management area.
- Potential effects on Peirson's milk-vetch, desert tortoise, burrowing owl, protected riparian birds, raptors, and other special-status species.
- Habitat fragmentation and interference with wildlife movement.
- Vehicle mortality and bird or bat collision and electrocution risks.
- Effects from noise, lighting, wildfire, invasive weeds, and increased predator access.
- Indirect effects caused by displaced OHV activity entering sensitive habitat or existing conservation closures.
- Whether disturbed dune habitat can realistically be restored and the anticipated recovery period.

Restoration measures should include measurable performance standards, long-term monitoring, and corrective requirements if restoration is unsuccessful.

6. Landscape, visual character, and dune morphology

The EIR should analyze construction and permanent changes to the unique dune landscape, including towers, conductors, access roads, grading, foundations, vegetation removal, and altered dune contours.

Visual simulations should be prepared from representative camping areas, heavily used OHV routes, gathering locations, public roads, overlooks, and other recreational viewpoints. The simulations should show conditions immediately following construction and after any anticipated restoration.

The EIR should also evaluate whether roads, foundations, grading, and stabilization would alter natural dune movement, sand transport, erosion patterns, or the area's geologic character. Long-term dune movement could affect foundations, guy-wire anchors, access roads, and conductor clearance and should be considered in both the geology and public-safety analyses.

7. Noise and vibration

The noise analysis should include camping areas and concentrations of recreational users as sensitive locations. It should evaluate helicopters, blasting, drilling, grading, heavy equipment, and construction traffic, including the maximum noise level, duration, and time of day at affected camping areas.

The EIR should also evaluate operational corona noise, maintenance activities, and periodic helicopter use. Seasonal, weekend, nighttime, and holiday construction restrictions should be

considered as mitigation.

8. Construction timing

The EIR should analyze a construction schedule that avoids or minimizes work in recreational areas during the October-through-April peak season. At a minimum, it should evaluate prohibiting work and maintaining full recreational access during major holiday weekends, including Halloween, Thanksgiving, New Year's, and Presidents' Day.

Any schedule restrictions adopted as mitigation should be specific and enforceable rather than left to future coordination.

9. Alternative alignment in a non-recreational, previously disturbed corridor

The EIR should evaluate a project alternative that avoids active camping and OHV recreation areas by locating the transmission line within or immediately adjacent to a previously disturbed transportation or utility corridor.

Specifically, the EIR should evaluate an alignment adjacent to Interstate 8, to the greatest extent technically feasible, or another route through non-recreational and already disturbed land. An I-8-adjacent alternative could potentially consolidate infrastructure within an existing disturbed corridor and reduce impacts to recreation, public safety, scenic resources, undisturbed dune habitat, and wildlife.

The alternatives analysis should not be limited to the routes previously selected or screened by the applicant. It should consider:

- An I-8-adjacent alignment.
- An alignment paralleling existing transmission infrastructure.
- A hybrid alignment combining freeway and existing utility corridors.
- Route variations that avoid established camping and active OHV areas.
- Structure designs that eliminate guy wires in recreational areas.
- Construction methods that reduce the width and duration of disturbance.

The EIR should independently compare the recreational, visual, biological, cultural, public-safety, and construction impacts of these alternatives. If an I-8-adjacent or other previously disturbed alignment is rejected, the EIR should provide a detailed, evidence-supported explanation of its feasibility and environmental tradeoffs. Increased cost or applicant preference should not, standing alone, substitute for a complete evaluation of an alternative that could avoid or substantially reduce significant environmental impacts.

10. Cumulative impacts

The cumulative analysis should consider other transmission, renewable-energy, border-infrastructure, recreation-management, and habitat-conservation projects that could collectively:

- Reduce or restrict available recreational acreage.
  Concentrate campers and OHV riders.

- Fragment or degrade wildlife habitat.
- Increase dust, noise, traffic, and emergency-service demand.
- Degrade the scenic character of the dunes.

The geographic scope should be tailored to each resource and should not rely on an arbitrary uniform radius where recreation displacement, wildlife movement, or regional visual impacts extend farther.

11. Enforceable mitigation and monitoring

The EIR should consider enforceable measures including:

- Seasonal and holiday construction restrictions.
- Setbacks from camping and gathering areas.
- Continuous recreational and emergency access.
- Advance notice of closures and clearly marked detours.
- On-site traffic and OHV safety personnel.
- Restrictions on guyed structures in active riding areas.
- Dust monitoring and stop-work thresholds.
- Independent biological and environmental compliance monitors.
- Restoration standards with multi-year monitoring and corrective action.
- A publicly available complaint and incident-reporting process.

These comments are directed to environmental effects within the scope of CEQA, including recreation, air quality, biological resources, aesthetics, geology and soils, hazards, noise, public services, transportation, wildfire, cumulative impacts, mitigation, and alternatives.

Please include this email in the administrative record for the Project and add me to the mailing list for future notices, including publication of the Draft EIR.

Respectfully,

Reece Pettersen

[redacted]

Reece Petterson (Letter 2), Community Member, 08/21/2026

From: Reece Pettersen [redacted]
Sent: Friday, August 21, 2026 3:44 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Supplemental Scoping Comment – High-Voltage Infrastructure, Nighttime Noise, and Health and Safety (Ironwood Transmission Line Project, A.25-09-008)

Dear Mr. Sanchez and Ironwood EIR Team:

I previously submitted scoping comments regarding the Ironwood Transmission Line Project. Please accept this email as a separate supplemental comment and include it in the administrative record for Application A.25-09-008.

My supplemental concern is the placement and operation of high-voltage transmission infrastructure near areas where families camp and recreate overnight in the Imperial Sand Dunes Recreation Area.

I have personally camped near high-voltage infrastructure and experienced severe headaches as well as continuous electrical humming that interfered with my ability to sleep. I understand that one person's experience does not establish the medical cause of a symptom. Nevertheless, it demonstrates why the project's audible noise, electrical conditions, proximity to camping areas, and potential effects on sleep and visitor health should receive meaningful, site-specific evaluation.

1. Operational corona noise and sleep disturbance

High-voltage transmission facilities can produce audible corona noise, often described as humming, buzzing, or crackling. The Bonneville Power Administration identifies audible noise as a recognized effect of corona discharge from high-voltage equipment.

The World Health Organization recognizes that environmental noise can cause sleep disturbance, annoyance, cognitive effects, and cardiovascular and metabolic health effects. These concerns are especially important at recreational camping locations where people sleep outdoors or in tents and recreational vehicles with substantially less sound insulation than a conventional residence.

The EIR should therefore:

- Identify established and dispersed camping locations, staging areas, and other overnight recreational areas as sensitive receptors.
- Measure existing nighttime ambient sound levels within these areas, including locations that may be particularly quiet when off-highway vehicles are not operating.
- Model audible corona and other operational noise under peak electrical loading and reasonably foreseeable weather and atmospheric conditions.
- Evaluate humming, buzzing, tonal noise, low-frequency noise, maximum noise levels, and continuous nighttime noise—not merely average A-weighted sound levels.
- Evaluate sleep disturbance and related health consequences for people camping outdoors, in tents, and in recreational vehicles.

- Identify the distance at which the proposed facilities would be audible under quiet nighttime conditions.
- Consider increased setbacks, conductor and tower design changes, equipment specifications, operational controls, and alternative routing as mitigation.
- Evaluate a project alternative along or adjacent to Interstate 8, or another previously disturbed and non-recreational corridor, that would place the infrastructure farther from established camping and intensive recreational areas.

In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, the court found a nighttime-noise analysis inadequate where the EIR relied too heavily on averaged noise measurements and did not meaningfully examine sleep disturbance, the frequency of noise events, and existing ambient conditions. That decision supports evaluating how operational transmission-line noise would actually be experienced by people attempting to sleep in a quiet desert camping environment.

2. Electric and magnetic fields

I recognize that the project's Notice of Preparation states that electric and magnetic fields will not be analyzed as a CEQA impact because there is no scientific consensus regarding health effects and no adopted CEQA significance standard.

I also recognize that the World Health Organization states that current evidence does not confirm health consequences from ordinary low-level EMF exposure and does not establish a causal relationship between EMF and commonly reported symptoms such as headaches or sleep disturbance. My personal experience should therefore not be interpreted as claiming that EMF exposure has been scientifically proven to cause my symptoms.

Scientific uncertainty, however, does not mean that exposure and avoidance measures should be ignored. The International Agency for Research on Cancer has classified extremely low-frequency magnetic fields as "possibly carcinogenic to humans"—a hazard classification reflecting limited evidence, not proof that a particular transmission line will cause cancer.

More importantly, the CPUC continues to apply a policy of prudent avoidance and low-cost or no-cost EMF-reduction measures to new transmission projects. CPUC Decision D.06-01-042 affirmed the use of standardized design guidelines and a benchmark of approximately four percent of project cost for low-cost EMF mitigation.

I therefore request that, whether within the EIR or separately as part of the CPUC's Certificate of Public Convenience and Necessity review, the CPUC require the applicant to:

- Prepare and publicly disclose a project-specific EMF Field Management Plan.
- Model expected electric- and magnetic-field levels at the right-of-way boundary and at nearby camping, staging, gathering, and recreational locations.
- Identify the assumptions used, including conductor configuration, line loading, tower height, and distance from receptors.

- Apply all feasible no-cost and low-cost field-reduction measures, including routing, increased setbacks, conductor height, conductor spacing, and phase configuration.
- Compare the proposed alignment with an alternative adjacent to Interstate 8 or another previously disturbed, non-recreational corridor.
- Explain why any available prudent-avoidance measure is rejected.

The California Supreme Court's decision in *San Diego Gas & Electric Co. v. Superior Court (Covalt)* (1996) 13 Cal.4th 893 recognizes the CPUC's central regulatory authority over EMF policy associated with utility facilities. Accordingly, if CPUC considers this issue outside the CEQA process, I request that this portion of my comment be treated as a comment in the underlying CPCN proceeding or forwarded to the appropriate CPUC decision-makers rather than disregarded.

3. Requested treatment in the environmental review

Please evaluate audible transmission-line noise as an operational environmental impact separate from the broader EMF question. The absence of a CEQA significance standard for EMF should not prevent the EIR from analyzing objectively measurable corona noise, sleep disturbance, public-health effects of environmental noise, or alternatives and setbacks that reduce exposure of overnight visitors.

Please also ensure that the alternatives analysis includes an alignment along or adjacent to Interstate 8, or another already disturbed and non-recreational corridor, because such an alternative may substantially reduce conflicts with camping, recreation, nighttime quiet, public health, and public safety.

Sources and authorities:

1. CPUC, Ironwood Transmission Line Project Notice of Preparation: https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/pdfs/NOP%20Ironwood.pdf
2. CPUC, "PUC Actions Regarding EMFs": https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/permitting-and-environmental-review/electric-magnetic-fields/puc-actions-regarding-emfs

3. CPUC Decision D.06-01-042, EMF Policies for Electrical Utility Facilities: https://docs.cpuc.ca.gov/publishedDocs/published/FINAL_DECISION/53181.htm
4. World Health Organization, "Radiation: Electromagnetic Fields": https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields
5. World Health Organization, Environmental Noise and Health: https://www.who.int/europe/news-room/fact-sheets/item/noise
6. International Agency for Research on Cancer, *Extremely Low-Frequency Electric and Magnetic Fields*, Monograph Volume 80: https://publications.iarc.who.int/Book-And-Report-Series/Iarc-Monographs-On-The-Identification-Of-Carcinogenic-Hazards-To-Humans/Non-ionizing-Radiation-Part-1-Static-And-Extremely-Low-frequency-ELF-Electric-And-Magnetic-Fields-2002
7. Bonneville Power Administration, explanation of corona discharge and audible transmission-line noise: https://www.bpa.gov/about/newsroom/news-articles/2022/20221027-its-alive-high-voltage-lab-sparks-halloween-frankenstein-fantasies
8. *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344: https://law.justia.com/cases/california/court-of-appeal/4th/91/1344.html
9. *San Diego Gas & Electric Co. v. Superior Court (Covalt)* (1996) 13 Cal.4th 893: https://law.justia.com/cases/california/supreme-court/4th/13/893.html

Thank you for including this supplemental comment in the administrative record and considering these issues in both the EIR and the CPUC's broader review of the proposed project.

Sincerely,

Reece Pettersen
[redacted]

Don Wilson, Community Member, 08/22/2026

From: Don Wilson [redacted]
Sent: Saturday, August 22, 2026 7:46 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Dunes

I've been taking my family to the Dunes for over 25 years. This is a big part of our life at Gordon's Well. We all have a lot of money invested in toys and motorhomes trailers, etc. they've already taken away a lot of the Dunes due to the milkweed. They They need to look at alternative routes for the transmission lines rather than go right through the middle of our playground.

Sent from my iPhone

Gail Overton, Community Member, 09/01/2026

Date: 1 September 2026

From:

Gail Overton, Imperial County resident and Sierra Club member

[redacted]

To:

CPUC Boris Sanchez c/o ECORP

215 N 5th St, Redlands, CA 92374

CEQA@IronwoodTransmissionProject.com

CC: Michelle Wilson; Michelle.Wilson@cpuc.ca.gov

Subject: Public Scoping Comment for proposed Ironwood Transmission Line

In 2024, tribal interests, environmental organizations, and local landowners were able to stop the Oro Cruz exploratory gold mine in the Cargo Muchacho Mountains, primarily due to the abundance of cultural and natural resources in this area (see https://smp.gold/southern-empire-updates-permitting-status-for-its-oro-cruz-project-in-california-2/). The Cargo Muchachos are in an Area of Critical Environmental Concern (ACEC) and the Quechan Tribe has been working to designate this zone as the Kw'tsan National Monument. The Ironwood Transmission Line would cut yet another path over these mountains with significant deviations from the existing SDG&E Southwest Powerlink (SWPL), which was routed over the Colorado River and along the northern edge of the Quechan Tribe land boundary in the 1980s. The proposed Ironwood path is problematic as it would cross a new section of the Colorado River and deviate significantly from the SWPL by jogging far north of the Quechan boundary and dangerously close to the largest colony of leaf-nosed and other bat species that live within the Cargo Mine area.

The EIR should seriously address alternatives to the proposed path of the line, shown at https://ironwood.mysocialpinpoint.com/. Deviations from the existing SWPL simply to avoid Quechan Tribal Boundaries are of major environmental concern. Specifically, the path deviates in two areas: (1) a new path across the Colorado River north of Laguna Dam in Arizona; and (2) a new path that jogs in a horseshoe shape through the Jackson Gulch corridor of the Cargo Muchachos in California.

Concerning path (1), crossing an entirely new section of the Colorado River is detrimental for obvious damage to plant species, migratory birds, and larger animals that depend on the river vegetation and water. What are the reasons the existing SWPL path cannot be followed? The EIR needs to address this in detail.

And concerning path (2), the BLM says that the horseshoe jog to the far north of the SWPL line was necessary to position Ironwood along the 368 Energy Corridor that was designated in this area in 2009. The energy corridor, while an easy option for BLM to justify as the most logical path for regulatory reasons, represents the worst-case environmental path considering its proximity to the Cargo Mine bat colony. Bulldozing new roads through Jackson Gulch will seriously disrupt the foraging habitat for bats in this area. According to biologist and bat expert Pat Brown, “There are a few *Macrotus* roosting in underground placer workings in the floodplain of Jackson Gulch that could be killed if not evicted at the appropriate season. Desert tortoises also use these placer workings for shelter. The Cargo Muchacho mines shelter a lot of tortoises. However the main concern for bats is the loss of foraging habitat that supports the thousands of *Macrotus* roosting in the Cargo Mine. The number of bats living in the mine is directly related to the quality of foraging habitat near the roost. If much of the riparian wash vegetation is removed during the powerline construction, the remaining vegetation cannot support the current number of bats in the Cargo Mine.” The Horizon West preliminary environmental assessment (PEA; see https://ia.cpuc.ca.gov/environment/info/ecorp/ironwood/index.html) unfortunately states that impact to the bats would mostly be "Unlikely" as the California Natural Diversity Database (CNDDB) apparently shows that few bats have been present recently in the 5 mile study area around the Ironwood transmission line. The EIR will need to address this position as CNDDB data is outdated, incomplete, and questionable. A new field survey of bats and other wildlife species should be undertaken.

Furthermore, running the Ironwood line just parallel and slightly to the north of SWPL would avoid both the bat colony and Quechan tribal boundaries while being logically cheaper for Horizon West as the path proposed runs through an entirely new canyon and extremely rugged terrain compared to the existing SWPL path.

If the environmental concerns of those two path diversions cannot be mitigated, and if the Ironwood line cannot follow the existing SWPL or be routed along existing railroad or Highway 8 rights of way to avoid environmental impacts, the EIR should address the alternative of not developing the overall project and instead, to add renewable (solar, wind, battery) technology closer to the North Gila and SDG&E Imperial Valley substations.

The Environmental Impact Report (EIR) should include a full discussion of the alternatives to the Ironwood project. Horizon West has said that “reconductoring” of the existing SWPL along the Ironwood route had been explored and was not a viable alternative. The reasons for this should be included with the EIR, as well as other possible alternative options such as routing needed energy directly to the Ironwood substations from existing power lines; after all, neither the Ironwood route or the existing SWPL section that roughly parallels the proposed Ironwood path have any drop locations but simply run power between substations.

On the surface, the Ironwood line would simply allow energy to be funneled from far-distant energy sources across Imperial County and (if hooked up to the proposed Golden State Powerlink) sent to customers in San Diego and Los Angeles. Imperial Valley and Colorado River ecosystems should not be sacrificed to a new power line considering that energy could be funneled to those substations if renewable energy projects were developed closer to the point of need, negating the requirement for an Ironwood or Golden Pacific power line entirely. Finally, the EIR should describe whether CAISO/CPUC have considered upgrading the existing SDG&E SWPL rather than building a parallel 500 kV line.

If these no-go alternatives are all not viable, and the power line is approved, specific environmental concerns of the two path deviations previously described need to be fully addressed in the EIR. The Colorado River new crossing point is problematic for multiple environmental reasons (in addition to other issues raised in other public scoping comments regarding the Yuma Proving Ground boundaries as well as the flat-tailed lizard habitat and OHV/camping concerns). And the SWPL detour through Jackson Gulch and more mountainous terrain is concerning not only for the Cargo mine bat population, but seems more of a BLM 368 corridor convenience rather than an argument based on sound environmental science and concerns. The EIR needs to address shortcomings in the Energy Corridor and tribal boundary avoidance arguments that again contradict the best interests of the environment.

Sincerely,

Gail Overton

RECEIVED
SEP - 8 2026
ECORP Consulting, Inc.

Date: 1 September 2026

From:

Gail Overton, Imperial County resident and Sierra Club member

[redacted]

To:

CPUC Boris Sanchez c/o ECORP

215 N 5th St, Redlands, CA 92374

CEQA@IronwoodTransmissionProject.com

CC: Michelle Wilson; Michelle.Wilson@cpuc.ca.gov

Subject: Public Scoping Comment for proposed Ironwood Transmission Line

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Sincerely,

Gail Overton

Overton

[redacted]

PORTLAND OR RPDC 972

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CPUC Boris Sanchez c/o ECORP
215 N 5th St
Redlands, CA 92374

92374-334499

Andrew Green, Native American Heritage Commission, 09/02/2026

NATIVE AMERICAN HERITAGE COMMISSION

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Reginald Pagaling
Chumash

VICE-CHAIRPERSON
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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

September 2, 2026

Michelle Wilson
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: 2026080073, Ironwood Transmission Line Project, Imperial County

To Whom It May Concern:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation of a Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) includes a separate category of cultural resources, "tribal cultural resources" and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. To determine whether a project will cause a substantial adverse change in the significance of a tribal cultural resource, a lead agency will need to determine whether there are tribal cultural resources within the project area.

Consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of your proposed project should occur as early as possible. Early consultation will assist in developing a plan for protecting tribal cultural resources and avoiding inadvertent discoveries of Native American human remains.

For a list of tribes that are traditionally and culturally affiliated with your project area, or for any questions or additional information regarding tribal consultation, please contact me at Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

Timothy Hawk, Community Member, 09/07/2026

RECEIVED

SEP 1 4 2026

ECORP Consulting, Inc.

Comments Regarding

Ironwood Transmission Line Project

September 7, 2026

Subjects: A. Timothy Hawk's APN # 059-260-001 (80 acres) potentially impacted by Ironwood

B. Expansion of Southwest Powerlink Transmission Line Right-Of-Way to Include the Ironwood Transmission Line

Dear CPUC and Staff,

Thank you for your very informative presentation at 6:30 PM on August 27, 2026, which I attended remotely.

A.

My Subject A property, about 6 miles south of Holtville, is a small family farm that has been in my family for 3 generations. Its dimensions are one-quarter of a mile by one-half mile. The long, one-half mile length of my field runs east to west, the same direction as the proposed Ironwood Transmission line. The placement of the Ironwood transmission line on my field would necessarily run along the long, east to west, half-mile length of my field, thus having a very outsized, damaging impact on my farm.

In addition, the capital investments in this farm are very high, with a half-mile of cement ditches and almost 32,000 feet of drainage tile lines running 5-6 feet beneath the surface of the field. Power poles and lines would make it very difficult to provide the continuing maintenance required for these capital improvements. Also, the intense nature of the farming operation requires the use of big, heavy duty farming equipment that could come in contact/conflict with any transmission poles and lines placed in the field.

Finally, just beyond my farm to the west, is a nearby country house that would be at risk in the direct path of any power-line that would be placed on my farm.

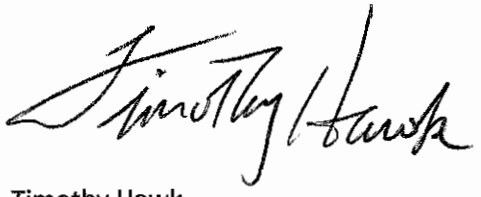
B. Incorporating Ironwood Into the Existing Southwest Powerlink Transmission Line

I asked the question electronically during the Q&A at the August 27th zoom meeting about the possibility of incorporating Ironwood into the existing Southwest Powerlink (SWPL) right-of-way, which runs in the same east-west direction that Ironwood would run. The CPUC spokesperson answered that the SWPL right-of-way was too limited to incorporate Ironwood. A recent 60-Minutes news report televised on August 23, 2026 showed how the Brightline company solved its Los Angeles to Las Vegas high-speed rail line right-of-way issue by designing the rail line to run down the median of the existing Interstate 15 freeway between Los Angeles and Las Vegas. Two projects were accommodated by one right-of-way. The SWPL right-of-way, adjusted to include space for the Ironwood transmission line, should seriously be considered. An expansion of the SWPL Right of Way by perhaps 50-100 feet would be far less impactful than building Ironwood on a brand new 210 foot right of way. This adjustment of SWPL would also result in far fewer people/farmers being impacted by Ironwood as well, because significantly fewer,

or no, new lands unaffected by SWPL would be needed for Ironwood. This change in the proposal could be the most significant mitigating solution to the proposed Ironwood transmission line.

Thank you for considering my input on this most serious project.

Sincerely,



Timothy Hawk

[redacted]

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Boris Sanchez
CPUC Ironwood Transmission Line Project
Attn: A. Surdzial c/o ECORP Consulting, Inc.
215 North 5th Street
Redlands, CA 92374

Don Amador, Motorcycle Industry Council (MIC), Specialty Vehicle Institute of America (SVIA), Recreational Off-Highway Vehicle Association (ROHVA), 09/16/2026

September 16, 2026

Boris Sanchez, Project Manager
California Public Utilities Commission
c/o ECORP Consulting, Inc.
215 North 5th Street
Redlands, CA 92374
Submitted Via Email: CEQA@IronwoodTransmissionProject.com

RE: Proponent's Environmental Assessment for Horizon West Transmission's Ironwood Transmission Line Project

Dear Mr. Sanchez:

On behalf of the Motorcycle Industry Council[1] (MIC), Specialty Vehicle Institute of America[2] (SVIA), and Recreational Off-Highway Vehicle Association[3] (ROHVA) collectively, the Associations, appreciate the opportunity to provide scoping comments regarding the Proponent's Environmental Assessment for Horizon West Transmission's Ironwood Project (PEA).

The Associations represent manufacturers, distributors, dealers, enthusiasts, and users of motorcycles, all-terrain vehicles, side-by-side vehicles, and other powersports products. Our members and their customers are significant participants in California's outdoor recreation economy and are frequent users of public lands managed by the Bureau of Land Management (BLM), California State Parks, and other public agencies.

[1] The Motorcycle Industry Council (MIC) is a not-for-profit, national trade association representing several hundred manufacturers, distributors, dealers and retailers of motorcycles, scooters, motorcycle parts, accessories and related goods, and allied trades.

[2] The Specialty Vehicle Institute of America (SVIA) is the national not-for-profit trade association representing manufacturers, dealers, and distributors of all-terrain vehicles (ATVs) in the United States. SVIA's primary goal is to promote safe and responsible use of ATVs.

[3] The Recreational Off-Highway Vehicle Association (ROHVA) is a national, not-for-profit trade association formed to promote the safe and responsible use of recreational off-highway vehicles (ROVs – sometimes referred to as side-by-sides or UTVs) manufactured or distributed in North America. ROHVA is also accredited by the American National Standards Institute (ANSI) to serve as the Standards Developing Organization for ROVs. More information on the standard can be found at https://rohva.org/ansi-standard/

The Associations represent manufacturers, distributors, dealers, enthusiasts, and users of motorcycles, all-terrain vehicles, side-by-side vehicles, and other powersports products. Our members and their customers are significant participants in California's outdoor recreation economy and are frequent users of public lands managed by the Bureau of Land Management (BLM), California State Parks, and other public agencies.

We recognize the importance of maintaining a safe, reliable and resilient electrical transmission system. The Associations are not opposed to responsible investment in electrical infrastructure. However, major infrastructure projects must be planned and constructed in a manner that recognizes existing public recreation uses and protects the public's ability to safely access and enjoy public lands.

The proposed approximately 86-mile, 500-kV transmission line would cross federal, state and private lands between the North Gila Substation in Arizona and the Imperial Valley Substation in California. The project would include transmission structures, foundations, temporary and permanent access roads, staging and pulling sites, work areas and other infrastructure necessary for construction, operation and maintenance.

The project is particularly significant from an OHV recreation standpoint because it would cross approximately eight miles of the BLM’s Imperial Sand Dunes Recreation Management Area (ISDRA) and approximately 1.55 miles of the Heber Dunes State Vehicular Recreation Area (SVRA).

SIGNIFICANT ISSUES

1. Deficient Consultation with OHV Stakeholders

One of the most important concerns arising from our review of the Ironwood PEA is the apparent disconnect between the project's extensive agency and landowner outreach and meaningful engagement with the organizations and public institutions representing California's OHV recreation community.

The PEA states that Horizon West Transmission conducted extensive pre-filing consultation beginning in 2024 with BLM, California State Parks, counties, federal agencies, tribes, landowners and other entities. It also states that HWT continued to seek input from "recreational groups" and other stakeholders.

However, the documented outreach record does not identify substantive consultation with the California Off-Highway Motor Vehicle Recreation Commission, nor does it identify substantive

consultation with major statewide OHV organizations or the powersports industry represented by the Associations.

As the Associations learned through the Coyote Creek Agrivoltaic Ranch matter adjacent to Prairie City SVRA, simply identifying "recreation" as an environmental resource does not necessarily mean that the people who understand the recreational transportation network, visitor-use patterns, event schedules, access issues and long-term recreation planning have been meaningfully engaged.

At Coyote Creek, the powersports industry, OHV organization, and the OHMVR Commission ultimately became involved after significant project planning had already occurred. The Associations believe California should learn from that experience rather than repeat it.

Accordingly, the Associations respectfully request that the CPUC and BLM:

1. Brief the California Off-Highway Motor Vehicle Recreation Commission regarding the Ironwood Project;
2. Provide the Commission and OHV stakeholders with project mapping showing the relationship between the transmission corridor, existing OHV routes, access roads, staging areas and recreation facilities;
3. Conduct substantive consultation with the Associations and other affected OHV organizations before the Draft EIR/NEPA analysis is finalized; and
4. Document how OHV stakeholder input is considered in route selection, construction access, traffic management, mitigation and long-term operation.

The Associations are not suggesting that the OHMVR Commission possesses approval authority over this project. Rather, because the project directly affects California's State Vehicular Recreation Area system and BLM-managed OHV recreation, the Commission should have an opportunity to provide informed technical and policy input.

2. The Recreation Analysis Should Recognize the OHV Transportation Network

The PEA appropriately recognizes that recreation on BLM lands is frequently dispersed and is not necessarily associated with developed facilities. It identifies OHV use as one of the recreational activities occurring throughout the California Desert Conservation Area.

Many desert routes serve as connectors between highways, staging areas, campgrounds, dispersed camping areas, riding areas, destinations and other public-land routes. A route that appears insignificant when evaluated individually may be critical to maintaining connectivity across a much larger recreation landscape.

The PEA itself acknowledges that the Northern and Eastern Colorado Desert Coordinated Management Plan identifies vehicle routes that provide connectivity to ISDRA. .

Therefore the Associations believe the EIR should include a route-by-route OHV connectivity analysis identifying:

• Existing designated OHV routes;
• Open maintained and unmaintained BLM routes;
• Informal and established routes used for recreational access;
• Utility/access roads that are also available to the public;
• Routes connecting staging and camping areas;
• Routes connecting highways and recreation destinations;
• Routes that would be crossed by the transmission corridor;
• Routes that would be used for construction access;
• Routes subject to temporary restrictions;
• Routes that could become restricted during future maintenance; and
• Routes where project activities could create safety conflicts with public OHV use.

3. Construction Access Impacts to OHV Transportation System

The project states that existing roads and trails would be used where feasible. However, the PEA also identifies approximately 335 acres of existing access roads requiring improvement, including grading, widening, vegetation clearing, roadbed compaction and other modifications necessary to accommodate heavy construction equipment. New access roads and overland access are also contemplated.

The PEA states that construction could involve up to 154 workers along the alignment on a given day, with construction occurring for approximately 19 months. Vehicle types include pickup trucks, semi-trucks, water trucks, seven-ton bunk trucks, bucket trucks and mechanic trucks. Construction equipment would travel on public roads and the existing access-road network, and the PEA specifically recognizes that equipment may be transported along the existing network of access roads.

The Associations believe the EIR should analyze recreational traffic conflicts, not merely vehicle miles traveled.

4. Peak Recreation Periods and Visitor Safety Need Specific Analysis

The PEA identifies more than 1 million annual visitors to ISDRA. It also identifies numerous formal and informal trails, campgrounds, day-use facilities and other recreation infrastructure.

Accordingly, construction traffic controls should account for seasonal and event-related concentrations of OHV use, rather than treating recreation as a uniform year-round activity.

The EIR should evaluate whether construction activities, temporary closures, heavy truck movements, helicopter operations and other activities could conflict with periods of concentrated OHV visitation. And, the final project should include an enforceable Recreation Construction Access and Traffic Management Plan developed in consultation with BLM, California State Parks, the OHMVR Commission and affected OHV stakeholders.

5. Temporary Access Restrictions Can Produce Permanent Recreational Consequences

The PEA concludes that temporary closures would be less than significant with mitigation because the project would not permanently close recreational facilities or roads. APM REC-1 requires coordination with recreation facility managers when closures are necessary.

The Associations believe this conclusion is too narrowly framed. The EIR should therefore require that any proposed detour be evaluated for legality, vehicle accessibility, safety, distance, terrain, seasonal availability, connectivity, capacity, compatibility with different types of OHVs, and whether it provides substantially equivalent recreational access.

6. Permanent Changes to Roads Need To Be Distinguished From Temporary Construction Impacts

The PEA states that no permanent road closures are proposed. At the same time, it proposes permanent improvements to existing access roads and construction of new permanent access roads. This distinction is important.

The Associations believe the EIR should identify:

1. Which existing public routes will become utility access routes;
2. Whether public OHV use will continue to be allowed;
3. Whether access will be subject to gates, closures or utility safety restrictions in the future;
4. Who will control the route;
5. Who will maintain it;
6. Whether future maintenance will require additional restrictions;

7. Whether route modifications will affect OHV suitability; and
8. What mechanisms will ensure that public recreational access is retained.

The final project approvals should include enforceable provisions protecting existing public access wherever compatible with utility safety.

7. Analyze Impacts to OHV Recreation from Long-Term Maintenance and Emergency Operations

The PEA characterizes operational traffic as minimal, estimating up to approximately 24 routine O&M trips annually in California.

The PEA also recognizes that HWT would conduct repair and maintenance activities in response to high winds, storms, fires, accidents and other events, including replacement of structures and re-stringing conductors. Such emergency repairs could be needed at any time.

The analysis should therefore distinguish between routine inspection, vegetation management, road maintenance, planned maintenance, emergency repairs, contractor activities, storm response, fire response and major component replacement.

The Associations believe the final mitigation program should establish procedures for notifying recreation managers and stakeholders when maintenance activities will affect public routes, including procedures for temporary closures and safe passage.

8. Visual Impacts Are a Direct Recreation Impact

The PEA identifies motorists and recreationists as important viewer groups and recognizes that recreationists have moderate to high visual sensitivity because they may experience views of extended duration.

The PEA further identifies numerous visually sensitive recreation locations, including ISDRA and other BLM recreation destinations.

Most significantly, the PEA concludes that the project's visual impacts would remain significant and unavoidable at recreational resources including the Imperial Sand Dunes, Tamarisk Long Term Visitor Area and Mittry Lake. It also acknowledges that portions of the project would be inconsistent with BLM VRM Class II and III objectives.

The experience of riding across an open desert landscape, viewing natural landforms and experiencing a relatively undeveloped setting is an important component of the recreational

value of the Imperial Valley and Colorado Desert. Transmission towers, access roads, vegetation clearing, staging areas and associated infrastructure can permanently alter that experience.

The Associations believe the EIR should therefore evaluate visual impacts from the perspective of actual recreation users, including motorcycle, ATV, side-by-side and four-wheel-drive users traveling through the affected landscapes.

9. Cumulative Industrial Encroachment and the "Brownfield Effect"

The Associations also urge the CPUC and BLM to take a broader look at the cumulative effect of industrial development on California's public recreation system and have raised similar concerns via formal comment letters or public testimony at OHMVR Commission meetings regarding the following energy projects.

- The Coyote Creek Agrivoltaic Ranch adjacent to Prairie City SVRA;
- The White Rock North Mine and its potential conflicts with Prairie City SVRA; and
- The proposed Golden Pacific Powerlink through the Anza-Borrego Desert State Park

The White Rock and Coyote Creek experience demonstrates how industrial development can progressively surround a public recreation area, increasing truck traffic, dust, noise, visual intrusion and other conflicts with recreation. Similarly, concerns raised regarding the Golden Pacific Powerlink identified the potential for transmission infrastructure, access roads, staging areas, vegetation clearing and construction traffic to alter the character of a major recreation landscape.

The Associations believe the cumulative analysis should specifically consider loss and fragmentation of the functional recreation network and degradation of scenic recreation experiences, rather than simply calculating the acreage of individual recreational facilities physically occupied.

10. Requested Mitigation and Project Conditions

The Associations respectfully request that the CPUC and BLM require the following measures as part of the environmental review and, where appropriate, as enforceable project conditions:

A. OHV Stakeholder Coordination. Establish a formal consultation process involving the OHMVR Commission, California State Parks, BLM recreation staff, and affected OHV stakeholders.

B. Recreation Route Inventory. Complete a route-by-route GIS inventory of formal and informal motorized recreation routes and connectors affected by the project.

C. Recreation Traffic Management Plan. Prepare a project-specific plan addressing construction traffic conflicts with OHV users, including seasonal and high-visitation periods.

D. Functional Detours. Require replacement or alternative access that provides functionally equivalent recreational connectivity whenever a public route must be restricted.

E. Public Access Protection. Establish enforceable provisions maintaining public access to existing roads and routes that are incorporated into the project access system where compatible with public safety.

F. Maintenance Notification. Establish procedures for advance notification of planned maintenance and immediate notification of emergency closures affecting recreation routes.

G. Visual Mitigation. Require additional consideration of structure placement, alignment, color, design, vegetation treatment and other measures that can reduce visual contrast from recreation areas and travel corridors.

H. Peak-Use Restrictions. Avoid, where reasonably feasible, major construction closures and high-volume construction traffic during periods of concentrated OHV visitation.

I. Restoration. Require post-construction restoration of temporary construction areas and any recreational routes disturbed by construction to standards acceptable to the applicable land manager.

J. Cumulative Recreation Analysis. Expand the cumulative analysis to evaluate the progressive industrialization and fragmentation of important California Desert recreation landscapes.

Conclusion

The Ironwood Transmission Line Project is being proposed in a landscape where motorized recreation is already an important and established public use.

The PEA’s own environmental documentation confirms that it would cross the Imperial Sand Dunes Recreation Area, affect Heber Dunes SVRA, use and modify existing access roads, create new access roads, require substantial construction traffic, and produce significant and unavoidable visual impacts to important recreation resources.

These facts warrant a more comprehensive recreation analysis than simply concluding that temporary closures will be localized and that routine O&M traffic will be limited.

The Associations respectfully request that the CPUC and BLM use this environmental review to establish a better model for integrating major infrastructure projects with California's existing public recreation system.

We also respectfully request that the CPUC provide the Associations with notice of future environmental review milestones, including publication of the Draft EIR, public meetings and opportunities for additional comment.

Thank you for your consideration.

Sincerely,

Don Amador

Don Amador
Western States Representative
MIC Government Relations Office
15635 Alton Parkway, Suite 390
Irvine, CA 92618
Email: damador@mic.org

cc: CA BLM State Office
CA State Parks Off-Highway Motor Vehicle Recreation Commission
CA State Parks Off-Highway Motor Vehicle Recreation Division
CA State Parks Rangers Association
OHV Stakeholders

Paul Aguirre, Resident, Riverside, CA, 09/16/2026

From: Paul Aguirre [redacted]
Sent: Wednesday, September 16, 2026 8:53 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Paul Aguirre and I live in Riverside/CA. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Paul Aguirre, Riverside CA

Daniel French, Resident, Los Angeles, CA, 09/16/2026

From: Daniel J. French [redacted]
Sent: Wednesday, September 16, 2026 8:35 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Daniel French and I live in Los Angeles. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

I am asking the Commission to do three things in the EIR:

• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
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Thank you for considering this comment.

Daniel French, Los Angeles

Gael Garcia, Resident, Imperial Valley, CA; Imperial Valley Equity & Justice, 09/16/2026

From: Gael Garcia <ggarcia@ivequityjustice.org>
Sent: Wednesday, September 16, 2026 8:10 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission, My name is Gael and I live in Imperial Valley. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project. The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there. I am asking the Commission to do three things in the EIR: • Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined. • Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after. • Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly. These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back. Thank you for considering this comment. Gael, Calexico

Imperial Valley Equity & Justice

Gael Garcia
Community Organizer
w: ivequityjustice.org
e: ggarcia@ivequityjustice.org
pronouns: He/Him/El

Isamay Sandoval Pasillas, Resident, Imperial County, CA, 9/16/2026

From: isamay Sandoval [redacted]
Sent: Wednesday, September 16, 2026 8:27 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Isamay pasillas and I live in imperial county. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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Thank you for considering this comment.
Isamay el centro, ca

Tierra Shelmire, Resident, Orange, CA, 09/16/2026

From: Tierra Shelmire [redacted]
Sent: Wednesday, September 16, 2026 8:42 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Tierra Shelmire and I live in Orange. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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Thank you for considering this comment.

Tierra K. Shelmire
Orange, CA

Sent from my iPhone

Carrie Brown, Resident, Bishop Paiute Tribe, 09/17/2026

From: Carrie Brown [redacted]
Sent: Thursday, September 17, 2026 6:44 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Carrie Brown, I live in Bishop California- Bishop Paiute Tribe. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:

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Thank you for considering this comment.

Carrie Brown Bishop Paiute Tribe

Sent from my iPhone

Gabby Emerson, Resident, Kwatsan Reservation, 09/17/2026

From: Gabby Emerson [redacted]
Sent: Thursday, September 17, 2026 2:11 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Gabriella Emerson I live on the Kwatsan reservation. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:

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Thank you for considering this comment.

Gabriella Emerson, Winterhaven, CA

Sherri Levek, Resident, Yuma, AZ, 09/17/2026

From: sherri levek [redacted]
Sent: Thursday, September 17, 2026 6:54 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Sherri Levek and I live in Yuma, AZ. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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Thank you for considering this comment.

Sherri Levek
Yuma, AZ

Abigail Maze, Resident, Yuma, AZ, 09/17/2026

From: Abi Maze [redacted]
Sent: Thursday, September 17, 2026 11:39 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Abigail Maze and I live in Yuma, Arizona. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project. As a local scientist of ecology, I stand with the Quechan Tribe's suggested alternative route.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. We have a duty to care for the land, and the Indigenous Tribes' who steward the land's history. Once a 250-foot right-of-way is cut through them, no mitigation harms the tribe, the land, and the history.

Thank you for considering this comment.

Abigail Maze, Yuma

Rosalinda McDonald, Resident, Winterhaven, CA, 09/17/2026

From: Rosalinda [redacted]
Sent: Thursday, September 17, 2026 12:27 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Rosalinda McDonald and I live in Winter Haven, California. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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Thank you for considering this comment.

Rosalinda McDonald, Winter Haven, California

Alena Pastores, Resident, Riverside, CA, 09/17/2026

From: Alena Pastores [redacted]
Sent: Thursday, September 17, 2026 1:16 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Alena Pastores and I live in Southern California. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Alena Pastores, Riverside, CA

Janeen Powers, Quechan Tribe Member; Realty Specialist, Reno Sparks Indian Colony, 09/17/2026

From: J P [redacted]
Sent: Thursday, September 17, 2026 7:12 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — request for Due Diligence- Ironwood Transmission Line Project, A.25-09-008

Dear Commissioners,

My name is Janeen Powers, Quechan Tribal member and Realty Specialist for the Reno Sparks Indian Colony, and I live in Reno, my family resides on Quechan Lands.

I am requesting the Commission to conduct full and complete due diligence in connection with the Environmental Impact Report (EIR), with full transparency throughout the process for the Ironwood Transmission.

Specifically, I respectfully ask the Commission to ensure that the EIR addresses three critical areas:

- **Fully study the alternative route requested by the Fort Yuma Quechan Indian Tribe.** The applicant's own routing study identifies the preferred route as paralleling the northern boundary of the Fort Yuma Quechan Reservation and crossing the Colorado River near Imperial Dam. The study also documents the Quechan Tribe's concerns that this area holds significant cultural and spiritual importance, including sacred mountains and potential ceremonial and burial sites.
  At the Tribe's request, the applicant evaluated a more southerly alternative route but ultimately concluded that no viable alternative existed in that area. **However**, the responsibility for identifying and evaluating a reasonable range of alternatives rests with the lead agency, not solely with the project applicant.
  CEQA Guidelines §15126.6 requires an EIR to describe a range of reasonable alternatives that could feasibly attain most of the project's basic objectives while avoiding or substantially lessening significant environmental effects. The regulation also makes clear that the lead agency is responsible for selecting the range of alternatives for examination and must publicly disclose its reasoning for doing so. Alternatives considered during the scoping process but rejected as infeasible should also be identified, with the reasons for that determination explained.
  In addition, the alternatives analysis must contain sufficient information to permit meaningful evaluation, analysis, and comparison of the alternatives with the proposed project.
  In light of these requirements, I respectfully request that the Commission independently evaluate the Tribe's proposed southern alternative rather than simply adopting the applicant's conclusion that no viable alternative exists. The EIR should identify the evidence supporting any determination that the alternative is infeasible and clearly explain the basis for that determination. **The applicant's conclusion should be the beginning of that analysis—not the end of it.**

- **Treat cultural resources as a full impact category, with the Tribe meaningfully involved as a consulting party throughout the process.** Cultural resources should not be treated simply as a

survey that is completed once and filed away. Given the Tribe's documented concerns regarding the cultural and spiritual significance of the affected area, the EIR should incorporate the information and knowledge provided by the Tribe and meaningfully evaluate potential impacts to tribal cultural resources.
The Tribe should have a seat at the table as the route is evaluated and refined—not after key routing decisions have already been made. A conventional technical survey may not, by itself, capture the full cultural and spiritual significance of places identified by the Tribe. Meaningful consultation and consideration of tribal knowledge should therefore be part of the analysis throughout the EIR process.

- **Examine the project's purpose and need against current conditions.** Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand for which this transmission line is being sized is not materializing on the schedule assumed, the EIR should address that changed circumstance directly. The Commission should examine whether the underlying assumptions regarding demand and project need remain supported by current conditions and should evaluate the alternatives accordingly.

My/ our request is straightforward: that the EIR reflect a **complete, transparent, and independent examination of the project**, including reasonable alternatives, tribal cultural resources, and whether the stated purpose and need remain supported by current conditions.

I/we respectfully ask the Commission to ensure that the final analysis is based on the full record—including the Tribe's concerns, information, and requested alternative—rather than relying solely on conclusions reached by the project applicant.

The public deserves an EIR that provides a meaningful opportunity to understand the impacts, alternatives, and underlying assumptions supporting this project. We therefore ask the Commission to ensure that the analysis is thorough, well-supported, transparent, and consistent with the requirements of CEQA.

Thank you for your consideration and for your commitment to a thorough and transparent review.

Respectfully,

Janeen Powers
Quechan Tribal Member

Kris Urbanrezlife Longoria, Resident, San Leandro, CA, 09/17/2026

From: Cruze [redacted]
Sent: Thursday, September 17, 2026 1:19 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Kris Urbanrezlife Longoria and I live in San Leandro California. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Please protect this land

Thank you for considering this comment.

Gratitude
Kris Urbanrezlife Longoria
San Leandro, California

Edith Weber, Resident, Yuma, AZ, 09/17/2026

From: Edith Michelle [redacted]
Sent: Thursday, September 17, 2026 10:42 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Edith Weber and I live in Yuma, AZ. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

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Thank you for considering this comment.

Kindly, Edith Michelle, Yuma, AZ

Lycia Ortega, Resident, Fort Yuma Quechan Indian Tribe Citizen, 09/18/2026

From: Lycia Ortega [redacted]
Sent: Friday, September 18, 2026 9:43 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Lycia Ortega, citizen of the Fort Yuma Quechan Indian Tribe. and I grew up on the beautiful landscapes of my Tribe's traditional homelands. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The Horizon West Transmission LLC,'s own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

Tribal consultation means listening to Tribes when we offer our input. This is not something that you should allow them to "check the box" about. We said find an alternate route and they want to move forward with their original route anyway. That is unacceptable. We do not agree with that and as a Tribal citizen, and a voting member in the Imperial Valley, my voice should matter, too. Show Tribes that you respect us and that you really do due diligence when the projects you allow. It is up to you to set a precedence and we expect you to act accordingly. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Lycia Ortega

Nicolette Gomez, Resident, Yuma, AZ, 09/19/2026

From: Niko G [redacted]
Sent: Saturday, September 19, 2026 8:39 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Nicolette Gomez and I live in Tucson, Arizona. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

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Thank you for considering this comment.

Nicolette Gomez
Tucson, Arizona

Nathaniel James, Community Member, 09/19/2026

From: Nathaniel James [redacted]
Sent: Saturday, September 19, 2026 1:59 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is _____ and I live in _____. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
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Thank you for considering this comment.

_____ (name, city)

Alex Ray, Resident, Catskanie, OR, 09/19/2026

From: Alex Ray [redacted]
Sent: Saturday, September 19, 2026 1:57 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Alex Ray and I live in Clatskanie Oregon. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

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Thank you for considering this comment.

-Alex Ray

Kacy Strong, Quechan Tribe Member; Resident, Red Lodge, MT, 09/19/2026

From: Kacy Strong [redacted]
Sent: Saturday, September 19, 2026 6:18 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Kacy Strong and I am Quechan. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
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Thank you for considering this comment.

Kacy Strong, Red Lodge MT

Sisko Stargazer, Resident, Yuma, AZ, 09/20/2026

From: Sisko J. Stargazer [redacted]
Sent: Sunday, September 20, 2026 10:50 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

Dear California Public Utilities Commission,

My name is Sisko Stargazer and I live in Yuma, Arizona. Although I'm not from California, I'm still affected by the Ironwood project. That's why I'm writing now about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• **Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion.** A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• **Treat cultural resources as a full impact category with the Tribe as a consulting party throughout** — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• **Examine the project's purpose and need against current conditions.** Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here and have helped make the Yuma region what it today. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Sisko Stargazer, Yuma, Arizona.

Daniel Steward and Dan Carter, U.S. Army Garrison Yuma Proving Ground, 09/20/2026

From: Steward, Daniel M CIV USARMY ID-T2 (USA) <daniel.m.steward.civ@army.mil>
Sent: Monday, September 21, 2026 7:02 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Cc: Trelease, Richard D CIV USARMY ID-T2 (USA) <richard.d.trelease.civ@army.mil>
Subject: US Army Yuma Proving Ground Scoping Comments

Mr. Sanchez,

Please see the attached scoping comments from Yuma Proving Ground (YPG). We will also be participating in the EIS as Cooperating Agency. Please let me know if you have any additional questions.

Thanks

Daniel Steward
Wildlife Biologist (AMIM-YMP-E)
Environmental Sciences Division
U.S. Army Garrison Yuma Proving Ground
301 C St. Bldg 307
Yuma, AZ 85365
Desk: (928) 328-2125
Cell: (760) 482-5785
DSN: 899-2125

We are the Army's Home

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND HEADQUARTERS
UNITED STATES ARMY GARRISON, YUMA
301 C STREET
YUMA AZ 85365-9498

September 20, 2026

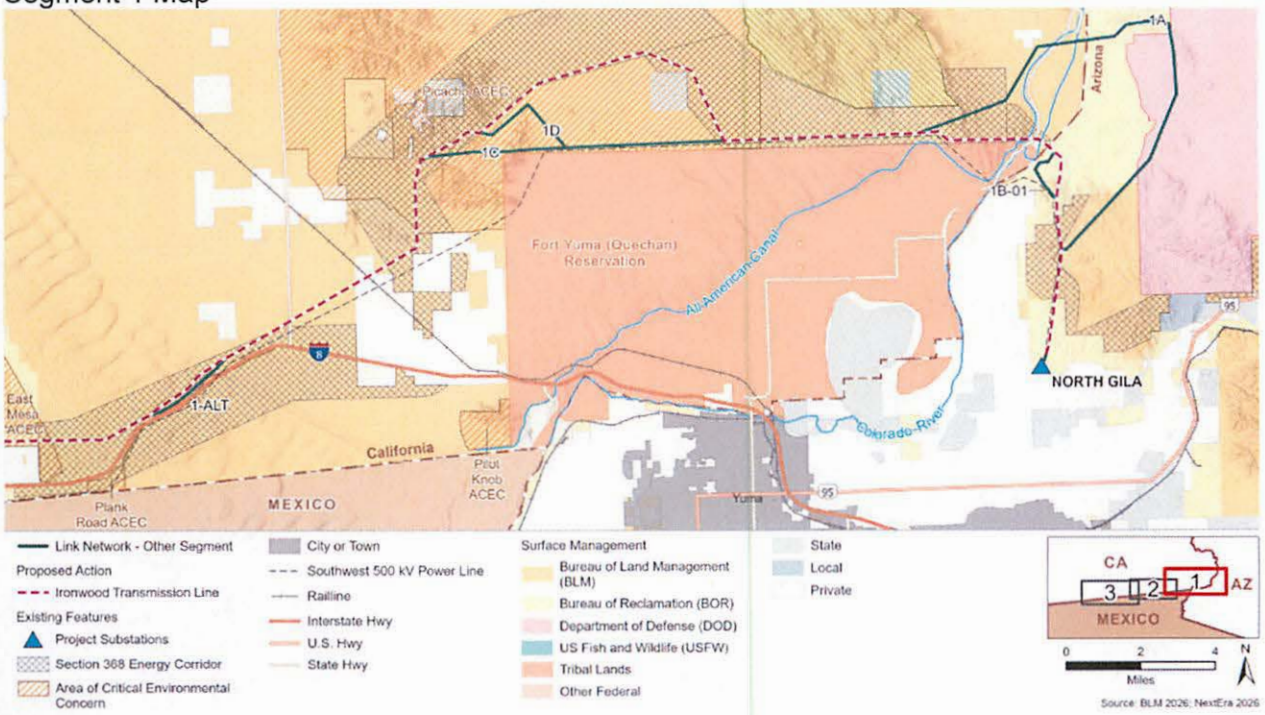
Boris Sanchez
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3214

Dear Mr. Sanchez,

The U.S. Army Garrison Yuma Proving Ground (USAG YPG) has reviewed the proposed alignments for the Ironwood Transmission Line and offer these comments, which mirror the concerns we sent to Paul Mallman of Horizon West Transmission on January 28, 2026.

Alternative Route 1A encroaches on USA YPG property, as shown in figure below. Based on the information available, the proposed alternative 1A powerline route and associated Right Of Way (ROW) appears to pass through USA YPG Howard Cantonment near YPG test facilities including the Fording Basin, through Training Area Bravo, near Hill 630/Site 1, and approximately 1.1 Nautical Miles (NM) from the USA YPG Laguna Army Airfield nearest approach/departure runway. Furthermore, the line would lie adjacent to areas used by Military Freefall School in training for parachute operations.

Segment 1 Map



YPG has serious concerns with Alternative 1A as it could jeopardize testing, training and safety on YPG. Military testing and training on YPG depend on the expansive ranges, and dedicated airspace to support the evaluation and advancement of the nation's defense equipment and technologies. YPG's remote location makes our installation a unique asset vital to national defense and strategic readiness. YPG conducts developmental testing of manned and unmanned ground & aircraft systems, munitions, various sensory technology, and sensitive electronic equipment. Any development activity on YPG property has the potential to adversely affect the operational integrity, safety, and security of military testing and training conducted at YPG. YPG urges careful consideration of these national defense implications prior to any land use authorizations.

Specific YPG facilities and missions affected by Alternative 1A include:

a. Fording Basin: The proposed development site and associated ROW are situated near YPG's Fording Basin facility and adjacent mud course - both of which are essential for testing ground vehicle military platforms under controlled conditions. Additionally, the Fording Basin is currently enclosed by a security perimeter, and there is significant concern that the planned transmission infrastructure may compromise access to the facility, disrupt the integrity of the security fencing, and impede access to the canal used to supply water to the basin. Operating military vehicles near transmission infrastructure introduces a tangible risk of unintended contact, potentially resulting in damage to both the vehicles and the transmission assets. Such interference could undermine the safety and effectiveness of ongoing test operations.

b. Training Area Bravo: The proposed transmission development route would significantly affect YPG's Training Area Bravo, compromising several critical capabilities. Land navigation exercises may be disrupted due to electromagnetic interference, which could introduce magnetic anomalies that impair navigation accuracy. Moreover, this area is uniquely suited for military working dog work, owing to its distinct terrain, vegetation density, and olfactory environment-- including natural water sources. No other location on the installation replicates this combination of features, making it irreplaceable for such training. Explosives training is also conducted in this zone, strategically distanced from public traffic routes and installation boundaries to ensure safety. The introduction of power transmission lines would render this activity infeasible in the vicinity, as accidental detonations could pose risks to critical infrastructure. Finally, electromagnetic interference from the transmission lines may introduce safety hazards related to explosive handling and could negatively impact communications reliability within the area.

c. Safety of Flight: Power lines would cross just 1.1 NM from the approach end of Runway 06 and departure end of Runway 24 of Laguna Army Airfield. Depending on height of the power lines, this could result in a safety of flight issue. Even if lines are under the height, it will be a learning curve to contend with a set of power lines within a mile of the airport that YPG hasn't had to deal with for the last 75 years of flying at Laguna Army Airfield. This presents a significant flight hazard.

d. Military Free Fall School: The Military Freefall School trains soldiers for parachute jumps. Alternative 1A would result in the transmission line standing beneath areas where students glide into Philips Drop Zone to the north. Advanced courses involve students dropping into Cox Field

on Howard Cantonment Area. Alternative 1A would require students to navigate over the line. A mishap with the line for these operations would be deadly.

e. Spectrum Interference for Test Items: YPG operates in a remote area within Yuma County where the range areas offer a pristine environment with little to no non-YPG infrastructure, lights, or items that could cause interference to sensor systems when conducting testing. During sensor testing, it is important to have a low noise floor that could present variation to the baseline Radio Frequency (RF) environment. Testing of optical and radio frequency sensors could be negatively impacted due to the spurious emissions commonly caused by powered transmission lines. These power lines at the proposed location will inhibit test data collection by congesting the RF spectrum.

f. Spectrum Interference for Instrumentation: YPG instrumentation and test articles operate from several locations near the proposed development site. These locations are used to position range instrumentation that transmit and receive RF radiation. The proposed development represents a severe encroachment on YPG operations and risks an increase in uncontrolled spectrum clutter. Spectrum use for instrumentation is sensitive and requires a clean environment and low noise floor that transmission lines could degrade. Electrical development and operation from these transmission lines add additional electric and magnetic fields that may degrade communications, resulting in negative impact to YPG range instrumentation and developmental testing.

g. Operations Security (OPSEC): The development of uncontrolled land next to Laguna Army Airfield and YPG ranges presents a significant OPSEC concern to our test mission. Land development near these locations from the transmission lines will increase uncontrolled public activity for prolonged durations and provide adversaries an opportunity to gather intelligence on emerging technologies, developmental military systems, and their respective operations, which poses a risk to national security.

h. Range Communication: There are seven air-to-ground frequencies hosted out of a communications shelter on Hill 630 (including both Very High Frequency and Ultra High Frequency for Cibola Range Control), in addition to a trunking system. These frequencies are used to coordinate safety of movement on the range in both the ground and airspace. A transmission line would have electromagnetic emissions emanating in the surrounding area that would impact communications equipment co-located on this hill.

Thank you for this opportunity to comment and we look forward to continued coordination in this matter. For further coordination on this project please contact Richard Trelease at richard.d.trelease.civ@army.mil or (928) 328-2545.

Sincerely,

Dan Carter
Acting Garrison Manager

Xia Cachora, Resdient, Yuma, AZ, 09/21/2026

From: Xia Cachora [redacted]
Sent: Monday, September 21, 2026 10:51 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Xia Cachora and I live in Yuma, Az. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Xia Cachora, Yuma, Az

Andie Cuesta, Resident, El Centro, CA, 09/21/2026

From: Andie Cuesta [redacted]
Sent: Monday, September 21, 2026 11:32 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Andie Cuesta and I live in El Centro. I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

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Thank you for considering this comment.

Andie Cuesta, El Centro CA

Paula Jacoby-Garret, Friends of Avi Kwa Ame National Monument, 09/21/2026

From: Paula Jacoby-Garrett [redacted]
Sent: Monday, September 21, 2026 7:10 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Cc: Kim Garrison Means <kim@friendsofavikwaame.org>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

I am writing on behalf of the Friends of Avi Kwa Ame National Monument regarding the scope of the Environmental Impact Report (EIR) for the proposed Ironwood Transmission Line Project (A.25-09-008). Located in southern Nevada, our organization opposes the proposed project and respectfully urges the Commission to fully evaluate and avoid potential impacts on Indigenous cultural landscapes, sacred places, cultural resources, wildlife habitat, scenic values, and Tribal Nations' continuing cultural connections to this region.

We are particularly concerned that the cultural significance of this region could be underestimated if the EIR evaluates cultural resources merely as individual archaeological sites or discrete locations. For Indigenous communities, cultural landscapes are interconnected networks encompassing mountains, rivers, springs, trails, flora, fauna, ceremonial locations, stories, and traditional practices. A transmission corridor can profoundly affect a cultural landscape even without physically disturbing a specific archaeological site.

Friends of Avi Kwa Ame urges the CPUC to establish avoidance as the preferred approach wherever Tribal Nations identify sacred places, sensitive cultural landscapes, or areas where development would interfere with cultural practices. Mitigation after damage occurs is not equivalent to protection; documenting a site, installing barriers, monitoring construction, or recovering artifacts cannot restore a sacred landscape. The integrity of these places depends heavily on their setting, viewsheds, quietude, access, and relationships to surrounding sacred locations.

The applicant's routing study acknowledges that the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. Quechan representatives have identified this area as holding deep cultural and spiritual significance. We request that the Commission include the following measures in the EIR scope:

- Fully analyze the Fort Yuma Quechan Indian Tribe’s requested alternative route, rather than accepting the applicant's unilateral conclusion. The scoping process exists precisely to evaluate viable alternatives that the applicant declined to carry forward.
- Treat cultural resources as a comprehensive, ongoing impact category with the Tribe as a consulting party throughout the entire process. The Tribe must be actively involved during route refinements, rather than treating cultural assessment as a one-time completed survey.
- Re-examine the project's purpose and need against current conditions. With recent public suspensions of Salton Sea geothermal and lithium projects, the Commission should reassess whether the projected demand justifying this line remains accurate and weigh lower-impact alternatives accordingly.

Thank you for your consideration of these comments.

Respectfully submitted,

Paula Jacoby-Garrett
Administrative Director
Friends of Avi Kwa Ame National Monument

Mary Ann Jessen, Community Member, 09/21/2026

From: Mary Ann Jessen [redacted]
Sent: Monday, September 21, 2026 2:32 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: PROPOSED transmission line

Another case of money being more important than anything else to large corporate entities. Respect for cultural and spiritual land, and leaving it be just that, is not a priority to them. Study history and it is crystal clear: if there is mega money to be made the people and the land that they cherish mean nothing to corporate giants. IF THE DECISION MAKERS HAVE ANY INTEGRITY OR A HEART THEY SHOULD PICK ANOTHER ROUTE!

Robert Johnson, Resident, Yuma County, AZ, 09/21/2026

From: Robert jOHNSON [redacted]
Sent: Monday, September 21, 2026 7:20 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: transmission route.

This route seems to predominantly benefit California and has no real benefits to the Yuma community. It would only bring temporary jobs to the area and then negatively affect the desert ecosystems.
California has so many other ways to produce power to support their state but they refuse to because they do not want to disrupt THEIR natural ecosystems but ironically have no problem disrupting another state's ecosystems.
If this line project were to be green lit, how much of the financial burden are the people of Yuma County going to have to carry? Let's face it, EVERY time a power company talks about projects to help strengthen the power grid and reduce rates. They "temporarily" raise rates to help pay for their projects and then we the people NEVER see our rates reduce, instead we see them rise again! Enough is enough! Let California solve their own problems within their own state! California has already screwed Arizona with their ridiculous minimum wage increases and yet another gas tax increase and since Yuma County gets most of its fuel from California, it has already caused a huge financial burden on us.

Yahoo Mail: Search, Organize, Conquer

Benjamin Kantner, Resident, Los Angeles, CA, 09/21/2026

From: M&W Mirror&Web [redacted]
Sent: Monday, September 21, 2026 4:35 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping Comment, Ironwood Transmission Line Project, A.25-09-008

I am writing to you as a concerned citizen and resident of Los Angeles County who has enjoyed recreating in the area impacted by the current design of the Ironwood Transmission Line Project. I respectfully request for further studies to review alternate routes that protect the sacred landscape of the Fort Yuma Quechan Indian Tribe in addition to the incredible recreation opportunities in the region. The transmission line as proposed will irreversibly harm these sacred lands and the historic recreation landscape.

Sincerely,
Benjamin Kantner
[redacted]

Sara Locket and Ray Lennox, California State Parks, Ocotillo Wells District, 09/21/2026

From: Lockett, Sara A@Parks <Sara.Lockett@parks.ca.gov>
Sent: Monday, September 21, 2026 9:56 AM
To: CEQA CEQA@IronwoodTransmissionProject.com>
Cc: Lennox, Ray@Parks <Ray.Lennox@parks.ca.gov>
Subject: Ironwood Transmission Line (A.25-09-008) Scoping Letter from California State Parks

Good morning,

Please see the attached comment letter from California State Parks in response to CPUC's scoping request for the Ironwood Transmission Line (A.25-09-008). Due to the size of the attachments, two copies of the letter are provided - one contains attachments, while the other doesn't. Additionally, electronic versions of the attachments can be found at https://ohv.parks.ca.gov/?page_id=25642.

If there are any follow up questions or concerns, I'd be happy to provide additional details.

Thank you,
Sara

Sara Lockett
Resources Program Manager
Ocotillo Wells District
California State Parks
Office: (760) 767-1084

Book time to meet with me

RE: California Department of Parks and Recreation’s Scoping Comments on Ironwood Transmission Line Project

California State Parks
Ocotillo Wells District
5172 Highway 78, SPC 10
Borrego Springs, CA 2004

September 21, 2026

Boris Sanchez
California Public Utilities Commission
215 North 5th Street
Redlands, CA 92374

RE: California Department of Parks and Recreation's Scoping Comments on Ironwood Transmission Line Project

Dear Mr. Sanchez:

The California Department of Parks and Recreation (DPR) appreciates the opportunity to participate in the scoping process for the proposed Ironwood Transmission Line (Project). The applicant-proposed preferred route (Applicant Route) crosses Heber Dunes State Vehicular Recreation Area (SVRA), located west of State Route 7 and south of Holtville in Imperial County, CA. DPR is charged with managing the park unit and its resources on behalf of the people of California, in accordance with the California Public Resources Code (PRC). For the Applicant Route and alternative routes that cross Heber Dunes SVRA, DPR is both a Responsible and Trustee Agency under the California Environmental Quality Act (CEQA).

Heber Dunes SVRA is a 343-acre day-use park that provides off-highway vehicle (OHV) recreation, including open riding areas and public gathering spaces, and is primarily by local Imperial County residents. Heber Dunes SVRA is surrounded by agricultural fields, and preserves remnant natural lands, particularly in the native vegetation areas on the southern end of the park. An existing San Diego Gas and Electric (SDGE) transmission line runs diagonally through the southern portion of the unit, installed prior to the park's acquisition in 2007.

To inform Project scoping, a summary of potential impacts to Heber Dunes SVRA are provided below. These comments focus on the Applicant Route, unless otherwise stated.

Management Plan Consistency

Several park-specific management plans have been developed for Heber Dunes SVRA, providing guidance on park management, operations, recreational use, and resource

management. The Applicant Route and any future Project alternatives that include work within Heber Dunes SVRA, should be evaluated for consistency with these adopted plans.

2012 Heber Dunes SVRA General Plan

California State Parks uses General Plans to establish long-term management and operation practices for individual park units. A General Plan was completed for Heber Dunes SVRA in 2012 and is enclosed as Attachment A. Project work within the boundaries of Heber Dunes SVRA should be evaluated to determine if alternatives, design changes, or avoidance and minimization measures could be implemented to avoid, reduce, and/or mitigate inconsistencies with the park's General Plan.

While the General Plan recognizes that existing SDGE access to the existing easement should be continued, the expansion of utility easements that could conflict with park operations and management is discouraged. Additionally, the conservation of native vegetation communities, especially in the southern portion of the park, and special status wildlife is emphasized. Specific guidance relevant to the Project includes:

- Natural and Physical Resources (NPR) Guideline 1.4: Prepare and conduct surveys and inventories of natural resources in areas subject to development where sensitive biological resources are expected to occur based on monitoring efforts. These sensitive biological resources could include creosote scrub habitat, Western burrowing owl, or other sensitive species identified under future monitoring efforts. Use survey and inventory results to guide adaptive management decisions.
- NPR Guideline 1.5: If any sensitive biological resources are found within the areas that would be affected by the proposed activities, plan and design such activities to avoid or mitigate potential impacts during construction and post-construction periods.
- NPR Guideline 1.6: In the event that some disturbance to sensitive biological resources is unavoidable, appropriate measures to offset those impacts will be identified and implemented in consultation with a qualified biologist and the appropriate resource agencies.
- NPR Guideline 1.7: Concentrate new trail development in areas of low habitat value. This could include existing disturbed habitat or areas of nonnative vegetation.
- NPR Guideline 1.8: New trails should primarily be routed around the edges of high-quality habitat areas to avoid bisection of habitat.
- Cultural Resources (CR) Guideline 1.1: No cultural resources have been identified within Heber Dunes SVRA through studies to date. However, if unanticipated resources are discovered within or adjacent to areas that will be affected by

proposed activities, such activities will be planned and designed to avoid or minimize impacts to the identified resources.

- CR Guideline 1.2: In the event that some disturbance to cultural resources is unavoidable, appropriate measures will be identified and implemented in consultation with a qualified cultural resource professional. Such measures will be consistent with all applicable rules and regulations relating to the protection of cultural resources.

Additionally, planning zones were identified for Heber Dunes SVRA. The Applicant Route includes portions of the park's Resource Management Zone (RM) and Dunes Recreational Zone (DR). The RM specifically states that rules and regulations are more restrictive in this area of the park to ensure resource protection. Guidelines specific to these zones, with relevance to the Project, include:

- DR Guideline 1: Encourage continued use of this area for open OHV activity and social gathering and associated recreational opportunities.
- RM Guideline 1: Minimize disturbance to creosote scrub habitat, saltbush habitat, and other natural resources.
- RM Guideline 3: Implement weed control measures where necessary to encourage recovery of degraded native habitats.

SVRA-Specific Plans Required by the PRC

Additionally, SVRAs are required by PRC Section (§) 5090 et seq. to conserve and improve wildlife habitat and to manage soils for long term sustainability. Park-specific efforts are described in Soil Conservation Plans (SCP) and Wildlife Habitat Protection Plans (WHPP).

In 2022, the current Heber Dunes SVRA Wildlife Habitat Protection Plan (WHPP), Attachment B, was updated to identify new management goals, monitoring objectives, and management actions using an adaptive management framework. Plan objectives include conserving native vegetation communities and special-status wildlife, controlling invasive plants, and reducing on-site trash. Project design and/or avoidance and minimization measures should consider ways to reduce impacts to park resources, including the consideration of additional alternatives that would avoid impacts.

In 2025, the Heber Dunes SVRA Soil Conservation Plan (SCP) was finalized, similarly detailing an adaptive management approach to park objectives, monitoring, and maintenance actions. Several objectives were established that would be relevant to the Project, including control of anthropogenic sources of erosion and sedimentation, native vegetation conservation, and control of invasive species. See Attachment C for more information.

Work within Heber Dunes SVRA will need to consider these plans and avoid impacts to the unit that would not be consistent with DPR's responsibilities under the PRC. DPR can provide input into avoidance, minimization, and mitigation measures that may be suitable.

Other Plans

The Dust Control Plan for Ocotillo Wells and Heber Dunes State Vehicular Recreation Areas, Imperial County, California (DCP) describes compliance with the Imperial County Air Pollution Control District's Rule 800 requirements. While the DCP is primarily related to park facility management, the Project would be required to meet local and state air quality measures and any work within Heber Dunes SVRA should be consistent both during construction and implementation stages with the park's DCP.

Aesthetics

The Applicant Route would result in a new 500 kV transmission line placed north of and parallel to the existing SDGE line. The issuance of a new 250-foot easement, as requested by the proponent, would be an outsized impact relative to the size of the park. Due to the diagonal placement of the Applicant Route and tower height, tower placement would be visible in a large portion of Heber Dunes SVRA. While this design aims to improve visible compatibility with existing infrastructure, the trellis design that is currently in the Applicant Route increases the on-site footprint and visibility of the proposed line at Heber Dunes SVRA. All options, including alternative routes and pole design alternatives, should be fully evaluated during environmental review, particularly for impacts on day use facilities.

Air Quality

The park's DCP addresses the SVRA's responsibilities for managing OHV facilities. The applicant would need to establish a project-specific DCP for meeting local and state air quality standards. While measures would need to be incorporated to meet local and state air quality standards, dune stabilization should not be considered within Heber Dune SVRA as natural sand transport is a crucial ecological process, and stabilization would also adversely affect recreational experience. Unexpected substrate changes can also be hazardous to OHV recreationalists as vehicle handling changes across different terrain.

Biological Resources

The park provides remnant natural and semi-natural habitat, which is locally limited. Most lands surrounding Heber Dunes SVRA have been converted to agriculture, with limited intact natural habitat. The Applicant Route would bisect native vegetation communities within the park. While these vegetation communities are not considered sensitive by the California Department of Fish and Wildlife (CDF)W, vegetation within the California State Park System is typically protected (California Code of Regulations Title 14, § 4306). The park's 2012 General Plan reflects this protection by zoning the southern end of the park,

which contains the greatest density of native vegetation, as the Resource Management Zone. Protection of native vegetation, control of invasive species, and management of disturbance are prioritized in this portion of the park. This zone was also incorporated into the park's WHPP (Figure 1).

The Applicant Route parallels the existing transmission line, which runs diagonally through Heber Dunes SVRA. This would require additional vegetation clearing for equipment that can pull the new lines at the required angle of placement, specifically 13.1 acres of vegetation clearance and 23.09 acres of temporary construction pads (36.19 acres combined). Alternative routes should be evaluated that would avoid or minimize vegetation clearing within Heber Dunes SVRA. Additionally, control measures for invasive species should be incorporated into the project to avoid the transport and spread of species that could threaten or harm native species in the park.

In 2022, vegetation alliances and associations on-site were mapped using the state's current standard for vegetation classification and mapping: CDFW's Vegetation Classification and Mapping Program (VegCAMP). Mapping is performed at a fine scale and can help determine where inconsistencies exist with Heber Dunes SVRA management plans. The Applicant Route overlies 70.74 acres of native vegetation, including 21.9 acres of arrowweed, 44.47 acres of creosote scrub, and 4.37 acres of quailbush (Figure 2). Avoidance or minimization of these vegetation communities should be prioritized.

Long-standing habitat monitoring plots, which include surveys for perennial vegetation, birds, reptiles, and small mammals, would be affected by the proposed route location (Figure 3). Wildlife monitoring at Heber Dunes SVRA has occurred since DPR initially leased the property in 1998. Data is utilized by park management and has been incorporated into the park's WHPP to provide ongoing ecological data and inform species inventory.

Temporary disruption to the plots would occur during construction, including site disturbance and potentially access restrictions for DPR staff. Long-term, two proposed towers are immediately adjacent to monitoring plots and it is probable that behavioral changes in wildlife could be observed following development. Additionally, the current SDGE transmission line interferes with GPS-unit accuracy; a parallel line could impact DPR's ability to effectively monitor and document park resources.

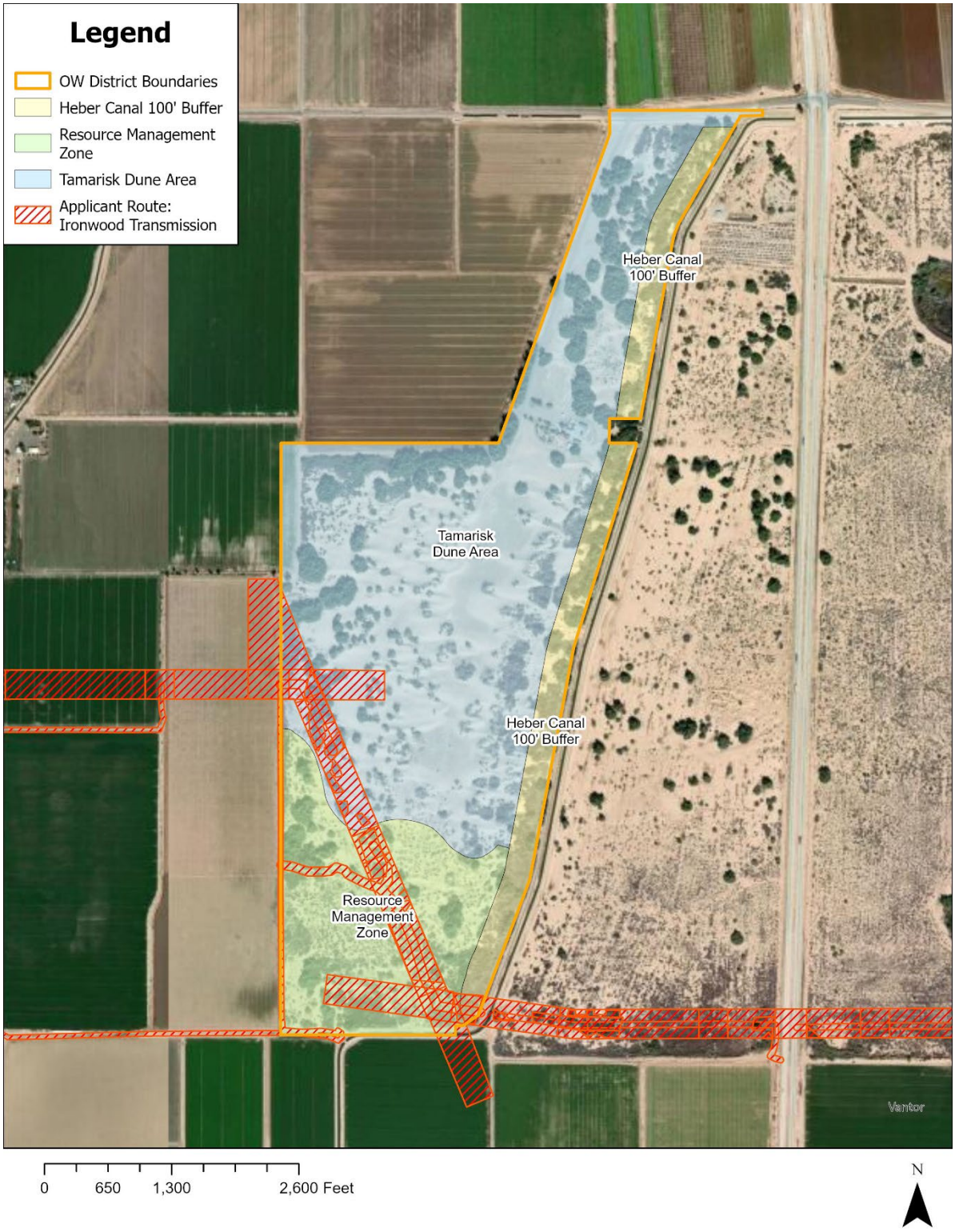

Figure 1. The Applicant Route overlays all three WHPP-designated management units, including the Resource Management Zone first identified by the park's General Plan.

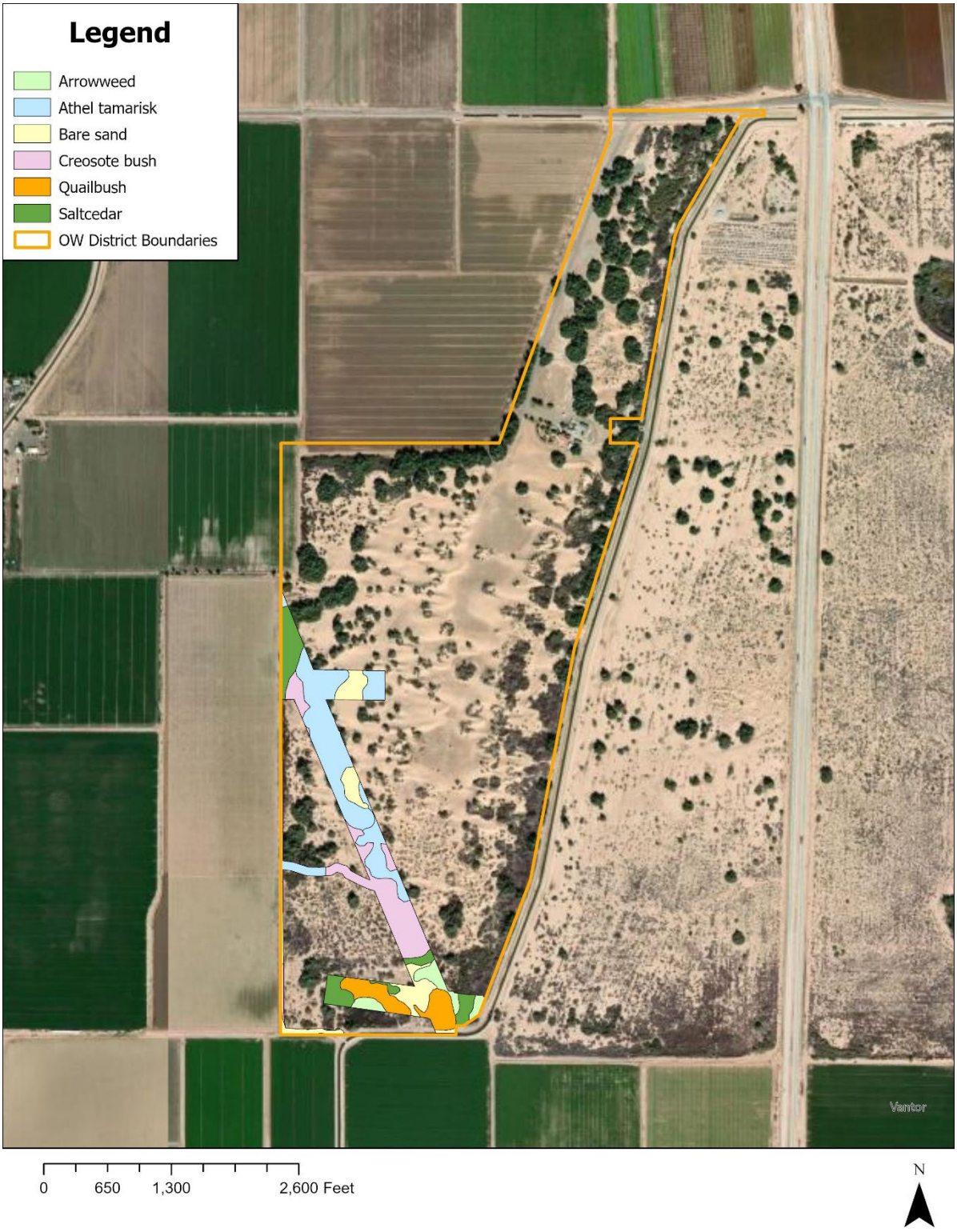

Figure 2. The Applicant Route includes several native vegetation communities at Heber Dunes SVRA.

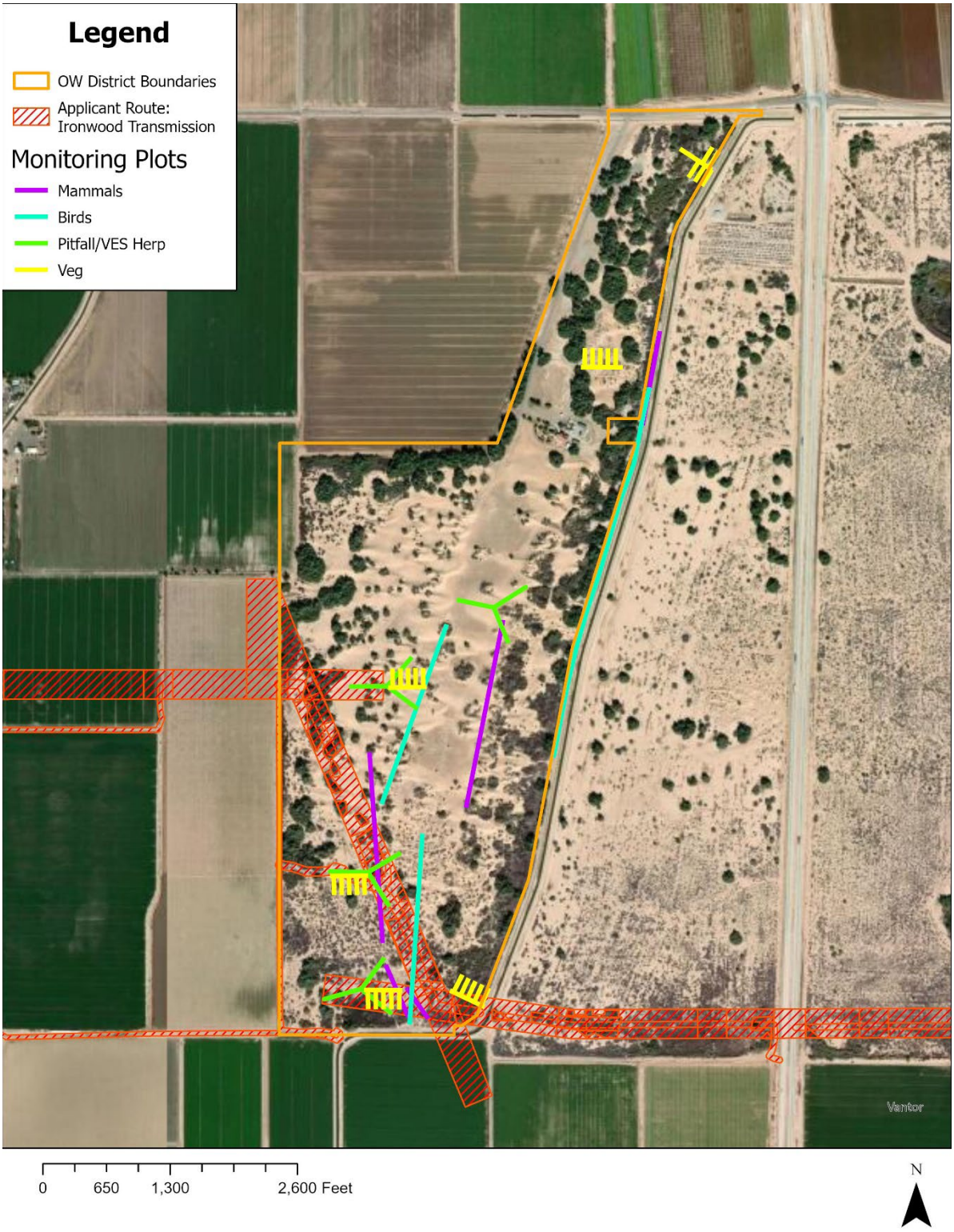

Figure 3. The Applicant Route would potentially disturb multiple long-term monitoring plots at Heber Dunes SVRA.

Several special-status species have been observed at Heber Dunes SVRA, particularly bats and birds, primarily through long-term park monitoring. Western burrowing owl, a state candidate under the California Endangered Species Act, has been documented on several occasions within Heber Dunes SVRA. In addition to western burrowing owl, 12 California Species of Special Concern (SSC) have been documented on site, as well as four (4) state Watch List (WL) species (Table 1). The eastern boundary of Heber Dunes SVRA has a perennial water source, the Alamo Canal, which supports a wide range of species, particularly bats. Work within and adjacent to Heber Dunes SVRA will need to carefully consider the potential impacts of work on special-status species and implementation of the park's WHPP, including both temporary and permanent impacts.

Table 1. Special-status wildlife observed at Heber Dunes SVRA.

Common Name	**Scientific Name**	**Status**[1]
Arizona myotis	*Myotis occultus*	SSC
Big free-tailed bat	*Nyctinomops macrotis*	SSC
Black-tailed gnatcatcher	*Polioptila melanura*	WL
California leaf-nosed bat	*Macrotus californicus*	SSC
Cooper's hawk	*Astur cooperii*	WL
Loggerhead shrike	*Lanius ludovicianus*	SSC
Long-billed curlew	*Numenius americanus*	WL
Merlin	*Falco columbarius*	WL
Northern harrier	*Circus hudsonius*	SSC
Pallid bat	*Antrozous pallidus*	SSC
Pocketed free-tailed bat	*Nyctinomops femorosaccus*	SSC
Western mastiff bat	*Eumops perotis californicus*	SSC
Western red bat	*Lasiurus frantzii*	SSC
Western yellow bat	*Lasiurus xanthinus*	SSC
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	SSC
Yellow warbler	*Setophaga petechia*	SSC

[1]Status: California Species of Special Concern = SSC; California Watch List = WL

Cultural and Tribal Cultural Resources

During the development of the park's General Plan, Heber Dunes SVRA was fully surveyed for cultural resources. At the time, no cultural sites were encountered, however, one site was later documented in 2018. In 2026, the site's boundary was expanded to include additional artifacts and site features that were encountered, and temporary protection measures were established. DPR is currently consulting with local California Native American tribes to protect the site long-term. The site is culturally significant and should

be classified as a Tribal Cultural Resource under CEQA. The Applicant Route would impact the site, particularly along proposed access roads and the transmission corridor.

The 2018 site boundary is recorded within the California Historical Resources Information System, but the 2026 updates have not yet been submitted. DPR archaeologists can provide more details about the site, including survey reports, site records, and summaries of consultation to CPUC.

This site highlights one of the challenges of work at Heber Dunes SVRA – despite a full cultural survey of the park and long-term monitoring, site conditions can change rapidly due to shifting sands. It is probable that additional cultural resources are present under the existing sand dunes; measures for inadvertent discovery of cultural resources, including ancestral remains, must be incorporated into the Project to address potentially significant impacts to cultural resources. Additionally, DPR recommends including tribal cultural resource monitors for the Project, particularly during ground disturbance, clearing of sand, brush, or similar cover that would expose new soils, and other activities that could adversely affect cultural resources.

Geological Resources

Heber Dunes SVRA contains rolling sand dunes that range in elevation from 25 to 50 feet above sea level. Heber Dunes SVRA is composed of lacustrine deposits from ancient Lake Cahuilla, with late Holocene dune sands covering portions of these deposits. Dunes and aeolian sand transport are an important ecological function, which can also obscure subsurface cultural resources. These dunes are unique, particularly in contrast to the adjacent agricultural lands.

A 2024 paleontological survey by the San Diego Natural History Museum indicates that the Applicant Route is within an area considered to have low paleontological potential, although areas immediately north are classified as moderate (Mueller et al., 2024). If the Project includes work in areas with moderate paleontological potential at the park, specifically in Lake Cahuilla deposits, potential impacts to paleontological resources should be mitigated. This may include paleontological monitors during ground disturbance, documentation of both stratigraphic and geographic context, recovery and identification of paleontological resources, and curation of recovered fossils at an appropriate location.

Several fault lines underlay Heber Dunes SVRA, including the Imperial Fault, which crosses the property from the southeast to the northwest. An Alquist-Priolo Earthquake Fault Zone is mapped for the Imperial Fault along the southern part of the park, north and parallel of the Applicant Route, and surface rupture has previously been observed at the property (Wright Environmental Services, Inc., 2009). Further assessment would be needed to determine site suitability and conformance with appropriate building codes.

Noise

The project has the potential to increase noise levels on-site, particularly during construction. On-site noise conditions at Heber Dunes SVRA were monitored, using both long- and short-term methods, between May 2022 and May 2025. Short-term monitoring included three-hour attended measurements distributed across the property, typically on Sunday afternoons when average visitation is greatest. Across all visits, short-term monitoring observed no off-site noise exceedance and the average noise level was 53.6 A-weighted decibel (DBA). Similarly, the third year of long-term monitoring found that the modeled noise level was 60 dBA at the monitoring site and no off-site noise exceedance was observed (CSDA Design Group, 2025). All datasets show that average park noise levels are well under Imperial County's noise ordinance for general industrial noise limits, set at 75 dBA.

Construction noise may exceed the County's noise ordnance limit, which would require consideration of mitigation measures. One residence is present on the north end of the park unit and should be considered a sensitive receptor in any noise analysis within and adjacent to Heber Dunes SVRA. Additionally, park visitors should be considered in the analysis of construction noise, particularly on weekends and holidays outside summer, as the park is popular for gathering, not just OHV recreation. While long-term noise levels may not exceed noise limits, consistent humming should also be considered when evaluating potential impacts to ongoing recreation.

Recreation

Heber Dunes SVRA provides opportunities for open riding OHV exploration and learning, as well as several gathering places for the public. Weekends are most popular for visitors, with families often gathering to picnic and recreate. It is important to note that Heber Dunes SVRA primarily allows for open exploration of the dunes, rather than trail riding, although the southern portion of the SVRA, within the Resource Management Zone, allows for a trail system.

Any towers or related infrastructure proposed within Heber Dunes SVRA must account for recreation and public access, during both construction and implementation phases to reduce impacts to recreational opportunities within the park and avoid reductions in site safety. In portions of the park, riding through dune and vegetation corridors can provide an experience akin to being within a maze; this is a unique riding opportunity but can result in limited visibility and time to react to trail hazards. Additionally, dune movement occurs on site and can shift conditions rapidly.

For any infrastructure proposed within Heber Dunes SVRA, measures to reduce the likelihood of public access, including climbing or otherwise improperly using Project

facilities should be considered to ensure public safety. Any infrastructure would need to be sufficiently visible to avoid collisions.

Wildfire

While large-scale wildfires related to transmission are not likely to occur in Heber Dunes SVRA, fire is still a concern. The height and density of vegetation within the Applicant Route would necessitate vegetation management activities at Heber Dunes SVRA to protect park facilities and employee housing. Balanced route selection that limits disturbance to native vegetation, while reducing fire risk, is essential at the park. Additionally, neighboring lands that are included in project alternatives would need to be assessed for off-site activities that could alter fire likelihood at Heber Dunes SVRA. The area is remote, with the nearest fire station located approximately 9.5 miles from the park, which could result in slow initial notification and response to emergencies.

External Considerations

DPR's Off-Highway Motor Vehicle Recreation Division provides statewide leadership in OHV recreation. The Applicant Route, and many of the alternatives identified to date, cross the Imperial Sand Dunes Recreation Area (ISDRA). ISDRA is a very popular OHV recreation area, with over a million visitors annually. Due to the recreational value and long-term usage of this area, DPR recommends early engagement with OHV recreationalists to gather feedback that can be considered during the evaluation and selection of project alternatives, identification of impacts, and development of mitigation measures.

While Heber Dunes SVRA is not a signatory to the Flat-tailed Horned Lizard Rangewide Management Strategy and the species is not currently found at the park, DPR broadly is a signatory agency. DPR recommends early coordination with agencies administering Management Areas and the Flat-tailed Horned Lizard Interagency Coordinating Committee for species specific avoidance and mitigation.

Cumulative Impacts

While evaluated separately under CEQA, cumulative impacts of the proposed Ironwood Transmission Line and Golden Pacific Powerlink must be evaluated, as well as reasonable assumptions about long-term energy needs of the state. DPR recognizes that energy security and a decreased reliance on fossil fuels are a critical need for the state and its residents but encourages a thorough evaluation of the impacts of these types of projects on other priorities of the state, including the 30x30 initiative and importance of parks on public wellbeing.

The current applicant-preferred routes for both projects include routing through multiple park units of the California State Park System, including Anza-Borrego Desert State Park, Heber Dunes SVRA, Ocotillo Wells SVRA (adjacent), Salton Sea State Recreation Area, and

Indio Hills Palms. The California State Park System was designed to preserve the state's biodiversity, protect cultural and natural resources, and provide opportunities for quality outdoor recreation. Park units are managed for the long-term benefit and inspiration of Californians, including protecting a diverse and unique range of California ecotypes. Cumulative impacts should consider analysis of potential impacts to the system, not just individual park units.

While economic impacts of projects are not typically considered during CEQA, it is important to consider that the California State Park System contributes greatly to California's economy and the wellbeing of Californians. The California State Park System is the second largest state park system in the US by acreage and receives approximately 80 million visitors annually (California State Parks, 2023). The 2006-2008 California Outdoor Recreation Economic Study found that direct visitor expenditure contributed $3.2 billion to the state's economy over the study, with over 30% of these expenditures occurring in Southern California (BBC Research & Consulting et al., 2011). When including visitation and operation expenditures, the study found that the California State Park System contributed approximately $6.8 billion to the state's economy, including 56,000 jobs. Reduced public access during construction, impacts to park facilities, and alterations to viewsheds, resources, recreation, and similar land values associated with the California State Park System may have ripple effects to neighboring lands and communities.

Analysis should consider if both projects would result in a potentially significant cumulative impact to the California State Park System and its units, resource preservation, and recreational opportunities for Californians.

In Closing

DPR appreciates the opportunity to submit comments on the Project and looks forward to engaging in the CEQA process. If you have any questions or would like further information regarding this letter, please contact Sara Lockett, Resources Program Manager, at Sara.Lockett@parks.ca.gov or (760) 767-1084.

Sincerely,

Ray Lennox
District Superintendent

Attachments:

A. 2012 Heber Dunes SVRA General Plan
B. 2022 Heber Dunes SVRA Wildlife Habitat Protection Plan
C. 2025 Heber Dunes SVRA Soil Conservation Plan

Literature Cited

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A. 2011 Final Heber Dunes State Vehicular Recreation Area General Plan (adopted 2012)











FINAL
HEBER DUNES SVRA GENERAL PLAN
DECEMBER 2011

This page is a placeholder for the Commission resolution adopting the plan, plus any other resolutions such as reclassification connected with the plan. This page will not be numbered.

FINAL HEBER DUNES SVRA GENERAL PLAN

DECEMBER 2011

Edmund G. Brown Jr.
Governor

John Laird
Secretary, Natural Resources Agency

Ruth Coleman
Director, California State Parks



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TABLE OF CONTENTS

Section **Page**

Chapter 1.0 – Introduction 1
1.1 Introduction to Heber Dunes SVRA 2
1.1.1 Location 2
1.1.2 Characteristics of Heber Dunes SVRA 4
1.1.3 PurposeAcquired 4
1.1.4 Sense of Place 4
1.2 Purpose of the General Plan 5
1.3 The Planning Process 6
1.3.1 Overview of the Planning Process 6
1.3.2 Planning Framework 8
1.3.3 Subsequent Planning 9
1.4 Organization of the General Plan 10

Chapter 2.0 – Existing Conditions 11
2.1 Land Use and Facilities 12
2.1.1 Regional and Local Context 12
2.1.2 Regional Recreation Facilities 17
2.2 Existing Heber Dunes SVRA Land Use and Circulation 19
2.2.1 Land Use 19
2.2.2 Circulation 21
2.2.3 Facilities 24
2.3 Visitor Use and Recreation 25
2.4 Significant Resource Values 28
2.4.1 Physical Resources 28
2.4.2 Natural Resources 32
2.4.3 Cultural Resources 39
2.4.4 Aesthetic Resources 40
2.5 Operations and Maintenance Functions 44
2.5.1 Operations and Visitor Services 44
2.5.2 Utilities 45
2.5.3 Public Safety 46
2.5.4 Concessions 46
2.5.5 Accessibility 46
2.5.6 Heber Dunes SVRA Support 47
2.6 Interpretation and Education 47
2.6.1 Existing Interpretation 47
2.6.2 Interpretation Audience Demographics 47
2.6.3 Local, Regional, and Statewide Context 48
2.6.4 Interpretation Issues, Opportunities, and Constraints 48
2.7 Planning Influences 49
2.7.1 Systemwide Planning 49
2.7.2 Regional Planning Influences 54
2.7.3 Demographics, Trends, and Projections 58
2.7.4 Public Concerns, Interests, and Opportunities 62

TABLE OF CONTENTS

Chapter 3.0 – Issues and Analysis 65
3.1 Planning Assumptions 66
3.2 Planning Issues 67
3.2.1 Regional Planning Context 67
3.2.2 Heber Dunes SVRA Land Use and Facilities 69
3.2.3 Significant Resource Values 73
3.3 Specific Area Issues 74

Chapter 4.0 – Plan Components 77
4.1 Park Classification 78
4.2 Purpose 78
4.3 Vision 78
4.4 Land Use Management 79
4.4.1 General Goals and Guidelines 79
4.4.2 Planning Zone Management Intent and Guidelines 89
4.4.3 Managing Visitor Capacity 96
4.4.4 Visitor Management Indicators 100

Chapter 5.0 – References 103

LIST OF FIGURES

Page

Figure 1. Regional Location Map 3
Figure 2. Local Context 15
Figure 3. Aerial View 16
Figure 4. Heber Dunes SVRA Facilities 20
Figure 5. Vegetation and Plant Communities 33
Figure 6. Planning Zones 93

LIST OF TABLES

Page

Table 1. California State Parks Planning Framework 8
Table 2. Other Types of California State Parks Plan 9
Table 3. Federal and State OHV Recreation Areas Near Heber Dunes SVRA 18
Table 4. Hispanic and Latino Compostion of Nearby Communities 27
Table 5. Population Growth Trends 59
Table 6. Desired Outcomes and Indicators for Visitor Capacity 100

LIST OF CHARTS

Page

Chart 1. Monthly Visitor Attendance at Heber Dunes SVRA, July 2009 to June 2011 26


GATE OPEN
7 AM - 9 PM
BOUNDARY









WELCOME TO HEBER DUNES STATE VEHICULAR RECREATION AREA

For decades, Heber Dunes State Vehicular Recreation Area (SVRA) has been a cherished family gathering place for people to enjoy both motorized and non-motorized forms of recreation. Groups of friends and families from neighboring communities have long enjoyed afternoons spent recreating on off-highway vehicles (OHVs), socializing, and barbecuing or picnicking. Long-time visitors fondly refer to Heber Dunes SVRA as "Heber Beach," a nod to the small, sandy dunes that create a fun and relaxed OHV recreation setting. While most visitors to Heber Dunes SVRA arrive in groups, lone visitors can also be found enjoying the solitude of an early morning or twilight OHV outing.

This document is the first General Plan for Heber Dunes SVRA. The park was owned and managed by Imperial County for decades. In 1998, California State Parks Off-Highway Motor Vehicle Recreation (OHMVR) Division began leasing and operating the park, and officially acquired the park in 2007.

State Park General Plans are broad, goal-oriented plans that serve as the primary management documents for park units within the California State Parks System. The goals of this General Plan aim to provide the framework to create an enjoyable recreational experience; to enhance OHV recreation opportunities; and to protect the SVRA's resources including plants, wildlife, and cultural resources.

Opposite Page
Top Left: Heber Dunes SVRA hours of operation.
Top Right: Day use facilities.
Middle Left: Tamarisk trees.
Middle Right: Visitors prepare for a day of recreation.
Bottom: Facilities near Heber Beach Road.



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CHAPTER 1
INTRODUCTION











1.1 INTRODUCTION TO HEBER DUNES SVRA

Heber Dunes SVRA is a small island of sand dunes in a large valley dominated by agriculture. For decades, Heber Dunes SVRA has been a popular recreation area for local residents to gather and recreate on OHVs, picnic, and visit with family and friends. Weekends at Heber Dunes SVRA are very popular during the spring, winter, and fall months of the year. Located within close proximity to the population centers of Imperial County, the park offers an intimate recreational experience and a family friendly atmosphere.

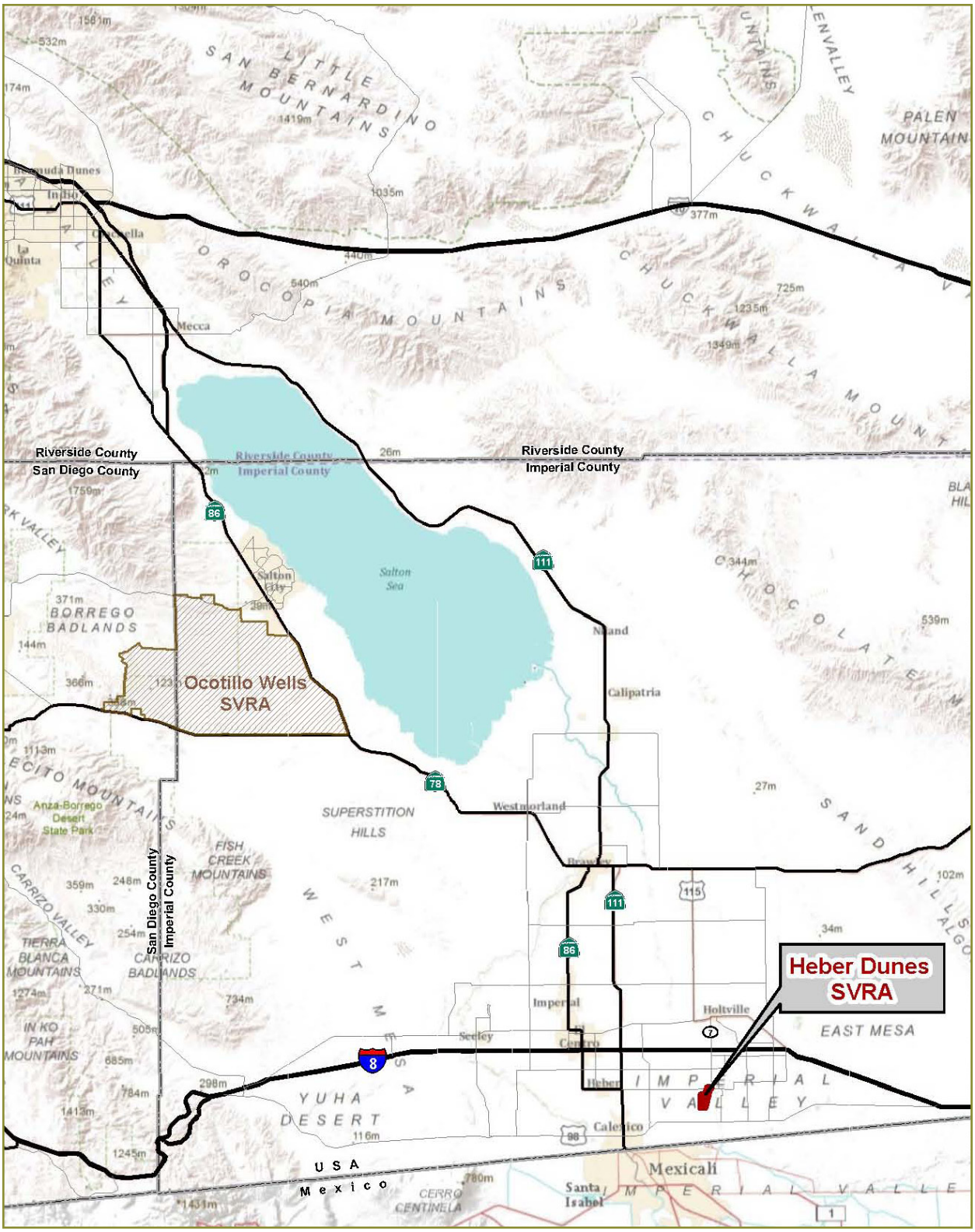
1.1.1 Location

Heber Dunes SVRA is a 340-acre OHV park operated by the OHMVR Division of California State Parks. Heber Dunes SVRA is located within unincorporated Imperial County in Southern California, between Interstate 8 (I-8) to the north and the Mexican border to the south, and within irrigated cropland of the Imperial Valley, just west of State Route 7 (SR-7). Figure 1 depicts the regional location of Heber Dunes SVRA.



Families and friends enjoying the park.

FIGURE 1 - REGIONAL LOCATION MAP



Source: California State Parks 2009; ESRI 2010

1.1.2 Characteristics of Heber Dunes SVRA

Heber Dunes SVRA is dominated by sand dunes, with desert vegetation scattered throughout the site, mostly along the borders and consisting primarily of creosote brush and tamarisk trees. With its natural characteristics and opportunities for OHV enjoyment, Heber Dunes SVRA provides recreational opportunities.The primary use of Heber Dunes SVRA is OHV recreation. Heber Dunes SVRA is known for being a family friendly OHV recreation area, and experiences high use on weekend days during the fall, winter, and spring. Summer weather is typically too hot for most visitors to engage in OHV recreation, although there is some activity in the early mornings and evenings.

1.1.3 Purpose Acquired

Heber Dunes was operated as an OHV park by Imperial County for more than 30 years. In 1998, OHMVR Division accepted responsibility for park operations at Heber Dunes by lease agreement. Heber Dunes was officially deeded to OHMVR Division in 2007.

1.1.4 Sense of Place

Heber Dunes SVRA has been a treasured recreation area for families and friends for generations. On any given day, extended families and friends can be found socializing and enjoying the dunes on OHVs. The small, rolling dunes offer a dramatic contrast to nearby agricultural fields. Once within Heber Dunes SVRA, farmland and towns give way to greenery, dunes, and hills, creating a unique setting within the surrounding agricultural environment.



Visitors gather at the ramada.

1.2 PURPOSE OF THE GENERAL PLAN

This General Plan directs the long-range development and management of a park by providing broad policy and program guidance. This guidance is essential to managers and staff, and is of value to those organizations and individuals who have an interest in California State Parks. A California State Park must have an approved General Plan before any major park facilities can be developed. General Plans are intended to be used for 20 years or more. Therefore, the General Plan establishes a decision-making framework that is consistent with the established vision but also flexible enough to allow for changing conditions over time.







Top: Sand dunes within Heber Dunes SVRA.
Bottom Left: Supervising Ranger, Vic Herrick, sharing his knowledge of the park.
Bottom Right: Welcome to Heber Dunes SVRA.

1.3 THE PLANNING PROCESS

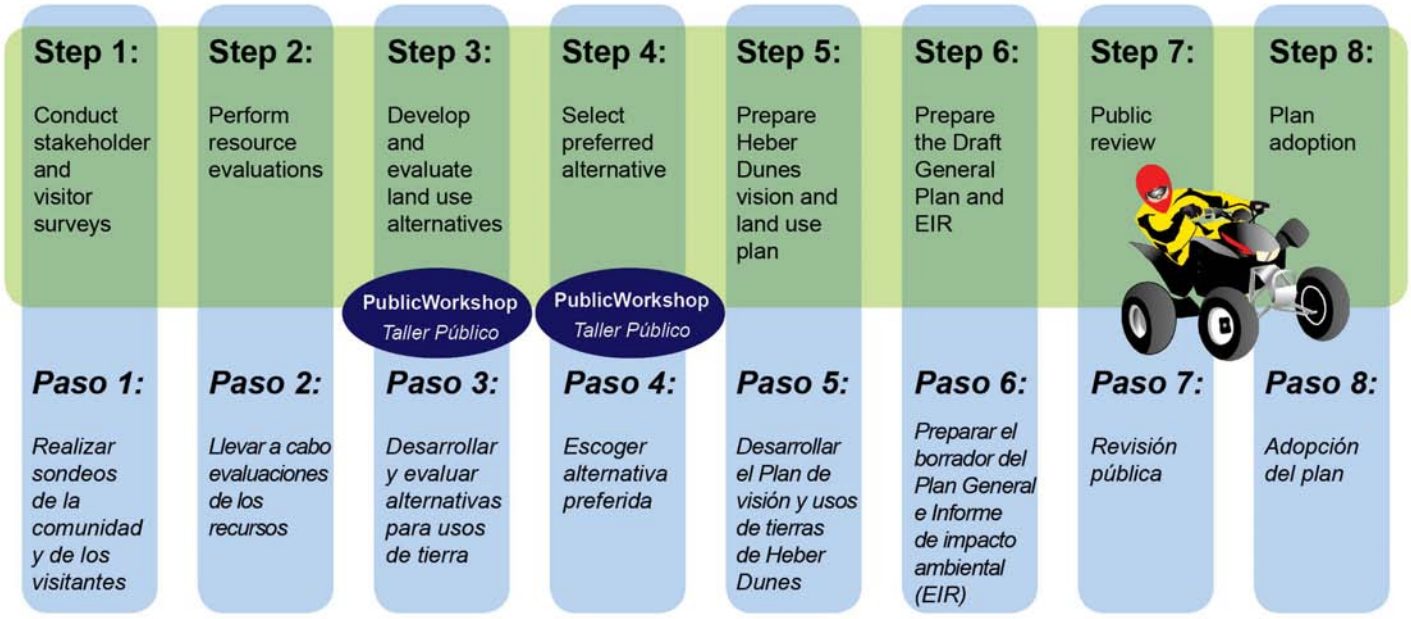
This section describes the planning process undertaken to develop the General Plan for Heber Dunes SVRA.

1.3.1 Overview of the Planning Process

This is the first General Plan for Heber Dunes SVRA. Key phases in the General Plan process included existing conditions research and resource evaluations, development and evaluation of land use alternatives, the selection of a preferred alternative, and preparation of the General Plan document. Opportunities for public input occurred throughout the General Plan process. Specifically, the public participation program was as follows:

- **On-site Visitor Survey**, using a person-to-person questionnaire. A total of 49 surveys were conducted at Heber Dunes SVRA in February and March 2009.
- **Stakeholder Interviews**, conducted with a cross-section of stakeholders regarding potential ideas, concerns, and common goals associated with development of the Heber Dunes General Plan. The interviews were conducted in March 2009.
- **Two Public Workshops**, held to gather public input during the formulation of the Heber Dunes General Plan. At the first workshop, held in October 2009, OHMVR Division staff presented concept alternatives for Heber Dunes SVRA. During the second workshop, which was held in February 2010, the Heber Dunes SVRA draft preferred alternative was presented.
- **Fact Sheets and Newsletters**, provided background information on the project, updates on project progress, and announcements of the public workshops.
- **California State Parks Website**, provided updates regarding the General Plan preparation process and opportunities for public input.

Step-by-Step Process





A young OHV enthusiast enjoys an afternoon at Heber Dunes SVRA.

1.3.2 Planning Framework

California State Parks uses a planning framework with hierarchical planning concepts and tools that influence future management of Heber Dunes SVRA. The following planning framework (Table 1) provides direction for the future management and improvement of Heber Dunes SVRA in this General Plan.

Table 1–California State Parks Planning Framework

Planning Concept	Description
OHMVR Division Mission	The OHMVR Mission guides acquisition, planning, and management of the SVRAs as part of the OHMVR Division's responsibility to provide leadership for a statewide OHV Program.
Classification	Park management, operation, and development are guided by the park unit's classification. Heber Dunes SVRA is an SVRA.
Declaration of Purpose	This is a broad statement of direction unique to Heber Dunes SVRA. The California Public Resources Code (PRC) 5090.43 (a) indicates that SVRAs shall be developed, managed, and operated for the purpose of making the fullest public use of the outdoor recreational opportunities present while balancing the protection of natural and cultural resources.
Park Vision	The Vision Statement is a view of the desired future conditions for the SVRA. It expresses what the park should ultimately be and look like, as well as what kinds of visitor experiences should be available in the future.
Goals and Guidelines	Goals apply to the entire SVRA to address existing issues and provide ongoing guidance to management. Guidelines provide the direction that OHMVR Division will consider to achieve these goals.
Planning Zones	Planning Zones allow for specialized management by area. These Planning Zones are developed through consideration of a variety of factors, including geographic relationships, resource values, ecological parameters, management issues and goals, types and intensities of land use, and visitor use and experience. Targeted guidelines are developed for each Planning Zone.

1.3.3 Subsequent Planning

Major programs and projects implemented during the lifespan of the General Plan will require additional planning, such as management plans or specific project plans (Table 2). These subsequent planning efforts are required to be consistent with the General Plan. Subsequent planning efforts also include preparing project-specific environmental compliance documents to implement management plans and proposed SVRA development projects.

These compliance documents will tier off and be consistent with the General Plan's Program Environmental Impact Report (EIR).

Table 2–Other Types of California State Parks Plans

Subsequent Plan Type	Description	Examples
Management Plan	Defines the objectives, methodologies, and/or designs for accomplishing management goals. Management plans are consistent with system-wide plans and policies and with the unit's General Plan. Occurring on an as-needed basis, management plans typically focus on specific management topics, goals, or issues.	• Resource Management Plans • Trails Plans • Operations Plans • Interpretive Plans • Concession Plans • Facility Development Plans
Specific Project Plans	Detailed implementation plans needed to accomplish specific projects.	• Design Concepts • Site Plans • Museum Exhibit Plans

1.4 ORGANIZATION OF THE GENERAL PLAN

This General Plan is organized into five chapters. The first three chapters provide an overview of Heber Dunes SVRA. Chapter 4 establishes the plan components, including goals and guidelines for Heber Dunes SVRA, and Chapter 5 provides references and plan contributor information. A brief description of each chapter is provided below.

- **Chapter 1** provides an introduction to Heber Dunes SVRA.
- **Chapter 2** presents a summary of existing conditions, facilities, and important resources.
- **Chapter 3** summarizes and analyzes key issues identified during the planning process.
- **Chapter 4** establishes the proposed Heber Dunes SVRA General Plan components, purpose, vision, and land use management.
- **Chapter 5** lists references cited.

A Program EIR for the Heber Dunes SVRA General Plan has been prepared as a separate document.



Ramadas provide shady picnic areas.

CHAPTER 2
EXISTING CONDITIONS











This chapter identifies the recreational, natural, cultural, interpretive, and aesthetic resources of Heber Dunes SVRA. This information provides the foundation to understand specific issues related to Heber Dunes SVRA.

2.1 LAND USE AND FACILITIES

2.1.1 Regional and Local Context

Heber Dunes SVRA is located within unincorporated Imperial County. The County is primarily a rural, agricultural region, with several population centers located near regional transportation routes. This area is easily accessible by regional transportation routes such as I-8 and SR-7. The greater San Diego area and the greater Palm Desert area are each approximately 2 hours away and are the nearest U.S. metropolitan regions to Heber Dunes SVRA. Generally, agricultural land use extends for miles in all directions around Heber Dunes SVRA, with residential homes scattered throughout the area. An intricate series of canals provide irrigation water for cropland. Several population centers are found within the expansive farmlands in the vicinity of Heber Dunes SVRA. The communities of Calexico, El Centro, Holtville, Imperial, Heber, and Mexicali are within short driving distance of the park (10 miles). As of 2005, Mexicali's population was estimated at 850,000 people, whereas the other communities can be characterized as small to medium sized population centers. Section 2.7.3 provides additional information on population trends.



Farmland near Heber Dunes SVRA.

The U.S./Mexico border, and the Calexico East border crossing, are located approximately 2.5 miles south of Heber Dunes SVRA. This crossing accommodates most of the commercial trucking operations crossing the border in this region. There are multiple commercial trucking, warehousing, and storage operations located on the north side of the border in Calexico.

Figure 2 depicts the local context of Heber Dunes SVRA, which is surrounded by large parcels of land used for agriculture. Figure 3 provides an aerial view of the park. Heber Dunes SVRA is bounded to the north by Heber Road, and I-8 is located approximately 3 miles north of Heber Dunes SVRA. Cropland is located immediately north of Heber Dunes SVRA. There are approximately five residential home sites located within 0.5 mile to the north and northwest of Heber Dunes SVRA along King Road. Cropland continues to the north, with agricultural land use dominating the area, extending north to the City of Holtville.

The South Alamo Canal forms most of the southern and eastern boundaries of Heber Dunes SVRA. The canal traverses north and south along the entire eastern site boundary of Heber Dunes SVRA and forms a portion of the southern boundary. Immediately east of and adjacent to the canal is a 306-acre undeveloped parcel of land that was purchased by the California Department of Transportation (Caltrans) for mitigation purposes associated with previous improvements to SR-7. SR-7 connects to I-8 to the north and the U.S./Mexico border to the south. SR-7, located less than 0.5 mile east of the park, is roughly paralleling the Heber Dunes SVRA eastern boundary. SR-7 provides the main regional



Adjacent agricultural land, South Alamo Canal, and perimeter road.

access to Heber Dunes SVRA. An additional 350 acres of Caltrans-owned land is located east of SR-7.

The land uses immediately south of Heber Dunes SVRA are dominated by agriculture, but suburban tract developments along SR-98 are located approximately 1 mile south of Heber Dunes SVRA.

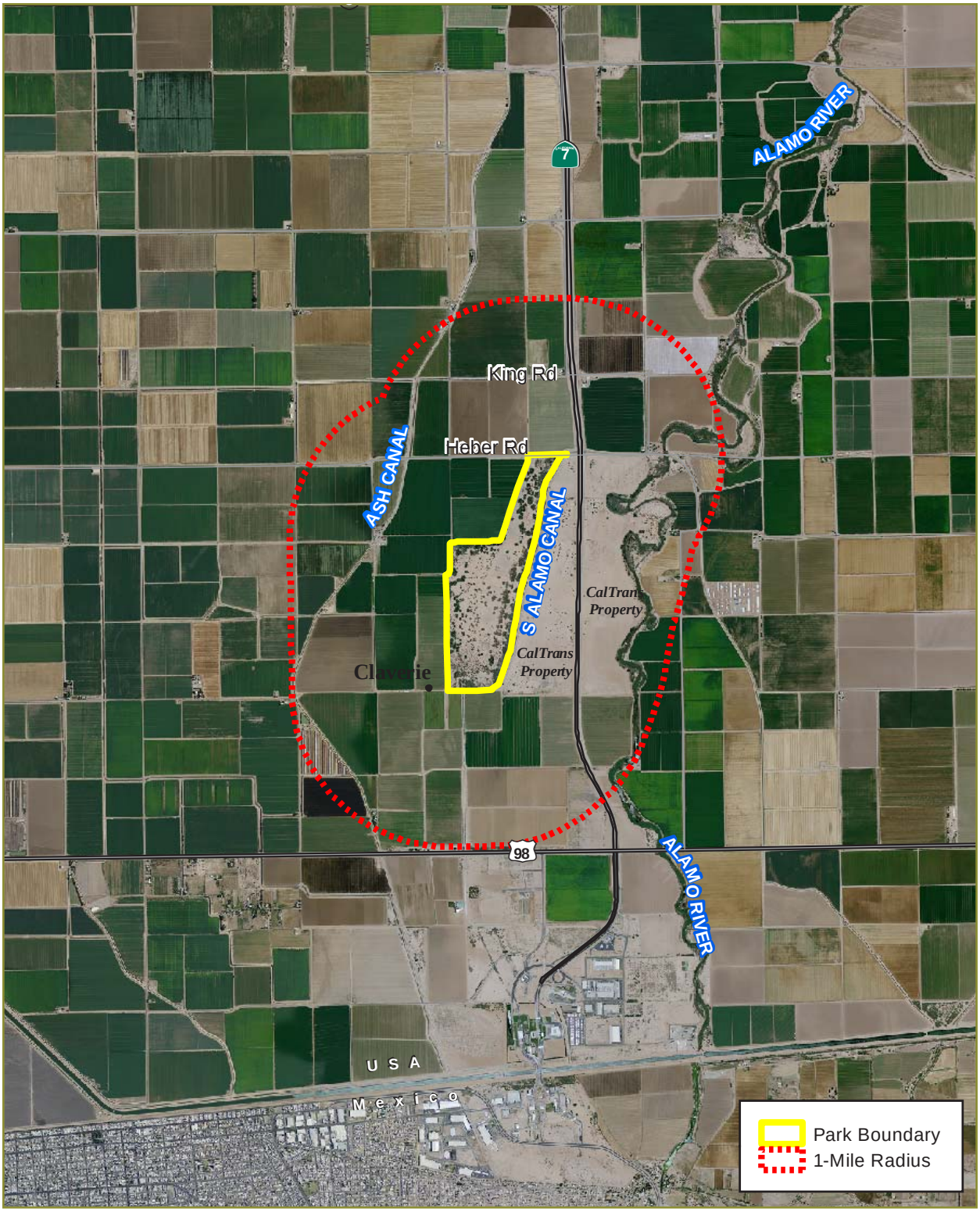
Agricultural cropland is the primary land use immediately west of Heber Dunes SVRA, and continues for many miles to the west. There are also scattered homes to the west, with the nearest located approximately 0.5 mile from Heber Dunes SVRA along Claverie Road. The Ash Canal generally runs north and south approximately 0.5 mile west of Heber Dunes SVRA.

While Heber Dunes SVRA is a unique land use within the context of adjacent land uses, it is generally considered compatible with those uses surrounding it. This is largely because it is a rural area with very few sensitive uses (i.e., residential, commercial, or other urban uses) that could be affected by sound, dust, or traffic associated with Heber Dunes SVRA.



Caltrans parcel adjacent to Heber Dunes SVRA.

FIGURE 2 - LOCAL CONTEXT

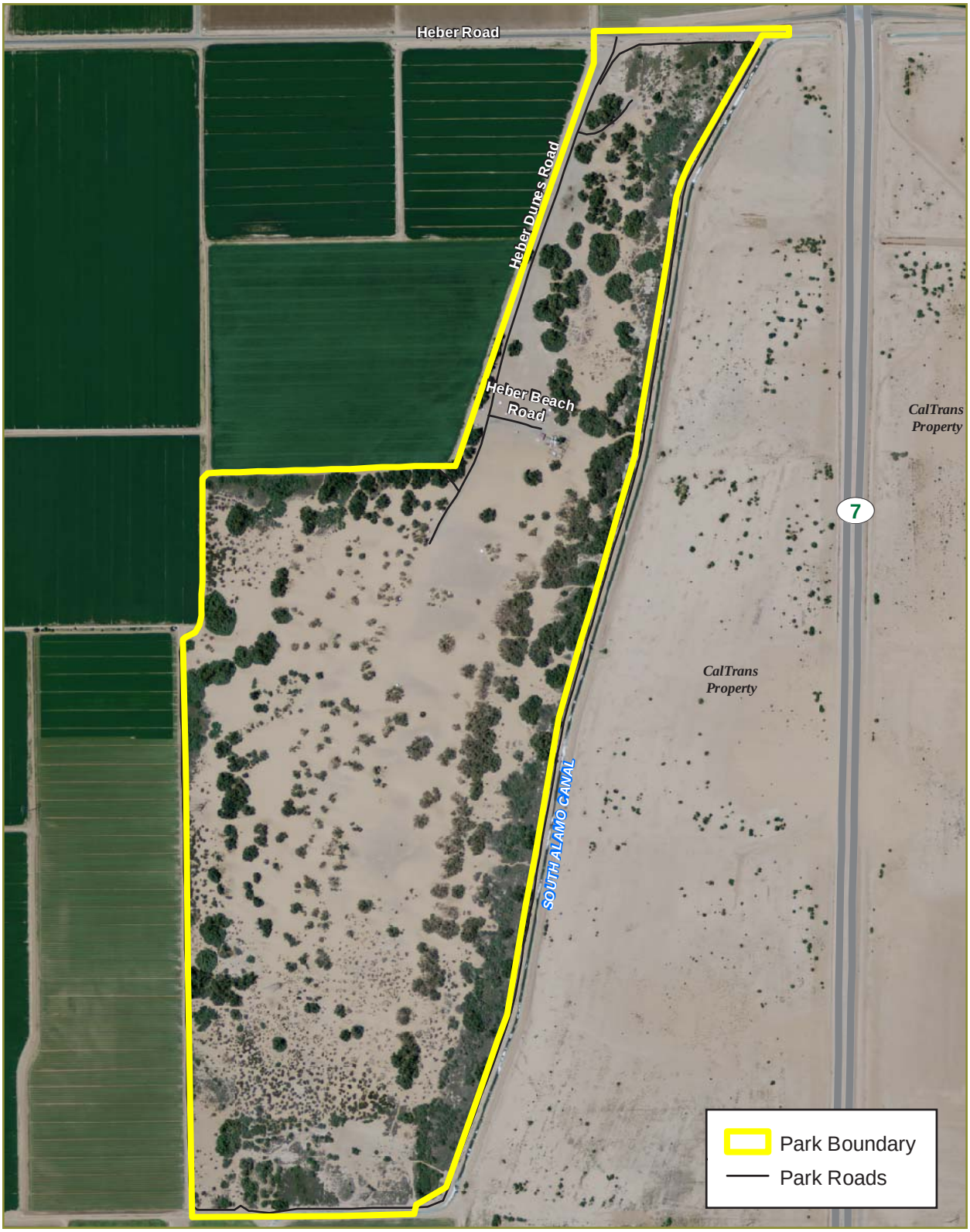


Source: California State Parks 2009; NAIP 2009

1 0.5 0 1 Mile

Scale: 1 = 63,360; 1 inch = 1 miles

FIGURE 3 - AERIAL VIEW



Source: California State Parks 2009; NAIP 2009

1,000 500 0 1,000 Feet

Scale: 1 = 12,000; 1 inch = 1,000 feet

2.1.2 Regional Recreation Facilities

Imperial County offers a variety of recreational opportunities, such as hiking, boating, and OHV recreation, that are supported by the region's varied terrain. This terrain includes rugged mountains, sand dunes, dry lake beds, badlands, mud hills, desert washes, broad alluvial fans, rocky peaks, volcanic areas, natural springs, water bodies, and broad areas of desert pavement.

The varied terrain in Imperial County provides a wide variety of opportunities and challenges for OHV enthusiasts, from high-speed runs to very slow and technically difficult steep climbs through rocky and rough terrain. Heber Dunes SVRA is one of several OHV recreational areas in Imperial County.

Four other designated OHV recreation areas are located within Imperial County. These areas are summarized in the Table 3 matrix and described below.

Imperial Sand Dunes Recreation Area (ISDRA) covers approximately 159,000 acres of which approximately 83,000 acres is currently available for OHV use. Located approximately 30 miles northeast of Heber Dunes SVRA, ISDRA is characterized by very high sand dunes (some dunes are more than 300 feet tall), which provide a challenging OHV recreation experience.

Ocotillo Wells SVRA is also managed by the OHMVR Division. Ocotillo Wells SVRA covers approximately 86,400 acres and is located approximately 65 miles northwest of Heber Dunes SVRA. Most visitors to ISDRA and Ocotillo Wells SVRA originate outside of Imperial County.

Plaster City OHV Open Area is located approximately 28 miles northwest of Heber Dunes SVRA, and provides 41,000 acres for OHV use.

Superstition Mountain OHV Open Area is a 13,000-acre area located 35 miles northwest of Heber Dunes SVRA.

Several additional parks and recreation facilities which do not provide OHV recreation opportunities are located within Imperial County. Imperial County park and recreation facilities range from small neighborhood parks to regional recreation facilities. Recreational opportunities provided by these parks include passive and active recreation such as barbeque facilities, picnic areas, sports fields, and fishing and boating opportunities. County parks located in the vicinity of Heber Dunes SVRA are as follows:

Heber

- Two privately maintained County Neighborhood Parks located within tract developments, which provide playgrounds and landscaped areas

- One County Community Park with a baseball field, maintained by the Heber Public Utility District

El Centro

- One County Regional Park (Pioneers County Park), which primarily serves as a campus for Pioneers Museum and Cultural Center; the park includes several outdoor exhibits, a shade structure, restrooms, and a train station building with a patio

No County parks exist in the Calexico and Holtville areas.

In addition to public parkland, some private recreation facilities (such as recreational vehicle (RV) parks) exist within the County, but they do not provide OHV recreation opportunities.

In addition to existing regional recreation facilities, the nearby cities of Calexico, El Centro, and Holtville have various parks. Specifically, Calexico has 12 parks, El Centro has 28 parks, and Holtville has three parks. Most of these parks provide shaded areas, playgrounds, and sports fields.

While substantial recreation facilities exist in Imperial County, Heber Dunes SVRA provides a unique recreational experience in a more intimate setting. Gentle terrain of low sand dunes and meandering trails offer opportunities for family friendly recreation within close proximity to population centers. These Heber Dunes SVRA characteristics were cited as important by visitors and stakeholders during public outreach efforts.

Table 3–Federal and State OHV Recreation Areas Near Heber Dunes SVRA

Recreation Area	Manager	Recreational Opportunities	
Imperial Sand Dunes Recreation Area	Bureau of Land Management	• OHV recreation • Hiking • Horseback riding • Wildlife/scenery viewing	• Picnicking • Nature study • Environmental Education • Camping
Plaster City OHV Open Area	Bureau of Land Management	• OHV recreation • Primitive camping	• Day use
Superstition Mountain OHV Open Area	Bureau of Land Management	• OHV recreation • Primitive camping	
Ocotillo Wells SVRA	OHMVR Division of California State Parks	• OHV recreation • Camping • Environmental education	• Wildlife/scenery viewing • Geocaching • Picnicking

2.2 EXISTING HEBER DUNES SVRA LAND USE AND CIRCULATION

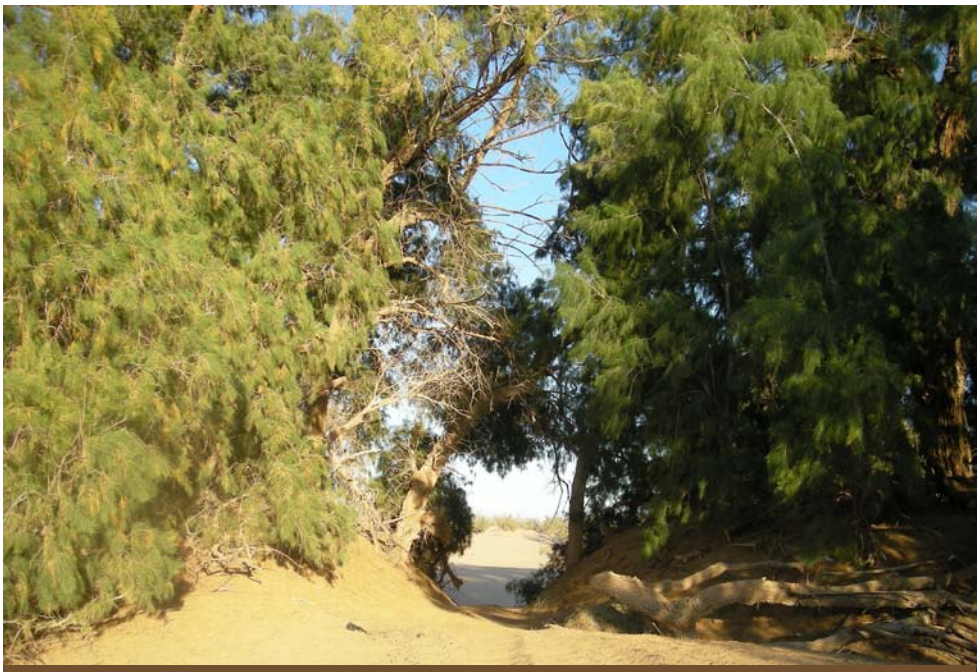
2.2.1 Land Use

Heber Dunes SVRA is largely undeveloped with limited infrastructure and improvements. The majority of the park is composed of sand dunes and natural vegetation, with a network of established trails and a perimeter road (Figure 4).

Existing on-site land uses include recreation (OHV use and associated socializing areas), administrative and operations uses, and a Heber Dunes SVRA camp host area. The majority of the site is used for OHV recreation and socializing, and these activities occur throughout the park. Heber Dunes SVRA does not have features that allow for the more extreme forms of OHV recreation, such as trail climbing, that exist in other recreational areas in Imperial County. A small developed area in the north-central portion of the site off Heber Dunes Road includes administrative and maintenance buildings, and a visitor restroom and shower facility. The host area is located near the northern boundary of the park off Heber Dunes Road. Heber Dunes SVRA camp hosts live on-site in an RV during the fall, winter, and spring, which coincide with the period of highest visitor use.

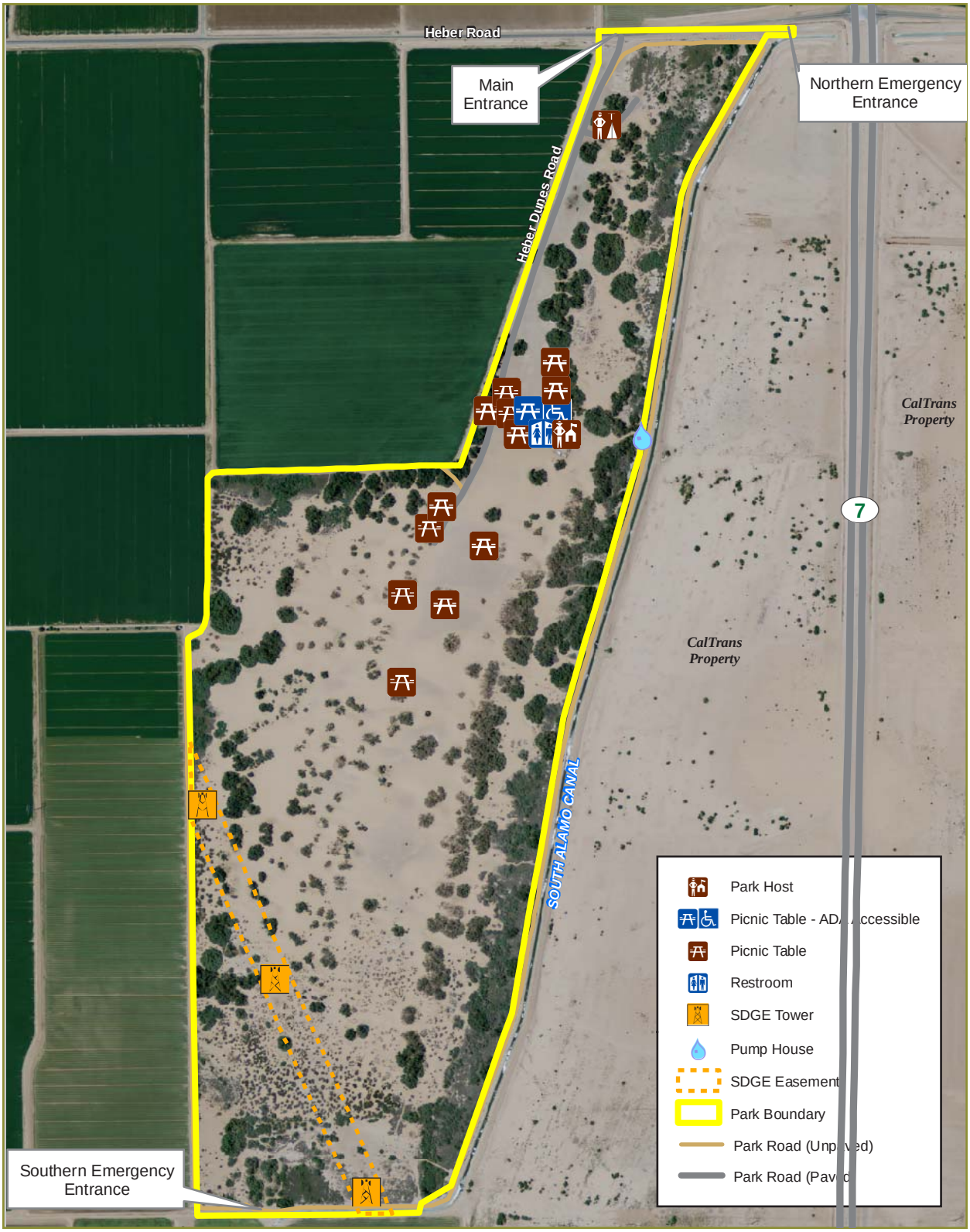
Easements and Rights-of-Way

There are multiple rights-of-way and easements that cross Heber Dunes SVRA boundaries related to power transmission and irrigation canal access.



Keyhole view.

FIGURE 4 - HEBER DUNES SVRA FACILITIES



Source: California State Parks 2009; NAIP 2009

1,000 500 0 1,000 Feet

Scale: 1 = 12,000; 1 inch = 1,000 feet

Imperial Irrigation District (IID) provides irrigation water and electric power to farmers and residents in the Imperial Valley. IID has operational facilities and water conveyance structures throughout Imperial County. IID supplies water to Heber Dunes SVRA and has water conveyance structures in the vicinity of the park. Specifically, the South Alamo Canal, which is managed by IID, is located immediately outside of the park boundary. IID has rights-of-way associated with the South Alamo Canal and South Alamo Lateral 5-A. In addition, a pump house and a water treatment plant are located on a small piece of land in the eastern portion of the park (Figure 4). These facilities are used for water delivery operations for Heber Dunes SVRA.

San Diego Gas & Electric (SDG&E) is a regulated public utility that provides gas and electric service in San Diego County and south Orange County. SDG&E transmits electricity through Imperial County. Three SDG&E transmission towers bisect the southwest corner of Heber Dunes SVRA and carry high-voltage 500-kilovolt overhead electric lines across Heber Dunes SVRA. This line was built in 1984 and has been designated a Western Electric Corridor. SDG&E has a 200-foot-wide easement that runs with the electric line through Heber Dunes SVRA (Figure 4). The electrical tower in the southernmost part of the park has become one of the more popular places for visitors due to the cleared flat area and space for parking and gathering.

For the most part, SDG&E uses existing roads to access its facilities at Heber Dunes SVRA, with the exception of the southernmost tower where access gets obscured by shifting sands. SDG&E patrols the line by air and land, and washes the insulators on the towers as needed (typically once a year) using deionized water. SDG&E requires 24-hour access to these facilities to respond to unexpected emergency outages.

2.2.2 Circulation

Access

Heber Dunes SVRA is accessed by a circulation network that includes I-8 to the north, SR-111 to the west, SR-7 to the east, and SR-98 to the south (Figures 1 and 2). I-8 is the primary east/west highway in the vicinity, connecting San Diego to the west and Arizona and beyond to the east. SR-78 and SR-86 provide connections to the Greater Palm Desert area to the north. SR-111 and SR-7 are main north/south access routes that generally connect nearby communities north and south of I-8. SR-98 is another east/west highway that runs just north of the U.S./Mexico border.

The main entrance for Heber Dunes SVRA is located approximately 0.5 mile west of the intersection of SR-7 and Heber Road. This entry point is marked with California State Parks signage and is stop-sign controlled. Intersections along Heber Road in the vicinity of Heber Dunes SVRA currently operate at acceptable levels of service during peak traffic periods.

A secondary emergency and employee access road is located approximately 565 feet west of the intersection of SR-7 and Heber Road, and is restricted by a locked gate. Another emergency access point is located on the southern edge of the park and is also restricted by a locked gate. Figure 4 identifies access points and facilities at Heber Dunes SVRA.

The main access road into Heber Dunes SVRA is Heber Dunes Road, which begins at Heber Road and runs along its western boundary. It provides 0.7 mile of paved two-lane travel into Heber Dunes SVRA, terminating at the main dirt OHV use area near the park office facilities. This internal roadway is unimproved, with no curb or gutters, and has a posted speed limit of 15 miles per hour (mph). The secondary emergency access road with entrances on the northern and southern boundaries of the park is unpaved and parallels the South Alamo Canal on the eastern boundary of Heber Dunes SVRA.

Alternative Modes of Transportation

Typical alternative modes of transportation to California State Parks include bus transit, rail, bicycle, and pedestrian facilities. However, because of the rural location of Heber Dunes SVRA and because registered OHVs must be transported to recreational areas by truck or trailer, alternative transportation options are currently limited.

Heber Dunes SVRA is located outside Imperial Valley Transit's primary bus service corridor, which includes Brawley, Imperial Valley College, El Centro, Heber, and Calexico. However, bus service to Heber Dunes SVRA may become feasible in the future as commercial and industrial development occurs within the Gateway of the Americas planning area, approximately 0.75 mile south of Heber Dunes SVRA.



Informational signage along main entrance road.

Internal Circulation

OHV circulation within Heber Dunes SVRA is a network of trails and open use areas. However, the majority of OHV use occurs in the northern part of the park, near the restroom facilities and picnic areas. There are several large, flat, claypan areas that are often used for open OHV recreation; one is near the terminus of Heber Dunes Road and the other is farther south, within the interior of the park. Sand dunes are distributed throughout Heber Dunes SVRA, and there is a cluster of higher dunes in the southern part of the park. None of these trail or open use areas has specific names or signage. An unpaved perimeter road is located along the park boundaries.

The open use areas tend to be flat, and some users enjoy passing through these areas at higher speeds. Because of topography and vegetation, at times, visibility is limited within the open use areas. Currently, open OHV use occurs in proximity to areas where large groups tend to gather (in the center of Heber Dunes SVRA, near







Recreation opportunities.

restrooms and picnic tables), which creates concerns for park visitors in these areas.

2.2.3 Facilities

There are a limited number of developed facilities within Heber Dunes SVRA (Figure 4).

Park Office Facilities – The Heber Dunes SVRA park office area is where the main concentration of infrastructure is located. A park employee lives on-site year-round in the park office area. This area includes an RV residence that receives potable water from the on-site water treatment plant and distribution facility and propane from refillable tanks, a park office and workshop/tool area, a parking area for Heber Dunes SVRA vehicles, and a storage building.

Restroom Facilities – A restroom is located at the northern part of the park near the park office facilities. It features flush toilets, sinks, and showers.

Picnic Facilities – There are 15 picnic table areas, including one that is accessible per the Americans with Disabilities Act. Seven of the 15 picnic areas are clustered near the restroom facility. The remaining six are scattered south of Heber Dunes Road. Each of these picnic table areas includes a picnic table and benches, a fire pit, and a trash can. The



One of many picnic facilities.



Volunteer camp host site at Heber Beach Road entrance.

picnic tables include a shade-cover structure. Fires are permitted only in designated fire pits.

Camp Host Facilities – This is an unimproved site on the south side of the main access road into Heber Dunes SVRA where seasonal voluneer maintenance hosts reside in an RV in the park several months each year, usually during the busy season. There are dumpsters in the immediate vicinity. Heber Dunes SVRA volunteers assist the rangers in cleanup and maintenance of Heber Dunes SVRA and facilities.

Pump House – A gated pump house and on-site water treatment plant is located in the northeastern part of Heber Dunes SVRA. It treats water drawn from the South Alamo Canal for use in Heber Dunes SVRA.

Signage – Some signage and wayfinding exists throughout Heber Dunes SVRA. At the main entrance area, a single-panel entry kiosk provides a "Guide to California Off-Road Adventures" poster. Along the entry road and perimeter road are various signs stating the rules of Heber Dunes SVRA, as well as Vehicle Code provisions related to OHV recreation. Other signs state the Heber Dunes SVRA hours and the no fireworks and no camping rules, and identify Heber Dunes SVRA boundaries.

2.3 VISITOR USE AND RECREATION

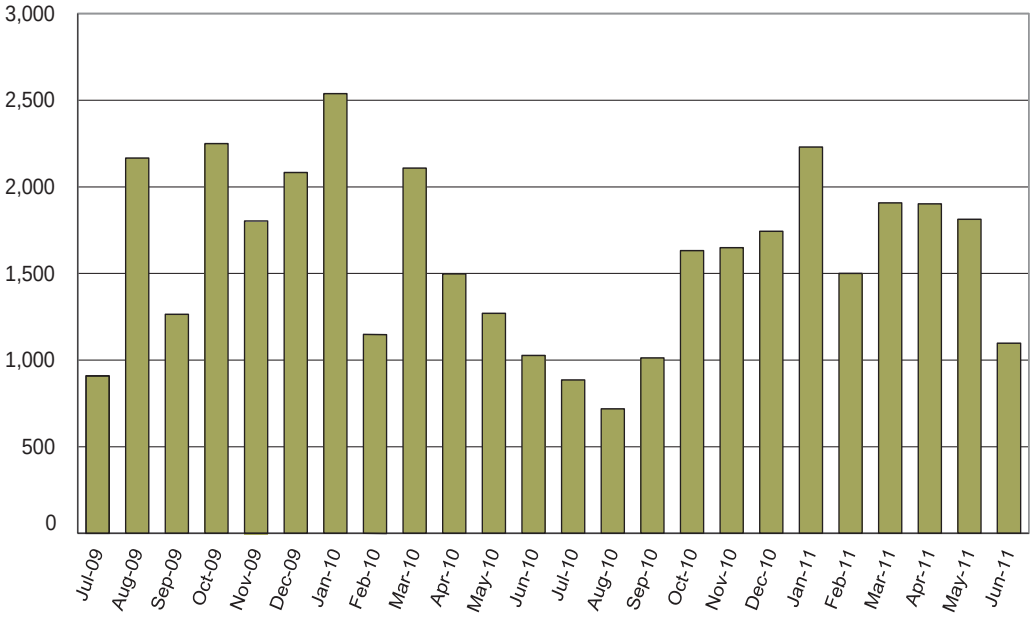
Heber Dunes SVRA is open 7 days a week year-round. Daily vehicle attendance at Heber Dunes SVRA is reported on California State Parks Monthly Visitor Attendance Reports. Counts are conducted when staff is available to perform such counts, but occasionally this figure is estimated by on-site staff. Chart 1 provides total monthly vehicle attendance at Heber Dunes SVRA from July 2009 through June 2011.

As with other OHV parks in the region, Heber Dunes SVRA experiences significant fluctuation by seasons, with the highest levels occurring in the fall, winter, and early spring (approximately September through April, with some variation). As shown in Chart 1, the number of visitors to Heber Dunes SVRA is reduced during the hotter seasons of late spring and summer (May through September). Nevertheless, some dedicated OHV recreationists visit Heber Dunes SVRA even during the hotter months, typically during morning and evening hours. Likewise, visitors may choose to recreate at Heber Dunes SVRA during summer months when temperatures are unseasonably cool.

Heber Dunes SVRA receives light visitation during the week, with the bulk of visitation occurring on Saturdays and Sundays. Sunday is generally the busiest day.

As indicated in visitor interviews administered in 2009, the majority of visitors to Heber Dunes SVRA are local residents who travel less than 30 minutes to get there. The interviews indicated that the majority of visitors are Hispanic or Latino and are from the nearby communities of Calexico, El Centro, Holtville, Imperial, and Heber, which are all within short driving distance of Heber Dunes SVRA (Table 4). As such, it is likely that a large proportion of the visitors to the park are of this ethnic background, which reflects the local communities.

Chart 1–Monthly Visitor Attendance at Heber Dunes SVRA, July 2009 to June 2011



Source: California State Parks Monthly Visitor Attendance Reports: July 2009 through June 2011.

Heber Dunes SVRA is a popular gathering and picnicking area for families and friends. The visitor interviews revealed that approximately one-third of visitors were children under the age of 15, signifying the popularity of Heber Dunes SVRA for families with children.



Family and friends enjoy the park.

Visitor interviews also indicate that visitors to Heber Dunes SVRA typically come in small and large groups of families and friends (between five and 10 individuals). The primary additional recreational activities that visitors take part in are gathering with family and friends, picnicking and barbequing, watching people use OHVs, and viewing scenery.

Visitors tend to gather at ramadas or in shaded areas under trees throughout Heber Dunes SVRA, and most visitors congregate in groups in the central portion of the park. Families with small children tend to gather in the northern portion of Heber Dunes SVRA, near the restroom facility. Existing ramadas and shaded areas under trees tend to be filled to capacity by early afternoon on heavy visitor-use days.

Most visitors drive street-legal vehicles into Heber Dunes SVRA with OHVs in trailers or the bed of pick-up trucks. Visitors typically park their street-legal vehicles at picnic tables; formal parking areas are not provided within Heber Dunes SVRA. Informal parking at day-use sites tends to be preferred by visitors so that they can access supplies in their vehicles throughout the day.

Table 4–Hispanic and Latino Composition of Nearby Communities

Community	Total Population	Percent Hispanic or Latino
Calexico	38,572	96.8%
El Centro	42,598	81.6%
Holtville	5,939	81.8%
Imperial	14,758	74.8%
Heber	4,275	98.2%

Source: U.S. Bureau of the Census 2010

2.4 SIGNIFICANT RESOURCE VALUES

2.4.1 Physical Resources

Topography

Heber Dunes SVRA consists of rolling sand dunes and areas of claypan soils. The dunes range in elevation from 25 to 50 feet above sea level and consist of fine sands with silty sand, clay silts, and silty clays. These topographic features are unique in that they are surrounded by flat, irrigated agricultural lands.



Claypan area and tamarisk-topped sand dunes.

Geology and Soils

Heber Dunes SVRA is located in the southern Imperial Valley that is part of the Salton Trough, a structural and topographic depression that lies within the Basin and Range physiographic province. The Salton Trough is an extension of the East Pacific Rise as it emerges from the 1,000-mile-long trough occupied by the Gulf of California and continues northward to Palm Springs. Several active faults occur in and near the project area, including the Imperial and Brawley Faults.

The sub-sea-level basin of the Salton Trough receives a continuous influx of sand, silt, and clay derived from the surrounding mountains and the Colorado River, which created ephemeral lakes in the Imperial Valley basin until roughly 300 years ago. As recently as 300 years ago, Lake Cahuilla filled the Imperial Valley basin to the elevation of the Colorado River delta. The shoreline of this ancient lake has an elevation of about 35 feet above mean sea level and is visible today.

Geologic maps show the region as underlain by Quaternary lake deposits and alluvium (Strand 1962). Quaternary sand dunes are mapped on the property. The Imperial Fault crosses the property from southeast to northwest (Kahle et al. 1984; Real et al. 1979). A 1937 aerial photograph (Youd and Wieczorek 1982) shows that the area surrounding the property was predominantly covered with sand dunes with a stream channel to the west of Heber Dunes SVRA. The overall large size of the dune substrate at Heber Dunes SVRA precluded its development for agriculture, unlike many of the smaller dune areas throughout the Salton Trough, which were easier to remove or level for other uses.

A county-wide soil survey indicates that six soil types exist at Heber Dunes SVRA. The majority of Heber Dunes SVRA, 83 percent, is composed of Rositas fine sand (284 acres). Other on-site soils types are Meloland and Holtville loams (21 acres), Vint loamy very fine sand (13 acres), Meloland very fine sandy loam (12 acres), Vint and Indio very fine sandy loams (9 acres), and Indio loam (1 acre).

Surface soil of the Rositas soil association consists of nearly level to moderately steep (with slopes up to 30 percent), excessively well-drained sand to silt loam formed in the transitional area between the ancient beachline of the Lake Cahuilla basin to the middle and upper levels of alluvial fans from the Imperial West Mesa (USDA 1981). The U.S. Department of Agriculture (USDA) describes these soils as deep (to at least 60 inches), highly permeable, and with a low water capacity. The soil erosion hazard is generally slight, but soils in this unit are susceptible to blowing and erosion during infrequent periods of intense rainfall.



Popular dunes for OHV recreation.

These soils are mainly used for desert recreation and wildlife habitat, but they have the potential for irrigated farming.

Climate

Heber Dunes SVRA is located in the Imperial Valley, in Imperial County, just north of the border between the United States and Mexico. All of Imperial County is contained within the Salton Sea Air Basin (SSAB). The climate is typical of a desert with low annual precipitation (2.61 inches annual average, most of which is received in late summer or mid-winter), very hot summers, mild winters, high evaporation rates, and strong temperature differentials and inversions. The winter months are the prime months for OHV recreation, with daily maximum temperatures in the 65 to 75 degrees Fahrenheit range, while the daily maximum temperatures during the hot summer months are in the 104 to 115 degrees Fahrenheit range. The climate influences the comfort level for OHV activity as well as air quality within the SSAB. The flat terrain of the valley, coupled with strong temperature differentials created by intense solar heating, produces moderate winds, which occasionally exceed 30 mph (most frequently in April and May). Wind speeds are generally less than 10 mph. Predominant wind directions are to the west and west-southwest during all four seasonsl The average daily wind speed is 6.9 mph.

Air Quality

In Imperial County, the Imperial County Air Pollution Control District (APCD) is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. Included in APCD's tasks are monitoring air pollution, preparing the Imperial County portion of the State Implementation Plan (SIP), and promulgating its rules and regulations. The SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in Imperial County.



Heber Dunes SVRA on a hot day.

Both the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA) designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified on the basis of available information as meeting or not meeting the standards. If an area is redesignated from nonattainment to attainment, the federal Clean Air Act requires a revision to the SIP, called a maintenance plan, to demonstrate how the air quality standard will be maintained for 10 years.

The SSAB is currently designated by federal EPA standards as a moderate nonattainment area for the 8-hour ozone standard and a serious nonattainment area for respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM_{10}) (EPA 2009). The SSAB is in attainment for the remaining criteria air pollutants.

Hydrology and Water Resources

Heber Dunes SVRA is located within the Imperial Hydrologic Unit (HU) of the Colorado River Basin. The Imperial HU encompasses an area of approximately 2,271 square miles. The major drainages within the Imperial HU consist of the Alamo and New Rivers. The Alamo and New Rivers lie approximately 0.5 mile east and 9 miles west of Heber Dunes SVRA, respectively. Both rivers drain to the Salton Sea approximately 30 miles to the north of Heber Dunes SVRA. These rivers convey agricultural irrigation drainage water from farmlands in the Imperial Valley, surface runoff, and lesser amounts of treated municipal and industrial waste waters from the Imperial Valley. The flow in the New River also contains agricultural drainage, treated and untreated sewage,



South Alamo Canal provides water to Heber Dunes SVRA.

and industrial waste discharges from Mexicali, Mexico (CRBRWQCB 2006).

Colorado River water, imported via the All American Canal, is the predominant water supply for the area, and is used for irrigation, and industrial and domestic purposes (CRBRWQCB 2006). Numerous canals and agricultural drainages also occur within the Imperial HU. The Ash Main Canal lies approximately 0.5 mile to the west of Heber Dunes SVRA, while the South Alamo Canal borders Heber Dunes SVRA on the east and west boundaries.

2.4.2 Natural Resources

Much of the land in the vicinity of Heber Dunes SVRA is used for agricultural production and supports limited plant and animal species. However, Heber Dunes SVRA continues to provide habitat for both native and nonnative plant and animal species. This section describes the existing plant and animal life in Heber Dunes SVRA.

Plant Life

Five vegetation types have been identified for Heber Dunes SVRA:

- Creosote scrub
- Saltbush scrub
- Arrowweed/Saltbush scrub
- Arrowweed/Coyote bush scrub
- Tamarisk dune

A map of the existing vegetation and plant communities within Heber Dunes SVRA is provided in Figure 5. All of these vegetation types represent important resource values for plants and wildlife. The tamarisk dune community is dominated by nonnative plant species, whereas the other plant communities are native vegetation communities.

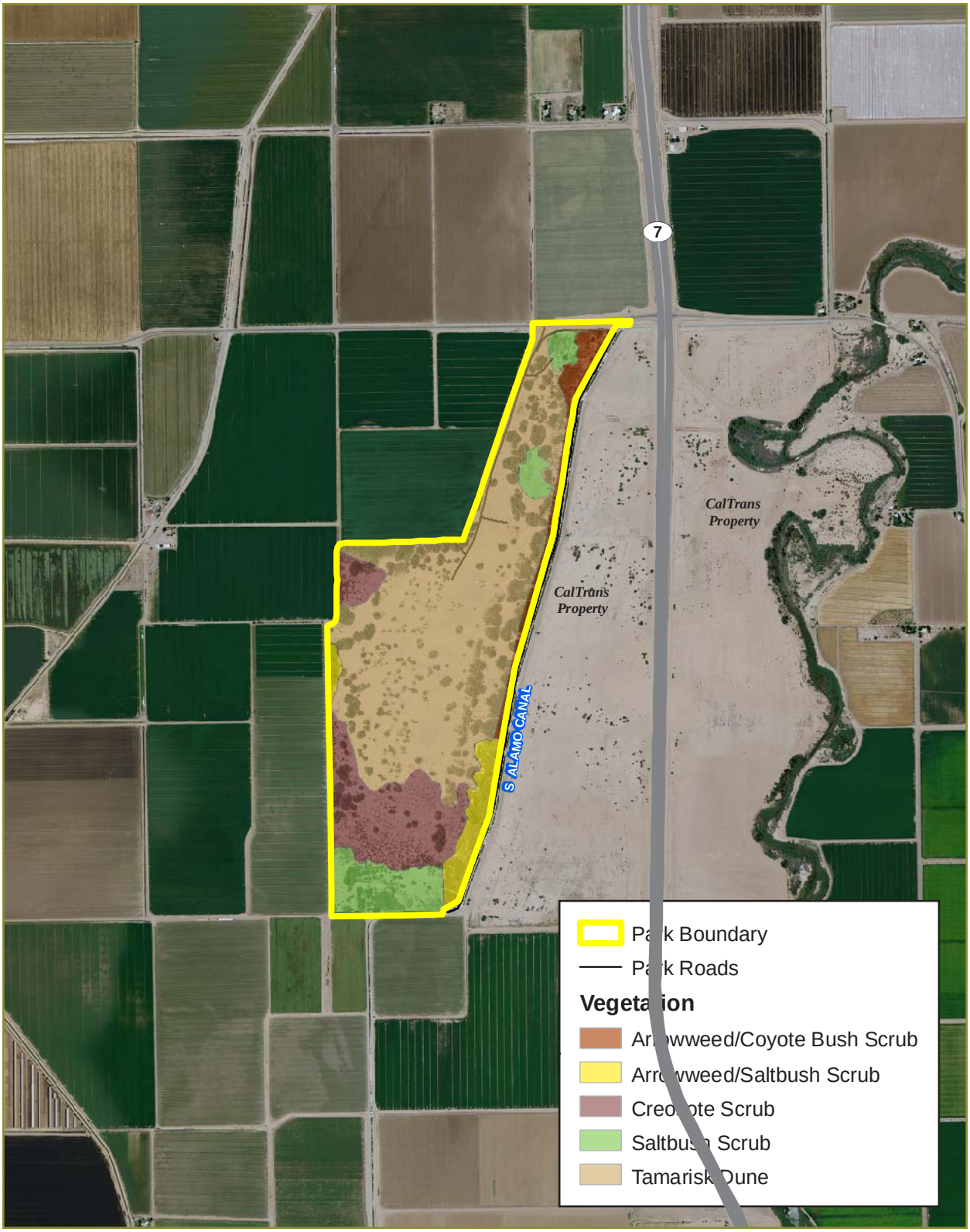
Creosote Scrub

This vegetation community is dominated by creosote bush (*Larrea tridentata*) and occurs in two different locations in Heber Dunes SVRA. Additional plant species found in these areas include narrow-leaf oligomeris (*Oligomeris linifolia*), popcorn flower (*Cryptantha* sp.), plicate coldenia (*Tiquilia plicata*), black mustard (*Brassica nigra*), and Mediterranean schismus (*Schismus barbatus*). The understory of annual plant species has declined since monitoring was implemented in 1999, and it appears that the root system of the creosote shrubs has been undermined, with portions of the topsoil layer being washed away.

Saltbush Scrub

The saltbush scrub community is found in three different areas of Heber Dunes SVRA. Species found in this vegetation type include big saltbush (*Atriplex lentiformis*), bush seepweed (*Suaeda moquinii*), arrowweed

FIGURE 5 - VEGETATION AND PLANT COMMUNITIES



Source: California State Parks 2009; NAIP 2009

(*Pluchea sericea*), coyote bush (*Baccharis emoryi*), apricot mallow (*Sphaeralcea ambigua*), and tamarisk (*Tamarix ramosissima*).

Arrowweed/Saltbush Scrub

The arrowweed/saltbush scrub community occurs in two areas of Heber Dunes SVRA. The arrowweed-dominated shrub areas probably represent the original habitat that occurred in the low areas that are not covered by dune sands. Other species found in this community include coyote bush, salt-cedar (*Tamarix ramosissima*), black mustard, and other weed species. Similar to the saltbush scrub, there are OHV trails throughout the arrowweed/saltbush scrub areas; however, their effect on the vegetation is not as substantial as effects seen in the creosote scrub areas.

Arrowweed/Coyote Bush Scrub

This vegetation community, dominated by arrowweed and coyote bush scrub, occurs in a linear area along the eastern edge of the park. There appears to be more water available on this side of the park, possibly due to the linear South Alamo Canal that runs parallel to the eastern boundary. Because of this water resource, wetland-adapted species are scattered in this area, including mesquite (*Prosopis glandulosa*), cottonwood (*Populus fremontii*), and black willow (*Salix gooddingii*). This area also has scattered tamarisk throughout and very little native understory species. The density of this vegetation type has precluded the level of OHV activity found in the other areas of the park.

Tamarisk Dune

The tamarisk dune community covers the greatest area of the park, dominating the central portion of Heber Dunes SVRA. The large nonnative athel tamarisk trees (*Tamarix aphylla*) growing on the dunes have most likely replaced a native vegetation type. Additional species found in this area include narrow-leaf oligomeris, popcorn flower, plicate coldenia, black mustard, Mediterranean schismus, and Russian thistle (*Salsola tragus*).

Sensitive Plant Species and Plant Communities within Heber Dunes SVRA

There are no known sensitive plant species within Heber Dunes SVRA. Likewise, none of the plant communities found at Heber Dunes SVRA are considered sensitive, either locally or regionally.

Invasive Nonnative Species within Heber Dunes SVRA

The primary nonnative species of concern are athel tamarisk and salt-cedar tamarisk. Athel tamarisk trees are very large and can preclude other species (both native and nonnative) from growing near or under their canopy. The deep taproots produced by the tamarisk trees are capable of depleting the water table and affecting native vegetation up to 100 feet away. In addition, the more shrub-like salt-cedar species has become common along the east side and in the southern and northern ends of Heber Dunes SVRA.



Creosote bush (*Larrea tridentata*)



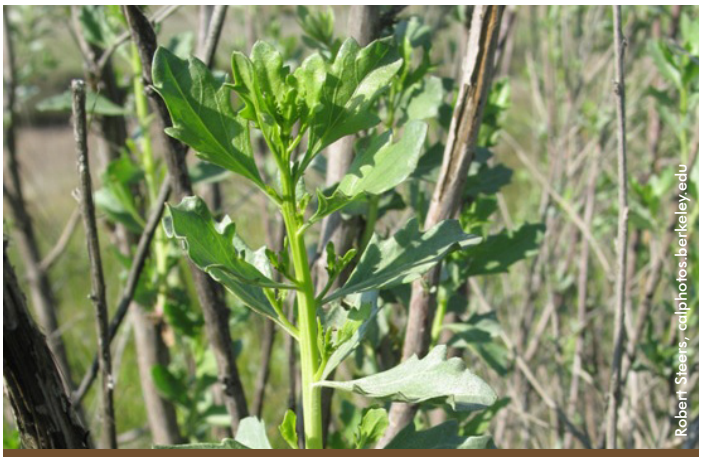
Popcorn flower (*Cryptantha* sp.)



Big saltbush (*Atriplex lentiformis*)



Arrowweed (*Pluchea sericea*)



Coyote bush (*Baccharis emoryi*)



Nonnative athel tamarisk trees (*Tamarix aphylla*)

Wildlife

The following native wildlife species have been observed throughout Heber Dunes SVRA: coyote (*Canis latrans*), bobcat (*Felis rufus*), raccoon (*Procyon lotor*), deer mouse (*Peromyscus maniculatus*), king snake (*Lampropeltis getulus*), gopher snake (*Pituophis catenifer*), coachwhip (*Masticophis flagellum*), Northern harrier (*Circus cyaneus*) and red-tailed hawk (*Buteo jamaicensis*). The five vegetation types at Heber Dunes SVRA support various wildlife species. The following sections describe wildlife observed in specific vegetation communities.

Creosote Scrub

Many desert wildlife species use creosote scrub for cover, foraging, and habitation, and some wildlife species are specific to this vegetation. Desert reptiles, amphibians, mammals, and birds will use creosote scrub to avoid predation and to escape the excessive daytime temperatures in the desert. At Heber Dunes SVRA, the creosote scrub community supports the greatest diversity of wildlife. Species observed within the creosote scrub communities include red-winged black bird (*Agelaius phoniceus*), Gambel's quail (*Lophortyx gambelii*), lesser nighthawks (*Chordeiles acutipennis*), roadrunners (*Geococcyx californianus*), western whiptail (*Aspidoscelis tigris*), long-tailed brush lizard (*Urosaurus graciosus*), long-nosed snake (*Rhinocheilus lecontei*), desert iguana (*Dipsasaurus darsalis*), desert pocket mouse (*Chaetodipus penicillatus*), and cactus mouse (*Peromyscus eremicus*).

Saltbush Scrub

The saltbush scrub areas of Heber Dunes SVRA provide good cover and food source for some wildlife species. This vegetation type offers the best cover for understory and ground-dwelling species such as birds and reptiles. Many of the bird species at Heber Dunes SVRA occur in this vegetation type, and the saltbush scrub has the highest density of reptile sightings on-site, particularly the western whiptail lizard, which is very common in this habitat type as an understory species. Mammal species that occur in the saltbush scrub include most of the common species for Heber Dunes SVRA, but of particular note is the spotted skunk (*Spilogale putorius*), which has only been found in saltbush scrub.

Arrowweed/Saltbush Scrub and Arrowweed/Coyote Bush Scrub

The two arrowweed scrub vegetation types support limited wildlife species. Both the arrowweed/saltbush scrub and the arrowweed/coyote bush scrub offer good cover and foraging value, but do not have as many wildlife species and sightings as compared to the creosote and saltbush scrub habitat types. The arrowweed in particular is visited by numerous bird species foraging for insects and seeds. Species that are particularly common in this vegetation include red-winged blackbird (the most common bird species at Heber Dunes SVRA), mourning dove (*Zenaida macroura*), white-winged dove (*Zenaida asiatica*), verdin (*Auriparus flaviceps*), side-blotched lizard (*Uta stansburiana*), and desert spiny lizard (*Sceloporus magister*).



Roadrunner (*Geococcyx californianus*)



White-faced ibis (*Plegadis chihi*)



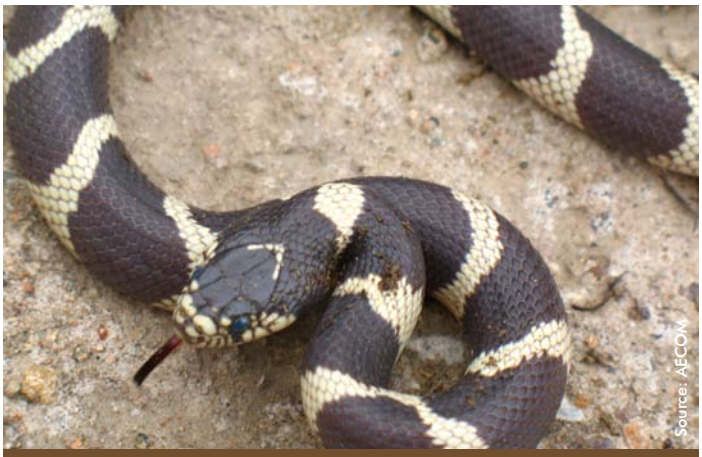
Gopher snake (*Pituophis catenifer*)



Red-tailed hawk (*Buteo jamaicensis*)



Red-winged black bird (*Agelaius phoniceus*)



King snake (*Lampropeltis getulus*)

Tamarisk Dune
The bird, mammal, and reptile diversity in the tamarisk dune habitat is much lower than in the native vegetation types. The one exception is the sightings for sidewinder rattlesnake (*Crotalus cerastes*), which is known only to occur in the tamarisk dune areas.

Agricultural Fields
The adjacent agricultural fields and associated roads that surround Heber Dunes SVRA offer habitat value to some of the desert wildlife species. A few of the wildlife species observed in the area are actually more common in the adjacent agricultural areas than in the native vegetation within Heber Dunes SVRA, in particular, some of the large mammal species. These species include Audubon's cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit, and roundtailed ground squirrel (*Spermophilus tereticaudus*) (SERG 1998). The more regular occurrence of these species in the agricultural areas is due to the high concentration of available food, making them better foraging sites for heavy browsers like rabbits. While these species are more common in the agricultural field areas, they all have been found regularly in the interior of Heber Dunes SVRA during monitoring activities.

Western burrowing owl (*Athene cunicularia*) has been observed in the surrounding agricultural areas on many occasions, but only a few times in the vegetation types within Heber Dunes SVRA.



Agricultural fields near the park.

Sensitive Wildlife Species within Heber Dunes SVRA

Western burrowing owl has been observed nesting once in the saltbush scrub and once in the arrowweed habitat. The Western burrowing owl is known to prefer agricultural areas over native desert scrub communities, as the available food sources (insects and small mammals) in the agricultural areas are usually greater year round than in many of the native vegetation areas. The Western burrowing owl is identified as a species of special concern by the California Department of Fish and Game (CDFG).



Western burrowing owl.

Other sensitive wildlife species that have been recorded from Heber Dunes SVRA are Albert's towhee (*Pipilo aberti* – CDFG special animal), sage sparrow (Amphispiza belli – CDFG watch list), and white-faced ibis (*Plegadis chihi* – CDFG watch list). Although not considered sensitive, Heber Dunes SVRA is one of the very most western occurrences for western diamondback rattlesnake (*Crotalus atrox*), which is known from both roadkill and live specimens found at Heber Dunes SVRA.

Pest Species

Not all wildlife found within Heber Dunes SVRA is desirable or truly wild. For example, populations of the brown-headed cowbird (*Molothrus ater*) have been observed. This parasitic species has had a large impact on local native bird reproduction rates, which ultimately impacts population growth and stability. In addition, local native species must compete with the brown-headed cowbirds for food and habitat. Another pest species common in the area is the great-tailed grackle (*Quiscalus mexicanus*).

Feral cats and dogs, along with domesticated cats and dogs that have been abandoned within or adjacent to Heber Dunes SVRA provide resource management challenges. This is because they often directly compete with native predatory species that are known to occur within the SVRA, causing degradation of bird, reptile, and small mammal populations.

2.4.3 Cultural Resources

History

Heber Dunes SVRA falls within the traditional territory of the Kamia. Also known as Kumeyaay, Ipai, Tipai, and Diegueño, the Kamia in this area settled primarily along the New and Alamo Rivers (Kirkish et al. 2000). The Kamia relied on gathering, supplementing that subsistence base with floodplain horticulture along rivers and springs (Underwood and Gregory 2006). In the late 18th Century, Spanish exploration and

settlement began in the area that is now eastern San Diego and Imperial Counties. Mexican settlers began to enter the area after California came under Mexican rule in 1821. Anglo-European contact precipitated the spread of cattle grazing and agriculture throughout the region. The development of a water conveyance system for agriculture and residential development in the early 20th Century facilitated agricultural development and associated population growth.

The dunes located within Heber Dunes SVRA were part of a much more extensive network of dunes before being graded in 1905 for the construction of irrigation canals (Craft, personal communication, 1998). Although little recorded history is available about the Heber Dunes property, oral interviews with long-time residents have provided some information. Many local residents know the area as "Heber Beach." There are differing stories about how the label originated. Some claim that it refers to the recreational use of flood waters from the Alamo River, which created stands of water surrounded by the dune sands. Others claim the name "came as a joke, when visiting relatives from the east came to visit California with visions of palm trees and waves and orange groves in their heads, locals would take them to Heber Beach, where the eastern visitors were faced with the stark reality of the lowland tropical desert that is the Southern Imperial Valley" (Herrick 2007).

Cultural Features

No cultural resources have been identified within Heber Dunes SVRA through studies to date. However, if unanticipated resources are discovered in the future, they would need to be evaluated to determine their eligibility to the California Register of Historic Resources (CRHR) and the National Register of Historic Places, and their significance under the California Environmental Quality Act (CEQA).

2.4.4 Aesthetic Resources

Scenic Resources

The overall visual setting of Heber Dunes SVRA can be described as low rolling sand dunes with areas of desert scrub vegetation, primarily tall tamarisk trees with some creosote. Densely vegetated areas are primarily on dune tops, around the perimeter of the park, and in deeper valleys. The sand dunes are a unique feature in the area, which is surrounded primarily by flat, irrigated agricultural land. The dunes undulate across Heber Dunes SVRA, but no substantially large or pronounced geologic formations are visible on the site.

Views from the dune tops offer glimpses of adjacent dunes and vegetation. Due to topography and dense vegetation, adjacent flat agricultural areas are not visible from many dune tops in the southern portion of Heber Dunes SVRA. Because many views from dune tops are limited to adjacent rolling dunes and greenery, these views provide a feeling of escape into a natural setting for residents of a valley dominated by agricultural vistas. Topography and vegetation also create



Looking out from Heber Dunes SVRA.

unusual views, such as the keyhole view through vegetation on a dune top. Likewise, windy conditions create interesting sand patterns that provide particularly pleasing vistas at sunset.

In the southwest portion of Heber Dunes SVRA are three large overhead SDG&E transmission towers. These towers carry overhead transmission lines, which connect to smaller transmission poles located both on Heber Dunes SVRA and off-site. The towers are by far the tallest structures on-site and in the immediate vicinity.

The majority of Heber Dunes SVRA, including the entire interior, is visible only to visitors on OHVs. There are areas of more expansive flat claypan topography that provide for more distant views within the park. Vegetation ranges from small shrubs and bushes to tall trees that block views to and from the park. The densest vegetation occurs along the eastern boundary, obscuring views of the site from areas west, including SR-7. From Heber Road, there are views south to Heber Dunes SVRA along the primary access road; although, its interior is not visible.

Due to the screening nature of the vegetation surrounding the perimeter, views off-site from Heber Dunes SVRA are limited in most places. From the tops of some dunes, adjacent agricultural uses are visible; however, they are often obstructed by vegetation and other dunes.

The unique sand dune environment within Heber Dunes SVRA is surrounded entirely on the north, south, and west by flat, extensive agricultural land. Adjacent to the east is an undeveloped Caltrans parcel that was previously agricultural land. This parcel has sparse vegetation





Dense vegetation rims the park.

and is void of structures. These surrounding land uses are not directly visible from the interior of Heber Dunes SVRA due to the dense perimeter vegetation. However, the surrounding flat cropland paired with minimal tall landscaping or structures allows for vast views in almost all directions from the perimeter road.

SR-7, which is located 500 feet in the north and 2,500 feet in the south from Heber Dunes SVRA, has limited obstructed views of the park. The expansive undeveloped Caltrans parcel and the dense perimeter tamarisk vegetation limits direct views of Heber Dunes SVRA from SR-7.

Auditory Resources

The existing sound environment at Heber Dunes SVRA is influenced primarily by transportation sound emanating from vehicular traffic on the regional and local area roadway networks. The majority of vehicular traffic noise in the vicinity of the project occurs due to SR-7, east of Heber Dunes SVRA. Additional sound sources that contribute to the existing ambient sound environment to a lesser extent include occasional aircraft overflights and seasonal operation of agricultural equipment on adjacent parcels. Most on-site sound sources are OHVs used for recreation.

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals and places where quiet is an essential element of their intended purpose. Noise-sensitive land uses in the vicinity of Heber Dunes SVRA include both on-site and off-site residential uses, the nearest of which is the on-site housing for park employees. Off-site residential dwellings are single-

family residences associated with the surrounding agricultural land uses. Sound levels from peak Heber Dunes SVRA use would not likely exceed noise ordinance limits, but they would likely be audible during quiet periods.

It is unlikely that OHV use at Heber Dunes SVRA contributes significantly to ambient sound levels at nearby residences because they are located more than 0.5 mile from Heber Dunes SVRA. However, during peak OHV use, when traffic noise is low, OHV activities at Heber Dunes may be audible to people outside at these residences.

2.5 OPERATIONS AND MAINTENANCE FUNCTIONS

2.5.1 Operations and Visitor Services

Currently, the entrance gate is closed outside of operating hours to prevent entry. Visitor interviews revealed that since regular ranger patrol began at Heber Dunes SVRA in 2007, there have been improvements in the safety, cleanliness, and overall management of Heber Dunes SVRA.

The primary recreational service provided to visitors is areas for OHV use. There are currently no marked trails or signage identifying specific areas of Heber Dunes SVRA, although there are several clearly defined user areas with different topographic features (i.e., flat claypan areas, steep sand dunes, perimeter trail, rolling sand dunes). Visitor interviews indicate that most OHV enthusiasts at Heber Dunes SVRA use ATVs, while some use dirt bikes and 4x4s. Other vehicles that are used include side-by-sides, dune buggies, trucks, and sand rails. Due to the open



Convenient restroom and shower facility.



Transmission lines at the south end of the park.

nature of the area, the majority of Heber Dunes SVRA is accessible to all types of OHV use, particularly those on ATVs. There are some narrow draws that are densely vegetated and prohibit OHV access. Staff often clear brush from trail areas, particularly on the east side of Heber Dunes SVRA, to maintain their use. Heber Dunes SVRA also provides picnicking and gathering space with its covered picnic areas and fire pits. There are currently no on-site concessions.

2.5.2 Utilities

IID provides electricity and water to Heber Dunes SVRA. All water used in Heber Dunes SVRA comes from the South Alamo Canal, which runs along the eastern boundary. The South Alamo Canal is fed by the All American Canal, which receives water from the Colorado River. Water from the South Alamo Canal is treated by an on-site water treatment plant and distribution facility. Potable water is distributed to the shower/restroom facility and the permanent RV site. Wastewater from the shower/restroom facility and the ranger/staff station are served by a septic tank.

No fire hose cabinets or hydrants are located within Heber Dunes SVRA. Fire response equipment currently uses water from the South Alamo Canal to refill fire truck tanks in the event of a fire.

2.5.3 Public Safety

State Park Rangers patrol Heber Dunes SVRA. Rangers provide security for Heber Dunes SVRA, are the first to respond to fire and medical emergencies, and have law enforcement authority. In the event of an emergency, the on-call ranger requests assistance from the Southern Communication Center (SURCOM) of the California State Parks Radio System. SURCOM then directs requests to the relevant responsible agency. In addition, calls made to 911 from cell phones within Heber Dunes SVRA are automatically routed to the California Highway Patrol, which then transfer the calls to SURCOM and SURCOM who then directs requests to the relevant responsible agency. Imperial County Fire Department (ICFD) responds to all emergency calls originating from Heber Dunes SVRA. In addition, Gold Cross Ambulance is dispatched to all medical aid calls. If Gold Cross Ambulance is unable to respond, the City of Calexico Fire Department provides ambulance support.

ICFD is the jurisdictional agency responsible for responding to fires within Heber Dunes SVRA. The closest ICFD fire station is approximately 5 miles east of the entrance to Heber Dunes SVRA in Heber. The typical response time from the Heber station to Heber Dunes SVRA is approximately 10 to 15 minutes (ICFD 2009).

During stakeholder interviews, emergency responders mentioned that it is at times challenging to locate a visitor in distress because visitors have trouble clearly identifying their location within Heber Dunes SVRA. Place names and/or landmarks could help emergency responders quickly locate visitors in distress.

Heber Dunes Road provides primary access for emergency responders. Outside of the paved road, Heber Dunes SVRA is dominated by sand dunes. Emergency access to areas outside of paved roads is a challenge because it is difficult to drive on the sand dunes without four-wheel drive.

2.5.4 Concessions

There are currently no on-site concessions. Many potential "concession" goods and services are available through private sector providers in nearby population centers. Visitors tend to spend a large portion of the day at Heber Dunes SVRA.

2.5.5 Accessibility

Heber Dunes SVRA has a fully accessible restroom with van accessible parking located adjacent to the Heber Dunes SVRA office.



ADA accessible restroom facility.

2.5.6 Heber Dunes SVRA Support

Heber Dunes SVRA has a limited number of volunteers or volunteer programs on-site. Seasonal voluneer maintenance hosts reside in an RV in the park several months each year, usually during the busy season. The on-site volunteers assist park staff in cleanup and maintenance of Heber Dunes SVRA and facilities during these high-use periods. In addition, the San Diego-Imperial Council Desert Trails District of the Boy Scouts of America has participated in cleanup and debris removal at Heber Dunes SVRA.

2.6 INTERPRETATION AND EDUCATION

2.6.1 Existing Interpretation

Heber Dunes SVRA provides formalized educational programs for visitors. Additionally, on-site staff informally provide interpretive, educational, and safety information. Currently there is no formal visitor or interpretive center at Heber Dunes SVRA, nor published materials or maps specifically for Heber Dunes SVRA. OHV trails throughout Heber Dunes SVRA do not have a formalized nomenclature or signage.

2.6.2 Interpretation Audience Demographics

Visitors to Heber Dunes SVRA tend to be large groups of families and/or friends with children. Most visitors who go to the park in large groups stay for a good portion of the day, yet the total time spent using OHVs is typically only a few hours. The primary additional recreational activities that Heber Dunes SVRA visitors take part in include gathering with family and friends, picnicking and barbequing, watching people use OHVs, and viewing scenery.



Many visitors live in the nearby communities where Hispanics or Latinos make up the majority of the residents. According to research conducted by federal recreation land managers and California State Parks, Hispanic outdoor recreation enthusiasts are interested in an outdoor experience with a strong social recreation component, such as facilities and programs that involve families, programs for youth and children, and family oriented entertainment events and festivals. This research also found that Hispanic outdoor recreation participants respond to interpersonal communication from multilingual and culturally diverse staff.



2.6.3 Local, Regional, and Statewide Context

Heber Dunes SVRA provides a unique recreational experience in a family friendly atmosphere appropriate for novice users. Visitor interviews indicated that these are valued attributes of Heber Dunes SVRA. Nestled within a sea of agricultural fields, the dunes are accessible via a short drive from nearby population centers. Interpretive and educational programming focuses on these valued attributes of Heber Dunes SVRA.

Minimal interpretive and educational programming is available in the vicinity of Heber Dunes SVRA. Regional recreation facilities located within approximately 30 to 60 minutes of Heber Dunes SVRA offer interpretive and educational programs such as youth programs, dunes and geology programs, and natural and cultural resources interpretation. While agriculture has historically played a large role in Imperial Valley's economy and culture, minimal interpretive and educational opportunities addressing the area's agricultural heritage exist within Imperial County.

2.6.4 Interpretation Issues, Opportunities, and Constraints

The availability of interpretive and educational programming within the nearby communities is limited as are the opportunities for such programming to be developed. Interpretive and educational programming at the Heber Dunes SVRA addresses an important local and regional need.



Hands-on learning for young visitors.

2.7 PLANNING INFLUENCES

This section includes a variety of influential factors to be considered when making planning decisions for Heber Dunes SVRA. These planning influences primarily originate outside Heber Dunes SVRA's boundaries and are important in understanding the park's land use, resources, and facilities in a larger context. These influences fall into four broad categories: systemwide planning, regional planning, changing demographics, and public concerns.

2.7.1 Systemwide Planning

Planning for California State Parks must be wide-ranging to consider issues that cross regional, local/community, and park boundaries. Federal, State, County, and community agencies are responsible for providing oversight and review of various planning-related laws and policies, such as CEQA, Colorado River Basin Regional Water Quality Control Board (CRBRWQCB), and Air Quality Management District regulations. Additionally, various California State Parks resource management directives guide the planning process, including the following documents that are relevant to the Heber Dunes SVRA planning effort:

- California State Parks Mission Statement
- OHMVR Division Mission Statement
- OHMVR Division Vision Statement
- 2009 OHMVR Division Strategic Plan
- California State Parks Accessibility Guidelines 2009
- Off-Highway Motor Vehicle Recreation Act
- Soil Conservation Standard and Guidelines for Off-Highway Vehicle Recreation Management
- OHMVR Resource Management
- Complete Findings of the Survey on Public Opinions and Attitudes on Outdoor Recreation in California 2009

California State Parks Mission Statement

Systemwide planning enhances the ability of California State Parks to fulfill its multi-faceted mission, which is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protect its most valued natural and cultural resources, and create opportunities for high-quality outdoor recreation.

OHMVR Division Mission Statement

The Mission of OHMVR Division is to provide leadership statewide in the area of OHV recreation; to acquire, develop, and operate SVRAs; and to otherwise provide for a statewide system of managed OHV recreational opportunities through funding to other public agencies. The OHMVR

Division works to ensure quality recreational opportunities remain available for future generations by providing for education, conservation, and enforcement efforts that balance OHV recreation impacts with programs that conserve and protect cultural and natural resources.

OHMVR Division Vision Statement

The OHMVR Division will assure ongoing access to a wide variety of high quality OHV recreational opportunities through our commitment to prudent resource management, community education and environmental stewardship.

2009 OHMVR Division Strategic Plan

The OHMVR Division 2009 Strategic Plan reaffirms a commitment to protecting California's unique natural areas by providing for well-managed OHV recreation. The plan seeks to actively engage the public to achieve its goals through multiple approaches included providing transparency in program management, and providing opportunities for children to connect with the natural environment. The Strategic Plan provides a road map for the Division and is based on four strategic themes and five guiding principles.

Themes:

- **Emphasize the Basics** – Maintaining existing OHV areas in good condition and preventing environmental damage are central to the success of the OHMVR Program.
- **The Greening of OHV Recreation** – New technologies are becoming available which present opportunities for OHV recreation to be managed in ways that significantly reduce impacts to the environment.
- **Improving Technology** – New vehicles now available are far more capable than those sold in the past. The OHMVR Program must respond to these improvements in technology by providing facilities appropriate for more capable vehicles.
- **The New Gateway** – The OHMVR Program will take advantage of the opportunity presented by the presence of large numbers of young people and non-traditional user groups in OHV recreation areas by providing educational programs which teach appreciation of nature and the outdoors.

Guiding Principles:

- **Sustainability** – We must manage lands and resources in such a way that they will be available for the enjoyment of many generations of Californians to come.
- **Transparency In Decision Making** – Restoring public trust in the administration of the OHMVR Program depends upon people understanding the reasons behind decisions made by Program managers.

- **Working with Partners and Volunteers** – Meeting OHMVR Program goals is far too complex an undertaking to attempt without the assistance of numerous related agencies, and participation from individuals and volunteer organizations.



OHV practice course.

- **Considering the Needs and Concerns of Stakeholders** – The OHMVR Program will only be relevant to the degree to which it responds to the needs and concerns of those who are most invested in the success of the OHMVR Program.
- **Sound Data for Management Decision Making** – In an era of diminishing opportunities, there is little room for mistakes. Commitment of resources and management actions must be based on the best available information to ensure success.

Based on these strategic themes and guiding principles, the Strategic Plan adopts a framework of six goals for the OHMVR Program to meet its legislative mandates:

- **GOAL 1** – Sustain Existing Opportunity: Protect, preserve, and enhance existing OHV opportunities in a manner that ensures well managed, interesting, and high quality experiences, and address the environmental impacts that may be associated with those activities.
- **GOAL 2** – Increase OHV Opportunity: Add new OHV opportunities where appropriate and needed to replace loss of existing opportunities and respond to changing and future demand.
- **GOAL 3** – Staff Development: Enhance the abilities of Program managers and staff dedicated to the development, management, and implementation of the OHMVR Program.

- **GOAL 4** – Develop an Informed and Educated Community: Achieve a highly informed and educated community associated with OHV recreational activities, dedicated to safe and lawful OHV operation and responsible environmental stewardship.
- **GOAL 5** – Cooperative Relationships: Establish and maintain productive relationships between individuals, organizations, industry, and government agencies to cooperatively identify problems and develop and implement solutions to advance the Mission and Goals of the OHMVR Program.
- **GOAL 6** – Informed Decision Making: Improve the quality, quantity, and accessibility of information needed to support sound decision making, transparency of administration, and communication with the interrelated groups interested in, and associated with, the OHMVR Program.

California State Parks Accessibility Guidelines 2009

The Access to Parks Guidelines were first published in 1994; the most recent revision took place in 2009. The Access to Parks Guidelines detail the procedure to make State Parks universally accessible while maintaining the quality of park resources. Also included in the guidelines are recommendations and regulations for complying with the standards for accessibility. The vision of the guidelines is embodied in the General Plan. The guidelines that would be most applicable to Heber Dunes SVRA are for picnic sites, fixed benches, ramps, restrooms, drinking fountains, and signage.

Off-Highway Motor Vehicle Recreation Act

The Off-Highway Motor Vehicle Recreation Act requires the OHMVR Division of California State Parks to implement and administer the Off-Highway Motor Vehicle Recreation Program, which provides and supports sustainable, ecologically based opportunities for OHV recreation at specified areas throughout the state (PRC Section 5090 et seq.). The act states that effectively managed areas and adequate facilities for the use of off-highway vehicles and conservation and enforcement are essential for ecologically balanced recreation.

Soil Conservation Standard and Guidelines for Off-Highway Vehicle Recreation Management

The Soil Conservation Standard and Guidelines for Off-Highway Vehicle Recreation Management is applicable to OHV areas funded by the California OHV Trust Fund, including all SVRAs. The Guidelines provide measures to help achieve the Standard that OHV recreation facilities shall be managed for sustainable long-term prescribed use without generating soil loss that exceeds restorability, and without causing erosion or sedimentation which significantly affects resource values beyond the facilities.

OHMVR Resource Management

The Wildlife Habitat Protection Program (WHPP) mandated by PRC Section 5090.35, and the Habitat Management System (HMS) developed by the Division are a major part of each SVRA's resource monitoring and evaluation program that includes standardized protocols tailored for the needs of the particular SVRA. The goals of the WHPP are to monitor and manage wildlife and plant populations and restore habitats where necessary to sustain a viable species composition for each area. These plans enable adaptive management, allowing management practices and strategies to change, or "adapt," as warranted by the new monitoring information. Environmental scientists for each SVRA conduct and oversee the monitoring based on the HMS and other monitoring protocols.







Managing wildlife and plant habitat.

2.7.2 Regional Planning Influences

Regional Plans

The following local and regional plans will have an influence on the management, operations, and visitor experiences at Heber Dunes SVRA:

- Imperial County General Plan
- Imperial County Zoning
- Gateway Specific Plan
- State Implementation Plan for Imperial County as implemented by the Imperial County Air Pollution Control District
- Southern California Association of Governments Regional Comprehensive Plan
- Southern California Association of Governments Regional Transportation Plan

Imperial County General Plan

The Imperial County General Plan presents a comprehensive guide for development within the County and provides mechanisms to achieve desired community goals and objectives through a coordinated implementation program. Land use decisions such as area plans, zonings, subdivisions, and public agency projects must be consistent with the General Plan. While the General Plan does not directly affect state-controlled properties, it does directly affect the surrounding land uses and thereby the context of Heber Dunes SVRA. For planning purposes, reviewing the County land use provisions provides guidance on the County's vision for use of the Heber Dunes SVRA site within the surrounding community context. The General Plan includes elements that guide various facets of growth and development within the County. The elements most applicable to the Heber Dunes SVRA planning process are Land Use, Parks and Recreation, and Conservation and Open Space.

The Land Use Element describes where different types of land uses may be established in the unincorporated areas of Imperial County (Imperial County 2008a). Heber Dunes SVRA, as well as most surrounding land, is designated Agriculture by Imperial County. The nearest land use designation other than Agriculture is the Gateway Specific Plan Area, which is located 1 mile to the south at SR-98. The Gateway Specific Plan is addressed below.

The Parks and Recreation Element establishes a framework for the stewardship and development of County parks and other recreational amenities that enhance the quality of life of County residents and visitors (Imperial County 2008b). This element focuses on community- and neighborhood-type parks and does not provide policies or goals for the development of OHV recreation areas. County parks and recreation facilities are intended to serve as wide a range of interests as possible. Emphasis is placed on family oriented opportunities and those that

encourage visitor use. The Conservation and Open Space Element identifies goals and policies to ensure the managed use of environmental resources. The goals of this element also include protecting open space for the preservation of natural resources, the managed production of resources, outdoor recreation, and public health and safety. The goals and policies are also designed to prevent limiting the range of resources available to future generations.

Imperial County Zoning

Heber Dunes SVRA is zoned as Government/Special Public (G/S) Zone by the County. The purpose of the G/S Zone is to designate areas that allow for the construction, development, and operation of governmental facilities and special public facilities. Primarily, this zone allows for all types of government-owned and/or government-operated facilities, including offices or other uses. It also allows for special public uses.

The surrounding parcels are zoned for agricultural use as either General Agriculture (A2) or Heavy Agriculture (A3). The A2 zoning designation requires a lot size of 40 acres or greater, with the intent to designate areas that are suitable and intended primarily for agricultural uses (limited) and agriculture-related compatible uses. The A3 zone also requires parcels of 40 acres or more with the purpose to promote the heaviest of agricultural uses in the most suitable land areas of the County. Uses in the A3 zoning designation are limited primarily to agriculture-related uses and agricultural activities that are compatible with agricultural uses. The Imperial County General Plan presents a comprehensive guide for development within the County and provides mechanisms to achieve desired community goals and objectives through a coordinated implementation program.

Gateway Specific Plan

The Gateway of the Americas (Gateway) planning area is composed of approximately 1,775 gross acres of land in Imperial County, adjacent to the international border with Mexico and about 6 miles east of the City of Calexico. The Gateway planning area is roughly bounded by the international border to the south, the Alamo River to the east, the Ash Canal to the west, and SR-98 approximately 0.25 mile to the north. The northern boundary of the Gateway planning area is located approximately 0.75 mile south of Heber Dunes SVRA.

The Gateway planning area is proposed as a master-planned commercial and industrial complex designed to capitalize on the economic benefits of the adjacent international port-of-entry. The planned development consists of facilities for manufacturing, wholesaling, distribution, and assembly, plus related supporting transportation infrastructure and support services such as retail. Of the 1,775 gross acres within the planning area, 1,420.6 net acres are considered developable. The majority of the Gateway Specific Plan

planning area is zoned as Gateway Commercial and Gateway Industrial, with some G/S zoning in the southern portion of the planning area.

While Heber Dunes SVRA is not included within the Gateway planning area, the intensive level of development proposed for the area may create development pressure on properties surrounding Heber Dunes SVRA.

State Implementation Plan for Imperial County

A State Implementation Plan (SIP) is an enforceable plan developed by the State of California to set forth how the state will comply with air quality standards according to the federal Clean Air Act. The SIP includes strategies and tactics to attain and maintain acceptable air quality. Imperial County Air Pollution Control District (APCD) prepares the Imperial County portion of the SIP.

Southern California Association of Governments Regional Comprehensive Plan

The Southern California Association of Governments (SCAG) 2008 Regional Comprehensive Plan addresses issues of regional growth (SCAG 2008a). The Air Quality chapter contains goals that are particularly applicable to the Heber Dunes SVRA General Plan. These goals include reducing emissions of criteria pollutants to attain federal and state air quality standards, reversing current trends in greenhouse gas emissions, and minimizing land uses that increase the risk of adverse air-pollution-related health impacts from exposure to air contaminants, particulates (PM_{10}, $PM_{2.5}$, ultrafine), and carbon monoxide. While the 2008 Regional Comprehensive Plan does not provide specific strategies that could be implemented at Heber Dunes SVRA, it is important to be cognizant of the goals that SCAG has set for air quality and how OHV use at Heber Dunes SVRA relates to those goals.

Southern California Association of Governments Regional Transportation Plan

The SCAG 2008 Regional Transportation Plan (RTP) is a long-term transportation plan that addresses transportation issues in six Southern California counties: Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura (SCAG 2008b). The 2008 RTP presents the transportation vision for this region through the year 2035 and provides a long-term investment framework for addressing the region's transportation and related challenges. The RTP is the culmination of a multiyear effort focusing on maintaining and improving the transportation system through a balanced approach that considers system preservation, system operation and management, improved coordination between land use decisions and transportation investments, and strategic expansion of the system to accommodate future growth. The Heber Dunes SVRA is within the SCAG region and will be affected by any plans related to transit services or the highway system; however, no new transit services or highway projects are proposed in the 2008 RTP that would directly affect circulation around Heber Dunes SVRA.

2007 Imperial County Transportation Plan Highway Element

The 2007 Imperial County Transportation Plan Highway Element includes near-term, mid-term, and long-term transportation priorities and projects on Imperial County's Highway Network that were developed through a comprehensive and cooperative planning approach between the Imperial County Association of Governments, SCAG, the cities within and the County of Imperial, Caltrans, and other public and private stakeholders. According to the 2007 Imperial County Transportation Plan Highway Element, future improvements for the near term (2007 to 2015), midterm (2015 to 2025), and long term (2025 and beyond) are anticipated in the project area. Near-term projects include the following:

- Widening SR-98 from SR-111 to SR-7 from two to four lanes
- Widening SR-111 from two to four lanes
- Widening Jasper Road to become a six-lane expressway
- Constructing SR-115 to connect with I-8

Mid- and long-term projects include improving the Bowker Road interchange with I-8 and constructing a new interchange on SR-7 (northeast of Heber Dunes SVRA) to access a future planned private airport, respectively. These circulation projects could impact routes that are used to access Heber Dunes SVRA.

Regional Organizations

The following organizations have an interest in regional planning issues within Imperial County:

- Imperial County
- Imperial County Farm Bureau
- Imperial County APCD

County of Imperial

Imperial County may have an interest in the long-term management and operation of Heber Dunes SVRA as it relates to the services and oversight the County provides, such as police, fire, transportation and circulation, land use planning, and development services.

Imperial County Farm Bureau

Imperial County Farm Bureau is a nongovernmental, nonprofit, voluntary membership organization whose purpose is to protect and promote agricultural interests in Imperial County, the state, and the nation through public relations, education, and advocacy to support the economic advancement of agriculture balanced with appropriate management of natural resources. The Farm Bureau strives to protect and improve the abilities of farmers and ranchers to provide a safe and reliable supply of food and fiber through responsible stewardship of our natural resources. Heber Dunes SVRA is surrounded by agriculture; thus, understanding agricultural interests in the region has been important in conjunction with development of the General Plan.

Imperial County Air Pollution Control District

APCD is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. Included in APCD's tasks are monitoring air pollution, preparing the Imperial County portion of the SIP, and promulgating rules and regulations.

APCD shares responsibility with CARB for ensuring that all state and federal ambient air quality standards are achieved and maintained within the County. APCD is responsible for monitoring ambient air quality and has authority to regulate stationary sources and some area sources of emissions. APCD is responsible for developing the overall attainment strategy for Imperial County and, therefore, is responsible for planning activities involving the development of emission inventories, modeling of air pollution, and quantification and comparison of emission-reduction strategies.

2.7.3 Demographics, Trends, and Projections

Most visitors to Heber Dunes SVRA travel from Imperial County (EDAW 2009; OHMVR Division 2008). The nearest population centers include Mexicali (across the international border with Mexico), Calexico, El Centro, Holtville, and Heber. These urban centers have had high growth rates over the last several years (Table 5). Recreation demand and use, over time, are affected by the changing demographic patterns of the areas served. As of June 2011, Imperial County had more than 7,100 green-sticker registered OHVs. In addition, Riverside and San Diego Counties had 132,579 green-sticker registered OHVs as of June 2011. These registered users from adjacent counties will create the highest demand for SVRA use.



Social gathering at Heber Dunes SVRA.

According to the 2010 U.S. Census, there were 174,528 people in Imperial County. SCAG projects that growth in Imperial County will accelerate, adding roughly another 100,000 residents by 2030, an increase of more than 60 percent. The Southern California region (including Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties) is projected to increase to 27,240,131 by 2030 (SANDAG 2008; SCAG 2008). Over time, local and regional population growth is likely to contribute to an increase in visitation at Heber Dunes SVRA.

Table 5–Population Growth Trends

Community	2000[a]	2010[b]	Percent Change
Calexico	27,109	38,572	42%
El Centro	37,835	42,598	12%
Holtville	5,612	5,939	5%
Mexicali*	764,602	936,826*	22%
Imperial County	142,361	174,528	23%

Source: (a) U.S. Bureau of the Census 2000; (b) U.S. Bureau of the Census 2010; *INEGI 2010.

Hispanics or Latinos make up the majority of the residents in Imperial County. At the time of the 2010 U.S. Census, Hispanic or Latino residents of Imperial County were estimated at 140,271, representing 80.4 percent of the total County population. There were about 14 million Hispanic people out of the total statewide population of 37 million people (37.6 percent). The high proportion of Hispanic people within the County has implications for Heber Dunes SVRA planning.

For example, the 2005 California State Parks report on park and recreation trends in California found the following regarding Hispanic outdoor recreation enthusiasts:

- they often prefer to recreate in larger groups and prefer forested sites with water features and amenities to support a day-long, extended family social outing with extensive on-site meal preparation;
- they are often interested in an outdoor experience with a strong social recreation component, such as facilities and programs that involve families, programs for children and youth, and family oriented entertainment events and festivals;

- they identify stress relief and having a good family experience as the most important features of a satisfying outdoor recreation excursion;
- they enjoy picnicking, day hiking, camping, and large family gatherings in outdoor settings; and
- they respond to interpersonal communication from multilingual and culturally diverse staff.



Heber Dunes SVRA is a popular recreation area for local residents.

The Complete Findings of the Survey on Public Opinions and Attitudes on Outdoor Recreation in California (California State Parks 2009) found that when compared to facility use by non-Hispanics, cross-tabulation analyses showed many significant differences between Hispanics and non-Hispanics. Hispanics were more likely than non-Hispanics to use the following amenities:

- Swimming pools
- Picnic tables
- Amusement areas
- Playgrounds
- Tennis or basketball courts
- Organized sports fields
- Open spaces to play
- Skate parks



In the same report, respondents were asked to rate the importance of a variety of California park and recreation facilities and services. The most important facilities and services to Hispanics were (1) play activity areas for tots and young children; (2) multi-use turf areas for field sports such as softball, baseball, soccer, and/or football; (3) areas and facilities for environmental and outdoor education programs; (4) hard surface trails for biking, jogging, and fitness walking; and (5) wilderness type areas where no vehicles or development are allowed.

Given that most visitors originate in Imperial County, the importance of Heber Dunes SVRA as a local recreational resource should not be overlooked. The Survey provided the following recommendation related to local parks:



A rider enjoys the unique desert scenery.

Recommendation: Provide local, easily accessible parks. Recreation providers should continue to ensure the accessibility of local parks for all citizens in California. Local parks encourage increased use by local community members.

2.7.4 Public Concerns, Interests, and Opportunities

Public input played an essential role in the formulation of recommendations, programs, and priorities for the Heber Dunes SVRA General Plan. The OHMVR Division used a stakeholder-driven process whereby issues and ideas voiced by community members guided project research, alternatives analysis, and recommendations.

The major themes presented in this section represent a synthesis of input captured from the visitor survey and stakeholder interviews on ideas, concerns, and common goals related to Heber Dunes SVRA. In effect, the major themes encapsulate the topics that were raised most through the visitor survey and stakeholder interviews.

Meets important local recreation need

Stakeholders frequently made the observation that Heber Dunes SVRA fulfills an important local recreational need. The park is close to several population centers within Imperial County and the results of the visitor survey indicate that the overwhelming majority of visitors choose to visit Heber Dunes SVRA because it is "close to home." More than 90 percent of visitors surveyed indicated it takes them less than 30 minutes to travel to Heber Dunes SVRA. Tied to some of these concepts were comments about the potential for camping at Heber Dunes SVRA and the need to consider whether overnight use would shift the character of Heber Dunes SVRA from a local recreation area to an amenity that primarily serves regions beyond Imperial County.

Recognition of improved Heber Dunes SVRA management

During surveys, many visitors mentioned that they appreciated the improvements made by OHMVR Division since acquiring the park, including efforts to improve maintenance and safety conditions, as well as the installation of new restrooms.



Visitors and stakeholders commented that enforcement and patrol activities by the patrolling ranger, such as issuing tickets for illegal OHV use, have improved safety conditions at Heber Dunes SVRA. Likewise, some visitors pointed out that the mere

presence of a ranger may deter illegal and/or irresponsible activities at Heber Dunes SVRA. Many parents commented that they feel that Heber Dunes SVRA is a safe and comfortable place to recreate with their children because of these efforts. Some stakeholders noted that in the past Heber Dunes SVRA had problems with trespassing and associated public safety issues, such as vandalism and unauthorized late night parties. It was acknowledged that the presence of a ranger outside of operating hours and the ability to close the entrance gate overnight has likely controlled these issues.

Promoting responsible OHV use

There was widespread acknowledgement that safety conditions at Heber Dunes SVRA are generally safe. Areas of potential improvement identified by visitors and stakeholders included a desire to reduce vehicle speeds within areas where people and families gather and to generally reduce conflicts between OHV and non-OHV users. An emphasis was placed on the establishment of reduced speed zones and the availability of separate zones for novice users, especially youth, from more mature riders. The importance of OHV user education was also rasied as a consideration. When visitors were asked if they "generally feel safe" at Heber Dunes SVRA, nearly all responded positively. Given that safety concerns related to OHV operation surfaced at other points in the survey—as well as in the stakeholder interviews—it is likely that visitors responded to this survey question in terms of personal safety (for example, feeling safe from criminal activity).



Enhancing the recreation experience for families and groups

The results of the visitor survey and stakeholder interviews indicated that most visits to Heber Dunes SVRA occur during weekends. These weekend visitors tend to be large groups of families and/or friends with children. Almost two-thirds of the visitors surveyed were in groups of six or more people, and visitors under the age of 15 accounted for nearly one-third of all visitors present on the days of the surveys. Dedicated solo users tend to use Heber Dunes SVRA during the week.

Most visitors who come in large groups stay in Heber Dunes SVRA for a good portion of the day, yet the total time spent using OHVs is typically only a few hours. Specifically, the survey results indicate that 80 percent

of visitors stay more than 4 hours, yet most visitors spend less than 4 hours using OHVs. The primary additional recreational activities that Heber Dunes SVRA visitors take part in are gathering with family and friends, picnicking and barbequing, watching people use OHVs, and viewing scenery.

Environmental considerations for the planning process

Environmental considerations for the planning process that were raised most frequently involved natural areas and air quality. Heber Dunes SVRA is primarily sand dunes with pockets of vegetation (both native and nonnative) located throughout. Many visitors and other stakeholders value the natural characteristics and open area of Heber Dunes SVRA.

Most existing trees are tamarisk, a nonnative, invasive species. The value of the existing trees for shade and natural characteristics was cited repeatedly. Tied to these discussions was dialogue about tamarisk's invasive qualities and the relatively high rate at which it absorbs water. Some stakeholders would like to see the tamarisk replaced by native vegetation. Other stakeholders commented that a tamarisk removal program would be costly and difficult, and that it would be challenging to establish native vegetation in its place.

Air quality impacts from dust and engine emissions were raised as a concern. Dust was recognized by several respondents as a regional air quality issue. Discussion also included the role of existing trees in stabilizing sandy soils and thereby potentially reducing dust dispersion.



Dense areas of tamarisk trees provide shade.

CHAPTER 3
ISSUES AND ANALYSIS









This chapter identifies planning assumptions and key issues that were identified during the planning process. These issues were identified through existing conditions research, public outreach efforts, and through discussions with OHMVR Division staff. This chapter presents only those planning issues of primary importance and those that are driving the planning effort.

3.1 PLANNING ASSUMPTIONS

The following planning assumptions are based on OHMVR Division policy, core program initiatives, and statewide planning issues, which form the planning context and parameters for addressing General Plan issues.

OHMVR Division will do the following at Heber Dunes SVRA:

- Maintain and enhance OHV recreational opportunities within Heber Dunes SVRA
- Administer Heber Dunes SVRA to encourage responsible OHV recreation
- Provide education, conservation, and enforcement efforts that balance OHV recreational opportunities with programs that conserve and protect natural resources at Heber Dunes SVRA



Taking a break.

3.2 PLANNING ISSUES

3.2.1 Regional Planning Context

Heber Dunes provides unique recreational opportunities for local communities

While state and federal parkland with OHV recreation opportunities are abundant within Imperial County, these parks do not provide the intimate atmosphere or proximity to urban centers that make Heber Dunes SVRA unique. For these reasons, Heber Dunes SVRA functions as a highly valued regional park and recreation resource for residents of Imperial County.

Likewise, the majority of visitors come from the nearby communities of Calexico, El Centro, Holtville, Imperial, and Heber, which are within short driving distance of Heber Dunes SVRA. The overwhelming majority of these communities is of Hispanic or Latino origin. Park visitors to Heber Dunes SVRA reflect this ethnic background.



Sand dunes provide unique OHV recreation opportunities.

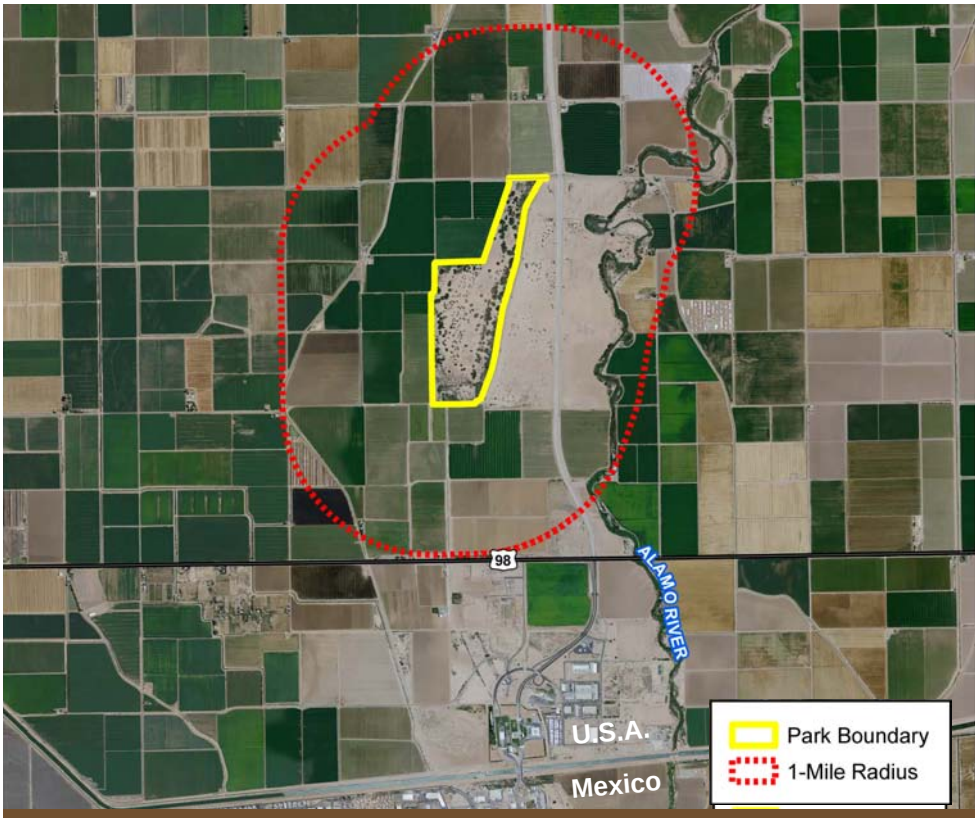
Potential air quality effects are a regional concern

Air quality is an issue of regional concern in Imperial County. Dust carried by strong desert winds is common. While the majority of land disturbance in Imperial County can be attributed to agriculture, the Imperial County APCD has identified OHV use as a possible contributing factor. The OHMVR Division is currently working with the Imperial County APCD to address this issue.

Anticipate future border-crossing-spurred economic development through defensive planning and acquisition strategies

Heber Dunes SVRA is currently surrounded by agriculture, and the designated land use to the west, north, and east is agriculture (see aerial photograph below). However, the northern boundary of the 1,775-acre Gateway Specific Plan planning area (which is primarily zoned for commercial and industrial uses) is located approximately 0.75 mile south of Heber Dunes SVRA. In general, industrial and commercial uses are considered compatible with OHV activities because these uses are not particularly sensitive to sound and/or dust. Thus, the uses that would occur under existing Gateway Specific Plan zoning are expected to be compatible with current land uses at Heber Dunes SVRA.

However, it is important to note that future regional population growth may create development pressure on the agricultural parcels adjacent to Heber Dunes SVRA. For example, if housing were to be proposed on the properties adjacent to Heber Dunes SVRA, concerns about sound and dust emanating from the park could be raised. Acquisition of adjacent properties should be considered to minimize the potential for adjacent land use incompatibilities resulting from potential future border-crossing-spurred economic development.



Aerial view of Heber Dunes SVRA and surrounding land use.

Seek collaborative planning with public agencies for the state highway borrow site and riparian access area

The OHMVR Division should seek to develop and maintain a collaborative relationship with adjacent property owners to encourage collaborative planning for proposed changes to parcels adjacent to Heber Dunes SVRA. There is the potential for the OHMVR Division to consider the acquisition of the adjacent Caltrans-owned parcel for expansion of Heber Dunes SVRA. This 306-acre undeveloped parcel would nearly double the size of Heber Dunes SVRA. The parcel is mainly flat, and it does not have the dunes structure of Heber Dunes SVRA. Acquisition of this land would allow the OHMVR Division to use the land in a manner that would not conflict with OHV recreation, thus reducing the potential for adjoining land-use conflicts. Additional recreational uses that are compatible with OHV use could be considered for this parcel.

3.2.2 Heber Dunes SVRA Land Use and Facilities

Promoting responsible OHV recreation

The OHMVR Division should promote and facilitate responsible OHV use through the General Plan. This can be accomplished through concepts such as user education programs and separate use zones within the Heber Dunes SVRA, including designated areas for novice users (especially youth) such as open OHV use areas, youth training tracks, a designated youth OHV trail or trails, and the establishment of



OHV training track at Heber Dunes SVRA.

associated management approaches. All future management decisions should promote the responsible use and enjoyment of OHVs within the park. The OHMVR Division should also continue to meet or exceed existing enforcement levels so visitors continue to "generally feel safe" when visiting the park.

Maintaining on-site and adjacent facilities access (SDG&E, IID)

Consideration should be given to organizations such as IID and SDG&E that have an interest in maintaining access to existing facilities within existing easements within the Heber Dunes SVRA. For example, IID provides water to and has facilities in the vicinity of the SVRA. Operation of the SVRA should not affect access to these facilities. Likewise, drainage patterns should not be altered in a manner that would negatively affect IID's water conveyance structures. In addition, operation of the SVRA should allow SDG&E continued access to their transmission lines and towers within existing SDG&E easements.



Access road parallels canal.

Preventing encroachment of utility easements

While access to all existing utilities and associated utility easements within and adjacent to the Heber Dunes SVRA should be maintained, expansion of those easements that would in any way be detrimental to the operation and management of the SVRA in conflict with the Division's mission to ensure quality recreational opportunities remain available for future generations should be strongly discouraged.

Improving wayfinding

Signage and identification of popular gathering areas could improve the overall visitor experience at Heber Dunes SVRA. Place names and associated wayfinding information could make the visitor experience more enjoyable by making it easier for visitors to find each other. Likewise, place names could help emergency responders quickly locate visitors in distress.

Optimizing interpretation and education resources

Given the limited availability of interpretive and educational programming in nearby communities, such programming at Heber Dunes SVRA could fill an important local and regional need. Topics that could be interpreted include the following:

- Responsible OHV recreation;
- Historic conditions that have been influenced largely by natural processes;
- Changes over time to the Imperial Valley and sand dunes from human modification;
- Dunes ecology and sensitivities to human impacts;
- History of Heber Dunes SVRA and surrounding communities, including the history and agricultural heritage of Imperial County;
- The relationship between farming and nutrition, with a focus on youth education;
- Heber Dunes SVRA's natural resources; and
- Diversity of recreational experiences offered within Heber Dunes SVRA, including open OHV use, perimeter trail use, destination outings to the interpretive exhibits, and other compatible recreational opportunities.

Distributing visitor use over underutilized areas of Heber Dunes SVRA

The predominant OHV use areas are currently concentrated in the northern part of Heber Dunes SVRA in proximity to facilities such as restrooms, shaded picnic tables, and shade cover provided by tamarisk. There is potential to expand or reconfigure facilities into other parts of Heber Dunes SVRA to distribute visitors throughout the 340 acres. Another way to encourage visitor distribution throughout the site would be to identify popular gathering areas and specific trails and OHV use areas with names and signage. This would also help improve emergency access and management of the park.

Enhancing social gathering and associated recreational opportunities

Most visits to Heber Dunes SVRA occur during weekends. These weekend visitors tend to be large groups of families and/or friends with children. Dedicated solo OHV users tend to use the SVRA during the week.

As previously identified in Chapter 2 most visitors come in large groups and stay for a good portion of the day, yet the total time spent using OHVs is typically only a few hours. The primary additional recreational activities for visitors at Heber Dunes SVRA is gathering with family and friends, picnicking and barbequing, watching people use OHVs, and viewing scenery. Many visitors and other stakeholders stated there is a need for additional passive recreational opportunities at Heber Dunes SVRA that are compatible with OHV use. Suggestions tied to these discussions included barbeque facilities, additional shaded areas, additional small and large group picnic areas, additional restrooms, additional drinking water fountains and spigots, established OHV trails removed from picnic areas, and creation of a children's trail.



Visitors enjoy Heber Dunes SVRA.

Location of Heber Dunes SVRA boundary relative to the existing "perimeter trail"

Some uncertainty exists over whether the "perimeter trail" occurs within the Heber Dunes SVRA boundary or not. The location of the perimeter trail relative to the Heber Dunes SVRA boundary should be confirmed outside of the General Plan process. If the trail, or a portion thereof, occurs outside of the Heber Dunes SVRA boundary, the OHMVR Division would need to explore rerouting the trail or pursue a boundary adjustment to bring the complete extent of the trail within the Heber Dunes SVRA boundary.

Improving accessibility within Heber Dunes SVRA

Additional opportunities to increase accessibility include designating specific trails for universal accessibility and incorporating universal accessibility into interpretation and education programs. To address all members of an interpretive audience, the following issues should be considered when designing and implementing interpretive programs:

- Hearing impairments
- Learning disabilities
- Mental retardation
- Mobility impairments
- Visual impairments
- Limited English proficiency
- Older adults

3.2.3 Significant Resource Values

Heber Dunes SVRA contains interesting and unique biological resources

Although the majority of vegetation on-site is nonnative tamarisk trees of low habitat quality, unique biological resources exist within Heber Dunes SVRA that could be preserved, restored, and enhanced. Particularly, the creosote habitat in the southern part of the park is a unique native habitat type that, with the appropriate management efforts, could be enhanced and potentially preserved. This could include managing OHV



Dense vegetation within the park.

use in creosote areas, managing tamarisk, and providing education and interpretation of biological resources. In addition, Western burrowing owls have been observed at Heber Dunes SVRA.

The existing tamarisk vegetation on-site creates a natural resources management challenge

Because tamarisk is an invasive nonnative vegetation community, biological restoration and/or enhancement efforts should consider the advantages and disadvantages of tamarisk removal. However, tamarisk is very difficult to eradicate completely because it resprouts from any remaining root structure. It is also challenging to restore native vegetation communities in the dune landscapes of Southern California. In addition, the tamarisk trees provide significant areas of shade, which are particularly valued in the desert climate of Heber Dunes SVRA. Likewise, all of the on-site vegetation (including tamarisk) serves to hold down sand. Therefore, any tamarisk removal proposals would need to consider the potential impact on visitors resulting from the loss of valued shade areas and potential incremental fugitive dust generation resulting from the potential net loss of vegetation (e.g., removal of tamarisk and unsuccessful establishment of native vegetation).

3.3 SPECIFIC AREA ISSUES

Providing places for family gatherings

The majority of Heber Dunes SVRA users are in groups of five to 10 individuals, and a large proportion are children under the age of 15. There are currently no specific OHV recreation areas for children. There is the potential to create a designated youth OHV recreation area in



Ramadas provide places for family gatherings.

the northern portion of Heber Dunes SVRA, near the picnic areas and other facilities. Additionally, there are no other activities provided for families and individuals who are not using OHVs (besides spectating). An opportunity exists to provide additional gathering places with recreational activities catered to large groups and/or families. This could be accomplished by creating an area focused on supporting family and group uses such as clustered ramadas, barbeque facilities, fire pits, and passive recreational facilities (such as horseshoe pits).

Supporting responsible OHV recreation in the claypan area

The claypan area is a smooth, flat area located in the central portion of Heber Dunes SVRA. Some users enjoy driving at higher speeds through this area, which creates visibility and safety concerns due to dust and quickly moving vehicles. Measures should be considered that would control use through this area and minimize dust generation.

Interesting and unique biological resources are concentrated in the southern portion of Heber Dunes SVRA

The creosote-based habitat located primarily in the southern part of Heber Dunes SVRA is a unique native habitat type for the park unit, although it is found throughout the greater southwest region. Planning efforts should consider measures to preserve and enhance the existing creosote habitat while maintaining and enhancing the quality of the OHV recreational experience.



Creosote bush at Heber Dunes SVRA.

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CHAPTER 4
PLAN COMPONENTS











This chapter provides an overview of the proposed Heber Dunes SVRA General Plan components, including purpose, vision, and land use management.

4.1 PARK CLASSIFICATION

Heber Dunes is an SVRA.

4.2 PURPOSE

The declaration of purpose describes the purpose of Heber Dunes SVRA and is the broadest statement of management goals designed to fulfill the vision of Heber Dunes SVRA. A declaration of purpose is required by PRC Section 5002.2(b).

The purpose of Heber Dunes SVRA is to provide effectively managed, responsible OHV and related recreational opportunities, with recognition of the significance of Heber Dunes SVRA to the local population and the greater Southern California region. The park's relatively small size and unique outdoor recreational setting provide opportunities for OHV recreation, family and social gathering, special events, and education and interpretative programs.

4.3 VISION

A park's vision describes an SVRA in future years, after the General Plan's objectives have been achieved.



The Heber Dunes SVRA General Plan provides a convenient place for friends, families, and groups to enjoy the outdoor recreational setting through OHV activity and other compatible recreational uses. On any given day, visitors would be able to take part in managed OHV recreation and other activities, relax, and enjoy the unique setting. Heber Dunes SVRA visitors will have access to well-managed, varied, and enjoyable OHV recreation opportunities. The community significance and natural history of Heber Dunes SVRA provide an opportunity for education and interpretation. Future expansion of Heber Dunes SVRA would provide a greater range of OHV recreational and resource management opportunities, along with potentially avoiding or minimizing conflicts from future development.

4.4 LAND USE MANAGEMENT

Goals and Guidelines that apply to the entire Heber Dunes SVRA (Goals and Guidelines) have been developed to address existing issues and to provide on-going guidance to management that can be implemented to achieve the long-term vision for Heber Dunes SVRA. The Goals establish the purpose and the Guidelines provide the direction that the OHMVR Division will consider to achieve these goals. Goals and Guidelines apply to the entire Heber Dunes SVRA.



Family time at Heber Dunes SVRA.

In addition to the Goals and Guidelines, Planning Zones for the proposed Heber Dunes SVRA General Plan have been developed to allow for specialized management by area. These Planning Zones were developed through consideration of a variety of factors, including geographic relationships, resource values, ecological parameters, management issues and goals, types and intensities of land use, and visitor use and experience.

Section 4.4.1 identifies the Goals and Guidelines and Section 4.4.2 presents an overview of the management intent for each Planning Zone, as well as guidelines for each Planning Zone. Section 4.4.3 lists goals and guidelines to address Heber Dunes SVRA visitor capacity.

4.4.1 Goals and Guidelines

This section provides the goals and guidelines of the General Plan, addresses existing issues and provides guidance and management strategies that can be implemented to achieve the long-term vision for the park.

Visitor Use and Recreation (VUR)

VUR Goal 1: Provide a range of high-quality and responsible OHV recreation opportunities that a diverse visiting population can enjoy, experience, and appreciate.

VUR Guideline 1.1: Accommodate and enhance existing recreation and visitor opportunities and ensure use levels are appropriate to the OHMVR Division resource protection guidelines.

VUR Guideline 1.2: Monitor demographic trends and Heber Dunes SVRA visitation patterns. Implement management actions that respond to these trends while remaining consistent with Heber Dunes SVRA General Plan's vision, goals, and guidelines.

VUR Goal 2: **Enhance individual-, family, and community-centered recreational opportunities.**

VUR Guideline 2.1: Provide facilities and recreational opportunities that respond to local needs. These could include outdoor education programs, managed camping, and collaborative programs for local schools and organizations. Potential habitat-disturbing activities, such as camping, would be located to minimize impacts to environmentally sensitive areas.

VUR Guideline 2.2: Create partnerships for interpretive programs that connect Heber Dunes SVRA to the broader region, such as interpretation and education of Imperial County's agricultural heritage and the relationship between farms and child nutrition. Consider partnerships with OHV groups, community groups, and local organizations such as the University of California Desert Research and Extension Center and the Imperial County Farm Bureau.



People from local communities frequent the park.

VUR Goal 3: Provide essential visitor and management facilities to enhance the operation of Heber Dunes SVRA and the visitor experience.

VUR Guideline 3.1: Promote opportunities to incorporate sustainability into Heber Dunes SVRA development, operations, and maintenance. Sustainability initiatives could include incorporating alternative energy and promoting energy efficiency, using reclaimed water, applying Leadership in Energy and Environmental Design (LEED) standards to new construction, and other sustainability initiatives.

VUR Guideline 3.2: Minimize greenhouse gas emissions at Heber Dunes SVRA by supporting and encouraging renewable energy powered OHV use.

VUR Guideline 3.3: Prioritize access to less-visited areas of Heber Dunes SVRA that are of low biological resource value by improving recreational opportunities in these areas first.

VUR Guideline 3.4: Establish and maintain a coordinated wayfinding program that clarifies how to access and enjoy Heber Dunes SVRA. Provide orientation and trail signs that help visitors easily understand the allowable recreational activities within the different Planning Zones.

VUR Guideline 3.5: Provide visitor use facilities that support opportunities for diverse visitor experiences, which could include a variety of OHV opportunities and other compatible recreational activities such as barbeque facilities and horseshoe pits. Locate facilities for effective and efficient visitor and staff use while minimizing use conflicts and negative effects on viewsheds and natural resources.

VUR Goal 4: Provide recreational opportunities compatible with OHV use.

VUR Guideline 4.1: Provide additional recreational and social gathering opportunities that are compatible with OHV use, such as training areas and tracks, shade structures, picnic tables, walking paths through shaded areas with interpretive programming, a children's play area, and managed camping.

VUR Goal 5: Encourage special events that are consistent with the OHMVR Division Mission and Values.

VUR Guideline 5.1: Develop partnerships with local communities to offer special events.

VUR Guideline 5.2: Actively develop partnerships with non-profit organizations or sponsors to offer special events

that feature both OHV activities and other recreational opportunities.

VUR Guideline 5.3: Coordinate with OHV clubs and nonprofit organizations to offer special events featuring OHV activities.

VUR Guideline 5.4: Use the OHMVR Division special event permit process to require appropriate traffic and safety procedures and enforcement measures for a given special event.

Interpretation and Education (IE)

Heber Dunes SVRA Interpretive Significance

Heber Dunes SVRA is capable of meeting an important local and regional need for interpretation and education. Topics for consideration are found in Section 3.2.2.

Heber Dunes SVRA Interpretive Mission

Provide educational opportunities for a broad cross-section of the public—including local communities—that address safe and responsible OHV recreation, natural history, resources, and sustainability programs. Provide OHV training programs for youth and adults.

Heber Dunes SVRA Interpretive Vision

High-quality interpretation will enhance safety and resource protection by educating the public in responsible recreation practices, and give participants enhanced enjoyment and knowledge of the history and resources of Heber Dunes SVRA.



Interpretive exhibits.

Themes

Interpretive themes encapsulate the central messages for Heber Dunes SVRA interpretation. The unifying theme for Heber Dunes SVRA integrates the OHMVR Mission.

Unifying Theme: The history, natural resources, and recreation opportunities of Heber Dunes SVRA collectively provide a distinctive outdoor setting that is valued by both OHV enthusiasts and the broader public.

Primary Themes:

1) Safe and sustainable OHV use in the desert.
2) The dunes have been shaped by natural and cultural processes that will continue to mold the dunes.
3) Heber Dunes SVRA's natural communities are a unique local resource.
4) Heber Dunes SVRA and surrounding communities have a rich history, including the agricultural heritage of Imperial County and the relationship between farming and nutrition.
5) Responsible conservation and sustainability practices can prevent future degradation of the environment.

IE Goal 1: Increase visitors' knowledge of and appreciation for OHV use and history, natural and cultural history, resources, and recreational opportunities of Heber Dunes SVRA.

IE Guideline 1.1: Develop youth and adult OHV training programs and supporting facilities. Provide outreach to increase visitor participation in the training programs.

IE Guideline 1.2: Interpret the history of Heber Dunes SVRA and surrounding communities, including the history and agricultural heritage of Imperial County.

IE Guideline 1.3: Provide opportunities for visitors to gain an understanding of Heber Dunes SVRA's natural resources.

IE Guideline 1.4: Interpret the diversity of recreational experiences offered within Heber Dunes SVRA.

IE Goal 2: Develop education and interpretive materials that respond to the sense of place, history, and OHV use at Heber Dunes SVRA to educate the visitor population.

IE Guideline 2.1: Heber Dunes SVRA interpretive programs should address OHV history at the SVRA and how natural processes affect the landscape.

IE Guideline 2.2: Provide a mix of interpretive and educational programs that are interactive and experiential, incorporating modern media and traditional exhibits. Expand marketing and outreach for Heber Dunes SVRA's educational programs.

IE Guideline 2.3: Provide universal access to all park visitors.

IE Guideline 2.4: Involve local community organizations and OHV organizations in the creation of interpretive programs that are attractive to Heber Dunes SVRA visitors. Provide interpretive programming in additional languages used in local

communities, such as Spanish, to ensure interpretive programs are available to a broad cross-section of visitors.

IE Goal 3: Promote outreach efforts to develop partnerships for interpretive programming and education for responsible OHV use.

IE Guideline 3.1: Expand the volunteer program and work closely with Heber Dunes SVRA volunteers to improve interpretive resources, programs, and opportunities.

IE Guideline 3.2: Collaborate with organizations such as Tread Lightly! to develop education and interpretive programming related to responsible OHV recreation.

IE Guideline 3.3: Use interpretive techniques to deliver Heber Dunes SVRA orientation information and public safety messages, such as responsible OHV use.

IE Goal 4: Expand understanding of ecological relationships and heighten awareness and sensitivity to human impacts.

IE Guideline 4.1: Provide environmental education on topics such as physical and natural resources and ecological relationships at Heber Dunes SVRA.

IE Guideline 4.2: Interpret dunes ecology and explain sensitivities to human impacts.

IE Guideline 4.3: Highlight opportunities for OHV recreationists to minimize their impacts on natural and physical resources through engaging, creative, interpretive programming and education. Seek assistance in developing creative



A fun afternoon in a sandrail.

interpretive programming from organizations such as Tread Lightly!

IE Guideline 4.4: Interpret the OHMVR Division carbon reduction goals and inspire Heber Dunes SVRA visitors to adopt similar measures in their daily lives, including OHV recreation.

Park Use and Operations (PO)

PO Goal 1: Maintain and enhance the quality of OHV recreational opportunities.

PO Guideline 1.1: Provide recreation opportunities that expand the use of Heber Dunes SVRA during weekday slow periods and during the summer "off season." Consider extended hours during the summer to allow visitors to enjoy Heber Dunes SVRA in the early morning and late evening.

PO Guideline 1.2: Provide visitor services and products that enhance recreational experiences consistent with the PRC, OHMVR Division strategic goals and objectives, and Heber Dunes SVRA's purpose and vision.

PO Guideline 1.3: Evaluate and implement new types of concessions to respond to regional and statewide recreation trends, demographic changes, and needs that are not being met by the private sector.



Visitors operate a variety of OHVs at Heber Dunes SVRA.

PO Guideline 1.4: Partner with organizations to enhance the OHV recreation experience with activities such as children's recreation events, managed night use events, and OHV competitive events.

PO Goal 2: Expand Heber Dunes SVRA to enhance recreation and resource management.

PO Guideline 2.1: Acquire adjacent properties or easements from willing sellers that can enhance the recreational experience and/or resource management of Heber Dunes SVRA.

PO Guideline 2.2: Provide additional sites for events, managed camping, water features, or other visitor amenities through additional property acquisition.

PO Goal 3: Provide facilities and services that contribute to the convenience of visitors.

PO Guideline 3.1: Provide signage informing the visitor of responsible OHV recreation and extreme temperature precautions. Install or improve signage where appropriate and necessary.

PO Guideline 3.2: Ensure OHV use areas are properly maintained, where feasible, and monitor for hazards.

PO Guideline 3.3: Continue to manage Heber Dunes SVRA for informal parking to respond to OHV visitor preferences.

PO Guideline 3.4: Provide staff housing to support Heber Dunes SVRA security, emergency response, and maintenance.

PO Guideline 3.5: Work with state agencies and local communities, districts, and agencies to achieve a unified delivery of services in response to public safety emergencies.

PO Guideline 3.6: When planning new facility development or property acquisitions, address the needs for maintenance and public safety personnel, equipment, communications, and emergency vehicle access.

PO Goal 4: Provide guidance to ensure that special events are well managed and that appropriate visitor services are available.

PO Guideline 4.1: Coordinate with sponsoring organizations regarding scheduling, operating, and managing special events and ensure that any appropriate mitigation is implemented.

PO Guideline 4.2: Design and implement parking management plans to accommodate increased demand during special events.

PO Guideline 4.3: Develop alternatives for special event parking such as traffic mitigation and control plans for overflow parking on local roads.

Natural and Physical Resources (NPR)

NPR Goal 1: Manage Heber Dunes SVRA for protection of natural communities and cultural resources and the quality of the OHV recreational experience.

NPR Guideline 1.1: Identify and establish Adaptive Management Opportunity Zones where known populations of special-status native wildlife and special-status plant species are known to occur.

NPR Guideline 1.2: Utilize an Adaptive Management Process for biological resources and soil resources that incorporates the 2008 Soil Conservation Standard and Guidelines and appropriate resource management.

NPR Guideline 1.3: To the extent feasible, locate visitor-serving facilities in areas already subject to considerable disturbance or of low resource value to minimize disturbance to existing habitat areas.

NPR Guideline 1.4: Prepare and conduct surveys and inventories of natural resources in areas subject to development where sensitive biological resources are expected to occur based on monitoring efforts. These sensitive biological



Turkey vultures at Heber Dunes SVRA.

resources could include creosote scrub habitat, Western burrowing owl, or other sensitive species identified under future monitoring efforts. Use survey and inventory results to guide adaptive management decisions.

NPR Guideline 1.5: If any sensitive biological resources are found within the areas that would be affected by the proposed activities, plan and design such activities to avoid or mitigate potential impacts during construction and post-construction periods.

NPR Guideline 1.6: In the event that some disturbance to sensitive biological resources is unavoidable, appropriate measures to offset those impacts will be identified and implemented in consultation with a qualified biologist and the appropriate resource agencies.

NPR Guideline 1.7: Concentrate new trail development in areas of low habitat value. This could include existing disturbed habitat or areas of nonnative vegetation.

NPR Guideline 1.8: New trails should primarily be routed around the edges of high-quality habitat areas to avoid bisection of habitat.

NPR Guideline 1.9: Use drought-tolerant local landscaping for future projects, as feasible.

NPR Guideline 1.10: Continue to pursue best available dust-control measures, which may include watering and soil amendments.



OHV trail at Heber Dunes SVRA.

Cultural Resources (CR)

CR Goal 1: Preserve and protect significant cultural sites and features.

CR Guideline 1.1: No cultural resources have been identified within Heber Dunes SVRA through studies to date. However, if unanticipated resources are discovered within or adjacent to areas that will be affected by proposed activities, such activities will be planned and designed to avoid or minimize impacts to the identified resources.

CR Guideline 1.2: In the event that some disturbance to cultural resources is unavoidable, appropriate measures will be identified and implemented in consultation with a qualified cultural resource professional. Such measures will be consistent with all applicable rules and regulations relating to the protection of cultural resources.

4.4.2 Planning Zone Management Intent and Guidelines

The following sections provide an overview of the management intent and guidelines for each Planning Zone. All specific Planning Zone management will adhere to appropriate Goals and Guidelines, in addition to the following more specific guidelines identified in each Planning Zone. As shown in Figure 6, there are eight Planning Zones:

- Park Housing Overlay
- Entrance Use Zone
- Heber Beach Activity Zone
- Welcome Zone
- Claypan Recreational Zone
- Eastern Recreational Zone
- Dunes Recreational Zone
- Resource Management Zone



Stone retaining wall.

Park Housing Overlay (PHO)

PHO Management Intent: The Park Housing Overlay (PHO) is proposed at the northern end of Heber Dunes SVRA, overlapping both the Entrance Use Area and the Heber Beach Activity Area. Employee residence facilities in this Planning Zone would provide continuous staff presence at Heber Dunes SVRA.

PHO Guideline 1: Establish staff housing in the Park Housing Overlay to provide staff presence in the vicinity of Heber Dunes SVRA entrance.

PHO Guideline 2: Establish camp host sites to facilitate additional oversight of Heber Dunes SVRA by volunteers.

PHO Guideline 3: Minimize conflicts between staff housing and visitor facilities and activities.

Entrance Use Zone (EU)

EU Management Intent: The Entrance Use Zone (EU) encompasses the main roadway into Heber Dunes SVRA and access to the Heber Beach Activity Area, Welcome Area, and Dunes Recreational Area. This area serves as the only Heber Dunes SVRA entrance. This Planning Zone would be managed to provide adequate circulation along the Heber Dunes SVRA entrance road. This area would include signage branding Heber Dunes SVRA and providing directional and responsible-OHV-use guides.

EU Guideline 1: Facilitate traffic circulation along the entrance road (Heber Dunes Road) by providing clear directional signage.

EU Guideline 2: Limit access to Heber Beach Activity Zone to specific access points to reduce potential conflict between vehicular traffic and recreational activities within the Heber Beach Activity Zone.

Heber Beach Activity Zone (HBA)

HBA Management Intent: The Heber Beach Activity Zone (HBA) is proposed in the northern portion of Heber Dunes SVRA, between the Entrance Use Zone to the west and the Eastern Recreational Area to the east. This area is characterized by a relatively flat, open area with pockets of tamarisk trees and saltbush scrub that provide shade. Currently, the area has a restroom/shower facility, shaded picnic areas, staff housing, and a staff office and workshop/tool area. HBA is primarily used by groups and families that like to use the flat, open area for novice riding. A portion of this area would be separated from other uses to create an area that includes non-OHV recreation.



Facilities available at Heber Dunes SVRA.

This Planning Zone would be managed with a focus on pedestrian mobility by limiting vehicle travel speeds and vehicular access from Heber Dunes Road to specific access points. Gathering areas and passive recreational opportunities would continue to be sited to maximize opportunities for shade. Facilities to support social gathering would be located in this area, such as single and clustered ramadas, barbeque facilities, and fire pits. Passive recreational opportunities, such as horseshoe pits and walking paths with interpretive programming, would be provided. Facilities such as a beginner's use area for adolescents and adults and a children's play area are intended to further enhance the recreational experience in this Planning Zone. Facilities to support interpretive and educational programming, such as a classroom and interpretive center, may be established in this area.

HBA Guideline 1: Separate portions of this area from other uses to create an area that includes non-OHV recreation through means such as physical barriers, signage, and/or landscaping.

HBA Guideline 2: Encourage additional recreational opportunities within this area, such as social gathering, picnicking, barbequing, and youth OHV recreation through reduced vehicle travel speeds.

HBA Guideline 3: Create additional passive recreational opportunities such as horseshoe pits, walking trails with interpretive programming, and play areas for children.

HBA Guideline 4: Install additional facilities to support recreational use of this area, such as single and clustered ramadas, barbeque facilities, and fire pits.

HBA Guideline 5: Site additional facilities and passive recreational opportunities to maximize opportunities for shade, as feasible.

HBA Guideline 6: Establish a training track designed for young and novice OHV users to gain experience, encouraging continued use of this area by families.

HBA Guideline 7: Consider adapting existing structures within this area for use as a classroom and interpretive center.

Welcome Zone (WZ)

WZ Management Intent: A Welcome Zone (WZ) is proposed between the Heber Beach Activity Zone to the north and the Claypan Recreational Zone to the south, and encompasses most of Heber Beach Road. This Planning Zone would be managed to provide a centralized location for initial visitor contact, orientation, and education. Facilities to be considered for this Planning Zone are a ranger/staff station, a maintenance facility, a visitor center, additional public restrooms, and a staging or parking area.

WZ Guideline 1: Establish this area's function as Heber Dunes SVRA's primary visitor orientation and interpretation center. Encourage visitor exploration of other portions of Heber Dunes SVRA from this area.

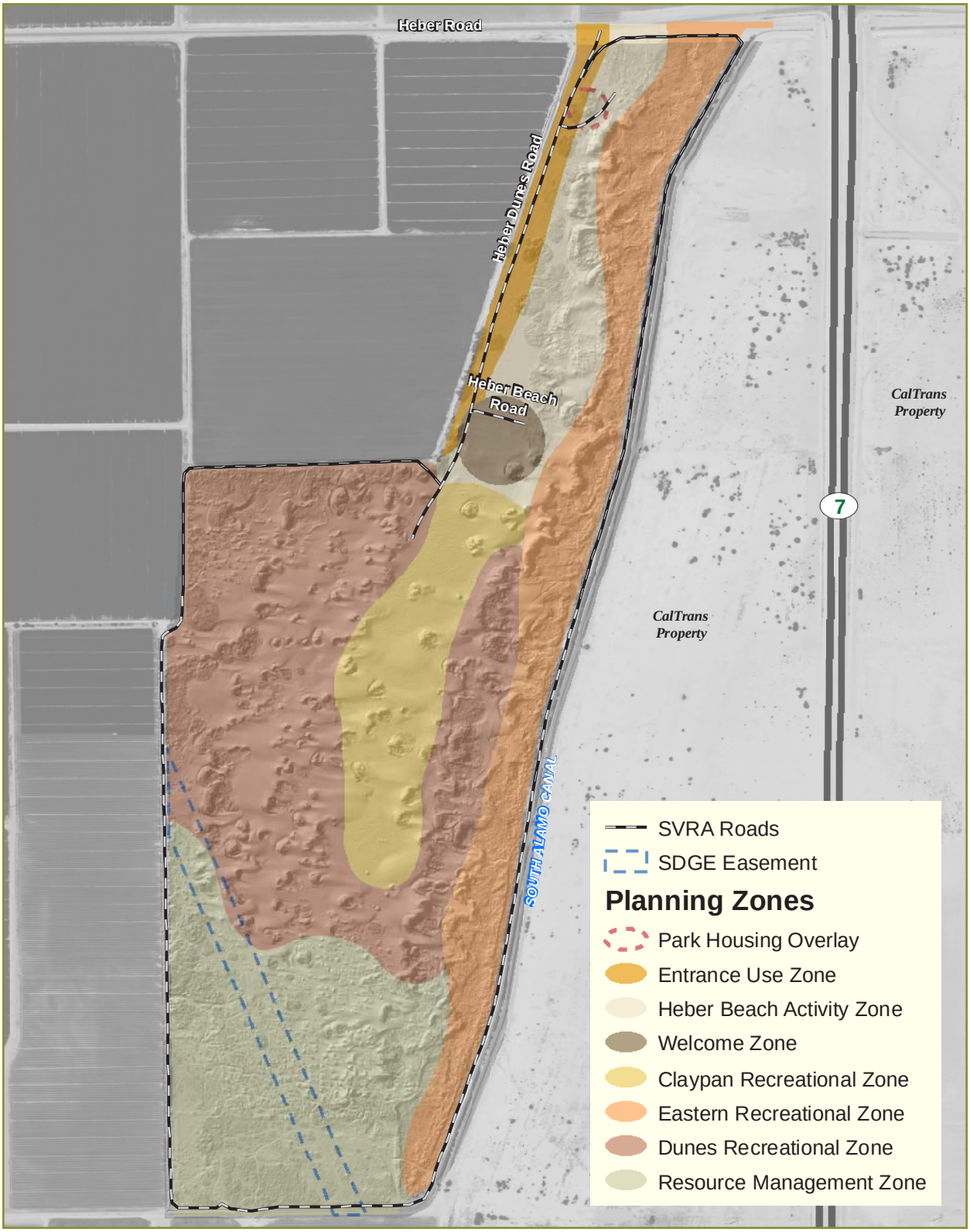
WZ Guideline 2: Provide orientation information, interpretive programs, and visitor services. Consider the establishment of facilities, such as a ranger/staff station, a maintenance facility, a visitor center, and additional public restrooms, to support these functions.

Claypan Recreational Zone (CZ)

CZ Management Intent: The Claypan Recreational Zone (CZ) is proposed in the center of Heber Dunes SVRA and is bordered by the Welcome Area to the north and the Dunes Recreational Zone to the west, south, and east. This Planning Zone would be managed to provide "open OHV use," which means that vehicular travel is not restricted to identified trails. Additional recreational and social gathering opportunities compatible with open OHV use would be considered for the CZ Zone. Individual and group picnic tables and shade ramadas would provide additional shaded gathering areas. Methods to control speed within this area would be considered.

CZ Guideline 1: Encourage continued use of this area for open OHV activity and social gathering and associated recreational opportunities.

FIGURE 6 - PLANNING ZONES



Source: California State Parks 2009; NAIP 2009

1,000 500 0 1,000 Feet

Scale: 1 = 12,000; 1 inch = 1,000 feet



Claypan recreational area.

CZ Guideline 2: Install additional facilities to support recreational use of this area as funding becomes available, such as single and clustered ramadas, barbeque facilities, and fire pits.

CZ Guideline 3: Monitor the need for speed control with respect to visitor safety within this area and examine methods to control speed.

CZ Guideline 4: Explore potential dust-control measures for this area, such as watering and soil amendments.

Eastern Recreational Zone (ER)

ER Management Intent: The Eastern Recreational Zone (ER) would be managed to provide an interesting and challenging recreational experience that capitalizes on existing topography and vegetation, primarily through the creation of new trail alignments. Existing trails may be realigned within the ER Zone.

ER Guideline 1: Provide an interesting and varied recreational experience that capitalizes on existing topography and vegetation, primarily through the creation of new trail alignments.

ER Guideline 2: Create a diversity of OHV use options by connecting new trails within this area to identified trails within the Resource Management Zone.

ER Guideline 3: Site new trails to minimize impacts to sensitive biological resources.

Dunes Recreational Zone (DR)

DR Management Intent: This Planning Zone would be managed to provide "open OHV use." Individual and group picnic tables and shade ramadas would provide additional shaded gathering areas. Additional recreational and social gathering opportunities compatible with open OHV use would be considered for the Dunes Recreational Zone (DR).

DR Guideline 1: Encourage continued use of this area for open OHV activity and social gathering and associated recreational opportunities.

DR Guideline 2: Install additional facilities to support recreational use of this area as funding becomes available, such as single and clustered ramadas, barbeque facilities, and fire pits.

Resource Management Zone (RM)

RM Management Intent: This Planning Zone would be managed to protect natural resources while providing OHV access only on identified trails. The Resource Management Zone (RM) would emphasize visitor education and interpretation. This area has been identified as a Resource Management Zone because it contains the highest quality creosote scrub habitat and other natural resources within Heber Dunes SVRA. Rules and regulations are more restrictive in this zone than in other management areas to ensure resource protection. Efforts to enhance and restore native vegetation and wildlife habitat would be considered for this area.



Vegetation within the park.

RM Guideline 1: Minimize disturbance to creosote scrub habitat, saltbush scrub habitat, and other natural resources.

RM Guideline 2: Enhance creosote scrub habitat and other natural resources within this Planning Zone while maintaining visitor access on identified trails. Enhancement measures could include trail closure, vehicle barriers, weed control, and habitat restoration.

RM Guideline 3: Implement weed control measures where necessary to encourage recovery of degraded native habitats.

RM Guideline 4: Close secondary trails to promote soil conservation and habitat protection. Closures would target trails that duplicate routes and that are unnecessary for maintenance of the overall OHV recreation experience.

RM Guideline 5: Use identified trails to provide public access while protecting and interpreting resource values. Ensure that identified trails allow users to pass through this area to access the Eastern Recreational Zone and the Dunes Recreational Zone.

RM Guideline 6: Maintain Heber Dunes SVRA signs and other boundary identifiers that clarify the boundaries of the Resource Management Zone to minimize inadvertent OHV activity in this area. Signage should clearly indicate that the closures are intended to help protect the natural resources while still providing adequate access for OHV activities.

4.4.3 Managing Visitor Capacity

California State Parks is required to assess carrying capacity issues in drafting General Plans in order to comply with PRC Section 5019.5. California State Parks defines carrying capacity as a prescribed number and type of visitors that an area will accommodate given the desired natural/cultural resource conditions, visitor experiences, and management programs.



Visitor Management Methodology

State Parks defines Visitor Capacity Management as "A methodology used to determine and maintain the desired resource and social conditions that fulfill the purpose and mission of a park. It includes establishing initial visitor capacities, then monitoring key indicators in order to identify appropriate management actions in response to unacceptable conditions."

An adaptive management process recognizes that management actions will have uncertain outcomes and, thus, it is important to adjust management and research decisions to better achieve management objectives. The steps that typically comprise an adaptive management process for California State Parks are presented below. Some of these steps were completed as part of the General Plan preparation process and some steps will require ongoing management, such as Steps 6 and 7.

Step 1. Identify Existing Opportunities and Constraints

Existing opportunities and constraints were documented in Heber Dunes SVRA General Plan Working Paper #2: Existing Conditions, Issues, and Opportunities, Draft Park Unit, Vision, and Goals. This working paper presents the results of initial General Plan research, which are summarized in Chapter 2 of the General Plan.

Step 2. Determine Vision and Desired Conditions

The draft vision and goals for the General Plan were drafted based on review of existing Heber Dunes SVRA issues and opportunities and other existing conditions research. The final vision and goals for Heber Dunes SVRA incorporate California State Parks staff feedback and public input.

Step 3. Identify Issues and Evaluate Alternatives

The evaluation of planning alternatives was a key step in the decision-making process toward developing a General Plan. Planning alternatives were developed to illustrate different scenarios for how Heber Dunes



ATV use is a popular activity in the park.

SVRA may evolve over the long-term. The planning alternatives were analyzed by OHMVR Division staff and the public to identify which combination of options best serves the Heber Dunes SVRA purpose and vision, the OHMVR Division Strategic Plan goals, and the public's interest in Heber Dunes SVRA's future.

Step 4. Develop Measurable Indicators and Thresholds
Key indicators that can diagnose whether the desired conditions for an SVRA are being met were developed as part of the General Plan process. These indicators are presented in Table 6 below.

Step 5. Establish Initial Visitor Capacities
California State Parks recommends that initial visitor capacities be formulated based on the analysis of existing conditions, alternative considerations, desired future conditions, and prescribed goals and objectives. Because the number of visitors Heber Dunes SVRA can support at any given time will depend on a variety of factors, Heber Dunes SVRA can be better managed through an adaptive management process, rather than by assigning a specific, quantifiable visitor capacity threshold. These factors include management actions such as operational decisions, ranger oversight practices, and natural resource management. Therefore, Heber Dunes SVRA visitor capacity is addressed in terms of desired outcomes and indicators. For example, visitor attendance could be considered within capacity if Heber Dunes SVRA receives successful assessments relative to the indicators provided below. Initial visitor capacity is presented in terms of positive indicators in Table 6.

Step 6. Monitor Use and Identify Changing Conditions
The guidelines provided below provide a framework for monitoring potential impacts or changes at Heber Dunes SVRA. The indicators identified in this section will be used to determine when an unacceptable condition exists and management actions are necessary.

Step 7. Adjust Environmental or Social Conditions
Guidelines are provided in this section regarding actions to be taken by management in the event that monitoring efforts reveal that environmental or social conditions may be approaching or exceeding thresholds.

Visitor Management (VM) Goals and Guidelines

VM Goal 1: Establish and implement an adaptive management process for managing visitor capacity at Heber Dunes SVRA in support of the purpose and vision.

VM Guideline 1.1: Consider Heber Dunes SVRA monitoring data and associated management recommendations prior to making management and improvement decisions.

VM Guideline 1.2: If monitoring efforts reveal that conditions are approaching or exceeding thresholds, management must consider alternatives and take appropriate action. Adjust management actions to direct resource and visitor experience conditions to the desired state. Potential indicators and actions presented in this plan should be updated as necessary.

4.4.4 Visitor Management Indicators

Table 6 presents goals developed specifically to address visitor management and other goals provided throughout the General Plan that will contribute to meeting the goal for visitor capacity.



Young visitor explores the park.

Table 6–Desired Outcomes and Indicators for Visitor Capacity

Visitor Use and Recreation	
Guideline	Provide a range of high-quality OHV recreational opportunities that a diversity of the visitors can enjoy, experience, and appreciate in a responsible manner. **(VUR Goal 1)**
Desired Outcome	A variety of OHV, recreational, and educational activities that enhance the appreciation and enjoyment of the park's resources while balancing environmental resource protection needs.
Indicators	• Presence of returning park visitors. • Diversity of recreation activity throughout the park. • Diversity in park visitation demographics. • Conflict among park users and differing recreation activities. • Effects on park resources with increases in park visitation.
Management Actions and Monitoring Activities	• Implement the adaptive management process as part of park operations. • Staff observations of park resources and visitor activity during day-to-day operations. • Design facilities for user needs. • Visitor satisfaction surveys. • Evaluate new recreation opportunities, trends, and activities. • Respond to changing visitor demographics. • Implement Trail Maintenance Plan, as appropriate.

Natural Resources	
Guideline	Manage Heber Dunes SVRA for high quality OHV recreational experience and the protection of natural communities and cultural resources. **(NPR Goal 1)**
Desired Outcome	• Reasonable balance between OHV recreation opportunities vs. the protection of special-status species and native habitats. • Minimize soil erosion within key/sensitive areas such as on the edges of open OHV use areas.
Indicators	• Occurrence of special-status wildlife and plant species. • Active nest sites. • Presence of suitable habitat. • Abundance of prey species. • Periodic sightings reported. • Presence of associated healthy plant communities. • Lack of OHV damage to habitats and species in protected areas. • Loss of sand dune vegetation. • Change in trail difficulty and/or safety conditions due to erosion.
Management Actions and Monitoring Activities	• Establish and enforce trail use on identified trails that are located in areas outside of known occurrences of special-status species and habitat. • Implement Adaptive Management Measures based on information from resource management protocols. • Interpretive/educational signage and fencing in some areas to inform visitors and protect particularly sensitive areas. • Regular evaluation of condition of OHV use areas. • Identification of all factors contributing to a given erosion problem area. • Temporary or permanent closure of OHV use areas.

Cultural Resources	
Guideline	Preserve and protect significant cultural sites and features. **(CR Goal 1)**
Desired Outcome	Integrity and value of cultural resources retained.
Indicators	Disturbance to known cultural resources sites.
Management Actions and Monitoring Activities	• Survey, record, and evaluate areas of high probability for prehistoric archaeological sites. • Establish criteria of significance for each class of resource. • Investigate record and evaluate the known historic sites and areas of historic-period activity. • Staff observations of park resources and visitor activity during day-to-day operations. • Fencing and signage to prevent damage to or loss of cultural resources. • Adaptive management used to assure preservation and protection of sites.
Visitor Management	
Guideline	Establish and implement an adaptive management process for managing visitor capacity at Heber Dunes SVRA in support of the purpose and vision. **(VM Goal 1)**
Desired Outcome	Management actions reflect current conditions and management lessons learned.
Indicators	Updated indicators and actions for Adaptive Management Process.
Management Actions and Monitoring Activities	• Create checklist of actions required for successful Adaptive Management Process. • Review Heber Dunes SVRA monitoring data and associated management recommendations prior to making management and improvement decisions.

CHAPTER 5
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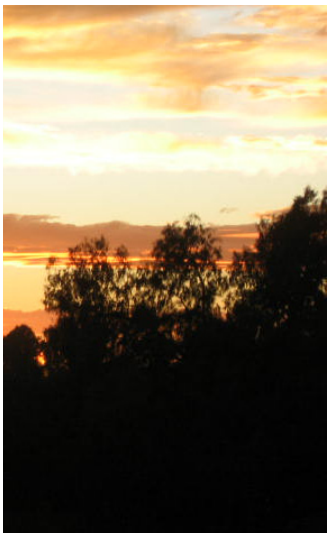







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B. 2022 Final Heber Dunes State Vehicular Recreation Area Wildlife Habitat Protection Plan

Heber Dunes State Vehicular Recreation Area

2022 Wildlife Habitat Protection Plan (WHPP)



Prepared by:

California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division and Natural Resources Division
Ocotillo Wells District

September 2022

TABLE OF CONTENTS

1 Introduction 5

1.1 Purpose and Scope of a 2022 WHPP 5

1.2 Legal and Operational Requirements 5

1.3 Relationship with Other Heber Dunes SVRA Plans 5

1.4 California Environmental Quality Act Compliance 6

1.5 Update Cycle 7

1.6 Adaptive Management 7

2 SVRA Setting and Natural Resource Assessment 7

2.1 Location and Regional Context 7

2.2 SVRA Operations 11

2.3 Abiotic Environmental Factors 16

2.4 Natural Resource Assessment 23

2.5 Management Units 42

3 Conservation and Improvement Goals and Objectives 46

3.1 Statutorily Required State and Regional Conservation Objectives 46

3.2 Conservation and Improvement Objectives for Heber Dunes SVRA 48

3.3 Management Actions 54

3.4 Monitoring Program 56

4 Evaluate and Adapt 62

4.1 Reporting 62

4.2 Adaptive Management Decisions 62

5 Constraints 64

5.1 Annual Weather Cycles 65
5.2 Legal or Regulatory Obligations 65
5.3 Operational Limitations 65
5.4 Stochastic Events 66
5.5 Other Constraints 66
6 References Cited 67
7 Appendix 1: Species Inventory 75
8 Appendix 2: Management Action Details 151
8.1 Management Actions Related to Resource Management 151
8.2 Management Actions Related to Recreation and Facilities Activities 152
8.3 Management Actions Related to Policy and Regulatory Compliance 152
9 Appendix 3: Monitoring Methodology 153
9.1 Vegetation Communities Monitoring 153
9.2 Invasive Species 157
9.3 Sensitive Species Avoidance Monitoring 159
9.4 Trash Clean-Up 165
9.5 Scientific Monitoring 167

LIST OF FREQUENTLY USED ACRONYMS

BAS	Best Available Science
CARB	California Air Resources Board
CDFW [formerly CDFG]	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
EDRR	Early Detection Rapid Response
HDSVRA	Heber Dunes State Vehicular Recreation Area
HU	Hydrologic Unit
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
MU	Management Unit
NAAQS	National Ambient Air Quality Standard
NDVI	Normalized Difference Vegetation Index
OHMVRD	Off-Highway Motor Vehicle Recreation Division
OHV	Off-Highway Vehicle
PM_{10}	Particulate Matter Less Than 10 Microns in Diameter
PRC	Public Resources Code
SB	Senate Bill
SCP	Soil Conservation Plan
SDG&E	San Diego Gas and Electric
SDSU	San Diego State University
SIP	Statewide Implementation Plan
SSAB	Salton Sea Air Basin
SSC	California Species of Special Concern
SVRA	State Vehicular Recreation Area
VegCAMP	Vegetation Classification and Mapping Program
WHPP	Wildlife Habitat Protection Plan

1 INTRODUCTION

Heber Dunes State Vehicular Recreation Area (HDSVRA, SVRA or park) offers 341 acres for off-highway vehicle (OHV) recreation in Imperial County. The California Department of Parks and Recreation (Department or State Parks) manages Heber Dunes SVRA in accordance with California Public Resources Code (PRC) §5090 and department policies, as defined in the Department Operations Manual. The PRC requires the Off-Highway Motor Vehicle Recreation Division (OHMVRD or the Division) to prepare a wildlife habitat protection plan (WHPP) for each SVRA. The 2022 WHPP replaces the existing Heber Dunes SVRA WHPP adopted in 2001.

1.1 PURPOSE AND SCOPE OF A 2022 WHPP

A WHPP acts as a dynamic working document that provides land managers with guidance for managing habitat, along with short- and long-term habitat goals and the methods to achieve these goals. The 2022 WHPP utilizes scientific literature, expert opinion, and staff expertise in setting goals and describing land management activities. The scope of a WHPP encompasses the full spectrum of land management and visitor use activities that affect wildlife habitat at a SVRA. It includes existing settings, goals, all management actions, and a plan for why and when management actions are implemented, among other items.

1.2 LEGAL AND OPERATIONAL REQUIREMENTS

Since 1988, the PRC has required a Wildlife Habitat Protection Program for each SVRA that focused on sustaining a viable species composition. In 2017, Senate Bill (SB) 249 amended the PRC to require that a WHPP that conserves and improves wildlife habitats be developed for each SVRA. Senate Bill (SB) 249 added other specific requirements, including that WHPPs consider statutorily required state and regional conservation objectives, apply best available science (BAS), and annual monitoring to ensure WHPP objectives are being met.

1.3 RELATIONSHIP WITH OTHER HEBER DUNES SVRA PLANS

A WHPP is only one of several planning documents used at State Parks, so it must relate to and complement other park plans (Figure 1). Heber Dunes SVRA has a limited number of planning documents. In late 2011, a general plan was approved for Heber Dunes that guides the management for all aspects of the SVRA. A Soil Conservation Plan (SCP) is being developed with anticipated completion in early 2022. The SCP will address compliance with the 2020 Soil Conservation Standard and address unit-wide assessment, maintenance, and monitoring actions related to OHV facility management. While the SCP and WHPP focus on different resources, there is overlap between the two documents, and they were designed to be complementary. A Dust Control Plan was developed in 2013 (Tetra Tech 2013) for the park unit and was subsequently updated in 2017 (CDPR 2017). An update is anticipated in late 2022. The

Dust Control Plan has limited relevance to the WHPP but is discussed in greater detail in the SCP.

State Park General Plans are comprehensive, goal-oriented plans that serve as the primary management documents for park units within the California State Parks System. A general plan is expected to stand for at least 20 years to provide a consistent vision while providing flexibility for replying to changing conditions. In 2011, the first General Plan was developed for Heber Dunes SVRA, providing a vision and guide for the long-term management of the park and its resources. The goals of this General Plan focus on providing an enjoyable recreational experience, enhancing OHV recreational opportunities, and protecting the SVRA's resources, including plants, wildlife, and cultural resources.

For further details on the park facilities and operations, see the 2011 Heber Dunes General Plan.



Figure 1. The WHPP is a type of Management Plan under the State Parks' Park Planning Structure.

1.4 California Environmental Quality Act Compliance

As a part of this process, the WHPP identifies resource objectives and general types of projects and/or actions that can or will be taken to ensure progress on meeting the WHPP objectives. The California Environmental Quality Act (CEQA) process begins at this stage. State Parks will follow Department procedures for meeting CEQA compliance if discretionary projects or actions

are identified. Once a project or action has been selected for implementation, it will undergo CEQA review at that time using the State Parks Project Evaluation Form.

1.5 Update Cycle

WHPP updates will generally occur every five years and forecast wildlife habitat protection and restoration planning in the SVRA over the next five years. Updates will include a summary of wildlife habitat protection and conservation at the SVRA since the previous WHPP revision and a description of the goals and objectives for the next five years. The update will reflect changes to landcover, land use, species occurrence, disturbance, land acquisitions, and updates to monitoring protocols or technology. The Department's Natural Resource Division (NRD) will review the WHPP to ensure BAS was applied, followed by approval by the OHMVRD. If CEQA review is deemed necessary, it will be completed at that time.

1.6 Adaptive Management

Adaptive management is a common strategy and fundamental component of implementing BAS in natural resource management. With the passage of SB 249, Section (§) 5090.14 was added to the PRC to provide additional guidance on the use of adaptive management within State Parks' OHMVRD:

> *"Adaptive management" means to use the results of information gathered through a monitoring program or scientific research to adjust management strategies and practices to conserve cultural resources and provide for the conservation and improvement of natural resources.*

This addition to PRC §5090 defined adaptive management as the foundation and guiding force behind SVRA monitoring programs and an integral part of updating the WHPP. An adaptive management loop for a WHPP includes assessing park resources, objectives based on those conditions, targeted management actions to meet objectives, monitoring to evaluate the success of management actions, and determining necessary adjustments. The Heber Dunes WHPP will define the adaptive management approach that guides resource management in the SVRA.

2 SVRA Setting and Natural Resource Assessment

2.1 Location and Regional Context

Heber Dunes SVRA is located in an unincorporated area of Imperial County, approximately six miles south of the town of Holtville (Figure 2). Imperial County is primarily a rural, agricultural region. The SVRA is accessible by regional transportation routes such as Interstate 8 (I-8) and State Route 7 (SR-7). The greater San Diego and Palm Desert areas are approximately 125 miles

west and northwest. Agricultural land with an intricate series of canals providing irrigation water for cropland surrounds the SVRA. Calexico, El Centro, Holtville, Imperial, Heber, and Mexicali are within short driving distance of the park (10 miles), and the international border with Mexico is approximately 2.5 miles south of Heber Dunes SVRA.

2.1.1 Regional Land Use

Heber Dunes SVRA is surrounded by agricultural fields (Figure 3) and bounded to the north by Heber Road. The South Alamo Canal forms most of the southern and eastern boundaries of Heber Dunes SVRA. The canal traverses north and south along the entire eastern site boundary of Heber Dunes SVRA and forms a portion of the southern boundary. Immediately east of and adjacent to the canal is a 306-acre undeveloped parcel of land purchased by the California Department of Transportation (Caltrans) for mitigation purposes associated with previous improvements to SR-7. Agricultural fields lie west of the SVRA, and a few residential homes within agricultural fields are located within one-half mile of the SVRA.

Multiple easements cross Heber Dunes SVRA boundaries related to power transmission and irrigation canal access. Imperial Irrigation District (IID) supplies water to the Heber Dunes SVRA park office and has water conveyance structures in the park's vicinity. IID also manages the Alamo Canal. San Diego Gas and Electric (SDG&E) has three transmission towers that bisect Heber Dunes SVRA, carrying high-voltage 500-kilovolt overhead electric lines across the park. SDG&E has a 200-foot-wide easement that follows the electric lines through the SVRA. These facilities are maintained by their associated entities and do not prohibit OHV recreation.

2.1.2 Relevant SVRA and Regional History

Heber Dunes SVRA falls within the traditional territory of the Kumeyaay. The Kumeyaay settled primarily along the New and Alamo Rivers (Kirkish et al., 2000) through the early 19th century, when traditional use of the area declined due to increased European settlement. The Kumeyaay were gatherers, living off the land and supplementing their diet with floodplain horticulture along rivers and springs (Underwood and Gregory, 2006).

In the late 18th century, Spanish exploration and settlement began in what would become eastern San Diego and Imperial Counties. Mexican settlers began to enter the area after California came under Mexican rule in 1821. Anglo-European contact precipitated the spread of cattle grazing and agriculture throughout the region. The development of a water conveyance system for agriculture and residential development in the early 20th century facilitated agricultural development and associated population growth.

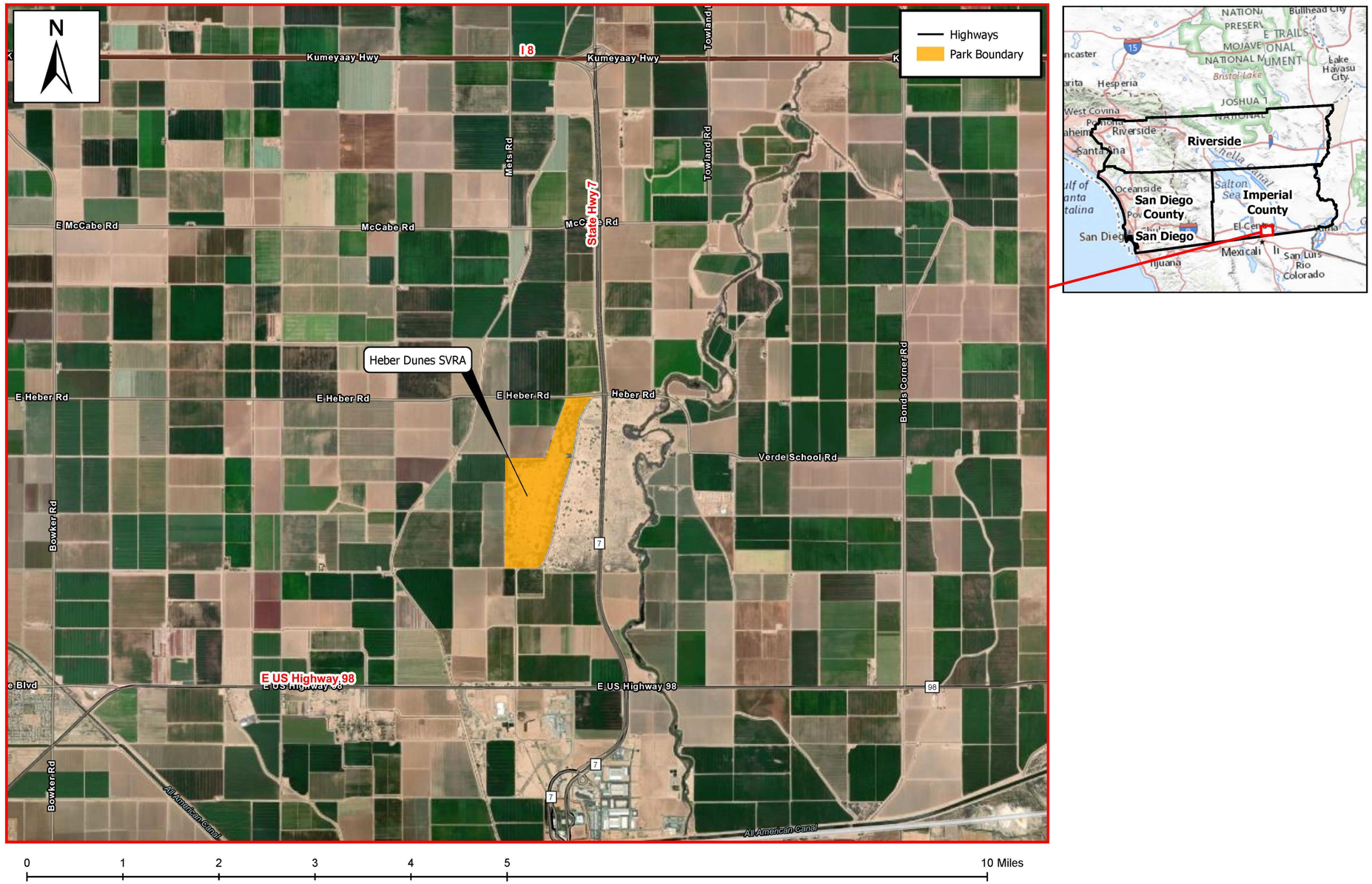

Figure 2. Regional location of Heber Dunes SVRA.

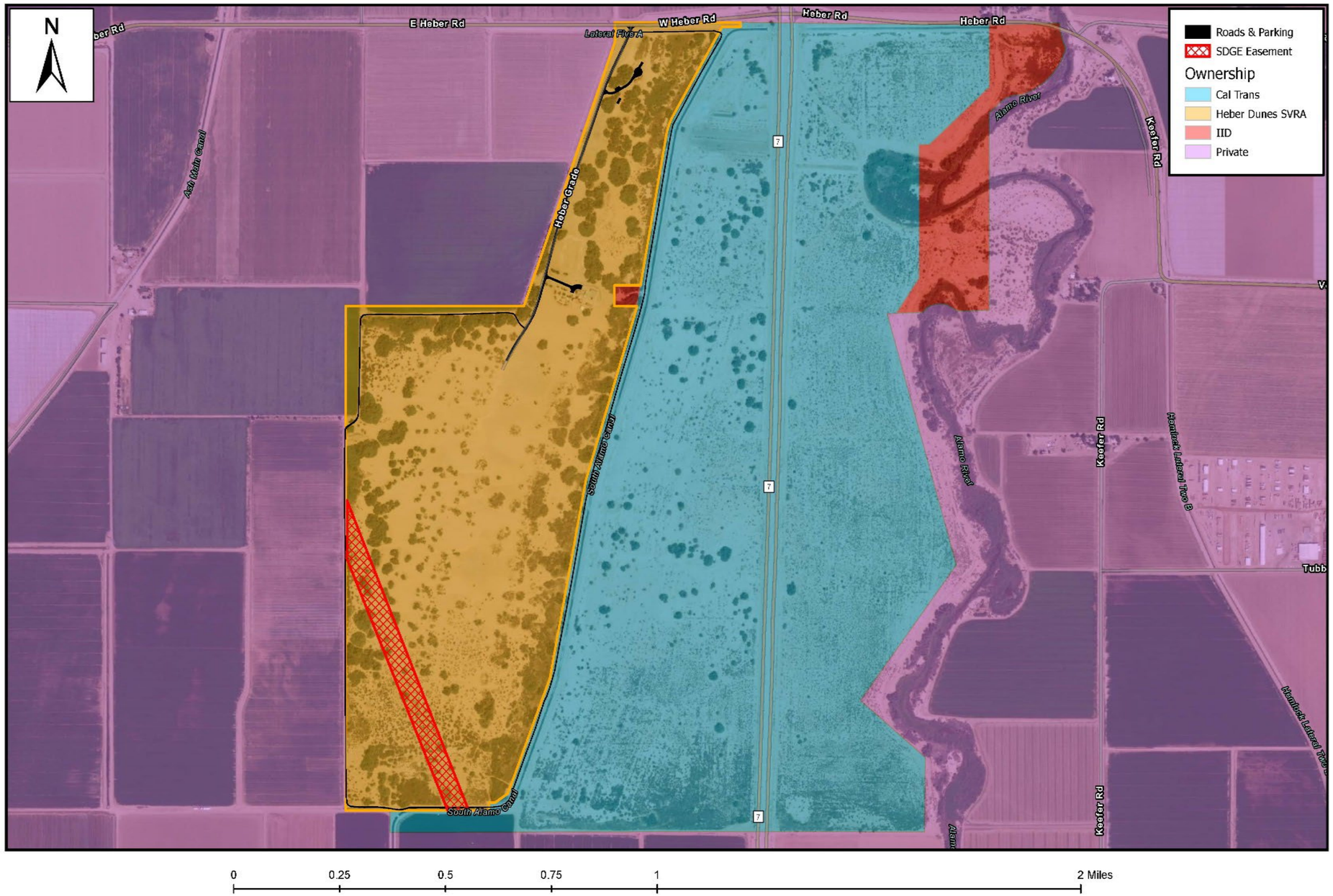

Figure 3. Regional land use at Heber Dunes SVRA.

The dunes located within Heber Dunes SVRA were part of a much more extensive dune network before being graded in 1905 to construct irrigation canals (Craft, personal communication, 1998). Although little recorded history is available about the Heber Dunes property, oral interviews with long-time residents have provided some information. Residents refer to the area as “Heber Beach” in reference to the consistent presence of water next to the dunes, although there are differing stories about how this name originated.

Before the OHMVRD managed Heber Dunes as a SVRA, Imperial County operated the area as an OHV facility for more than 30 years. In 1998, the OHMVRD entered into a lease with the County to assume responsibility for park operations. Heber Dunes was officially deeded to the OHMVRD in 2007 and was subsequently classified as a SVRA.

Today, Heber Dunes SVRA offers a unique recreation opportunity in Imperial County. It is located within several miles of Imperial County population centers and provides a good opportunity for novice riders to gain experience. Due to the relatively low dunes, limited day-use hours, and small park size, most visitation occurs from the local area. In addition to OHV recreation, the park is also popular as a gathering place for barbeques and picnics.

2.2 SVRA OPERATIONS

2.2.1 SVRA Operations

Heber Dunes SVRA is part of the Ocotillo Wells District (District). The Ocotillo Wells District manages four other park units (Figure 4). These units include Ocotillo Wells SVRA, Picacho State Recreation Area (SRA), Salton Sea SRA, and Indio Hills Palms, which is an unclassified unit that is managed as part of the Coachella Valley Preserve. The district headquarters is located at Ocotillo Wells SVRA, approximately an hour away from the park.

The park has limited dedicated staff, including a Park Maintenance Worker I, Interpreter I (Permanent Intermittent), State Park Peace Officer, and seasonal staff hired as needed. There is no dedicated permanent or seasonal resource staff located at the SVRA. District staff offers support as needed, including resource protection and maintenance support.

2.2.2 Facilities

Heber Dunes SVRA is largely undeveloped with limited infrastructure and improvements. Much of the park comprises dunes and vegetation, with a network of trails and perimeter roads (Figure 5). The park unit is zoned for open riding, although the General Plan indicates that the southwestern portion of the SVRA could be operated as trails only. A small, developed area in the north-central site off Heber Dunes Road includes administrative and maintenance buildings, a visitor restroom and shower facility, a large picnic area, and a dirt track for young OHV riders. A water treatment plant is located in the maintenance yard. A camp host area with a residence

and two concrete pads are in the facility's northern portion. A dozen shade ramadas are scattered in the center of the facility and one unloading ramp for OHVs.

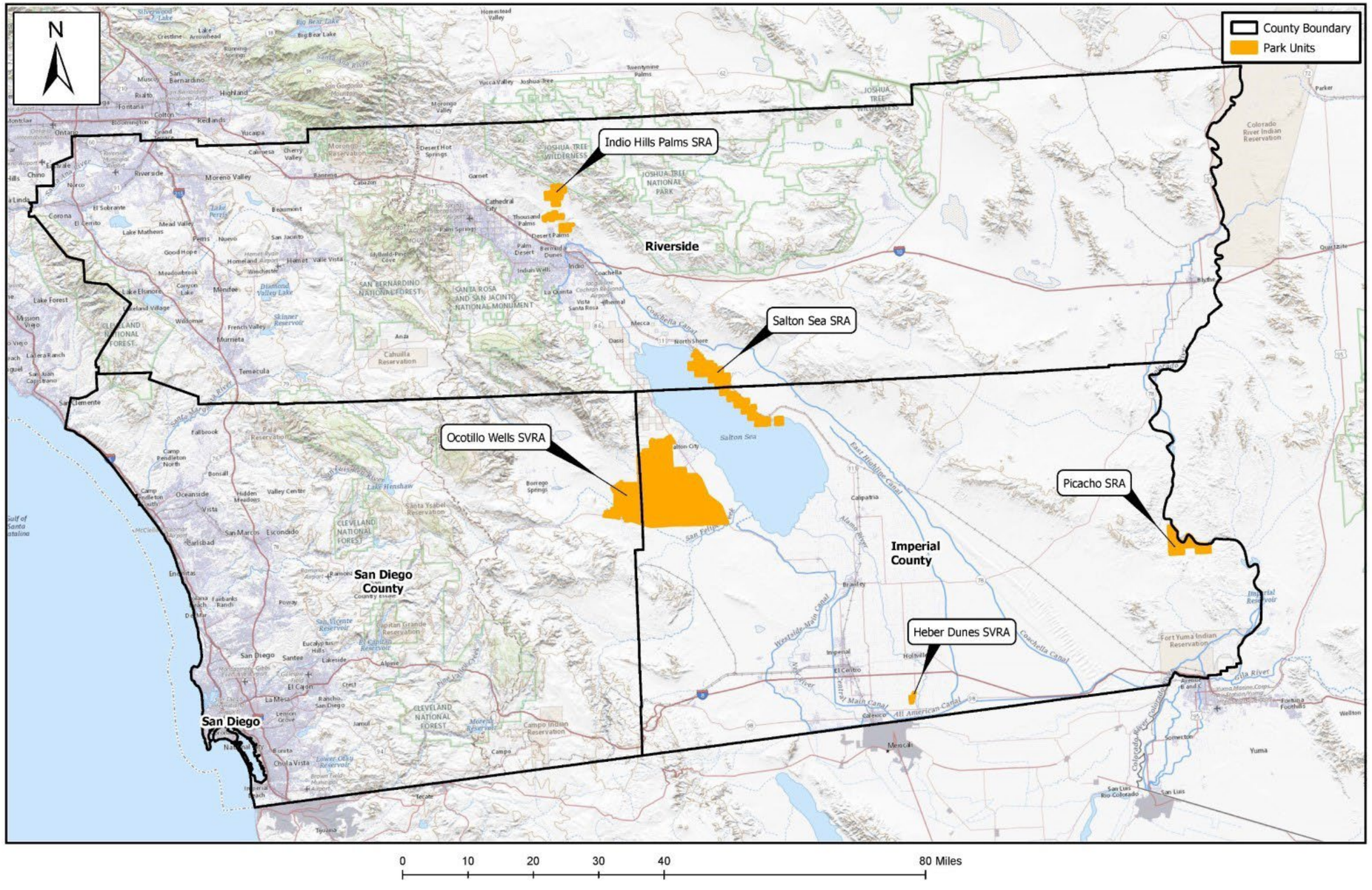

Figure 4. Park units in the Ocotillo Wells District.

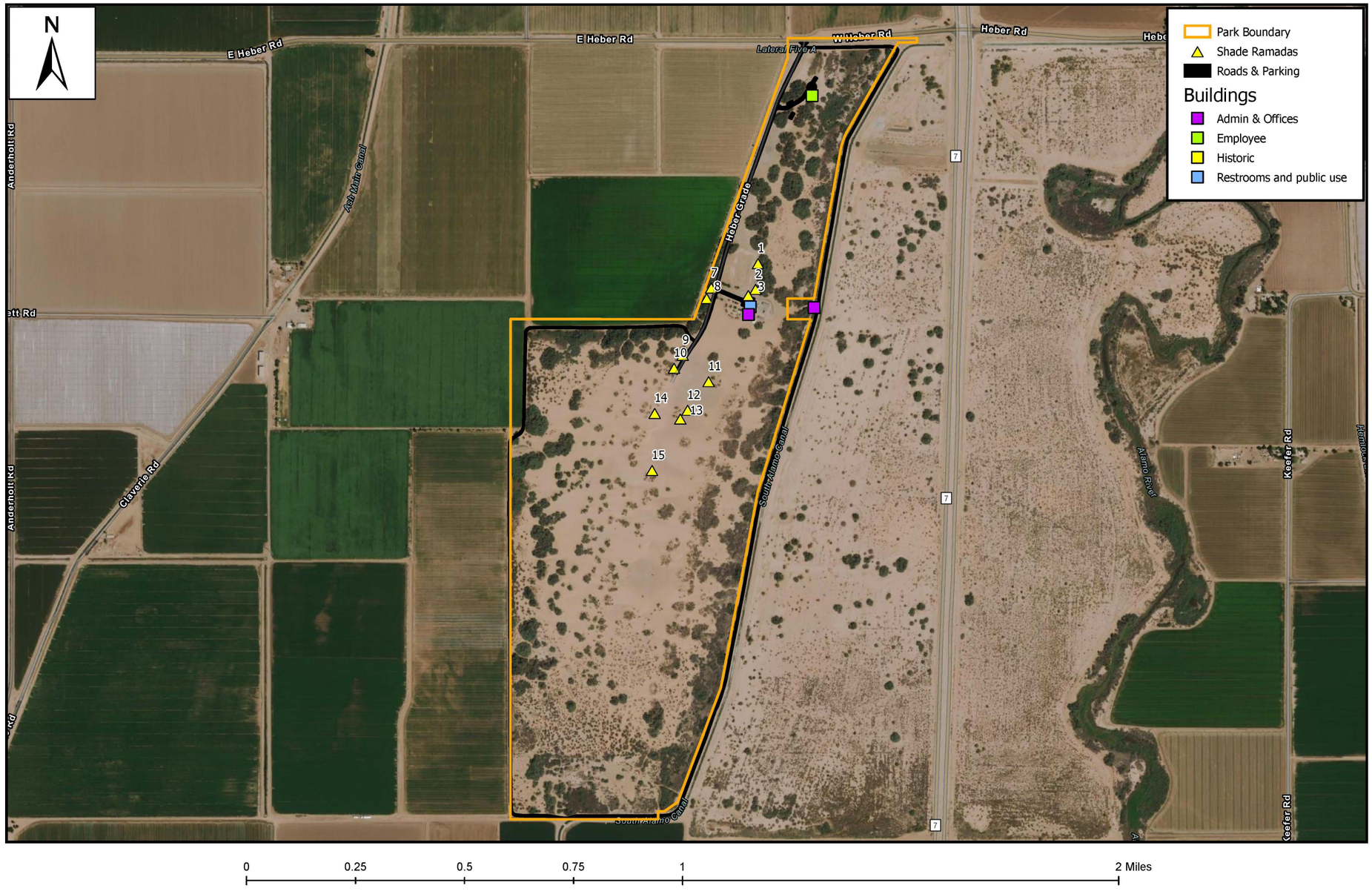

Figure 5. Day use and administrative facilities are located at Heber Dunes SVRA.

Aside from the SVRA's paved entrance road, Heber Dunes Road, and an unnamed dirt perimeter road, there are no designated trails in the SVRA. However, there are well-established user-created routes of travel, referred to as social or volunteer trails, throughout the unit. A pump house is located on IID property on the eastern portion of the SVRA, used for water delivery operations for the park. SDG&E has three transmission towers that run diagonally through Heber Dunes SVRA, starting in the southeastern corner.

There are some discrepancies in the park boundary between the county and State Parks datasets. Based on a survey performed by State Park's survey team, the unit boundary extends into an agricultural field, while the county's parcel data does not extend into the agricultural field. For the purposes of management and this document, the State Parks survey data has been used for maps. The boundary is of minimal management concern at this time, and any resolution would be beyond the scope of the WHPP.

2.2.3 Visitation and Use Levels

Heber Dunes SVRA's terrain offers OHV recreation for beginner and intermediate OHV enthusiasts. It does not have features that allow for more advanced OHV recreational opportunities. All-terrain vehicles (ATVs), also known as quads, are the predominant type of OHV used by recreationists at the SVRA. Larger four-wheel-drive vehicles and motorcycles designed for trails (dirt bikes) are also used.

Since Heber Dunes SVRA is open only for day-use, visitors tend to be from neighboring communities. Typically, weekend visitation is higher than weekday use. Overall, visitation varies by season, with the highest levels occurring between fall and early spring. Visitation is significantly lower during the late spring and summer when temperatures are considerably higher. Annual visitation is estimated at 13,000 vehicles with a total attendance of around 35,000 (Erickson et al., 2014).

Visitors gather in shaded areas, including ramadas, under trees, with family and friends in small to large groups (five to ten individuals). Besides OHV recreation, socializing, picnicking, barbecuing, watching OHV recreation, and viewing scenery are popular activities.

Most visitors drive street-legal vehicles into Heber Dunes SVRA with OHVs in trailers or the bed of pick-up trucks. Visitors typically park their street-legal vehicles at picnic tables. Informal parking at day-use sites tends to be preferred by visitors so that they can access supplies in their vehicles throughout the day.

2.3 ABIOTIC ENVIRONMENTAL FACTORS

2.3.1 Geology and Soils

Heber Dunes SVRA is in the Imperial Valley, part of the Salton Trough, a structural and topographic depression within the Colorado Desert geomorphic province. The Salton Trough marks the northern extent of tectonic plate rifting that created the Gulf of California. Over the millennia, the Colorado River has periodically meandered to the Salton Trough, filling it to create iterative versions of ancient Lake Cahuilla before reestablishing its path to the north end of the Gulf of California.

In repeatedly filling the Salton Trough depression, the Colorado river deposited its nutrient-rich fluvial soils onto the submerged desert floor. The soils of the Imperial Valley owe their fertility and productivity to this past wandering quirk of the Colorado River. Sands and silts deposited into Lake Cahuilla by the Colorado River were exposed to prevailing westerly winds when Lake Cahuilla dried. The sediments accumulated based on the regional wind patterns and silt from deposition, eventually creating the dunes that would become the Heber Dunes SVRA and the much larger Algodones Dunes found along the eastern edge of the Imperial Valley.

The agricultural production potential of the Lake Cahuilla soils in their present desert setting was recognized in the latter portion of the 19th century, as the country was expanding westward. Engineering attempts to more modestly divert Colorado River water to irrigate the soils of the Salton Trough began at the turn of the twentieth century. Repeated levee failures related to these early attempts caused the Colorado River to flow once again unchecked into the Salton Trough for about two years. Massive amounts of rock were repeatedly dumped into the levee breach, but it wasn't until 1907, when the Southern Pacific Railroad Company joined the effort, that the breach was closed. By that time, the Salton Sea had formed, a more modest but still massive, modern-day equivalent of ancient Lake Cahuilla.

The Salton Trough is bordered on the west and southwest by low-lying mountains comprised of deformed marine and non-marine sediments overlying older igneous and metamorphic units. Numerous active faults within the Salton Trough suggest the area is part of a depressed block at the northern end of crustal rifting caused by seafloor spreading that is still widening the Gulf of California to the south. As the trough continues to sink over time, uplift occurs in the surrounding areas, resulting in the tilting of the sedimentary deposits. As a result of activity associated primarily with the San Andreas Fault System east of the Salton Sea and the San Jacinto Fault System, the SVRA and region are subject to earthquakes. Related geothermal features, such as hot springs, are found along these fault traces, and commercial energy production from the regional geothermal activity is ongoing.

Geologic maps show the region underlain by Quaternary lake deposits and alluvium (Strand, 1962). Quaternary dunes are mapped on the property. The Imperial Fault crosses the property

from southeast to northwest (Kahle et al., 1984; Real et al., 1979). A 1937 aerial photograph (Youd and Wieczorek, 1982) shows that the property's area was predominantly covered with dunes with a stream channel to the west of Heber Dunes SVRA. The overall large size of the dune substrate at Heber Dunes SVRA precluded its development for agriculture, unlike many of the smaller dune areas throughout the Salton Trough, which were easier to remove or level for other uses.

Today, Heber Dunes SVRA consists of dunes and areas of claypan soils (Figure 6). The dunes are as high as 50 feet, but most are 25 feet high and lower. A county-wide soil survey indicates six soil types exist at Heber Dunes SVRA. The majority of Heber Dunes SVRA, 83 percent, comprises Rositas fine sand (284 acres). Other on-site soil types are Meloland and Holtville loams (21 acres), Vint loamy very fine sand (13 acres), Meloland very fine sandy loam (12 acres), Vint and Indio very fine sandy loams (9 acres), and Indio loam (1 acre).

The entire southern California region is a seismically active area with multiple fault lines, and Imperial County has high seismic activity. Most of the seismic activity is in the Salton Trough, and, consequently, the valley is subject to potentially destructive and devastating earthquakes. Several regional faults are quite active in the Salton Basin, including the San Andreas Fault and the San Jacinto Fault. Numerous other faults are near the SVRA, including the Imperial and Brawley faults. Rupture and/or ground distress has been noted at the South Alamo Canal and on the property, along Heber Road, following the 1979 Imperial Valley Earthquake (Wright Environmental Services, 2009).

2.3.2 Climate

Heber Dunes SVRA is in the Imperial Valley, in Imperial County, just north of the border between the United States and Mexico. Imperial County is contained within the Salton Sea Air Basin (SSAB)(Figure 7). The climate is typical of a desert with low annual precipitation (2.61 inches annual average, mostly in late summer or mid-winter), very hot summers, mild winters, high evaporation rates, and strong temperature differentials and inversions.

One of the main determinants of climatology in the SSAB is a semipermanent high-pressure area (the Pacific High) over the Pacific Ocean. The Pacific High is located well to the north in the summer, directing storm tracks north of California and maintaining clear skies for much of the year. When the Pacific High moves southward during the winter, weakened low-pressure storms and the mountains to the north bring little rainfall. The combination of subsiding air pressure, surrounding mountain barriers, and sufficient distance from the cold waters of the Pacific Ocean severely limit precipitation in Imperial County.

Heber Dunes SVRA receives three inches of rainfall on average annually. Precipitation over the entire area occurs mostly from November through April and August through September, but its distribution and intensity are often sporadic. Local thunderstorms may contribute to all the

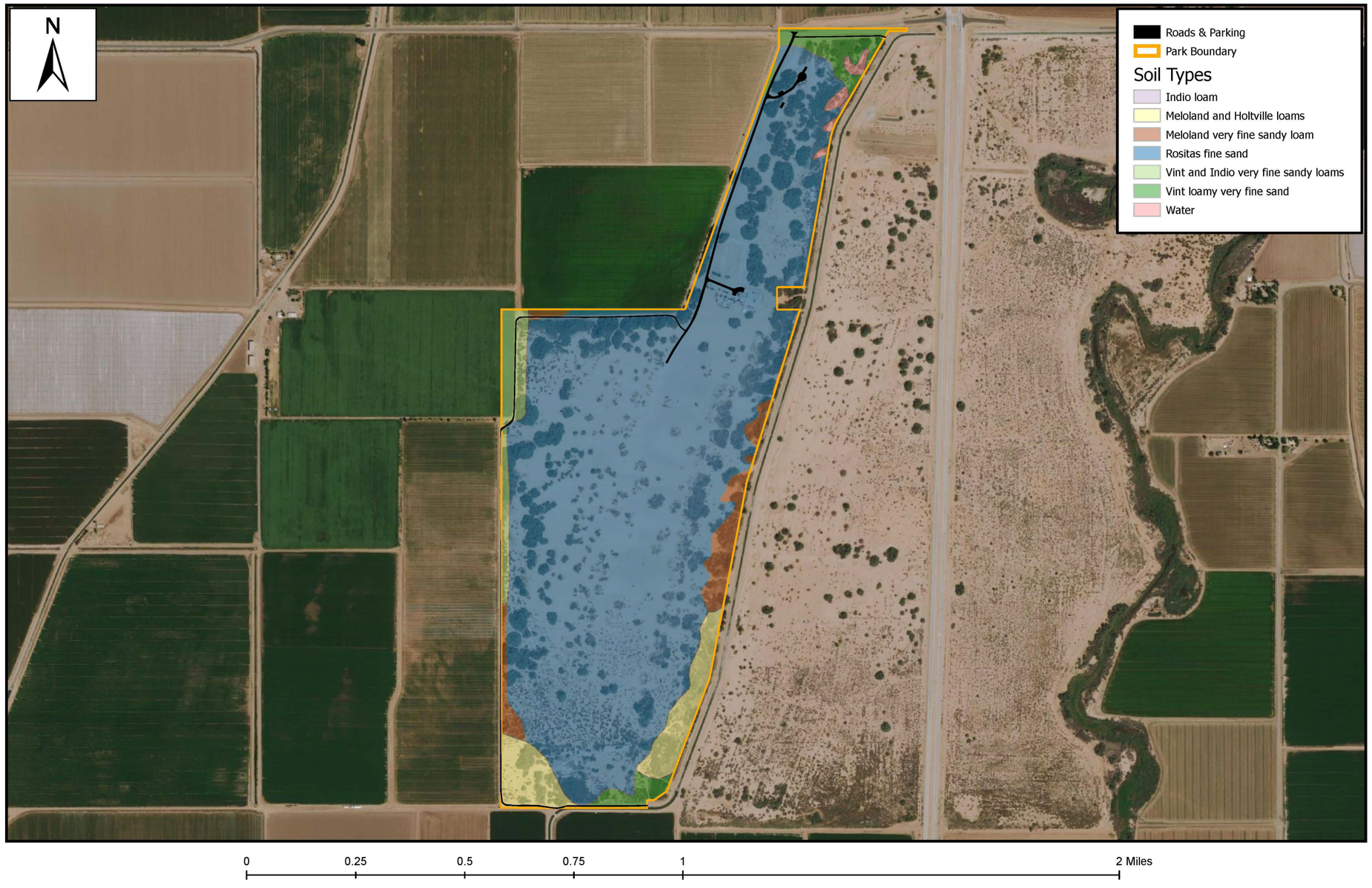

Figure 6. There are six unique soil types at Heber Dunes SVRA.

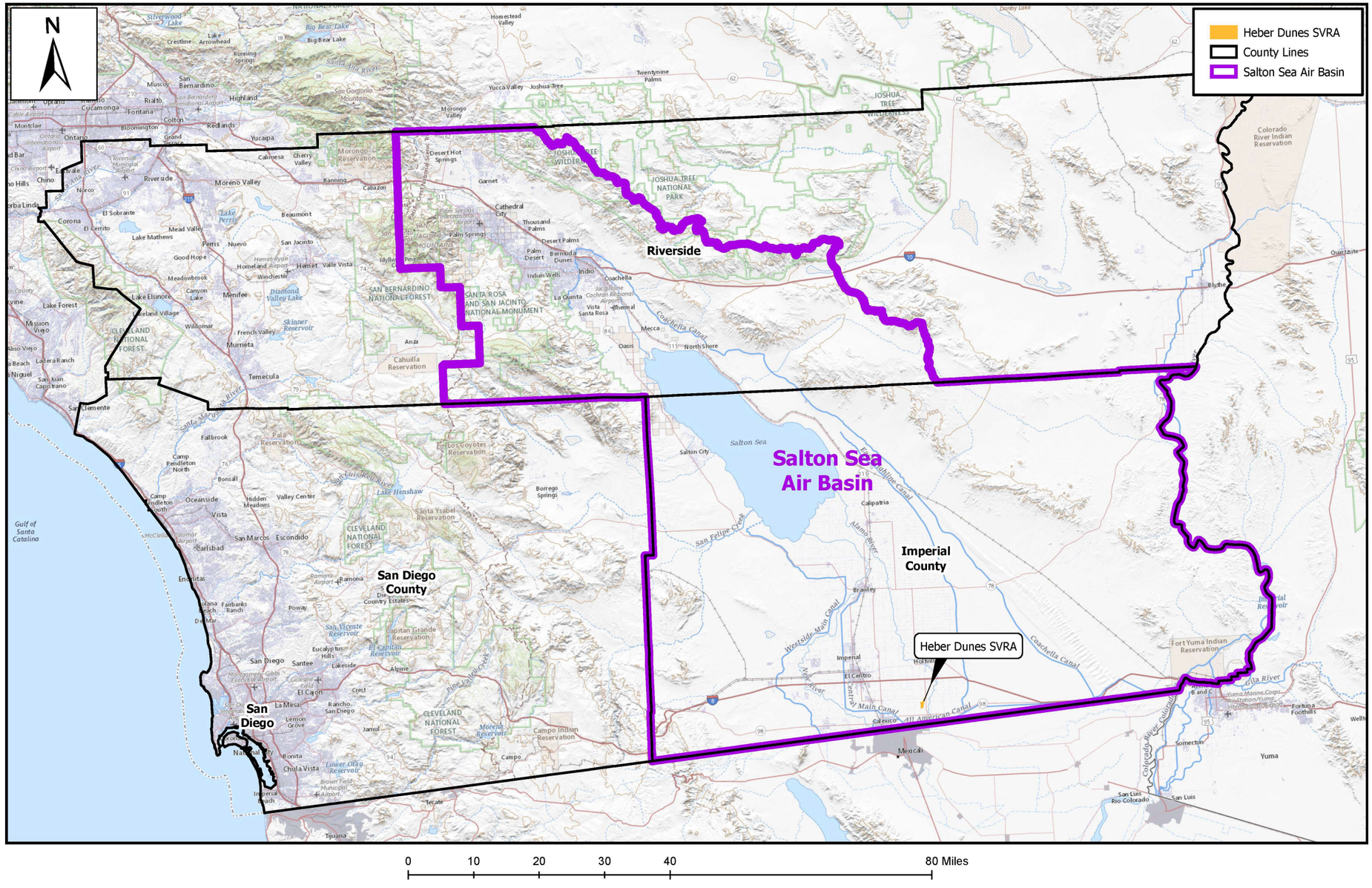

Figure 7. Regional extent of the Salton Sea Air Basin in relation to three Southern California counties and Heber Dunes SVRA.

average seasonal precipitation at one time, or only a trace of precipitation may be recorded at any locale for the entire season (CRBRWQCB, 2006).

The flat terrain of the SSAB, coupled with strong temperature differentials created by intense solar heat, produces moderate winds and deep thermal convections. The county experiences mild and dry winters with daily maximum temperatures that range from 65 to 75 degrees Fahrenheit (°F), while the daily maximum temperatures during the hot summer months are in the 104 to 115°F range (AECOM 2011a). The mean monthly temperature ranges from 55 to 90°F (AECOM 2011a).

Wind speeds are generally less than 10 ten mph; however, between April and May, the county may occasionally experience wind speeds greater than 30 mph between April and May. Predominant wind directions are from the west and west-southwest during all four seasons, and the average annual daily wind speed is 6.9 mph.

A common atmospheric condition between November and June in the county is known as a temperature inversion, where air temperatures become warmer with increasing height. An inversion can be associated with little air movement and stagnant conditions, and. It can persist for one or more days, thereby trapping air pollutants below and preventing their dispersion, thus increasing pollutant concentrations. The height of the inversion determines the size of the mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the temperature difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by winds or solar heating. Inversions appear to be relatively rare between July and October.

2.3.3 Air Quality

The Imperial County Air Pollution Control District (ICAPCD) is the agency responsible for protecting public health and welfare in the county by administering federal and state air quality laws and policies. ICAPCD's tasks include monitoring air pollution, preparing the Imperial County portion of the State Implementation Plan (SIP), and promulgating its rules and regulations. The SIP includes strategies and tactics to attain and maintain the acceptable air quality in Imperial County. In 2010, the county's primary sources of air emissions were from fossil fuel combustion, on-road vehicles, industrial processes, agricultural tilling, fertilizer and live-stock, and road dust (AECOM 2011a).

Both the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA) designate areas according to their attainment status for criteria air pollutants. These designations aim to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified based on available information as meeting or not meeting the standards.

The Clean Air Act allows a nonattainment area to be redesignated as attainment if the EPA determines that the 24-hour PM_{10} National Ambient Air Quality Standard (NAAQS) has been attained, in addition to other requirements. The 24-hour PM_{10} NAAQS allows for one exceedance of the 24-hour average PM_{10} standard (150 µg/m^3) per year averaged over a three consecutive calendar year period, excluding exceptional events, measured at each monitoring site within an area based on quality-assured air quality monitoring data (ICAPCD Staff Report 2018). If an area is redesignated from nonattainment to attainment, the federal Clean Air Act requires a revision to the SIP. This revision called a maintenance plan demonstrates how the air quality standard will be maintained for ten years. Until 2018, the SSAB had been designated by federal EPA standards as a moderate nonattainment area for the 8-hour ozone standard and a serious nonattainment area for respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM_{10}).

In 2018, the ICAPCD submitted the 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less than 10 Microns in Diameter (2018 PM_{10} Plan) to CARB requesting redesignation of the Imperial Valley as attainment for PM_{10} standards. According to ongoing monitoring of the SSAB, the ICAPCD demonstrated that when excluding exceptional events, the Imperial Valley did not violate the federal 24-hour PM_{10} NAAQS during the relevant time period. CARB approved the redesignation request in December 2018, and subsequently, the request was approved by EPA in October 2020 (EPA 2020). The SSAB is in attainment for the other criteria air pollutants.

In conjunction with ICAPCD, the park finalized a Dust Control Plan for the SVRA in 2017 to comply with Imperial County's Rule 800 – General Requirements for Control of Fine Particulate Matter (PM_{10}). The Dust Control Plan calls for control measures on two paved roads within Heber Dunes SVRA that average greater than 50 vehicle trips per day. Off-road special events or races with more than fifty vehicle trips per day would also require control measures. Primary control consists of road treatments, such as gravel or pavement, to main routes of travel within Heber Dunes SVRA. An update to the Dust Control Plan is anticipated in 2022. The Dust Control Plan will be subsequently updated and submitted to the Imperial County Air Pollution Control District every two years.

2.3.4 Hydrology and Water Resources

Heber Dunes SVRA is located within the Imperial Hydrologic Unit (HU) of the Colorado River Basin. The Imperial HU encompasses an area of approximately 2,271 square miles. The major drainages within the Imperial HU consist of the Alamo and New Rivers. The Alamo and New Rivers lie approximately 0.5 miles east and nine miles west of Heber Dunes SVRA. Both rivers drain to the Salton Sea approximately 30 miles to the north of Heber Dunes SVRA. These rivers convey agricultural irrigation drainage water from farmlands in the Imperial Valley, surface runoff, and lesser amounts of treated municipal and industrial wastewaters. The flow in the

New River also contains agricultural drainage, treated and untreated sewage, and industrial waste discharges from Mexicali, Mexico (CRBRWQCB, 2006).

Colorado River water, imported via the All American Canal, is the predominant water supply for the area and is used for irrigation and industrial and domestic purposes (CRBRWQCB, 2006). Numerous canals and agricultural drainages also occur within the Imperial HU. The Ash Main Canal lies approximately 0.5 miles to the west of Heber Dunes SVRA, while the South Alamo Canal borders Heber Dunes SVRA on the east and west boundaries.

Most of the surface drainage from the Heber Dunes SVRA appears to infiltrate the groundwater. Overall drainage is west and northwest (Wright Environmental Services, 2009). Water may pond before infiltrating in the clay flats south of the office. Groundwater is estimated to occur within 50 feet of the surface (Wright Environmental Services, 2009).

2.3.5 Noise

Existing noise sources at Heber Dunes SVRA primarily consist of transportation from vehicular traffic on regional and local roads and OHV activity, both on and off-site. To a lesser extent, occasional aircraft overflights and seasonal operation of agricultural equipment on adjacent property contribute to the noise environment at the park. There are no noise-sensitive receptors in the area.

As part of a Division-wide effort, a passive noise monitoring station was installed on October 5, 2021, in the park's maintenance yard, which is towards the center of the unit. Additionally, noise will be actively monitored at the unit two days per year.

2.3.6 Cultural Resources

Heber Dunes SVRA has been fully inventoried for historic and prehistoric resources of potential significance since 2009. No resources have been identified to date that would constrain SVRA management and use. District archaeologists review individual projects to ensure resource avoidance and protection.

Before the 2011 General Plan, a records search was conducted at the South Coastal Information Center, and contracted archaeologists conducted a pedestrian survey. State Parks policy recommends cultural surveys every five years to capture changes in resource presence and conditions over time. District archaeologists most recently surveyed the park in 2019.

2.4 Natural Resource Assessment

2.4.1 Wildlife Inventory

A variety of sources were used to compile a Wildlife Inventory Table for Heber Dunes SVRA (Appendix 1). The full inventory of these sources includes four amphibians, one arthropod, 90 birds, two fish, one fungus, four insects, 36 mammals, 122 plants, and 16 reptiles. Of these, 140 species have been documented within Heber Dunes SVRA.

This inventory began with internal records sourced from field surveys, the General Plan, and staff notes. Staff then pulled records from established databases, including the California Natural Diversity Database (CNDDB) run by the California Department of Fish and Wildlife, California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California, and the United States Fish and Wildlife Service's Information for Planning and Consultation (IPaC) system. Records were searched based on a nine United States Geological Survey 7.5' Quadrangle search methodology. However, only six quadrangles returned data due to Heber Dunes SVRA's proximity to Mexico. These quadrangles are Bonds Corner, Calexico, El Centro, Heber, Holtville East, and Holtville West. In addition to these searches, Calscape, eBird, and iNaturalist were used to refine observation and range data.

Once all data was collected, staff used habitat requirements and range estimates to determine a given species' potential presence and information about past observations at the SVRA. Past observations included those from formal field assessments and incidental observations. A brief justification was written to add the context of these conclusions.

The inventory contains two federally endangered species, one federally threatened species, one state endangered species, two state threatened species, 25 California Species of Special Concern (SSC), seven species listed on the California Watch List, and nine CNPS ranked rare plants. Of these, 12 SSC, four California Watch List, and two CNPS ranked rare plants are known to occur on-site.

2.4.1.1 Field Assessments

Following the desktop assessment, staff assessed the current field assessment methodology and datasets to inform the park's species inventory. Historically, staff has conducted avian, reptile, small mammal, and vegetation surveys throughout the unit, with a shift in recent years to emphasize avian and small mammal surveys. Field assessments conducted within the past ten years were considered current, while records from over ten years ago were considered historic. Current protocols can be found in Appendix 3.

The species table (Appendix 1) identified one amphibian, six avian, five mammal, four reptile, and 31 plant species last observed in the historical datasets. Gaps in observations may be

explained by several factors, including bias or experimental error from field assessment protocols, inaccurate or poor-quality historical records, changes in environmental condition, and lack of regular and reliable resource staff presence, among other factors. In addition, information for Heber Dunes SVRA may have been historically sourced from Ocotillo Wells SVRA datasets in early planning documents due to limited site-specific data. Although monitoring of vegetation, reptiles, mammals, and birds occurred consistently in the past, previous monitoring efforts were not well described.

Amphibians

Formal amphibian surveys have never been conducted at Heber Dunes SVRA. The park contains no aquatic features, although there are canals adjacent to the park's boundary in all directions. Park records list a Woodhouse's toad (*Anaxyrus woodhousii*) from 2002. Many of the agricultural fields around the SVRA have been rotationally cultivated and fallowed. These periodic changes in use and site conditions may have contributed to a lower quality habitat for amphibian species. No field assessments for amphibians are considered necessary due to the lack of suitable habitat within the SVRA and adjacent to the property.

Avian

Avian surveys were conducted at Heber Dunes SVRA beginning in 1999. Three plots were surveyed in the spring and autumn between 1999 and 2011, utilizing a point-transect protocol developed by San Diego State University (SDSU)(McClenaghan et al., 1998). These plots were located within saltbush, arrow weed, and dune habitats. In 2012, no surveys were conducted due to staffing constraints; however, a new variable circle point-count protocol was developed to meet recommendations from the University of California, Davis (UC Davis) that year and used in 2013. Between 2014-2016, annual monitoring was not conducted as new protocols were tested at Ocotillo Wells SVRA.

In 2017, avian surveys resumed at three plots in winter. As of 2018, three plots are surveyed in the spring and autumn using the original SDSU protocol (McClenaghan et al., 1998). Plots were located within saltbush, arrow weed, and dune habitats. In 2017 and 2018, surveys occurred twice daily – once near dawn and again near dusk. As of 2019, surveys are only completed in the morning as it was an operational challenge to conduct surveys at the extremes of each day. Due to COVID-19 limitations, in 2021, surveys were conducted using autonomous recording units that captured calls for a week and were then analyzed by Division consultants. The use of autonomous recording units continued in 2022. See Appendix 3 for protocols.

Six species were captured in historic datasets but not observed during the past ten years of field assessments. While the overall park dataset is robust and current protocols seem to be sufficient; there are a few areas of concern. Since bird surveys have primarily been conducted by district staff, staff turnover likely increased the variability of staff experience of local birds

and their calls over the years. Additionally, bird surveys are a limited district focus, and staff receives little formal training. It is hoped that the addition of autonomous recording units to existing in-person surveys can supplement ongoing efforts and reduce uncertainty in auditory data. Following initial results of autonomous recording units, staff should compare protocol efficacy to staffed avian surveys.

Mammals

Small mammal surveys began in 1999 at the park. Surveys were based on a protocol developed by SDSU (McClenaghan et al., 1997) for Ocotillo Wells SVRA but modified slightly for Heber Dunes SVRA. Surveys were for three nights, and three plots covered the saltbush, creosote bush, and arrow weed/baccharis habitats. In addition, a trail camera was installed at one location at Heber Dunes SVRA for some time in late spring or summer. Additionally, tracks were recorded as part of an informal survey effort. The small mammal trapping protocol was updated in 2012 by UC Davis, and annual surveys were not conducted between 2014-2016.

In 2017, four small mammal transect lines were established at Heber Dunes SVRA for live trapping using Sherman traps in different habitats following the original SDSU protocol (McClenaghan et al., 1997). Plots are surveyed twice per year, once in spring and again in fall. Plots are not utilized if ants are prevalent along the transect line to avoid harm to captured small mammals, per the conditions of the park's California Department of Fish and Wildlife (CDFW) Scientific Collecting Permit. Due to COVID-19, only two plots were surveyed in 2021. See full protocol in Appendix 3.

Since 2019, acoustic bat recorders have been set in three locations at the unit. Units are typically set twice per year for a month in spring and fall. While district set and maintain the recorders, Division contractors analyze the data set. See full protocols in Appendix 3.

While small mammals are well covered through current sampling, larger mammals (such as coyotes and bobcats) are less represented. In part, this can be attributed to less staff coverage at the park as historically, more employees worked at the unit and resources conducted additional surveys. Resource staff should consider testing sampling methods and protocols for large mammals in the future, including using wildlife tracks or trail cameras to supplement incidental observations and refine the species inventory.

Reptiles

In the fall of 1999 and spring of 2000, reptile surveys were conducted twice per day in spring and fall using a protocol developed by SDSU (McClenaghan et al., 1998). The protocol combined transects with a time constraint. Captures were limited over the years, so in 2002, the protocol changed to incorporate pitfall buckets.

No surveys occurred between 2014 to 2016. In 2017, time-constrained transects were introduced based on the original protocol. Pitfall buckets were implemented in 2018 but canceled in 2019 due to limited capture and concern over trap placement. In discussions with the San Diego Natural History Museum, the staff focused surveys on avian and small mammals. As of 2020, all pitfall buckets have been removed from the park. Incidental observations are noted in the species table.

Limited staffing at Heber Dunes SVRA and unsuccessful sampling efforts makes it challenging to maintain a full inventory of reptiles at the park unit, as incidental observations tend to be a less reliable dataset. Resource staff should consider implementing a citizen science program such as iNaturalist to bolster incidental data points. Additionally, staff may consider using tracks for species that would be uniquely identifiable.

Vegetation

Surveys alternated year-to-year to focus on annual or perennial species. Vegetation surveys were not conducted in 2010, 2012, or between 2014-2017. In 2018, district staff conducted transect surveys (McClenaghan et al., 1998) of perennial vegetation. This effort was discontinued in 2019 due to dense stands of tamarisk and arrow weed that were challenging to survey. In 2022, a community-level inventory was completed; see section 2.4.2 for further information.

The greatest variation in the species inventory was of vegetation observations. Old documents listed species in a species inventory, but other information stated that the park was outside the species range, and there were no other regional detections. These early species lists were likely sourced from Ocotillo Wells SVRA rather than through field surveys. In general, this variation is driven by annual vegetation. A citizen science program such as iNaturalist should be implemented at the unit to assist in the inventory of annual plants.

2.4.2 Native Plant Community Inventory

In 1998, SDSU classified the SVRA into six communities (McClenaghan et al., 1998) using aerial imagery and ground-truthing. An update to this vegetation community map was finalized in Spring 2022, using the state's current standard for vegetation classification and mapping: California Fish and Wildlife's Vegetation Classification and Mapping Program (VegCAMP). VegCAMP classifies vegetation according to the National Vegetation Classification System standards, which is a hierarchal classification of vegetation types, distinguishing alliance and association at the finest scale. An association is a characteristic range of species composition, while an alliance is composed of one or more associations. Field surveys identify vegetation alliances and/or associations, and mappers delineate landcover into alliance or association polygons based on information from field surveys and interpretation of aerial imagery. The resulting maps and data provide a foundation for tracking vegetation change, land use, and

protection and restoration actions undertaken at the SVRA. More information about this protocol can be found in Appendix 3.

Six vegetation community alliances were identified at Heber Dunes SVRA during surveys in April 2022, along with two non-vegetative landcover types (Figure 8). A description of each alliance can be found below. For further information on each alliance, please visit https://vegetation.cnps.org/. The 2022 survey and mapping effort found the same vegetation communities as in the 1998 classification; however, the current map delineates the community types at a finer scale, using the VegCAMP standard of a 1-acre minimum mapping unit.

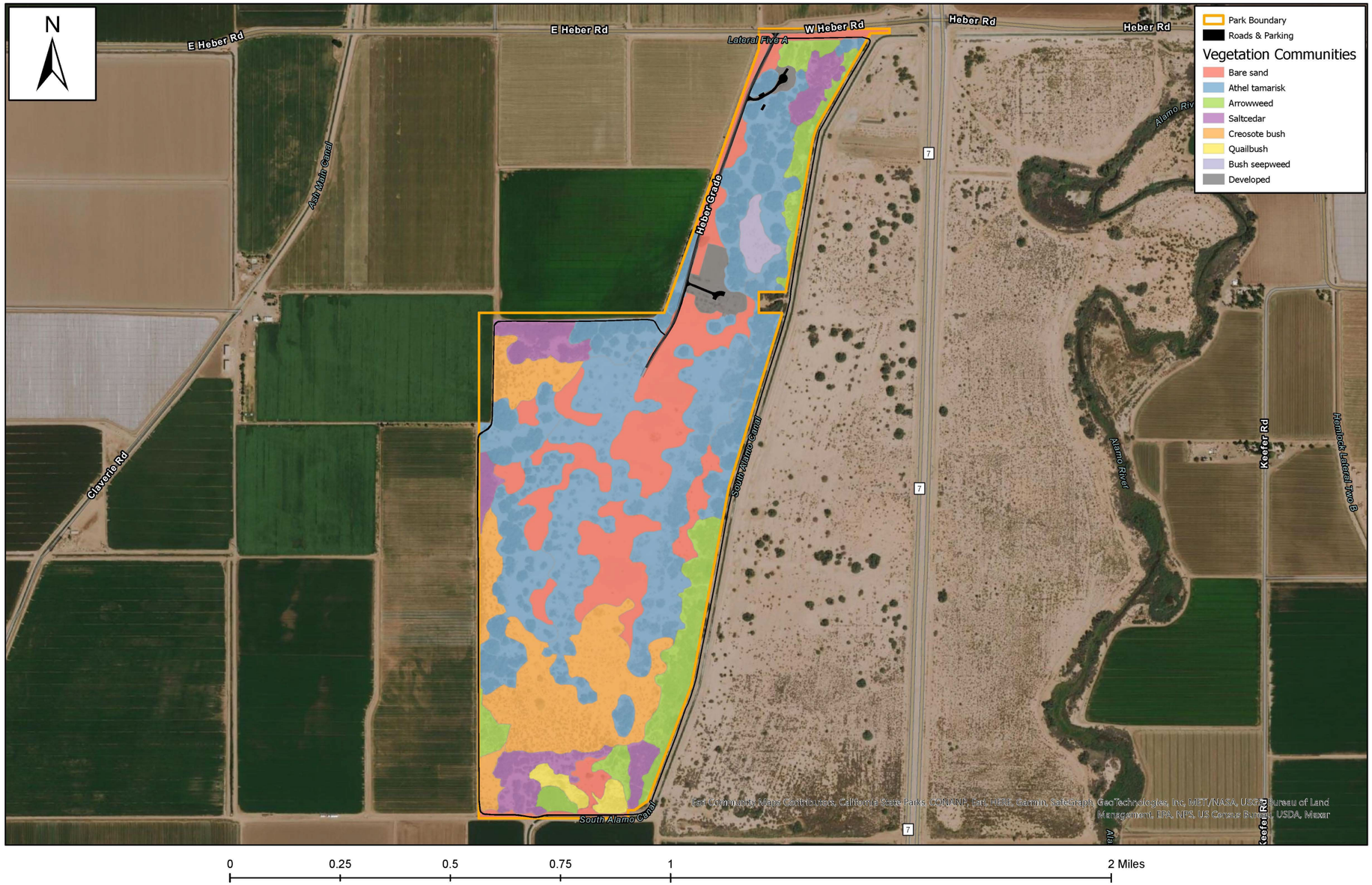

Figure 8. Six distinct vegetation alliances were mapped in VegCAMP in 2021-2022, along with open and developed landscapes.

2.4.2.1 Arrow Weed Thickets Shrubland Alliance

This alliance is strongly dominated by arrow weed (*Pluchea sericea*), with low cover of other shrubs including quailbush (*Atriplex lentiformis*) and willow baccharis (*Baccharis salicina*). Stands tend to occur in irrigation ditches, canyon bottoms, and seasonally flooded washes, generally in alluvial or aeolian derived sands or clay loam soils. This alliance covers 31 acres of Heber Dunes SVRA, primarily along the park edges near the perimeter roads. Arrow weed stands form dense thickets in the park, especially along the eastern and western sides of the park. Some parts of the stands on the east side of the park have significant dead material, likely related to drought stress. Arrow weed is known to stabilize eroded areas, although it may replace other species once established (UCB, 2006).

2.4.2.2 Creosote Bush Scrub Shrubland Alliance

This alliance is dominated by creosote bush (*Larrea tridentata*), covers 52 acres of Heber Dunes SVRA, mostly along the western and southern boundaries of the unit. Stands are open to intermittent, with evenly spaced shrubs and a sparse to absent herbaceous layer.

2.4.2.3 Quailbush Scrub Shrubland Alliance

This alliance is dominated by quailbush (*Atriplex lentiformis*), mixed with a lower cover of arrow weed (*Pluchea sericea).* Stands cover 5 acres of Heber Dunes SVRA, at the southern end of the park. Canopy cover is dense to intermittent. Elsewhere, this alliance has been used in restoration projects to provide cover to wildlife and for erosion control in riparian zones (Favorite, 2006).

2.4.2.4 Bush Seepweed Shrubland Alliance

This alliance is dominated by bush seepweed (*Suaeda moquinii* alt. *S. nigra).* There is one stand of this alliance at the SVRA, covering 4 acres, with sparse cover. Shrubs were mature to decadent, with significant amounts of dead material, likely related to drought stress.

2.4.2.5 Tamarisk (Athel Tamarisk and Saltcedar) Thickets Shrubland Semi-Natural Alliance

At Heber Dunes SVRA, two species of non-native tamarisk are present: athel tamarisk (*Tamarix aphylla*) and saltcedar (*Tamarix ramosissima*). VegCAMP classifies all tamarisk species under one alliance and association. However, because of the distinct difference in height class and ecology of the two species at Heber dunes, stands of each species were mapped separately. Total cover for both species is 168 acres.

Athel tamarisk (*Tamarix aphylla*) stands are widely distributed in the SVRA, covering 143 acres. Athel tamarisk trees are tall (5-10 meters) and occur in dense clusters with close to 100% cover. Due to the size of athel tamarisk present at the SVRA, it is presumed to be historical, although there is no known historical context. This non-native species is of minor management concern as it does not spread rapidly at the SVRA.

Saltcedar (*Tamarix ramosissima*) stands cover 25 acres of the SVRA. This species is more shrub-like than athel tamarisk, at 2-5 meters in height. Stands are dense to intermittent. This species is of greater management concern as it tends to be invasive throughout the southwest. However, historic imagery available on Google Earth shows that stands at the SVRA have not significantly expanded in the past 20 years. Further discussion on invasive management is included in Section 2.4.4.1.2 of this document.

2.4.2.6 Other Landcover Areas

In addition to the vegetation alliances discussed previously, there are two non-vegetated landcover areas: bare sand and developed space. Landcover is the physical material at the surface of the earth, which includes vegetation, bare ground, development, and water.

Bare sand landcover covers 64 acres of the SVRA, primarily towards the center of both the northern and southern parts of the park. Bare sand areas consist of open dunes. Annual plants grow seasonally in the dunes, but there is limited perennial vegetation.

Developed areas consist of park facilities, including paved roads, and covers 10 acres of the SVRA. There are two primary developed areas identified in the SVRA, with a smaller area towards the northern part of the unit and a larger developed area in the park's center. Vegetation that occurs in these areas may be more maintained or landscaped than in other areas of the unit.

2.4.3 Sensitive Resource Areas

Sensitive resource areas are established areas with outstanding natural or scientific significance. Per PRC §5019.71, resources of interest include features such as “rare or endangered plant and animal species and their supporting ecosystems, representative examples of plant or animal communities existing in California prior to the impact of civilization, geological features illustrative of geological processes, significant fossil occurrences or geological features of cultural or economic interest, or topographic features illustrative of representative or unique biogeographical patterns.”

Currently, no officially designated sensitive resource areas are present within the SVRA. While certain resources, such as the native vegetation communities, are of greater management concern, they do not warrant escalation to a defined sensitive resource area. Similarly, several

California SSC utilize the SVRA, but none have limiting habitat restrictions and may utilize the entirety of the SVRA. If conditions change in the future, sensitive resource areas may be established.

2.4.3.1 Rare or Endangered Plant and Animal Species and Their Supporting Habitats

There are no federal or state-listed species known to occur within Heber Dunes SVRA; however, several California SSC or California Watch List species are present within the SVRA. These species are described below and may be referenced as sensitive or special-status species elsewhere in the document. In instances that Imperial County data was unavailable, San Diego datasets were reviewed, particularly those that described desert conditions.

Cooper's Hawk

Cooper's hawk (*Accipiter cooperi*) is a common woodland hawk that is listed as a California Department of Fish and Wildlife (CDFW) Watch List species. This species is adapted to disturbed areas with trees and prefers to nest in tall trees with extensive canopy cover. Preferred habitat includes oak groves and mature riparian woodland, although urban eucalyptus is also well-used. Cooper's hawks are slender, medium-bodied hawks with rounded wings and long tails. Their primary food source is medium-sized birds; however, they will also prey on mammals and rob nests.

While not ideal habitat, Heber Dunes SVRA does contain suitable habitat for this species, and the park is within the wintering range of this species. The park is approximately 30 miles outside the year-round range, and while potential habitat features that may be marginal for nesting are present within the SVRA, the unit may be too far outside the year-round range to warrant a nesting attempt. Utility towers and tamarisk are present within the SVRA that could potentially be utilized for nesting; however, they are not ideal due to limited canopy cover. This species has been observed during both spring and fall surveys. Within the SVRA, this species was last observed on October 9, 2018, during an avian survey along the canal.

Burrowing Owl

Western burrowing owl (*Athene cunicularia*) is a subterranean ground-dwelling species that occupy open grasslands and desert with low-lying vegetation. This species has adapted to disturbed and human-modified agricultural lands. Burrowing owl tend to occupy the burrows of ground squirrels, prairie dogs, and desert tortoises; however, burrowing owl will dig their own burrows when excavated burrows are not available. During the day, the burrowing owl will hunt prey on the ground outside their burrows. CDFW currently lists this species as an SSC.

Breeding pairs stay near an established nesting burrow, while wintering owl are more mobile and may roost in vegetation rather than burrows. In California, the breeding season is

recognized generally as March to August, but breeding can begin as early as February and extend into December (Shuford and Gardali, 2008). In the Imperial Valley, burrowing owl are more numerous in summer than winter (Unitt, 2004).

Burrowing owl have been observed foraging and nesting on infrequent occasion within Heber Dunes SVRA, most recently in 2017, but agricultural lands outside of the park tend to be utilized for roosting more than the SVRA. California provides year-round habitat for this species, with the Imperial Valley supporting increasing populations of this species on land converted to agricultural use (Shuford and Gardali, 2008). This species was last observed by district staff within downed tamarisk in the southern portion of the SVRA in 2017; however, regular observations of this species occur off-site in nearby, non-adjacent agricultural fields.

Northern Harrier

Northern harrier (*Circus hudsonius*) is a slim, long-tailed hawk with a broad distribution across North America. They are regularly observed gliding over marshes and grasslands. During winter, northern harriers utilize a wide variety of habitats with low vegetation, including deserts, croplands, old fields, and grasslands. Primary prey includes small mammals and songbirds. Rainfall can vary the size of populations of northern harrier as it controls the abundance of prey available (Unitt, 2004). This species is a California SSC.

The northern harrier commonly winters in suitable open habitats throughout the southwest, including the Imperial Valley (Patten et al., 2004). The Imperial Valley, along with other southern California desert valleys, supports hundreds of northern harriers each winter, and suitable foraging and roosting is available within agricultural fields (Patten et al., 2004). When nesting in the winter, northern harriers roost on the grounds in groups, sometimes with short-eared owls. Preferred sites are in dense, tall shrubby vegetation patches in undisturbed areas (Shuford and Gardali, 2008).

Heber Dunes SVRA is within the wintering and nonbreeding range of northern harrier. The park contains suitable foraging habitats, along with adjacent agricultural lands. Due to site disturbance, the park likely does not support quality roosting habitat, but adjacent agricultural lands may be better suited. The last observation of the northern harrier by park staff was a flyover on September 29, 2020, during avian surveys in the saltbush plot. Northern harriers have only been observed during fall avian surveys.

Merlin

Merlin (*Falco columbarius*) are small, fierce falcons that primarily occupy forests; however, open and semi-open habitats may be utilized. During migration, grasslands, open forests, and coastal areas are utilized. Merlins primarily hunt smaller birds, catching them mid-air during high-speed attacks, and may partner to target flocks of birds. Merlins tend to be solitary, but

they may travel in groups and roost communally during migration. Similarly, during winter, pairs may winter together. This species is on the CDFW Watch List.

The SVRA is in the nonbreeding range of merlin, and the park contains suitable habitat for foraging. Portions of Heber Dunes SVRA are composed of open and semi-open habitat, and small birds are known to utilize the park (Appendix 1). The last observation of this species was a flyover recorded on April 18, 2018, during a canal plot avian survey.

Loggerhead Shrike

Loggerhead shrike (*Lanius ludovicianus*) is present throughout much of Northern America in grasslands and open habitats. From perches, shrikes will ambush their invertebrate and vertebrate prey, then skewer their catch on barbed wire or vegetative thorns as a cache. During the breeding season, insects tend to be the primary diet of loggerhead shrikes, while vertebrate species are utilized to a greater extent during winter. Nests are regularly built within thorny vegetation, between two and four feet above the ground. In the absence of shrubs or trees, nests may be built within brush piles or tumbleweeds. Loggerhead shrike is a California SSC.

Heber Dunes SVRA provides year-round habitat for loggerhead shrike. This species is resident within the SVRA and is regularly observed by park staff. Vegetation, park signs, posts, utility poles, and towers provide ample perch sites for this species throughout the park. Additionally, native vegetation within the SVRA provides appropriate nesting habitat. Avian surveys within the SVRA consistently observe this species during spring and fall. The last observation in the SVRA was on October 1, 2020 at the Canal plot.

Black-tailed Gnatcatcher

Black-tailed gnatcatcher (*Polioptila melanura*) is a tiny songbird that occupies semiarid and desert scrub in the southwestern United States and northern Mexico. They primarily prey on insects through foliage gleaning, although this may be supplemented by fruit or seeds. Nests are built in forks of branches of dense thorns or leaves, with overhead and side vegetative cover to provide shade. Both shrubs and trees are utilized. Breeding pairs are monogamous, and pairs defend year-round permanent territories. This species is on CDFW's Watch List.

Heber Dunes SVRA is within the year-round range of black-tailed gnatcatcher, and annual avian surveys confirm the species utilizes the park. The species is regularly observed during spring and fall avian surveys. The most recent observation of this species was on September 30, 2020 at the Canal Plot.

Yellow Warbler

Yellow warbler (*Setophaga petechia*) is a brightly colored, small songbird. It primarily spends the breeding season in vegetative thickets in disturbed habitats near streams and wetlands.

Nests are placed within the vertical fork of a shrub or small tree, typically within 10 feet of the ground but ranging up to 40 feet. Yellow warblers form monogamous breeding pairs, which sometimes last more than one breeding season. This species is a California SSC.

Heber Dunes SVRA is within the breeding range of this species and is not far outside of the migratory range. Nests have not been observed on-site, but suitable habitat is present within the park, particularly adjacent to the canal. Riparian habitat is present along the Alamo River, which is east of the SVRA and SR-7. Staff most recently observed this species on September 30, 2019, during avian surveys in the creosote plot.

Yellow-headed Blackbird

Yellow-headed blackbirds (*Xanthocephalus xanthocephalus*) utilize wetland habitat during the breeding season, then move southwest into crop and ranch lands in winter. Additionally, foraging may occur in croplands, grasslands, and savannahs. This species forms foraging flocks that will return to the same areas multiple days. Nesting sites overhang the water in cattails, reeds, willows, and tamarisk. This species is a California SSC.

Heber Dunes SVRA is within the year-round habitat for this species. There is no suitable nesting habitat within the park due to the lack of vegetation that would overhang the canal around the park's perimeter road. Foraging habitat is primarily available adjacent to the unit on agricultural lands, not in Heber Dunes. This species has been observed as a flyover before, on September 29, 2020, along the canal.

Western Mastiff Bat

Western mastiff bat (*Eumops perotis*) is the largest bat species found within California. It ranges from central Mexico across the southwestern United States, including portions of California, Nevada, Arizona, New Mexico, and Texas. Western mastiff bat is dark gray with long narrow wings and large ears that meet above the forehead. The species is considered a California SSC.

E. perotis is a strong, fast flier, allowing for extensive foraging ranges. Foraging occurs in open habitats such as dry desert washes, flood plains, and agricultural fields in California. Foraging calls are audible. While the species is found in a variety of habitats, roosting is limited to significant rock features that contain suitable crevices. Cracks in buildings may be used for roosting. On rare occasions, the species has been observed roosting in palm trees, although this is expected to be for temporary use only (Tremor 2017). Typical roost sites are high enough from the ground to allow for at least 10 feet vertical drop from the entrance for flight.

The species tends to move small distances seasonally rather than a prolonged migration and do not hibernate in winter (Pierson and Rainey, 1998). Mating appears to occur in spring, with

birth occurring in early-to-mid summer. This species is colonial, although colonies are small, containing both males and females throughout the year.

Heber Dunes SVRA is present in the year-round range for this species. Both the park and adjacent property provide foraging habitat, and the canal is likely utilized as a drinking site. As this species has specific site requirements for roosting, the SVRA provides at best, marginal day roosting habitat. Further investigation would be needed to determine if day roosting habitat is present, and if it is occurring (The Wildlife Project, 2022). Auditory detection on-site has observed this species, most recently in the summer of 2021 (The Wildlife Project, 2022).

Western Red Bat

The western red bat (*Lasiurus blossevillii*) is closely associated with cottonwood trees in riparian zones, although wooded suburban neighborhoods and orchards may be utilized. They only roost in tree foliage, particularly in trees that form dense canopies above their roosts and where branches do not obstruct the flyway below the roost. Western red bats are bright red, well-furred small-to-medium-sized bats with darker contrasting colors on their wings. When roosting, their coloration mimics dead tree leaves. This species is primarily found in wooded environments at low elevations.

Western red bats begin foraging within a couple of hours of dark; then, after a period of rest, they may continue into the following morning. Individuals appear to favor certain foraging locations that are utilized regularly, typically within one kilometer of their roosting location (Tremor, 2017). Moths are their primary prey, but flies, beetles, and crickets may also be eaten.

The species is typically solitary but will form groups during migration and mating. They may also roost and forage in proximity to other western red bats. Males and females of the species migrate at different times and have differing summer ranges, suggesting seasonal sexual segregation (Tremor, 2017). Typically, they migrate south in the winter and are active in areas with mild temperatures as low as 55-65°F (*Western Red Bats*, 2019). Mating occurs between August to October, with fertilization occurring in the following spring. Females give birth in late spring to early summer.

Threats to the species include birds of prey, roadrunners, and domestic cats. The loss of riparian habitat is considered the greatest threat to western red bats in the southwestern United States, particularly the loss of cottonwood habitats. Human activities such as barbed wire fencing, motor vehicles, pesticide usage, and general negative public impression of bats are considered threats. The species is currently considered a California SSC.

The SVRA is within the range of western red bats, although winter lows in the area may not be within the suitable temperature range for this species. The species is rare, and probably absent from extreme deserts in southern California, but the presence of nearby habitat increases the

likelihood of its presence near Heber Dunes SVRA (Stokes, personal communication). The South Alamo Canal may be utilized as a drinking site for this species, and Heber Dunes SVRA may be used for foraging. Cottonwood habitat is not present on-site, and tamarisk trees may not provide sufficient cover for roosting, but nearby habitats such as the New River may be utilized. This species was observed at the SVRA during acoustic monitoring in the summer of 2020 (The Wildlife Project, 2022). Due to species' relative rarity in the region, additional verification of this species through other surveys or manual verification of calls is needed (Stokes, personal communication).

Western Yellow Bat

Western yellow bat (*Lasiurus xanthinus*) is a medium-sized bat with dull yellow fur and black contrasting wings. This species roosts exclusively in foliage, typically individually but sometimes in small groups, particularly in dead fronds around the base of palm trees. While this species used to be found almost exclusively in California fan palm groves and desert riparian habitats, it has recently expanded its range towards the coast utilizing both landscaped palms and natural riparian corridors (Tremor, 2017). The diet of western yellow bats consists primarily of beetles, flies, moths, grasshoppers, and crickets.

A portion of the population may be migratory, but individuals are present throughout the range year-round. Similarly, the species is not believed to hibernate as active individuals are observed throughout the range year-round. Capture sites are typically associated with water features, both natural and man-made. Seasonal sexual segregation may occur between late spring to early summer, during parturition (Pierson and Rainey, 1998).

The species is currently considered a California SSC due to limited information on its distribution and selective habitat requirements. Threats include the removal of dead fronds from ornamental palms, using pesticides in orchards, and potential predation from domestic cats.

Heber Dunes SVRA is within the year-round range for the western yellow bat. The species have been auditorily recorded during winter and summer, most recently in summer 2021 (The Wildlife Project, 2022). Suitable foraging habitat is present on-site, with limited roosting habitat present on and adjacent to the park unit (The Wildlife Project, 2022).

California Leaf-nosed Bat

The California leaf-nosed bat (*Macrotus californicus*) is a medium-to-large bat with grayish coloration, big ears, and a distinct leaf-like nose. The species has limited distribution in the southwestern United States (portions of Arizona, California, and Nevada), extending south into Central America. In San Diego and Imperial Counties, California leaf-nosed bat is primarily observed in the desert; however, within the past couple of decades, observations of this

species have been made in valleys and foothills (Tremor, 2017). The species is well-associated with the lower Colorado River and mountainous mines in Riverside County (Braun and Unnasch, 2020). The species is currently a California SSC.

Roosting occurs in natural caves or cave-like features, such as downed trees, mines, and buildings. Overwintering, maternity, and mating roost locations may be limited to mines or caves (Braun and Unnasch, 2020). The species appears to be active year-round throughout its range and is considered intolerant of roost temperatures below 23°C (Tremor, 2017). Summer and winter roost locations are often close in proximity and tend to be in areas that average 29°C near the roost entrance. Females form maternity colonies in spring and summer; large male colonies may also form. Females give birth in late spring to early summer, and maternity colonies disband once the young are independent in late summer.

Foraging habitat includes desert washes and floodplains composed of plants like the smoke tree, catclaw, mesquite, palo verde, and desert willow (Tremor, 2017). The species is primarily insectivorous and tends to forage close to the ground for large moths, butterflies, and grasshoppers. It is suspected that prey is gleaned from vegetation and the ground, as many prey species are flightless or diurnal fliers.

Heber Dunes SVRA is within the year-round range for this species; however, the park is likely only utilized for foraging due to this species' specialized conditions for roosting (i.e., caves and mines). This species is known to use buildings on occasion, although it is unknown if this occurs at Heber Dunes SVRA (The Wildlife Project, 2022). Future investigation would be needed to assess buildings' suitability and usage. An acoustic call of this species may have been detected in fall 2020; however, additional work is needed to verify (The Wildlife Project, 2022). Mist netting may be utilized in the future.

Arizona Myotis

Arizona myotis (*Myotis occultus*) is a medium-sized bat present from southeastern California through Arizona, New Mexico, and south into Chihuahua, Mexico. Historically there was debate over the taxonomic status of this species – some researchers considered the species a subspecies of *Myotis lucifugus* based on an allozyme analysis (Valdez et al., 1999) while others considered it a separate species based on cranial measurements (Hoffmeister, 1986). Further work using genomic DNA has classified the Arizona myotis as a separate species (Piaggio et al., 2002). California currently considers *M. occultus* an SSC.

The species is known to occur at higher elevations, although nursery colonies exist along lower elevation desert regions along the Colorado River. Diverse roosting habitat is utilized, including buildings, bridges, mines, and caves. Maternity roosts have been found in bridges, buildings, and tree snags, with hundreds of bats comprising a colony. Limited data suggest that females give birth to a single young in early summer. While not much is known about wintering

behavior and habitat of Arizona myotis, it is theorized that the species may hibernate across their range based on the behavior of their former conspecific *M. lucifugus* (Diamond et al., 2015).

Foraging occurs in association with orchards, permanent water, and riparian vegetation at lower elevations and ponds in forest clearings at higher elevations. Diet consists of mayflies, midges, and mosquitoes.

White-nosed syndrome (WNS) may impact Arizona myotis in the future as related species have been heavily impacted in the eastern United States (Blehert et al., 2009). WNS has spread amongst hibernacula in eastern populations of related species. Management focuses have included monitoring these hibernacula; however, little data is available on the hibernacula of Arizona myotis. The improvement of baseline knowledge will help manage this threat in the future (Diamond et al., 2015).

As much is not known about this species' habitat needs, it is difficult to assess the potential utilization of Heber Dunes SVRA. The site contains habitat that is known to be used by this species (The Wildlife Project, 2022). This species has been auditorily observed multiple years in a row; however, additional data is needed to determine if this species is regularly present (The Wildlife Project, 2022).

Pocketed Free-tailed Bat

Pocketed free-tailed bat (*Nyctinomops femorosaccus*) is a medium-sized bat with dark grayish brown fur, long narrow wings, extended tail, and relatively large ears that meet mid-forehead. The species is a generalist when it comes to foraging habitat and appears to be wide-ranging without a clear habitat preference. The species is insectivorous, primarily eating moths and beetles. It may commute long distances to forage from roosting locations, and the species is currently a California SSC.

Pocketed free-tailed bat primarily roosts in crevices and openings in steep, rocky cliff faces and rocky outcrops. Man-made features such as quarries are also utilized, as well as buildings in portions of its range. In San Diego County, there is no clear evidence that buildings are used for roosting. However, individuals have been found clinging onto the sides of buildings, and one individual has been observed using an artificial bat house in San Diego County (Tremor, 2017). Colonies of up to 50 individuals are formed. Roosts may be in close proximity to the western mastiff bat but rarely near the Mexican free-tailed bat (Tremor, 2017). The distribution of pocketed free-tailed bats is closely linked to their preferred roosting habitat.

The species is a year-round resident in San Diego County, although local seasonal migrations may be made to avoid extreme summer temperatures in the desert (Tremor et al., 2017). Additionally, it is active year-round. Limited information is known about the species'

reproduction. The species bears a single young (Kumirari and Jones, 1990), with birth occurring in summer (Hoffmeister, 1986).

Heber Dunes SVRA contains suitable open foraging habitat for the species year-round, and the canal is likely used as a drinking site. This species has specific micro-habitat requirements for roosting that are generally not present at Heber Dunes SVRA. However, there is some chance that existing facilities and buildings could be used for day roosting; further investigation would be needed to determine the suitability and usage of buildings (The Wildlife Project, 2022). Auditory observations of the species have been made during winter and summer monitoring at the SVRA, most recently in summer 2021 (The Wildlife Project, 2022).

Big Free-tailed Bat

The big free-tailed bat (*Nyctinomops macrotis*) is a large bat with dark grayish brown fur, long narrow wings, an extended tail, and relatively large ears joined in the middle of the forehead. The species ranges from South America to the central United States. There are more records of the species in Arizona, New Mexico, Texas, and Utah, than in California (Pierson and Rainey, 1998). In the southwestern U.S., the species is associated with arid, high-relief landscapes. The species is believed to be a strong flier due to outlying observations (Tremor, 2017). The species is currently a California SSC.

N. macrotis is closely associated with its preferred roosting habitat – vertical cliffs, quarries, rocky outcrops, and occasional tall buildings. The species is also associated with coastal and desert scrub, evergreen forests, riparian zones, and montane woodlands (Hoffmeister, 1986). There is limited information about preferred foraging habitat, and the species is known to fly over wide-ranging habitats while foraging far from its roosts. The species is insectivorous, dieting primarily on moths, grasshoppers, crickets, and stinkbugs.

Limited information is known about reproductive habits, although females are known to bear a single young in summer (Easterla, 1973) and possibly form nursery colonies. No colonies of this species have been found in San Diego County, and only one juvenile has been observed within the County, suggesting that the species is a migrant to or through the area (Tremor, 2017). It is not known whether the species breeds in California (Pierson and Rainey, 1998).

Heber Dunes SVRA has suitable open foraging habitat for this species, and the South Alamo Canal is likely utilized as a drinking site. Roosting habitat is not likely on-site based on this species' specific requirements, although buildings may provide marginal day roosting habitat (The Wildlife Project, 2022). Further investigation would be needed to determine the suitability and use of park facilities. Auditory observations of the species have been made during winter and summer monitoring at the SVRA, most recently in summer 2021 (The Wildlife Project, 2022).

Ribbed Cryptantha

Ribbed cryptantha (*Johnstonella costata* aka *Cryptantha costata*) is a member of the Boraginaceae family native to California. The species is an annual herb that blooms between January and May in desert dunes and scrub, typically in sandy locations. The species is low water tolerant, needing an average annual precipitation of three to seven inches. Ribbed cryptantha typically grows 10-20 centimeters and often has a red-purple root. It is very bristly on the stem, leaves, inflorescence, and flowers. CNPS ranks this species a 4.3, meaning it is on a watch list due to its limited distribution in the state but is not considered very threatened at this time.

Heber Dunes SVRA contains suitable habitat for the species, and *Cryptantha* species have been observed previously in 2017. There are multiple species of *Cryptantha* that have the potential to occur within the SVRA (Appendix 1). Field identification can be difficult, and many species often require observation of nutlets and hairs at strong magnification to distinguish (Baldwin and Jepson Herbarium, 2002). The three species that may occur at Heber Dunes SVRA can reasonably be identified using a dichotomous key. Tom Chester's dichotomous key for the Borrego Valley is recommended (Chester, 2012; Chester, 2019). Based on park records, it is not possible to identify what species has been previously observed at the SVRA.

2.4.4 Additional Focused Assessment Elements

2.4.4.1 Non-native Invasive (Exotic) Species

There are currently two non-native invasive species of management concern at Heber Dunes SVRA. While these species currently have limited distributions, they have the potential to spread rapidly under select environmental conditions, can compete with native species for available resources, and can alter the habitat. Other non-native species are present on-site, including athel tamarisk (*T. aphylla*), which currently are not of management concern.

Due to the park's location near agricultural fields and regional roadways, invasive plants have the potential to spread within the park. A collaborative effort between park and district staff is needed to help identify and manage potential problems.

Russian Thistle

Russian thistle (*Salsola* spp.; formerly considered singular *Salsola tragus*) is a common weed throughout California, particularly in drier regions. It grows best on loose sandy soils and establishes in agricultural land, roadsides, and other disturbed places. It is a profusely branched annual herb with an efficient taproot, abundant seed production, and has a reduced leaf surface (Goeden, n.d.). This species is commonly called tumbleweed because mature plants break off at ground level and become windblown. These windblown plants are flammable and may hinder traffic.

This species was observed for the first time within Heber Dunes SVRA in the summer of 2021. A park maintenance worker identified the plant on the northern section of the perimeter road, removed it, and notified district resource staff. In total, ten plants were found parallel to Heber Road. This species has a variable tendency to spread, and staff should monitor the park to assess additional measures that may be required. Currently, opportunistic hand pulling appears appropriate control.

Saltcedar

Saltcedar (*Tamarix ramosissima*) is highly invasive throughout the southwest, typically found as a perennial, deciduous shrub, or small tree. This species tends to establish along disturbed and undisturbed streams, riverbanks, desert springs, and flood plains; seedlings require saturated soil to establish (USFS 2010). While saltcedar may be used by some species for nesting, it can also diminish habitat quality. Saltcedar can increase soil salinity, lessen microbial activity, resulting in drier soils under dense stands, and is capable of rapid spread and expansion (USFS, 2010).

This species is scattered throughout the park and historically has been minimally managed as it has not exhibited invasive tendencies (i.e., rapid spread and deterioration of habitat quality). Staff should continue to monitor saltcedar within the SVRA to assess if management intervention is required, particularly if environmental conditions or agricultural usage off-site changes.

2.4.4.2 Sensitive Aquatic Habitats

No sensitive aquatic habitats or watercourses are present within Heber Dunes SVRA. Based on the 2011 General Plan, no wetland or riparian features were identified on-site. The adjacent South Alamo Canal is concrete lined with no significant seepage to create a wetland habitat. The canal is an important component of the habitat at Heber Dunes SVRA as it provides a source of perennial water. No special-status species are known to reside in the canal, and no run-off is known to occur to any adjacent water bodies.

2.4.4.3 Wildlife Movement

Due to the amount of fragmentation and agricultural conversion around Heber Dunes SVRA, it is anticipated that the park may be used by wildlife as a limited corridor. As the park is not connected to other natural or semi-natural habitats, species moving through the area may opt to use agricultural fields as more prey and water sources are present. Wildlife movement is not considered of significance at the SVRA.

2.5 Climate Change

The earth's climate is changing rapidly due to anthropogenic factors that result in increased greenhouse gas emissions, primarily carbon dioxide. The effects of climate change include long-term shifts in temperature and precipitation and increase the frequency and magnitude of extreme weather events. Strategies to respond to climate change include mitigation and adaptation actions. Mitigation actions target the reduction of greenhouse gas emissions or their removal from the atmosphere. Adaptation actions target reducing the specific impacts caused by climate change on the landscape.

For vegetation and wildlife to successfully adapt, organisms require healthy, connected landscapes that allow shifts in behavior, distribution, and - on a longer timeframe - evolutionary processes to operate unimpeded (Chambers et al. 2019; Seavy et al. 2009). For organisms to respond to the rapid rate of climate change on an evolutionary level, they require a landscape that supports their biology and population dynamics (Bonnet et al. 2022).

The most important climate adaptation strategy for natural resource land managers is the recovery and protection of healthy, connected ecosystems (Seavy et al. 2009). Healthy ecosystems are more resilient to the short-term and long-term effects of climate change (Gunderson 2000; Scheffer et al. 2001). Ecosystems with high ecological connectivity (e.g., connectivity within a habitat type, between different ecotones, upstream/downstream through elevation gradients, horizontally on to floodplains) allow movement and resource exchange across the landscape.

The WHPP addresses climate adaptation for species and ecosystems through removing stressors and restoring ecosystem connectivity, structure, and function. This will allow natural resources to better adapt to primary (e.g., changes in temperature, precipitation, river flow?) and secondary (e.g., stream hydrology, fire) effects of climate change. The adaptive management approach of this WHPP provides the opportunity to understand the response of natural resources to changes in environmental conditions from climate change as well as changes in response to management through mitigation and adaptation actions.

2.6 Management Units

Resource Management Units (MUs) provide a structure for implementing natural resource management activities. MUs have defined land areas with unique identifiers that constitute manageable-sized areas for organizing and scheduling management work. For the WHPP, organizing, describing, and planning habitat management and ongoing maintenance is described for each MU within a SVRA.

2.6.1 Description of Management Units

Three MUs have been defined for Heber Dunes SVRA (Figure 9). The delineation of MUs was based primarily on vegetation community differences and the presence of the South Alamo Canal (CDPR 2021).

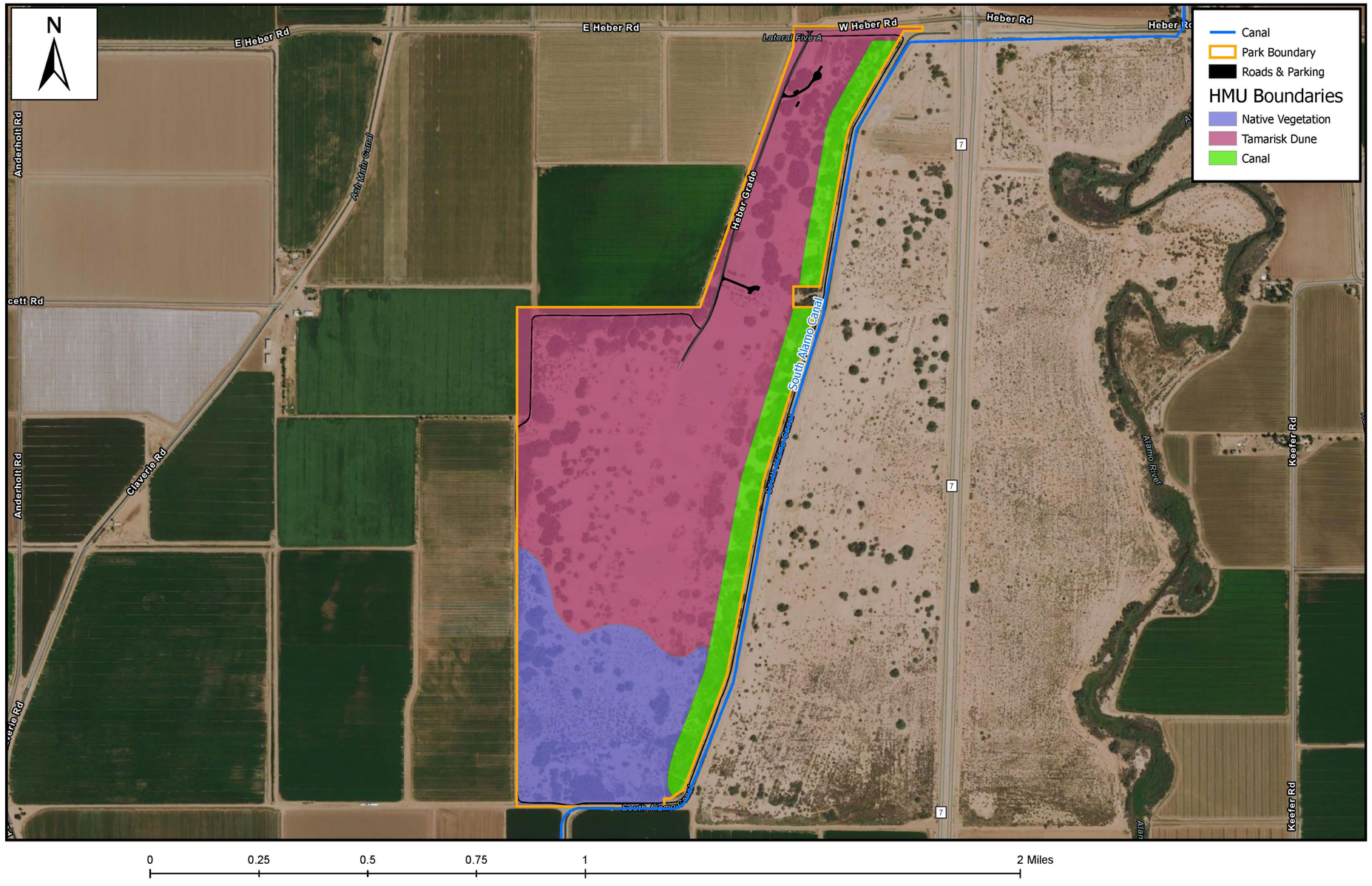

Figure 9. There are three Management Units delineated at Heber Dunes SVRA.

2.6.1.1 Canal MU

The Canal Zone MU comprises a 100-foot buffer along the eastern portion of the SVRA, capturing the perimeter and easement roads along the South Alamo Canal and a handful of OHV trails that connect riders back to the primary riding area. The MU is zoned for open riding, but riding is mostly contained to the maintained canal frontage roads and social trails connecting the frontage road to the park interior due to vegetation density. These frontage roads are also regularly used by IID and, to a lesser extent, SDG&E staff during maintenance.

Primary vegetation communities in this area consist of Athel tamarisk and dense arrow weed/baccharis. At the southern end of the MU, arrow weed/saltbush communities are dominant. The canal typically is filled with water, although it is drained a few days each year for maintenance. The presence of perennial water is unique in a desert setting. The Canal Zone MU is 39.7 acres.

2.6.1.2 Native Vegetation MU

The Native Vegetation MU is dominated by creosote and saltbush scrub in loamy and sandy soils. The General Plan identifies this portion of the park (the Native Vegetation MU is referred to as the Resource Management Zone in the 2011 General Plan) as the area with the highest quality creosote scrub habitat and other natural resources within the unit. The General Plan found that this area could be operated as a trail-only area; however, no park-designated travel routes are currently established. A network of social trails runs through the MU. Primary management concerns are reducing disturbance to native vegetation, enhancing existing native habitat and resources, managing weeds, restoring duplicate and degraded secondary trails, providing access to other portions of the SVRA, and clear signage that indicates zone boundaries.

There are no day-use facilities in this MU. A utility easement runs diagonally through the MU, with three towers currently installed and outside interest in the future expansion of utility facilities. The Native Vegetation MU is 75.4 acres.

2.6.1.3 Tamarisk Dunes MU

Athel tamarisk and barren, stabilized dunes dominate the Tamarisk Dunes MU. A few palm trees are present to the north of this MU, as well as some just outside the park's western boundary. This area is designated as an open riding area and is popular for riding/staging OHVs. Day use facilities are scattered throughout the MU, and these areas are often used for family picnics, with a portion of the group riding while others recreate near shade ramadas. The Tamarisk Dunes MU is the largest MU at 225.5 acres.

In the 2011 General Plan, six different zones overlap with the MU; three zones are recreational, two are for facilities, and one is a multi-purpose recreational and day-use facility zone. Goals for

this MU consider recreational opportunities (both OHV and non-OHV), interpretive opportunities, and safety and resource controls implementation.

3 CONSERVATION AND IMPROVEMENT GOALS AND OBJECTIVES

3.1 STATUTORILY REQUIRED STATE AND REGIONAL CONSERVATION OBJECTIVES

PRC §5090.32(g) requires that WHPPs be developed in consideration of statutorily required state and regional objectives. Conservation objectives are a central tool in planning and implementing effective resource management. Following a review of state and regional conservation plans, it was determined that there are no statutorily required state or regional conservation guidelines that directly apply to Heber Dunes SVRA. However, state and regional conservation goals that are broadly applicable to the park unit that will be discussed in this section.

3.1.1 State Conservation Objectives

3.1.1.1 State Wildlife Action Plan

The State Wildlife Action Plan (SWAP), developed by CDFW in concert with several partners statewide, provides a blueprint for wildlife conservation and habitats in the context of a growing human population and a changing climate. One of the priority goals of the Plan is to maintain and improve ecological conditions vital for sustaining ecosystems in California by, in part, improving ecosystem connectivity and community structure. This 2022 WHPP supports these SWAP goals by conserving and improving wildlife habitat over time within the SVRA.

The SWAP has divided the state of California into seven provinces and developed regional conservation strategies for each. Heber Dunes SVRA falls within the Colorado Desert Ecoregion of the Desert Province, with one identified conservation target, Sparsely Vegetated Desert Dune habitat, relevant to the park.

The five goals listed for Sparsely Vegetated Desert Dune in the 2015-2025 SWAP are:

- Increase acres where native species are dominant by at least 5%,
- Maintain or increase acres of habitat by at least 5%,
- Increase acres of habitat with suitable soil characteristics regimes by at least 5%,
- Increase acres of habitat with desired groundwater levels by at least 5%, and
- Increase acres of habitat with desired connectivity by at least 5%.

Several of these goals would be supported with the Heber Dunes SVRA WHPP, particularly the second goal to maintain existing habitat. As a SVRA, the park meets the SWAP objective to maintain acres of habitat.

3.1.1.2 Safeguarding California Plan

Developed by the California Natural Resources Agency, the updated 2018 Safeguarding California Plan's purpose is to lay out guidelines for how agencies can incorporate strategies necessary to address climate change into their future planning efforts. The 2018 update included a chapter specific to California State Parks and conservancies, chapter PC-5, and included the following recommendation to incorporate climate change in all state park planning and decision-making. To meet the chapter PC-5 recommendation, the plan identifies the steps to prioritize conservation, protection, and restoration of natural resources in climate change adaptation projects and planning to ensure sustainable recreational opportunities for the public. The Heber Dunes WHPP can contribute to this plan by conserving and improving habitat, which is a component of sustainable recreation at the park unit. Recreational activities at the park are generally defined by the 2011 General Plan.

3.1.1.3 California Biodiversity Initiative

California is a recognized global biodiversity hotspot. In 2017, a group of scientific experts from across the state developed the "Charter to Secure the Future of California's Native Biodiversity," a call to action on biodiversity conservation that prompted Governor Brown to launch the California Biodiversity Initiative in 2018. The Biodiversity Initiative incorporated biodiversity protection into the state's economic and environmental goals and work. In 2020, Governor Newsom furthered the cause by tasking the California Natural Resources Agency with forming the California Biodiversity Collaborative. This group would continue where the Biodiversity Initiative left off and introduce a new goal for the state to conserve thirty percent (30%) of California's land and coastal waters by 2030 (sometimes referred to as the 30 by 30 Initiative). The Heber Dunes WHPP will broadly support this initiative by conserving wildlife habitat.

3.1.2 Regional Conservation Objectives

3.1.2.1 Imperial County General Plan

While State Parks is not subject to or required to comply with the Imperial County General Plan, the objectives listed within the plan were considered during the development of the WHPP objectives. The County's General Plan balances land use policies and programs throughout the county while considering socioeconomics, resource management, development density, and many other factors. Of relevance to the WHPP is the County's Conservation and Open Space Element. This portion of the General Plan considers resource management for ecological, development suitability, public health, and sensitive resource values. The Element was updated in 2014 and adopted in 2016.

The Conservation and Open Space Element identifies nine broad conservation goals, of which the following will be supported either directly or indirectly by the 2022 Heber Dunes WHPP:

- Conserve resources through land use decisions and public education,
- Conserve critical habitats for their integrity, function, production, and long-term viability,
- Preserve cultural resources,
- Conserve, protect, and enhance water resources,
- Actively seek to improve regional air quality, and
- Maintain open space for aesthetics, natural resources, recreational opportunities, and minimize hazards to human activity.

3.2 Conservation and Improvement Objectives for Heber Dunes SVRA

The Public Resources Code provides the goals to be achieved through the WHPPs. Specifically, PRC §5090.35(c)(1) calls for the Division to "…prepare a wildlife habitat protection plan that conserves and improves wildlife habitats for each state vehicular recreation area." While the PRC defines "conserve" and "restoration," the broader definition of these terms used in the field of conservation biology are more appropriate for other purposes. To capture industry standards, the WHPP defines conservation as the protection and sustainment of resource values at existing conditions over time, and restoration as improvement in the quality or extent of resource values from existing conditions over time.

Development of objectives requires delineation of MUs and an assessment of ecological conditions within each MU. Additionally, it is important to consider goals and objectives from other internal and external plans and conservation priorities in developing park-specific objectives. Objectives have been designed to be S.M.A.R.T., where feasible, meaning they have been designed to be specific, measurable, achievable, realistic, and timely. The use of S.M.A.R.T. goals is compatible with the requirement of WHPPs to incorporate BAS.

If new monitoring programs are established through the WHPP or baseline data is insufficient, objectives may not currently meet the S.M.A.R.T. threshold. Anticipated timelines and data needs for developing S.M.A.R.T. objectives are addressed under each applicable objective's monitoring discussion. Once developed, these updated objectives will be addressed in the WHPP annual report.

Some pressures and stressors can impact and modify an environmental setting within every habitat. Management actions proposed within the WHPP will interact and drive changes to both pressures and the environmental setting itself. The effects of these interactions will then be assessed and used to consider the further use of management actions as part of an adaptive management loop (Figure 10).

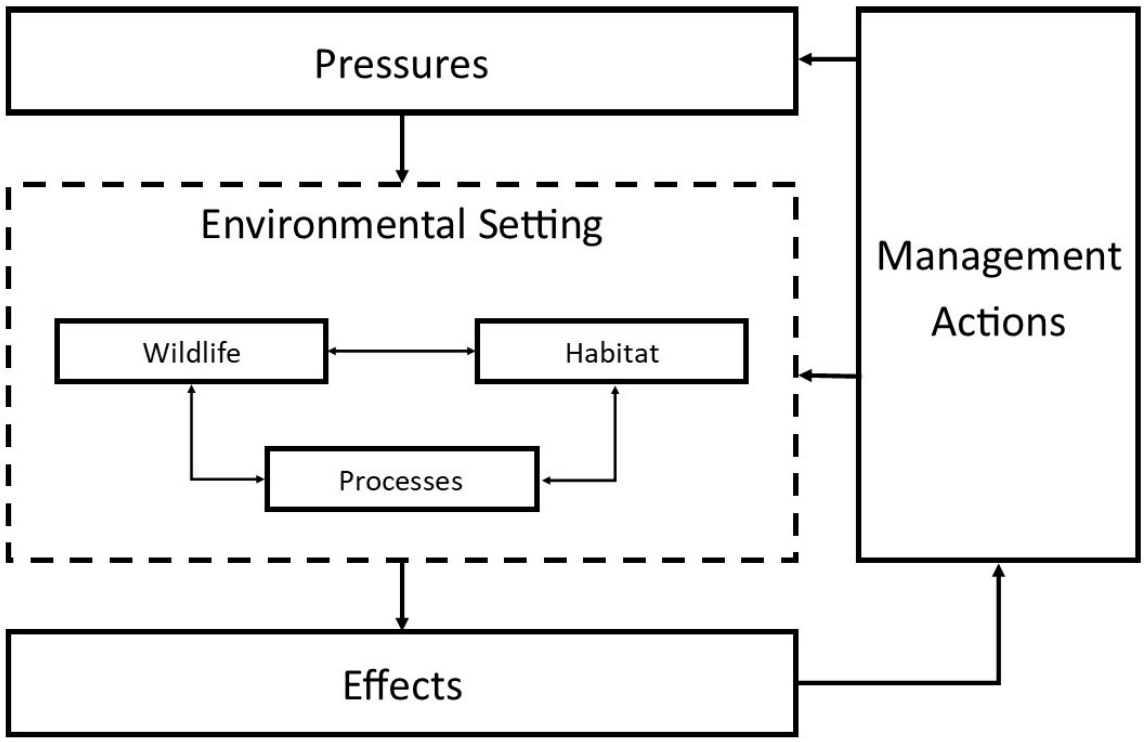

Figure 10. Conceptual model demonstrating the connectivity between the natural and physical environment to management actions. Adapted from Atkinson et al., 2004.

3.2.1 Conservation and Improvement Objectives

The PRC goals of resource conservation and improvement are achieved through setting resource objectives that target the protection and maintenance of the existing extent and condition of the specific soils, plants, wildlife, and habitats within a SVRA (Table 1 and Table 2). Furthermore, improvement and restoration objectives target improving conditions or re-establishing specific soils, plants, wildlife, and habitats within a SVRA. It is important to note that while these resource categories were identified from the language in the PRC, due to their interrelated nature, it is likely that there will be overlap amongst categories.

Setting objectives for conservation and improvement requires assessing existing conditions, quantitatively identifying resources of concern, and identifying clear management or monitoring actions that reevaluate resource conditions over time. Annual monitoring evaluates the efficacy of management actions that seek to achieve these targets.

3.2.1.1 Conservation Objectives

As defined in the WHPP, conservation objectives are tied to long-term protection of the resources within a park unit and were developed in consideration of information assembled within the natural resource assessment. These objectives target the protection and/or maintenance of the existing extent and condition of the specific soils, plants, wildlife, and habitats within a SVRA. As part of the adaptive monitoring cycle, monitoring data provide information about the efficacy of management actions undertaken to achieve this goal.

Goal 1. Conserve native vegetation communities at Heber Dunes SVRA long-term.

- **Habitat, Soil and Vegetation Conservation Objective 1 (HCO1, SCO1, and VCO1).** Over the next five years, conserve the existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.

A key focus of the WHPP is to maintain existing vegetation communities at the SVRA as vegetation has wide-ranging benefits to all resource conditions. Vegetation presence and health is beneficial to habitats in numerous ways, such as reducing erosion and providing stability, reducing moisture loss, and promoting biodiversity. Similarly, soil plays a key role in the condition and presence of vegetation in habitats, primarily by providing structure for rooting plants and as a source for nutrients and moisture. This objective will be accomplished by assessing community-level changes park-wide and monitoring changes to landcover within the Native Vegetation MU.

Heber Dunes SVRA is a unique environmental setting as it contains healthy remnant native vegetation communities in an area that has primarily been converted to agriculture. Soils in portions of the park provide suitable habitat for these native species to grow. Additionally, the non-native Athel tamarisk communities are also important to the park as they play a critical role in holding down dunes that would otherwise become windblown.

Goal 2. Conserve sensitive native wildlife at Heber Dunes SVRA long-term.

- **Wildlife Conservation Objective 1 (WCO1).** Verify and conserve special-status wildlife species within Heber Dunes SVRA over the next five years.

Wildlife conservation objectives focus on protecting special-status species that are known and suspected to occur at the park. Baseline conditions are not well understood for this objective currently. To allow for the establishment of baseline data, targets will be defined in 2024. Generally, targets will focus on understanding and maintaining the quality and health of special-status species present at the unit.

3.2.1.2 Restoration Objectives

The PRC restoration goal is achieved by setting objectives that target the improvement of resource conditions or re-establishment of the specific soils, plants, wildlife, and habitat within a SVRA. Again, these objectives are connected to the park's adaptive management, with monitoring assessments completed to determine the success of actions.

Goal 3. Improve habitat for native vegetation throughout Heber Dunes SVRA long-term.

- **Soil and Vegetation Restoration Objective 1 (SRO1 and VRO1).** By 2027, remove five acres of saltcedar from Heber Dunes SVRA.

Native vegetation can be impacted by invasive species in a variety of ways, including by outcompeting native species for resources, ability to rapidly spread, and altering the environment to inhibit other species. There are two known invasive species that pose management concern currently: saltcedar and Russian thistle. Saltcedar is known to be dominant in 25 acres within the SVRA, while not much is known about Russian thistle. Early efforts to control invasive plants will generally focus on saltcedar or emerging species of concern. Saltcedar has the potential to increase soil salinity in areas adjacent to where it grows, which can inhibit native species from growing. The removal of this species from the park will not decrease existing salinity levels but will reduce future deposition.

Goal 4. Improve wildlife habitat quality throughout Heber Dunes SVRA over time.

- **Wildlife and Habitat Restoration Objective 1 (WRO1 and HRO1).** Reduce micro-trash present on-site by 2027.

A focused effort on managing and reducing micro-trash will be beneficial to park wildlife and improve overall habitat quality. While trash can accumulate park-wide, the Athel tamarisk in the Tamarisk Dunes MU trap high quantities of windblown debris. Trash can be harmful to wildlife and should be removed from the system.

This objective will be achieved through clean-up events. Specific targets will be developed per clean-up event and reported within annual reports.

Table 1. Conservation Objectives for Heber Dunes SVRA

Category	Objective	Management Actions	Monitoring
Habitat, Soils, Vegetation	HCO1, SCO1, and VCO1. Over the next five years, conserve the existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.	Limit significant expansion of social trails (i.e., interpretive signage, temporary closures, etc.) within the Native Vegetation MU. Manage spread of invasive species with chemical and mechanical controls throughout the unit.	Update VegCAMP maps for the park every five years. Use Normalized Difference Vegetation Index (NDVI) to analyze changes in land cover within the Native Vegetation MU every two years.
Wildlife	WCO1. Verify and conserve special-status wildlife species within Heber Dunes SVRA over the next five years.	Use avoidance measures (i.e., avoidance buffers, seasonal restrictions on work, exclusion zones, etc.) to minimize impacts to special-status species. When burrowing owl are observed on site, Mitigation Measure Biology-1 (AECOM 2011) will be employed.	Conduct pre-construction surveys for breeding birds and /or rare plants in appropriate seasons. Conduct annual burrowing owl presence-absence surveys at the SVRA. Identify potential bat roost locations and conduct annual assessments for evidence of roosting beginning in 2023.

Table 2. Improvement Objectives for Heber Dunes SVRA

Category	Objective	Management Actions	Monitoring
Soils, Vegetation	SRO1 and VRO1. By 2027, remove five acres of saltcedar from Heber Dunes SVRA.	Plan and implement small-scale projects such as invasive plant removal, planting native vegetation, and scrubbing volunteer trails.	Use NDVI to analyze changes in land cover within the Native Vegetation MU every two years. Conduct EDRR surveys to identify and respond to invasive plants every other year.
Wildlife, Habitat	WRO1 and HRO1. Reduce micro-trash present on-site by 2027.	Hold up to two clean-up events at Heber Dunes SVRA annually, beginning in 2023.	Track locations of treated areas and weight of removed debris following every event.

3.3 MANAGEMENT ACTIONS

The goals and objectives identified in the WHPP are intended to guide the management of natural resources at Heber Dunes SVRA. Management actions are responses that can be taken to improve habitat, reduce impacts to habitat, respond to triggers, and attempt to reach success criteria, all with the intention of moving toward habitat goals and objectives. These actions are informed by the SVRA's resource objectives, success criteria, and management triggers.

The adaptive management process allows flexibility in incorporating management actions as the scale of understanding or uncertainties changes. The effectiveness or need for implementation of these management actions will be informed by a monitoring program. Therefore, management and monitoring are connected in a feedback loop into a decision-making process about the SVRA's resource management.

The management actions listed below are connected to the goals and objectives identified in Section 3.2.2, Table 1, and Table 2. A full list of management actions can also be found in Appendix 2.

3.3.1 Heber Dunes SVRA Conservation and Restoration Management Actions

1. Limit significant expansion of social trails (i.e., use of interpretive signage, route signage, temporary closures, etc.) within the Native Vegetation MU.

This management action is associated with HCO1, SCO1, and VCO1. It will be triggered if the significant expansion of new social trails is detected within the Native Vegetation MU. Potential management responses include interpretive messaging, route signage, temporary closures, and vertical mulching. The MU will be aerially monitored, with NDVI analysis, to show changes in vegetation cover over time. Baseline data is currently not defined, and management thresholds will be established by 2025. Successful implementation of this management action would result in maintained disturbance levels to the Native Vegetation MU.

2. Manage spread of invasive species with chemical and mechanical controls throughout the unit.

This management action is associated with HCO1 and VCO1. It will be triggered when known or emerging invasive species expand within the unit. Potential management responses include interpretive messaging, chemical or mechanical treatment, and implementation of an EDRR program. Unit-wide monitoring will consist of combined VegCAMP and EDRR methodology to show changes in the extent of invasive plant species over time. Baseline data is currently limited to VegCAMP assessments and anecdotal information. A better understanding of baseline conditions is anticipated by 2025. Successful implementation of this management

action would result in the maintenance or reduction of invasive plant species throughout the unit.

3. Use avoidance measures (i.e., avoidance buffers, seasonal restrictions on work, exclusion zones, staff training, etc.) to minimize impacts to sensitive resources (as defined within §2.4.3 and §2.4.3.1).
4. When and if burrowing owl are observed on-site, Mitigation Measure Biology-1 (AECOM 2011) will be employed. Mitigation Measure Biology-1 states:

> "In the event that western burrowing owl are discovered within a construction area or in an area that interferes with operation and management of Heber Dunes SVRA, CDFG [*sic*] will be consulted to determine the proper course of action, which may include avoidance or measures such as limiting construction to the nonbreeding season, burrow exclusion outside of the breeding season, collapsing of excluded burrows, and the creation of artificial burrows" (AECOM 2011).

These management actions are associated with WCO1. The detection of a sensitive (i.e., state or federal endangered or threatened species, burrowing owl, or CNPS 3+ ranked species) species in the SVRA would trigger management action. Potential management responses include the establishment of avoidance buffers, seasonal restrictions or avoidance of work, exclusion zones, and staff training.

If a burrowing owl is detected, CDFW would be consulted to determine the appropriate response. Based on the natural resource assessment, several sensitive species are known or have the potential to occur at Heber Dunes SVRA. However, further refinement of areas of use and seasonality is needed. Additionally, baseline conditions will need to be developed for specific projects at the unit. Successful implementation of this management action would result in conserving sensitive species at the unit over time and minimize impacts during construction projects.

5. Plan and implement small-scale projects such as invasive plant removal, planting native vegetation, and scrubbing volunteer trails.

This management action is associated with SR01 and VRO1. Specific restoration projects would be planned when deteriorated conditions are identified in the unit. Potential management responses include invasive plant removal, planting native vegetation, and scrubbing volunteer trails. No specific projects or actions have been currently identified but monitoring over the next five years may identify work. Once identified, projects would be evaluated consistent with CEQA, and standard district avoidance measures would be incorporated into the project design, as appropriate. When projects are identified or proposed, management thresholds and success criteria will be determined.

6. Hold up to two clean-up events at Heber Dunes SVRA annually, beginning in 2023.

This management action is associated with WRO1 and HRO1. Two clean-up events will be held annually beginning in 2023 to control accumulated non-organic trash and micro trash. Event advertisement will be focused on local communities, and may include schools, civic organizations, user groups, and other stakeholders. Beyond the clean-up events, potential management responses include interpretive messaging or programs, and informal clean-up events. The extent and location of clean-up events will be the primary tracking method associated with this management action. However, the weight of accumulated trash may be used as an event-specific metric to show success. Management thresholds will be established per event; park-wide conditions are currently not well understood, but wind-blown trash frequently accumulates under dense tamarisk stands and vegetated thickets. Successful implementation of this management action would result in decreased trash on-site.

3.4 MONITORING PROGRAM

A natural resource assessment (Section 2.4) is the initial assessment within a monitoring program, allowing periodic evaluation of the condition of resources and informing adaptive management within the SVRA. A monitoring program also identifies and documents a set of performance indicators that demonstrate progress and achievement of the objectives defined in Section 3.2.2. Performance indicators are evaluated at regular intervals, and results are used in the adaptive management approach to inform future management of targeted resources. In addition to a performance indicator-driven monitoring program, other monitoring provides relevant information to park management that does not directly tie to a management action.

This section contains a list of resource monitoring at Heber Dunes SVRA to meet new PRC mandates. A summary of monitoring focuses, the goal of monitoring, how it informs monitoring, and how it ties to the WHPP objectives is included below. Additional details on monitoring can be found in Appendix 3.

3.4.1 Objective-driven Monitoring

Monitoring listed in this section is tied to objectives and management actions, with established performance indicators that allow for success to be assessed as part of the adaptive management process. Performance indicators evaluate the effects of management actions on targeted natural resources. The following section discusses how the performance indicator is linked to the targeted resource, identified objective, and management actions that will be implemented to meet the objective. To meet BAS guidance, performance indicators have been based on robust and accepted methods, have clear linkage with the question or hypothesis being evaluated, and have well-documented methods and treatment of bias, uncertainty, gaps, and limitations.

A metric, baseline, and target for each monitoring focus have been identified. For the WHPP, a metric is a measurable parameter measured to provide information about the effects of a management action of concern. Baseline is the existing resource condition determined through BAS. Understanding of baseline informs the development and success of management actions. A target is the S.M.A.R.T. objective identified for resource conservation or improvement that can be measured against the baseline to show success.

3.4.1.1 VegCAMP Surveys

VegCAMP updates will be completed every five years, coinciding with WHPP updates. VegCAMP uses the Manual of California Vegetation to establish a hierarchical classification of vegetation on a fine scale. Data is evaluated through aerial imagery and strict protocols established by CDFW; then, field surveys assess accuracy. These surveys provide a spatial inventory of vegetation communities throughout the park. See Appendix 3 for further information.

- **Metric:** CDFW's VegCAMP protocol will categorize fine-scale vegetation communities and their extent (in acres) throughout the SVRA.
- **Baseline:** VegCAMP aerial surveys were first completed in 2021 for Heber Dunes SVRA; on-the-ground surveys occurred in spring 2022. This survey effort will serve as the baseline for future assessments. Six vegetation alliances were mapped within the SVRA, along with two non-vegetative landcover types (Figure 8). The vegetation alliances include:
    - arrow weed thickets shrubland alliance (31 acres),
    - creosote bush scrub shrubland alliance (52 acres),
    - quailbush scrub shrubland alliance (5 acres),
    - bush seepweed shrubland alliance (4 acres) and
    - tamarisk thickets semi-natural shrubland alliance (168 acres total; Athel tamarisk accounts for 143 acres while saltcedar covers 25 acres).
- **Target:**
    - By 2027, maintain existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.
    - By 2027, remove five acres of saltcedar from Heber Dunes SVRA.

3.4.1.2 Invasive Weed Monitoring

Monitoring invasive weeds will occur opportunistically and through established protocols at Heber Dunes SVRA. Currently, two invasive species of management concern are identified at the unit, including Russian thistle and saltcedar. Outside of VegCAMP surveys, dedicated mapping has not occurred, so there is a potential that other invasive species are present at the park, and the extent of invasive species is not well documented. EDRR protocols will be utilized to map, remove, and monitor invasive species. See Appendix 3 for further information.

- **Metric:** The extent (in acres) of invasive plants at the SVRA will be spatially mapped by species.
- **Baseline:** Two invasive species of concern have been identified in the unit. Dedicated mapping has not yet occurred; however, VegCAMP surveys captured areas that one of the species is present. That species, saltcedar, was mapped in 25 acres of the SVRA (Figure 8). Unit-wide baseline assessments will be completed by 2025 and will serve as baseline for future work.
- **Target:**
    - By 2027, remove five acres of saltcedar from Heber Dunes SVRA.

3.4.1.3 NDVI Landcover Changes in Native Vegetation MU

Native vegetation is important to Heber Dunes SVRA as it is remnant habitat in the region. Most of the native vegetation is located within the Native Vegetation MU. The General Plan identified that the vegetation in this area has some sensitivity as a remnant habitat and, while the area is managed as an open ride area, recognized that reducing future disturbance is desirable (AECOM, 2011a). The General Plan also noted erosion at the base of some vegetation within the Native Vegetation MU.

Staff will utilize NDVI to identify the landcover characteristics, including percent vegetation coverage, of the Native Vegetation MU. Changes in cover over time will be assessed to identify whether disturbance, shown through loss of percent vegetation coverage unassociated with natural effects, is increasing or decreasing within the MU. NDVI mapping will occur every two years. When vegetation loss is identified, VegCAMP data will be utilized to inform the specific native communities that are impacted. This data will guide management and restoration efforts within the Native Vegetation MU. A State Parks protocol, initially developed for Prairie City SVRA, will be utilized. See Appendix 3 for further information.

- **Metric:** NDVI will be used to identify changes in landcover, particularly the percent vegetation cover, within the Native Vegetation MU.
- **Baseline:** NDVI has not been utilized within the Native Vegetation MU to map disturbance. The first efforts will establish baseline landcover values and percent cover. The baseline will be established in 2025.
- **Target:** Targets will be established by 2025, following the availability of initial baseline data.

3.4.1.4 Sensitive Species Avoidance Monitoring

One goal of the Heber Dunes SVRA WHPP is to protect and conserve sensitive species. While several sensitive species are known to occur, and others have the potential to occur, not much is directly known about their behavior and presence within the SVRA. Most of the known sensitive species at the park unit are either bats or birds. There is one sensitive plant species as

well. Ongoing monitoring of taxa at the unit will provide information about the presence or absence of these species and, in time, can inform the seasonality and usage of the park.

Bats

An inventory of bats at Heber Dunes SVRA began in 2019 using acoustic recordings. Early efforts showed that numerous bats were at least seasonally foraging or migrating through the SVRA, including several species of special concern. Due to the relatively sparse dataset, the inventory will continue for several years to provide additional context on species' seasonality and potential to occur. As previously discussed, acoustic surveys since 2019 indicate that 13 bat species, including seven SSC, have been observed at the SVRA.

In addition to the inventory, a better understanding of bats' utilization of Heber Dunes SVRA will be important to ongoing park management. Locations within the SVRA identified as potential roost sites, such as buildings and palm trees, will be surveyed during key times of year to identify if bats or their sign are present. District staff will work with Division consultants to develop or select a protocol to conduct roost assessments at Heber Dunes SVRA by 2023. The implementation of this protocol will allow for baseline conditions to be understood. See Appendix 3 for more information.

Birds

Burrowing owls have the potential to be present within Heber Dunes SVRA, although they are more frequently observed outside the SVRA in agricultural fields. It is important to understand the potential use of the SVRA by burrowing owl. Staff will modify protocols and procedures from CDFW's 2012 Staff Report on Burrowing Owl Mitigation to assess presence, absence, and map utilized habitat within the SVRA. CDFW's protocol requires an initial habitat assessment, surveys, and an impact assessment. These protocols have been adapted as they were primarily developed for use during construction projects, and the SVRA is known to contain burrowing owl habitats. See Appendix 3 for further information.

In addition to burrowing owl, other sensitive bird species have the potential to be present seasonally or reside within the SVRA. Pre-construction surveys would occur during the species' breeding seasons to identify if nests are present within the project area and if present, ongoing monitoring of nests during construction activities would occur. These surveys would allow baseline conditions to be established for individual projects. See Appendix 3 for further information.

Plants

One sensitive plant species, ribbed cryptantha, has the potential to occur in the area, although it has not been identified in the SVRA. Due to the challenges in identifying this species, regular

surveys are not proposed; however, pre-construction surveys would occur during the species' bloom period, February to May, to flag avoidance zones around *Crypthantha* spp. in or near the project area. See Appendix 3 for further information.

Sensitive Species Avoidance Monitoring

- **Metric:** The presence or absence of a sensitive species or its sign.
- **Baseline:** Baseline conditions vary by taxon and methodology; see appendix 3 for further discussion.
    - Bat
        - Inventory: 13 total bat species observations, including seven sensitive species were auditorily observed at Heber Dunes SVRA from 2019 to 2020.
        - Roosting: Baseline data will be gathered beginning in 2023. Baseline conditions will be established by 2024.
    - Bird
        - Burrowing Owl: Burrowing owl are known to be present within the SVRA on occasion. Annual presence and absence will be determined through monitoring.
        - Pre-construction: Baselines will be established for individual projects and identified within annual reports.
    - Plant
        - Pre-construction: Baselines will be established for individual projects and identified within annual reports.
- **Target:** Targets will be established by 2024 following the availability of initial baseline data. Project-specific targets will be established as needed and reported on in the WHPP annual report.

3.4.1.5 Track Clean-Up Event Success

Heber Dunes SVRA is surrounded by low-lying agricultural fields and regional roadways. As winds blow through the area, trash tends to collect at the base of vegetation, particularly tamarisk, in the unit. This trash reduces overall habitat quality and may pose a risk to wildlife. While opportunistic clean-up occurs on-site, the organization and implementation of larger public clean-up events will result in greater impact. Prior to clean-up events, staff would document areas in need and then reassess the condition of those prioritized areas following the clean-up. In addition to tracking conditions of cleaned areas, the weight of trash bags would be measured. Volunteer hours would be maintained through short-term volunteer records. See Appendix 3 for further information.

- **Metric:** The location of treated areas in the SVRA.

- **Baseline:** A well-established baseline does not exist; however, staff has anecdotal knowledge about the density and frequency of build-up in certain locations around the unit. A better understanding of conditions will be established through the WHPP, particularly as clean-up events begin in 2023.
- **Target:**
    - This objective will be achieved through clean-up events. Specific targets will be developed per clean-up event and reported within annual reports.

3.4.2 Scientific Research

Scientific research consists of monitoring work that provides relevant management information but does not have a direct nexus with the effect of management actions on natural resources. Performance indicators have not been established for scientific research as the monitoring is not tied directly to a management action.

3.4.2.1 Taxa Monitoring

Periodic taxa monitoring (i.e., avian, reptile, small mammal, and vegetation) will provide an understanding of wildlife populations present at Heber Dunes SVRA and periodic updates to the species inventory, as appropriate. While some monitoring may occur regularly, not all taxa are well represented or easy to sample at the unit, so dedicated surveys may occur periodically to help inform the species inventory. Avian and small mammal surveys, focusing on species richness and evenness, have historically occurred twice per year. Reptile and vegetation surveys have occurred sporadically and poor sampling efforts that have produced limited data. All data would provide information on background ecological processes occurring at the SVRA, regardless of current conservation and improvement goals and objectives.

Avian survey protocols are currently being revised to utilize autonomous recording units, ideally reducing observer bias and increasing auditory observations. These surveys will continue to occur annually as methodology is field-tested.

3.4.2.2 Weather Data

Understanding local weather trends is an important element of analyzing habitat monitoring data. The nearest official weather station to the park is in El Centro, CA, approximately nine miles west of the SVRA. With the distance, there was concern that the El Centro dataset may not fully capture specific weather within the SVRA. A weather station was installed within the maintenance yard at Heber Dunes SVRA in fall 2021. The weather station collects data on precipitation, daily temperature, relative humidity, wind speed and direction, and gust speed. District staff periodically collects data and imports it into the habitat monitoring database. Annual reports will contain a section on observed weather.

4 EVALUATE AND ADAPT

4.1 REPORTING

An annual report will be produced to provide a "snapshot" of current resource conditions and describe the management actions implemented for natural resources in the previous year. This report will also discuss plans for the upcoming year's resource management. Annual reports provide one-year updates and progress reports to the overall goals of the WHPP. OHMVRD will review these reports to evaluate the Heber Dunes SVRA WHPP.

4.2 ADAPTIVE MANAGEMENT DECISIONS

4.2.1 Matrix Management and Chain of Command

The Ocotillo Wells District uses the Department Standard District Structure identified in Department Operations Manual 0202. Within Park Operations, the district falls under the Desert Division. However, aspects of district managed SVRAs, such as review and approval of the WHPP, also fall under the jurisdiction of OHMVRD and NRD. A District Superintendent is responsible for the district operations, and a core team of program managers is responsible for their respective programs (Figure 11). Core district programs include administrative services, facilities management, interpretation and education, public safety, resources, and service driven. While program managers are tied to specific disciplines and programs, it is important for cross-discipline and matrix management to occur as no program exists solely independent of others.

For the purposes of the WHPP, the district's resources department will primarily be responsible for implementation, although other district programmatic efforts will be required. For example, certain management actions call for the use of interpretive signage, which would be executed in conjunction with the interpretation program. Additionally, the district's core team will be part of the district approval process of the WHPP.

4.2.1.1 Approval for WHPP-Identified Management Actions

As management actions included in the WHPP have previously been reviewed by the district, OHMVRD, and NRD, implementation of any adaptive management strategy identified in the WHPP is to be approved by the district's Resource Program Manager and reported to the District Superintendent. Implemented management actions will be discussed in annual WHPP reports.

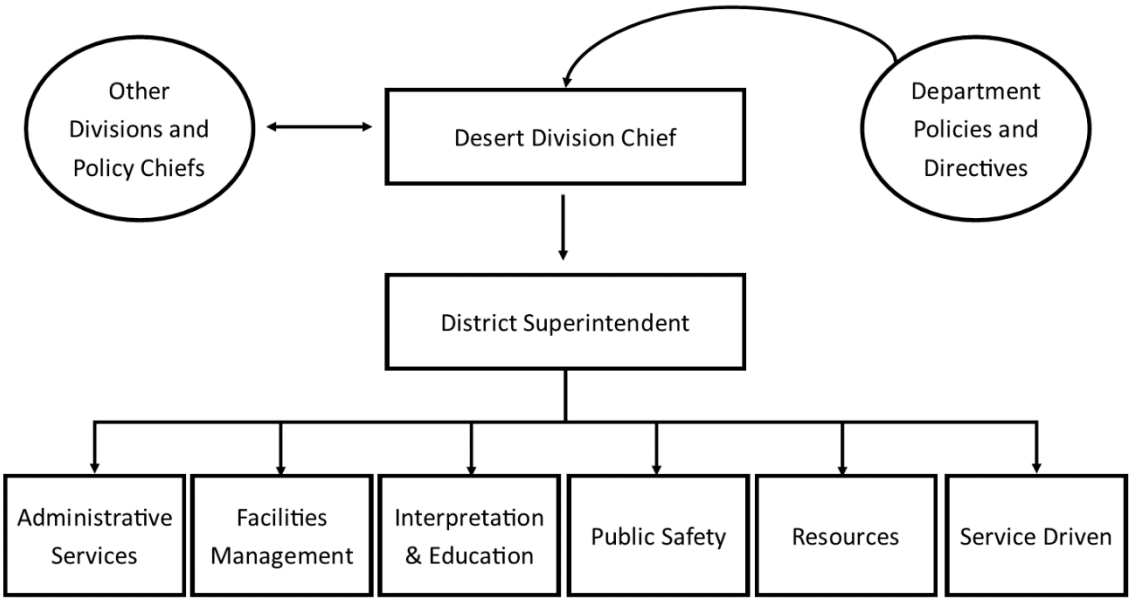

Figure 11. Overview of district chain of command.

4.2.1.2 Approval for Modified or New Management Actions

The management actions presented within the WHPP offer a comprehensive overview of all the management actions currently being used to manage the SVRA's natural resources. The presented management actions may be expanded or modified, and new management actions may be developed based on monitoring results. Adaptive management actions not outlined and approved by the WHPP will follow a different process for review and implementation. Modified and new management actions are to be categorized as low-level or high-level, depending on the scale or level of change to the current WHPP, resources program, and park unit. Any modified or new management action would follow Department policies found within the Department Operations Manual or relevant Departmental Notices.

Low-level management actions can be performed with little to no impact on the SVRA's recreation or WHPP. Implementation of low-level management actions is to be approved by the district's Resource Program Manager and reported to the District Superintendent. Additionally, low-level management actions would be reported in the annual WHPP report. The use of low-level management actions allows for resources staff to act and respond quickly to changes in the adaptive management strategies of their parks. Examples of low-level actions include closing a gate or removing incipient invasive plants.

High-level management actions are adaptive management decisions that require more thought, approval, and implementation and that may negatively impact the park's recreation activities or

result in broader changes to the current WHPP. High-level management decisions will require the approval of the district's Resource Program Manager and District Superintendent. These management decisions should be reported to OHMVRD and NRD and included in the WHPP annual report. Examples of high-level management decisions include closing sections of the SVRA for restoration or starting a new management program (e.g., grazing, controlled burn, etc.).

4.2.2 Reporting Guidance

4.2.2.1 Annual WHPP Report

Annual WHPP Reports will be used to capture the full natural resources program over the previous year, including adaptive management decisions, project implementation, and monitoring results. Annual WHPP Reports serve as a review of the application of the habitat management strategy and adaptive management approach of the SVRA.

Reports at a minimum will include the following:

- The resources goals, and objectives for the prior year.
- An analysis and review of the prior year's monitoring data results.
- The SVRA's management triggers from the prior year.
- All management action decisions implemented during the past year and a review of their level of success and ability to inform management decisions.
- Plans, goals and objectives for monitoring and management within the coming year.

4.2.2.1.1 Report Review Process

WHPP Annual Reports are to be reviewed within State Parks' Chain of Command. This includes SVRA, District, Division, and Department. After review at the SVRA and District levels, WHPP Annual Reports are to be sent to OHMVRD and NRD technical team staff for review to determine if the goals and objectives established by the SVRA's 2022 WHPP are being met.

4.2.2.1.2 Report Timing

WHPP Annual Reports will be submitted annually to OHMVRD and NRD resources staff following the review process defined above. Report generation, program review, and district review should be completed annually, with final reports submitted to OHMVRD and NRD by March 31st, following the year to which the annual report applies.

5 CONSTRAINTS

Constraints are factors that may limit staff's ability to meet the goals and objectives identified in the WHPP. While the WHPP considered many of these elements during development, the

likelihood of any given constraint or constraints occurring is unknown and impossible to account for. Potential constraints are discussed below to provide information about different situations that may arise; however, if a constraint were to impact staff's ability to meet WHPP goals and objectives, further discussion about the specific constraint or constraints would be incorporated into annual reporting.

5.1 Annual Weather Cycles

Annual weather cycles are an important driver of environmental conditions, and they can be highly variable. Drought conditions are a source of stress to the system, while wet seasons can boost wildlife populations and result in annual wildflower blooms. Monitoring and management can be affected by these weather cycles.

Annual vegetation can require specific conditions (i.e., above average precipitation, mild temperatures) to grow, and many species can remain dormant in the seed bank until these conditions are met. Similarly, above or below average temperatures can pose a mortality risk to animals during live trapping. While monitoring efforts maintain some level of flexibility in consideration of weather, it can be a challenge to time work appropriately or maintain a full park inventory if weather conditions are not suitable. Similarly, some management actions, such as restoration, could be less effective or require additional monitoring or action in drought conditions to ensure project success.

Due to the importance of annual weather cycles at Heber Dunes SVRA, a weather station has been installed at the unit. The weather station allows staff to better understand current trends at the SVRA to inform progress on WHPP goals and objectives. Still, this understanding does not negate the challenge associated with certain weather cycles.

5.2 Legal or Regulatory Obligations

Heber Dunes SVRA operates under several existing legal obligations. These existing requirements and potential future legal or regulatory obligations may change or redirect staff priorities. For example, if the language of PRC §5090 were to change or a species were to be listed, staff would need to temporarily reprioritize efforts and consider whether an update to the WHPP is appropriate to meet these new commitments. The decision to update a WHPP outside the five-year update cycle would be determined in conjunction with OHMVRD and NRD.

5.3 Operational Limitations

Operational limitations include financial obligations and staff capacity. These limitations may arise at any level within the state, not just from Heber Dunes SVRA or the district. Financial constraints may arise with competing district priorities, recessions, budget cuts, or other district funding or funding sources changes. Depending on the scale of the financial constraint, staff will

need to reprioritize efforts, which may alter the capacity to meet annual targets laid out in the WHPP.

Similarly, staffing at Heber Dunes SVRA is extremely limited, and district staff will primarily be responsible for meeting WHPP goals and objectives. These efforts do require at least opportunistic support from unit staff and administrative support from district staff. As direct changes to unit or district staff occur, staff capacity maybe reduced, and challenges will arise in meeting annual targets. When these challenges arise, staff will consider the use of statewide assistance or contracts to bolster staffing capacity and consider reprioritizing efforts from non-mandated and non-emergency projects.

5.4 Stochastic Events

Stochastic events are unpredictable events that may impact resources, land, or divert resources that would've otherwise been directed towards management. Examples of stochastic events include natural events such as storms and earthquakes and human-generated events such as plane crashes and hazmat events. Impacts from stochastic events may be either short or long duration.

5.5 Other Constraints

The constraints listed above are not intended as a comprehensive list as a variety of constraints could impact staff's ability to meet WHPP goals and objectives, rather as a sample of potential constraints that may arise. If any other constraint arose, it would be documented appropriately within an annual report.

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7 APPENDIX 1: SPECIES INVENTORY

Table 3. Heber Dunes SVRA Species Inventory.

The list was generated using park data and external records. CNDDB, CNPS RarePlants, and IPac were searched using a nine USGS quad 7.5' Quadrangle search on May 27, 2021. Due to the SVRA's proximity to Mexico, only six quads (Bonds Corner, Calexico, El Centro, Heber, Holtville West, and Holtville East) returned data. A report of native plants at the SVRA was generated in Calscape on June 6, 2021. iNaturalist and eBird supplemented these datasets.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Anaxyrus woodhousii Woodhouse's toad	Amphibian	None	None	N/A	IUCN: LC	Moist environments include irrigation ditches, canyons, and swamps.	Lays eggs in shallow, slow-moving, ephemeral bodies of water.	Moderate	Yes	Suitable habitat for this species is not present within the SVRA; however, adjacent properties have suitable habitat and irrigation canals surrounding most of the SVRA. However, many of the adjacent fields have been fallowed for several years. Within the past couple years, fields have been in use. This species has several observations around the SVRA and was last observed by park staff in 2002.
Incilius alvarius Sonoran Desert toad	Amphibian	None	None	N/A	CDFW: SSC IUCN: LC	Breeds in temporary pools and irrigation ditches along the Colorado River and southern Imperial Valley.	N/A	None	No	Per CNDDB, Sonoran Desert toad is presumed extirpated in this region. Two records were listed from 1912, but no recent observations are included. No suitable habitat is present within the SVRA or adjacent lands.
Lithobates pipiens northern leopard frog	Amphibian	None	None	N/A	CDFW: SSC IUCN: LC	The native range is east of Sierra Nevada-Cascade Crest. Near permanent or semi-permanent water in a variety of habitats.	Highly aquatic species. Shoreline cover submerged and emergent aquatic vegetation are important habitat characteristics.	None	No	CNDDB notes that the 1929 observation was of transplanted individuals outside their native range. Suitable habitat is not found within the SVRA or adjacent property as no aquatic habitat is present, and the park is located well outside of the native range.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Lithobates yavapaiensis lowland leopard frog	Amphibian	None	None	N/A	BLM: S CDFW: SSC IUCN: LC	Found along the Colorado River and in streams near the Salton Sea.	N/A	None	No	Suitable habitat for this species is not present at the SVRA or adjacent properties. According to CNDDB, this species is considered extirpated in California.
Hadrurus arizonensis desert hairy scorpion	Arthropod	None	None	N/A	N/A	Wide range of habitats from dunes to rocky hillsides.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA. Park staff last documented observation of this species on 4/5/2017.
Accipiter cooperii Cooper's hawk	Bird	None	None	N/A	CDFW: WL IUCN: WL	Forest and woodlands adapted to disturbed areas with trees.	Prefers to nest in tall trees with extensive canopy cover.	High	Yes	Suitable habitat for this species is present in the SVRA and surrounding area. The SVRA is in the nonbreeding range of the species, although it is close to the year-round range. Utility towers within the SVRA could potentially be used for nesting, although they are not ideal. This species was last observed in the SVRA on 10/9/2018.
Aechmophorus clarkii Clark's grebe	Bird	None	None	N/A	USFWS: BCC	Nests in inland freshwater lakes and marshes; occupy nearshore marine waters in winter.	Builds floating nests sheltered from waves near water's edge among emergent vegetation, typically reeds or rushes.	Low	No	Suitable habitat for this species is not present at the SVRA or adjacent properties. There are no park records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Aeronautes saxatalis white-throated swift	Bird	None	None	N/A	IUCN: LC	Broad. Breeds mainly in dry mountains, canyons; locally on sea cliffs (California).	For nesting, require crevices but have adapted to human-modified environments, using highway overpasses, quarries, buildings, and bridges.	High	Yes	Suitable habitat for foraging is present both within the SVRA and adjacent lands. The park is outside of the breeding range of this species. Frequent flyover observations occur during park surveys. This species was most recently observed by park staff on 9/29/2020.
Agelaius phoeniceus red-winged blackbird	Bird	None	None	N/A	IUCN: LC	Broad. Agricultural fields, cattle lots, sloughs, ditches, rivers, lake edges, and marshes.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent agricultural fields. Observations by park staff primarily are of flyovers. The last observation within the SVRA was on 9/30/2020.
Amphispiza bilineata black-throated sparrow	Bird	None	None	N/A	IUCN: LC	Desert scrub dominated by Joshua tree, Mojave yucca, cholla, and other spiny plants on well-drained rocky or gravelly soils.	Around the Salton Sea, habitat islands of nonnative tamarisk and suburban areas with planted trees. Occasional use of desert scrub dominated by quail brush or dense weed fields, often dominated by Russian thistle.	High	Yes	Poor quality habitat for this species is present at the SVRA. Preferred vegetation and soils are not found on-site or in nearby agricultural fields. The park acts as a habitat island, like other habitats used by this species around the Salton Sea. The park is within the year-round range for this species. Staff last observed this species within the SVRA on 10/1/2020.
Ardea alba great egret	Bird	None	None	N/A	CDF: S IUCN: LC	Freshwater, brackish, and marine wetlands. Forage in shallow water, salt or fresh, including partially flooded fields.	Nests in partially submerged snags; nests are frequently over water with banks of cattail near the nest tree.	Moderate	Yes	There are no suitable species for this habitat within the SVRA. Adjacent property may serve as a foraging habitat when partially flooded. Park staff regularly observe flyovers, with the most recent observation on 9/30/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Artemisiospiza belli Bell's sparrow	Bird	None	None	N/A	IUCN: LC	Breed in coastal sagebrush, chaparral, and other open, scrubby habitats.	Winters in dry shrublands or grasslands, including creosote and saltbush-dominated desert scrub, yucca, honey mesquite, and greasewood.	Moderate	No	Suitable year-round habitat is present within the SVRA, less so on adjacent property. There are no records of this species within the SVRA. This species is difficult to distinguish from *Artemisiospiza nevadensis*.
Artemisiospiza nevadensis sagebrush sparrow	Bird	None	None	N/A	IUCN: LC	Shrubsteppe habitats consist of shrubs approximately 6 feet tall, especially big sagebrush, as well as saltbush, rabbitbrush, shadscale, and bitterbrush. Typically, below 5,600 feet elevation.	Winters in dry shrublands or grasslands, including creosote and saltbush-dominated desert scrub, yucca, honey mesquite, and greasewood.	Moderate	No	Suitable wintering habitat is present within the SVRA, less so in adjacent property. The SVRA is within the nonbreeding range of this species. There are no records of this species within the SVRA. This species is difficult to distinguish from *Artemisiospiza belli*.
Athene cunicularia burrowing owl	Bird	None	None	N/A	CDFW: SSC BLM: S CDFW: SSC IUCN: LC USFWS: BCC	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	High	Yes	Suitable habitat for this species is present at the SVRA, although adjacent agricultural fields are preferred. Burrowing owl have been observed nesting at HDSVRA occasionally and may forage on site. This species was last observed by district staff within the SVRA in 2017.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Auriparus flaviceps verdin	Bird	None	None	N/A	IUCN: LC	Arid desert scrub or chaparral with thorny trees. Avoid open flats with low vegetation and dense forest.	Prefers mesquite, catclaw, blue palo verde, and smoke tree but has adapted to use tamarisk for nesting.	High	Yes	Suitable habitat for this species is present at the SVRA but not on adjacent property due to agricultural conversion. The park is within this species' year-round range, and park staff frequently observe it. The most recent observation within the SVRA was on 9/29/2019.
Bubo virginianus great horned owl	Bird	None	None	N/A	IUCN: LC	Broad. Secondary-growth woodlands, swamps, orchards, and agricultural areas, as well as a wide variety of deciduous, coniferous, or mixed forests.	Nest in cottonwood, mesquite thickets, and nonnative palms.	High	Yes	Suitable habitat is present at the SVRA, and the park is within the year-round range of this species. Minimal preferred trees for nesting are on site. The most recent observation within the SVRA was on 4/17/2018.
Bubulcus ibis cattle egret	Bird	None	None	N/A	IUCN: LC	Coastal barrier islands, marshes, reservoirs, lakes, quarries, swamps, riverside woodlands, and upland forests.	Around the Salton Sea, forage in agricultural and flooded fields.	Moderate	No	Suitable habitat is not present within the SVRA, but adjacent agricultural fields are suitable for foraging. The park is within the year-round range of this species. Observations primarily consist of flyovers or the use of nearby agricultural fields. Cattle egrets were most recently observed on 10/3/2019 as a flyover.
Buteo jamaicensis red-tailed hawk	Bird	None	None	N/A	IUCN: LC	Open habitat. Desert, scrubland, grassland, roadsides, fields and pastures, parks, broken woodland, and (in Mexico) tropical rainforest.	N/A	High	Yes	Suitable habitat is present within the SVRA and adjacent land. The park is within the year-round range. This species has been observed nesting in utility towers within the SVRA. The most recent SVRA observation was on 10/1/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Buteo regalis ferruginous hawk	Bird	None	None	N/A	CDFW: WL IUCN: LC USFWS: BCC	Open grasslands, sagebrush flats, desert scrub, low foothills, and fringes of pinyon and juniper habitats.	Eats mostly lagomorphs, ground squirrels, and mice. Population trends may follow lagomorph population cycles.	Moderate	No	Foraging habitat is present in the SVRA; minimal nesting habitat is present within the park and adjacent property. Utility towers within the SVRA have been used for nesting by other hawk species and may be utilized by this species when available. This species winters in southern California, and the SVRA is outside the breeding range. Per CNDDB, in 2003, a FEHA was observed near El Centro.
Callipepla gambelii Gambel's quail	Bird	None	None	N/A	IUCN: LC	Thorny and brushy vegetation throughout the Sonoran, Chihuahuan, and Mojave deserts, as well as parts of the Great Basin.	Common near water sources for drinking and bathing.	High	Yes	Suitable habitat is present within the SVRA, but surrounding agricultural fields are likely avoided. The park is within the year-round range of this species. The most recent observation within the SVRA was on 9/30/2020.
Calypte costae Costa's hummingbird	Bird	None	None	N/A	USFWS: BCC	Sonoran and Mojave Desert scrub, coastal California chaparral and sage scrub, and deciduous forest and desert scrub in Baja California, Mexico	In the Sonoran Desert, occur in desert washes with palo verde, jojoba, desert lavender or chuparosa, on steep rocky slopes, and in lowlands with saguaro, creosote bush, and cholla cacti below 3,000 feet elevation.	High	Yes	Suitable habitat for this species is present at the SVRA, and COHU has been observed during staff surveys in the past. This species was most recently observed by district staff on 10/3/2019. iNaturalist lists a 2014 record outside the park along State Route 7.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Cardellina pusilla Wilson's warbler	Bird	None	None	N/A	IUCN: LC	Willow, alder, and shrubby thickets near streams up to about 11,500 feet elevation.	Forests and scrubby areas along streams during migration.	High	Yes	Suitable habitat for this species is present within the SVRA but not in adjacent agricultural fields. The SVRA is within the migration path for this species. Staff observed this species last on 4/6/2020.
Cathartes aura turkey vulture	Bird	None	None	N/A	IUCN: LC	Open areas include mixed farmland, forest, and rangeland. Roost in trees, on rocks, and other high, secluded spots.	N/A	High	Yes	The SVRA contains suitable habitat for this species and is within the year-round range. Nearby agricultural fields provide better foraging opportunities, and there are minimal roost sites within the SVRA. This species is frequently observed by park staff, typically flying over the SVRA, most recently on 9/30/2020.
Charadrius montanus mountain plover	Bird	None	None	N/A	CDFW: SSC USFWS: BCC	Winters in shortgrass habitat, tilled or harvested farm fields, alkaline flats, and coastal prairies.	Agricultural fields and overgrazed landscapes that mimic preferred shortgrass habitats may be utilized.	Low	No	Suitable habitat for this species does not exist within the SVRA; however, this species has been observed wintering in adjacent agricultural fields. Minimal foraging opportunities may occur within the SVRA, although agricultural fields are likely sufficient to support wintering populations.
Charadrius vociferus killdeer	Bird	None	None	N/A	IUCN: LC	Open areas such as sandbars, mudflats, grazed fields, and golf courses. Tolerates dry areas.	Generally, the vegetation inhabited by this species is no taller than one inch.	Moderate	No	Suitable habitat for this species does not exist within the SVRA, but adjacent agricultural lands are known to be used by this species. The park is within the year-round range of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Chordeiles acutipennis lesser nighthawk	Bird	None	None	N/A	IUCN: LC	Deserts, areas with scrubby vegetation, dry washes, and agricultural fields. Generally, occur at lower elevations but have been reported up to 4,000 feet elevation in Texas.	Typical breeding habitat is xeric desert scrub, far from water and dominated by saltbush. Frequently roost in Athel tamarisk.	High	Yes	Suitable habitat is present for this species within and adjacent to the SVRA. The park is within the breeding range of this species. The most recent park observation was on 4/17/2018.
Circus hudsonius northern harrier	Bird	None	None	N/A	CDFW: SSC IUCN: LC	Coastal salt & freshwater marsh. Nest and forage in grasslands, from salt grass in the desert sink to mountain cienagas.	Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	High	Yes	Suitable habitat for this species is present in and adjacent to the SVRA. The park is within the nonbreeding range of this species. Most recently, this species was observed on 9/29/2020.
Colaptes auratus northern flicker	Bird	None	None	N/A	IUCN: LC	Woodlands, forest edges, and open fields with scattered trees, as well as city parks and suburbs.	Will occupy any large tree, native or not. This includes Athel tamarisk.	High	Yes	Suitable habitat is present within the SVRA, but adjacent lands are not suitable. The park is within the winter range of this species, and the most recent observation was on 10/8/2018.
Columba livia rock dove	Bird	None	None	N/A	IUCN: LC	Urban areas, farmland, and rocky cliffs.	N/A	High	Yes	Suitable habitat is present adjacent to the SVRA as this species commonly uses agricultural lands in the region. The most recent observation within the park was on 10/1/2020.
Contopus sordidulus western wood-peewee	Bird	None	None	N/A	IUCN: LC	Open woodlands, forest edges, and forests near streams, from sea level to around 10,000 feet elevation.	Prefers tall trees, native or nonnative, often perching on exposed snags or below the crown.	High	Yes	Suitable habitat is present within the SVRA. The park is within the migratory path of this species. The most recent observation within the park was on 10/2/2019.

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Corvus corax common raven	Bird	None	None	N/A	IUCN: LC	Broad. Coniferous and deciduous forests, beaches, islands, chaparral, sagebrush, mountains, desert, grasslands, agricultural fields, tundra, and ice floes.	N/A	High	Yes	Suitable habitat is present within the SVRA and surrounding land. The park is within the year-round range for this species. This species is regularly observed by staff, most recently on 9/29/2020.
Elanus leucurus white-tailed kite	Bird	None	None	N/A	IUCN: LC	Savannas, open woodlands, marshes, desert grasslands, partially cleared lands, and cultivated fields.	Tend to avoid heavily grazed areas.	Moderate	No	Suitable habitat for this species is present within and around the SVRA. The park is outside this species' range, but there are regional observations from eBird to the south and west of the SVRA. This species has not been observed within the park.
Empidonax difficilis Pacific-slope flycatcher	Bird	None	None	N/A	IUCN: LC	Shady coniferous and mixed woodlands, especially in places near water where the canopy is partly open.	Migrants tend to remain within relatively closed habitats and, in Imperial County, seem partial to Athel tamarisk.	High	Yes	Suitable habitat for this species is present within the SVRA, and the park is within the migration path. The most recent observation within the SVRA was on 4/9/2020.
Eremophila alpestris horned lark	Bird	None	None	N/A	IUCN: LC	Prairies, deserts, tundra, beaches, dunes, heavily grazed pastures, plowed fields.	Favor bare, dry ground and areas of short, sparse vegetation; avoid areas where grasses grow more than a couple inches tall.	High	Yes	Suitable habitat for this species is present within the SVRA, and the park is within the year-round range of this species. This species was previously observed during avian surveys at the unit, last on 2/14/2017.

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Euphagus cyanocephalus Brewer's blackbird	Bird	None	None	N/A	IUCN: LC	Grasslands, marshes, meadows, woodland, coastal scrub, chaparral, sagebrush, and human-created habitats such as golf courses, agricultural fields, and power line rights-of-way.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent agricultural fields. Observations by park staff primarily are of flyovers. The last observation within the SVRA was on 9/30/2020.
Falco columbarius merlin	Bird	None	None	N/A	CDFW: WL IUCN: LC	Seacoast, tidal estuaries, open woodlands, savannahs, edges of grasslands & deserts, farms & ranches.	Clumps of trees or windbreaks are required for roosting in open country.	High	Yes	Suitable habitat for this species is present within the SVRA, and the park is within the nonbreeding range of the species. The last observation in the SVRA was on 4/18/2018.
Falco sparverius American kestrel	Bird	None	None	N/A	IUCN: LC	Open areas with short ground vegetation and sparse trees. Meadows, grasslands, deserts, parks, farm fields, cities, and suburbs.	Attracted to human-modified habitats, such as pastures and parkland.	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent agricultural fields. The park is within this species' year-round range, and observations are regular during avian surveys. The last observation within the SVRA was on 10/1/2020.
Gallinula galeata common gallinules	Bird	None	None	N/A	IUCN: LC	Freshwater and brackish marshes, ponds, and lakes have a mix of submerged, floating, and emergent aquatic vegetation and are open water year-round.	Will use artificial aquaculture ponds, rice fields, sewage lagoons, and urban stormwater retention ponds.	Low	No	Suitable aquatic habitat for this species does not occur within or adjacent to the SVRA. The park is in the year-round range and is close to the migration path for this species. The adjacent canal may be used as a temporary stop while in transit. One flyover was observed by park staff on 9/29/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Gelochelidon nilotica gull-billed tern	Bird	None	None	N/A	USFWS: BCC	Winters in salt marshes, estuaries, lagoons, and plowed fields, less frequently along rivers, around lakes, and in freshwater lakes.	Breeds on gravelly or sandy beaches.	Low	No	Suitable habitat for this species does not exist within the SVRA or adjacent to the park. The park is just outside of the known range of this species, although there are regional observations outside of the known range. There are no park or CNDDB records of this species in the vicinity of the SVRA.
Geococcyx californianus greater roadrunner	Bird	None	None	N/A	IUCN: LC	Semi-open, scrubby habitat from below sea level to nearly 10,000 feet elevation. Habitats include areas dominated by creosote, mesquite, chaparral, and tamarisk, as well as grasslands, riparian woodlands, and canyons.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA, and the park is within the year-round range. The most recent observation at the park occurred on 10/1/2019.
Geothlypis tolmiei MacGillivray's warbler	Bird	None	None	N/A	IUCN: LC	Open woodlands with a rich understory or scrub community.	Migrants utilize habitats with lots of underbrush, especially near water.	High	Yes	Suitable habitat is present within the SVRA, and the park is within the migration path of this species. The most recent observation at the SVRA occurred on 10/1/2020.
Haemorhous mexicanus house finch	Bird	None	None	N/A	IUCN: LC	Dry desert, desert grassland, chaparral, oak savannah, streamsides, and open coniferous forests at elevations below 6,000 feet.	Tolerant of disturbed areas.	High	Yes	The SVRA contains suitable habitat for this species and is within the year-round range. This species is frequently observed by park staff, most recently on 9/29/2020.

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Hirundo rustica barn swallow	Bird	None	None	N/A	IUCN: LC	Open grasslands, including suburban parks and fields, agricultural fields, beaches, and over open water, ranging from sea level to 10,000 feet elevation.	Breeding habitat must include open areas for foraging, structures or cliffs for nesting, and a source of mud for nest material.	Moderate	No	Suitable migration habitat is present within the SVRA, and the park is within the migration path of this species. Staff commonly report observing flybys of this species. The most recent observation was on 4/7/2020.
Junco hyemalis dark-eyed junco	Bird	None	None	N/A	IUCN: LC	Coniferous and deciduous forests. During migration and winter, habitats include open woodlands, fields, roadsides, parks, and gardens.	N/A	High	Yes	Suitable migration habitat is present within and around the SVRA. The park is in the non-breeding range. Staff last observed this species on 2/14/2017.
Lanius ludovicianus loggerhead shrike	Bird	None	None	N/A	CDFW: SSC IUCN: LC USFWS: BCC	Broken woodlands, savannah, pinyon-juniper, Joshua tree, riparian woodlands, desert oases, scrub & washes.	Prefers open country for hunting, with perches for scanning and dense shrubs and brush for nesting.	High	Yes	Suitable habitat for this species is present within the SVRA, and the park is within the year-round range of this species. This species has previously been observed during avian surveys at the unit, most recently on 10/1/2020.
Leiothlypis celata orange-crowned warbler	Bird	None	None	N/A	IUCN: LC	Shrubs and low-growing vegetation in riparian settings, patches of forest, and chaparral.	N/A	High	Yes	The park is within the migration path for this species, and migrants may utilize the SVRA as suitable habitat is present. The most recent observation was on 9/28/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Leiothlypis ruficapilla Nashville warbler	Bird	None	None	N/A	IUCN: LC	Shrubby, second-growth forests.	Migrants will utilize most brushy habitats, and western populations frequent drier habitats, such as desert flats and washes in fall.	High	Yes	The park is within the migration path for this species, and migrants may utilize the SVRA as suitable habitat is present. The most recent observation was on 4/11/2019.
Limosa fedoa marbled godwit	Bird	None	None	N/A	USFWS: BCC	Breeds in shortgrass prairies near wetlands, avoiding areas with taller vegetation. Winter along coastal mudflats, estuaries, and sandy beaches.	Prefers native grass prairies with green needlegrass, western wheatgrass, blue grama, needle-and-thread, and little blue stem.	Low	No	Suitable habitat for this species does not exist within the SVRA or in nearby adjacent habitats. The park is within the migratory range of this species. There are no park or CNDDB records of this species in the vicinity of the SVRA.
Melanerpes uropygialis Gila woodpecker	Bird	None	None	N/A	USFWS: BCC	Arid environments, especially deserts and dry forests.	Most common in low swales and arroyos, including riparian corridors with cottonwood, willow, and mesquite.	Low	No	Marginal habitat for this species is present within the SVRA. While Gila woodpeckers have been observed to nest in Athel tamarisk, this is not ideal habitat for this species. Due to the conversion of native habitat to agriculture, the area surrounding Heber Dunes SVRA offers minimal habitat for this species. Neither CNDDB nor park records have observations of this species in the vicinity. iNaturalist records show this species was observed in Mexicali, approximately 10.9 miles south of the SVRA, in 2020.

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Melozone aberti Abert's towhee	Bird	None	None	N/A	IUCN: LC	Cottonwood-willow riparian forest with a dense understory of native shrubs and mesquite woodlands along the Colorado River.	Adapting to use stands of tamarisk, ornamental landscaping with sufficient understory, and agricultural areas lined with quailbush.	High	Yes	Suitable habitat for this species is present within the SVRA. The park is within the year-round range for this species, and it has been observed on many occasions. The most recent observation was on 9/30/2020.
Mimus polyglottos Northern mockingbird	Bird	None	None	N/A	IUCN: LC	Open ground with shrubby vegetation, such as hedges, fruiting bushes, and thickets.	Prefers grassy areas over the bare ground for foraging.	High	Yes	Suitable habitat for this species is present within the SVRA and vicinity. The park is within the year-round range of this species. The most recent observation at the SVRA occurred on 10/1/2020.
Molothrus ater brown-headed cowbird	Bird	None	None	N/A	IUCN: LC	Grasslands with low and scattered trees and woodland edges, brushy thickets, fields, prairies, fields, pastures, orchards, and residential areas.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and vicinity. The park is located where the year-round and breeding ranges intersect. This species has been observed in the park and overhead. The most recent observation was on 4/9/2020.
Myadestes townsendi Townsend's solitaire	Bird	None	None	N/A	IUCN: LC	Open woodlands and forests, particularly with juniper trees and tall pines.	Winter in desert washes, open hillsides, and shrublands if fruits are available.	High	Yes	Marginal wintering habitat for this species is present within the SVRA. The park is just outside the known nonbreeding range for this species, but there are a few regional records. This species was observed in the park most recently on 4/21/2007.

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Myiarchus cinerascens ash-throated flycatcher	Bird	None	None	N/A	IUCN: LC	Dry scrub, open woodlands, and deserts from sea level to 9,000 feet elevation.	N/A	High	Yes	Suitable habitat for this species is present in the SVRA. The park is within the year-round range for this species, and the most recent observation was on 4/9/2020.
Numenius americanus long-billed curlew	Bird	None	None	N/A	USFWS: BCC	Breeds in grasslands of the Great Plains and Great Basin; winters in wetlands, tidal estuaries, mudflats, flooded fields, and beaches.	N/A	Low	No	Suitable habitat for this species does not exist within the SVRA or in nearby adjacent agricultural fields. The park is within the migration path of this species, and staff regularly record flybys. iNaturalist lists a 2021 record of this species in Calexico, approximately 1.455 miles southwest of the park's southern boundary. The last flyover observation of this species was on 9/29/20 at the SVRA.
Numenius phaeopus whimbrel	Bird	None	None	N/A	USFWS: BCC	Open habitats - tundra for nesting; mudflats, beaches, and saltmarshes the rest of the year.	Prefer feeding on invertebrates in intertidal zones but will eat insects or berries.	Low	No	Suitable habitat for this species does not exist within the SVRA or nearby adjacent agricultural fields. The SVRA is within the migration path for this species. There are no park or CNDDB records of this species in the vicinity of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Oreoscoptes montanus sage thrasher	Bird	None	None	N/A	IUCN: LC	Open, dry shrub-steppe habitats with a mix of dense ground cover and bare ground. During migration and winter, arid or semiarid open country with scattered bushes, grasslands, and open pinyon-juniper woodlands.	Tend to be more numerous in areas dominated by sagebrush, a small number of grasses, and some bare ground.	High	Yes	Suitable wintering habitat is present within the SVRA, less so on adjacent property. The park is in the non-breeding range. This species was last observed on 2/14/2017.
Pandion haliaetus osprey	Bird	None	None	N/A	CDF: S CDFW: WL IUCN: LC	Shallow, fish-filled water, including rivers, lakes, reservoirs, lagoons, swamps, and marshes.	N/A	Moderate	No	Marginal habitat for this species is minimally present adjacent to the SVRA in the Alamo Canal. The park is within the wintering range of this species, and it's been observed by park staff flying over the unit. This species was most recently observed on 10/3/2019.
Passerina amoena lazuli bunting	Bird	None	None	N/A	IUCN: LC	Brushy hillsides, areas near streams, wooded valleys, thickets and hedges along agricultural fields, and residential gardens from sea level to 9,500 feet elevation.	N/A	High	Yes	Suitable habitat for this species is present at the SVRA, and the park is within the migration path. This species was most recently observed on 4/21/2007.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Passerina caerulea blue grosbeak	Bird	None	None	N/A	IUCN: LC	Open woodlands, old fields, forest edges, transmission-line corridors, hedgerows, stream edges, deserts, mesquite savannas, saltcedar forests, and southern pine forests.	Small number of tree species, little canopy coverage, and low shrub diversity.	Moderate	No	Suitable habitat for this species is present at the SVRA, and the park is within the migration path. This species was listed in the 2001 Heber Dunes SVRA WHPP; however, an observation record for the park has not been found.
Phalacrocorax auritus double-crested cormorant	Bird	None	None	N/A	CDFW: WL IUCN: LC	Lakes and ponds. High perches for use after foraging.	N/A	Low	No	Suitable habitat for this species is not present within the SVRA or adjacent property as there is minimal aquatic habitat. The park is within the migratory path of this species and is close to year-round habitat. Staff regularly observe this species during flybys. The most recent observation was on 9/29/2020.
Phalaenoptilus nuttallii common poorwill	Bird	None	None	N/A	IUCN: LC	Shrubby, open areas in arid environments.	Roost on the ground or among rocks.	High	Yes	Suitable habitat for this species is present within the SVRA, and the unit is within the year-round range. Per Heber Dunes SVRA staff in 2021, a nesting pair has been observed in the day-use area for several years.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Phasianus colchicus ring-necked pheasant	Bird	None	None	N/A	IUCN: LC	Open fields and weedy roadsides with brushy cover. Agricultural lands. Widespread.	Fields interspersed with grass ditches, hedges, marshes, woodland borders, and brushy groves.	Low	No	Marginal suitable habitat for this species is present within the SVRA, and the species has the potential to be present year-round in surrounding agricultural fields. Adjacent lands provide higher quality habitats and are known to be utilized on occasion. In 2018, Heber Dunes staff observed a pheasant in neighboring agricultural fields.
Pheucticus melanocephalus black-headed grosbeak	Bird	None	None	N/A	IUCN: LC	Forests composed of large trees and rich understory.	Migrants seek out shrubs and trees rich in berries.	High	Yes	Suitable habitat for this species is present and the park is within the migration path. The most recent observation at the SVRA was on 4/21/2007.
Piranga ludoviciana western tanager	Bird	None	None	N/A	IUCN: LC	Forests. Favor open woods including wetlands, forest edges, and burns, as well as suburban parks and gardens.	Migrants frequent forests, woodland, scrub, partly open habitats, and human-made environments such as orchards, parks, gardens, and suburban edges.	High	Yes	Suitable habitat for this species is present within the SVRA. The park is within the migration path of this species. It was most recently observed on 4/17/2018.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Piranga rubra summer tanager	Bird	None	None	N/A	CDFW: SSC IUCNLC	Summer resident of desert riparian along lower Colorado River, and locally elsewhere in California deserts.	Requires cottonwood-willow riparian for nesting and foraging; prefers older, dense stands along streams.	Low	No	Marginal habitat for this species is present within the SVRA and along the nearby Alamo River. The SVRA is within the breeding range of the species. There no records of this species in the vicinity of the park.
Plegadis chihi white-faced ibis	Bird	None	None	N/A	CDFW: WL IUCN: LC	Nests in tall stands of cattail and emergent snags of tamarisk. Forages in flooded fields, marshes with shallow water, river edges, and irrigation canals with soil floors.	N/A	Moderate	No	Suitable habitat for this species is not present within the SVRA. Adjacent property may be suitable for foraging if flooded in the future. The SVRA is within the wintering range of this species and is near year-round habitat. This species is regularly observed flying over the park, most recently on 10/11/2018.
Polioptila caerulea blue-gray gnatcatcher	Bird	None	None	N/A	IUCN: LC	Broadleaf and mixed woodlands from chaparral to mature forests. In the southwest, oak and pinon-juniper woodlands, chaparral, and willow and cottonwood woodlands near water.	Moist areas, often near habitat edges preferred.	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within the wintering range, close to the year-round range. This species is regularly observed during field surveys at the park, most recently on 9/29/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Polioptila melanura black-tailed gnatcatcher	Bird	None	None	N/A	CDFW: WL IUCN: LC	Primarily inhabits wooded desert wash habitats; also occurs in desert scrub habitat, especially in winter.	Primarily inhabits wooded desert wash habitats; also occurs in desert scrub habitat, especially in winter.	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within the year-round range. This species is regularly observed at the park. The most recent observation is 9/30/2020.
Pyrocephalus rubinus vermilion flycatcher	Bird	None	None	N/A	CDFW: SSC IUCN: LC	During nesting, inhabits desert riparian adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas.	Nest in cottonwood, willow, mesquite, and other large desert riparian trees.	Moderate	No	Suitable habitat for this species is present within the SVRA. There are no CNDDB or park records of this species in the vicinity of the SVRA. iNaturalist lists recent (2020-2021) records of this species in Mexicali, approximately 10.9 miles southwest of the SVRA.
Quiscalus mexicanus great-tailed grackle	Bird	None	None	N/A	IUCN: RWL	Natural habitats include chaparral and second growth forests but adapted to human-modified areas such as feedlots, farms, and fields.	N/A	Moderate	No	Marginal habitat for this species is present within the SVRA and on adjacent agricultural fields. The park is within the year-round range of this species. This species is regularly observed flying over the park and was most recently observed on 9/30/2020.
Rallus obsoletus yumanensis Yuma Ridgway's rail	Bird	Endangered	Threatened	N/A	CDFW: FP NABCI: RWL	Nests in freshwater marshes along the Colorado River and along the south and east ends of the Salton Sea.	Prefers stands of cattails and tules dissected by narrow channels of flowing water; principal food is crayfish.	Low	No	There is no suitable habitat for this species in or adjacent to the SVRA. A canal adjacent to the park does not have appropriate vegetation stands to support this species but may be used as a temporary stop. Per CNDDB, the nearest observation of this species is approximately 2.1 miles southeast of the SVRA. The park is within the migration path for this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Sayornis nigricans black phoebe	Bird	None	None	N/A	IUCN: LC	Open woodlands associated with water sources.	N/A	High	Yes	Suitable habitat for this species is present at the SVRA and it is regularly observed. The park is within the year-round range of this species. The most recent observation was on 10/1/2020.
Sayornis saya Say's phoebe	Bird	None	None	N/A	IUCN: LC	Dry, sparsely vegetated areas including sagebrush flats, badlands, dry barren foothills, canyons, and desert borders.	Wintering birds utilize open, grassy fields with scattered shrubs and agricultural areas.	High	Yes	Suitable habitat for this species is present at the SVRA and, in winter, adjacent property. The park is within the year-round range of this species and is regularly observed by staff. The most recent observation was on 10/1/2020.
Selasphorus rufus rufous hummingbird	Bird	None	None	N/A	USFWS: BCC	Breed in open or shrubby areas from sea level to 6,000 feet elevation. Winters in mountain meadows and woodlands.	Primarily feeds upon nectar from colorful, tubular flowers.	Moderate	No	Suitable habitat for this species is present within the SVRA, although adjacent habitat is not suitable. This species' preferred food source is not common in the area, which may limit populations. There are no CNDDB or park records of this species in the vicinity of the park. The nearest observation, from iNaturalist, is from 2019 outside El Centro, approximately 10.2 miles from the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Setophaga coronata yellow-rumped warbler	Bird	None	None	N/A	IUCN: LC	Mature coniferous and mixed coniferous-deciduous woodlands. Winter in areas with fruiting shrubs or scattered trees such as parks, streamside woodlands, open pine and pine-oak forest, dunes, and residential areas.	N/A	High	Yes	Marginal habitat for this species is present within the SVRA and adjacent habitat. The park is within the wintering range (scarce) of this species. The most recent observation was on 10/10/2018.
Setophaga nigrescens black-throated gray warbler	Bird	None	None	N/A	IUCN: LC	Open pine forests, pine-oak woodlands, and pinyon-juniper forests with a brushy understory.	Migrants utilize similar habitats as well as woodlands, scrub, and thickets.	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent habitat. The park is within the migration path for this species. The last observation was on 4/9/2020.
Setophaga petechia yellow warbler	Bird	None	None	N/A	CDFW: SSC USFWS: BCC	Riparian plant associations near water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada.	Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	High	Yes	Suitable habitat is present for this species in the SVRA, and the species has been observed at the park during avian surveys. District staff last observed this species on 9/30/2019 within the SVRA.
Spinus lawrencei Lawrence's goldfinch	Bird	None	None	N/A	USFWS: BCC	Arid, open woodlands, coastal scrub, streamside habitats, weedy fields, or deserts.	Breeding habitat is primarily woodlands with chaparral, weedy fields, and a source of freshwater.	Moderate	No	While this species has not been observed in the SVRA, potential habitat is present both within and adjacent to the park. This species is nomadic, seeking locations with preferred rainfall, seeding plants, and drinking water. When conditions are ideal, the SVRA or adjacent lands may be utilized.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Spizella breweri Brewer's sparrow	Bird	None	None	N/A	IUCN: LC USFWS: BCC	East of Cascade-Sierra Nevada crest, mountains and high valleys of Mojave Desert, and mountains at southern end of San Joaquin Valley.	For nesting they prefer high sagebrush plains, slopes and valley with Great Basin sagebrush and antelope brush.	High	Yes	Suitable wintering habitat is present within the SVRA and adjacent property. The park is within the winter range of this species and BRSP has been observed numerous times on-site. The most recent observation was on 10/1/2020.
Spizella passerina chipping sparrow	Bird	None	None	N/A	IUCN: LC	Open woodlands, grassy forests, woodlands and edges, parks and shrubby or tree-lined backyards.	Prefer evergreens.	Moderate	Yes	Marginal habitat for this species is present within and adjacent to the SVRA. The park is within the wintering range. CHSP has been observed once in the park on 4/10/2019.
Stelgidopteryx serripennis rough-winged swallow	Bird	None	None	N/A	IUCN: LC	Open areas often near water.	Salton Sea region: nest in earthen embankments, often irrigation ditches with near vertical walls	High	Yes	Suitable habitat for this species is present adjacent to the SVRA and the SVRA could provide foraging habitat. The park is within the year-round range of this species, near the breeding range. The most recent observation was on 2/14/2017.
Streptopelia decaocto Eurasian collared-dove	Bird	None	None	N/A	IUCN: LC	Broad. In agricultural areas, seek open sites with available grain.	May avoid areas with heavy forest cover or extremely cold temperatures.	High	Yes	Suitable habitat for this species is present within and near the SVRA. The park is in the year-round range. The most recent observation was on 9/29/2020.
Stumella neglecta Western meadowlark	Bird	None	None	N/A	IUCN: LC	Open grasslands, prairies, meadows, and some agricultural fields. Avoid wooded edges and areas with heavy shrubs.	N/A	High	Yes	Suitable habitat is not present within the SVRA, but adjacent agricultural fields are suitable. The park is within the year-round range of the species and observations occur regularly. The most recent observation was on 9/30/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Sturnus vulgaris European starling	Bird	None	None	N/A	IUCN: LC	Broad. Open, grassy areas to forage, a water source, and trees or buildings with cavities or niches for nesting.	Avoid large, unbroken stretches of forest, chaparral, and desert.	Moderate	No	Suitable habitat is present within the SVRA, although adjacent agricultural fields may be more suitable for foraging. The park is within the year-round range of this species. A flyby was recorded on 9/29/2020.
Tachycineta bicolor tree swallow	Bird	None	None	N/A	IUCN: LC	Fields, marshes, shorelines, wooded swamps, and beaver ponds. Migrating and wintering birds may use open areas.	N/A	Moderate	No	Marginal habitat is present in and around the SVRA. The park is within the wintering range of this species. A flyover was observed on 4/16/2018.
Thryomanes bewickii Bewick's wren	Bird	None	None	N/A	IUCN: LC	Bushy areas, scrub and thickets in open country, or open woodland.	N/A	High	Yes	Suitable habitat is present within the SVRA and property east of the park. The SVRA is within the wintering range of this species. This species was last observed on 10/3/2019.
Toxostoma crissale Crissal thrasher	Bird	None	None	N/A	BLM: S CDFW: SSC USFS: S	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting.	Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Moderate	No	Suitable habitat is present within the SVRA and the park is within the species' range. CNDDB shows records of the species south of the Salton Sea, but not near the SVRA. The species has not been previously observed at the unit.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Toxostoma lecontei LeConte's thrasher	Bird	None	None	N/A	BLM: S CDFW: SSC IUCN: LC NABCI: RWL USFWS: BCC	Desert resident; primarily of open desert wash, desert scrub, alkali desert scrub, and desert succulent scrub habitats.	Commonly nests in a dense, spiny shrub or densely branched cactus in desert wash habitat, usually 2-8 feet above ground.	Low	No	Marginal habitat is present within the SVRA and property east of the park. There is no desert wash habitat on-site. The SVRA is within the year-round range of this species. This species was listed in the 2001 Heber Dunes SVRA WHPP, however an observation record for the park has not been found.
Tringa semipalmata willet	Bird	None	None	N/A	USFWS: BCC	During breeding season, occur near wetlands, marshes, and wet fields. During wintering, inhabit open beaches, bayshores, marshes, mudflats, and rocky coastal zones.	N/A	Low	No	Suitable habitat is not present for this species within the SVRA or adjacent property. The park is within the migration path for this species. There are no CNDDB or park records of this species in the vicinity of the park.
Turdus migratorius American robin	Bird	None	None	N/A	IUCN: LC	Broad. Fields, woodlands, forests, mountains up to treeline, recently burned forests, and tundra.	Winter in moist woods with berry-producing trees and shrubs.	High	Yes	Suitable habitat for this species is present in the SVRA and surrounding area. The SVRA is within the winter range for this species. This species was last observed 10/10/2018 by park staff.
Tyrannus verticalis Western kingbird	Bird	None	None	N/A	IUCN: LC	Open areas including grasslands, desert shrubs, savannah, pastures, cultivated fields, and urban lands.	N/A	High	Yes	Suitable habitat for this species is present within and adjacent to the SVRA. The park is in the migration path of this species, near the breeding range. The most recent observation was on 9/28/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Tyto alba barn owl	Bird	None	None	N/A	IUCN: LC	Open habitats including grasslands, deserts, marshes, agricultural fields, strips of forest, woodlots, ranchlands, brushy fields, and cities.	Nest in tree cavities, caves, and in buildings.	Moderate	No	Suitable habitat for this species is present within and adjacent to the SVRA. The park is in the year-round range of this species. This species was listed in the 2001 Heber Dunes SVRA WHPP, however an observation record for the park has not been found.
Xanthocephalus xanthocephalus yellow-headed blackbird	Bird	None	None	N/A	CDFW: SSC IUCN: LC	Nests in freshwater emergent wetlands with dense vegetation and deep water. Often along borders of lakes or ponds.	Nests only where large insects such as Odonata are abundant, nesting timed with maximum emergence of aquatic insects.	High	Yes	Suitable habitat for this species is not present within or adjacent to the SVRA, although these areas may be suitable for foraging. The park is within the year-round range. The most recent observation was on 9/29/2020.
Zenaida asiatica white-winged dove	Bird	None	None	N/A	IUCN: LC	Dense, thorny forests, streamside woodlands, deserts, and urban areas.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and it is regularly observed. The park is within the breeding range of this species and is near the year-round range. The most recent observation was on 4/9/2020.
Zenaida macroura mourning dove	Bird	None	None	N/A	IUCN: LC	Open woodlands. Feeds in grasslands, agricultural fields, backyards, and roadsides.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent properties. The park is within the year-round range for this species and MODO are frequently observed perching in tamarisk trees. The most recent observation was on 10/1/2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Zonotrichia leucophrys white-crowned sparrow	Bird	None	None	N/A	IUCN: LC	Open or shrubby habitats, including tundra, high alpine meadows, and forest edges. During winter and migration, frequent thickets, weedy fields, agricultural fields, roadsides, and backyards.	Patches of bare ground and grasses.	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property. The SVRA is within the wintering range of this species. The most recent observation was on 9/30/2020.
Oncorhynchus tshawytscha pop. 11 chinook salmon - Central Valley spring-run ESU	Fish	Threatened	Endangered	N/A	AFS: TH	Adult numbers depend on pool depth and volume, amount of cover, and proximity to gravel. Water temps >27 C are lethal to adults.	Federal listing refers to populations spawning in Sacramento River and tributaries.	None	No	Suitable habitat for this species is not present at the SVRA or adjacent property. The SVRA is well outside of the known range of this species. There are no CNDDB or park records of this species in the vicinity of the park.
Oncorhynchus tshawytscha pop. 7 chinook salmon - Sacramento River winter-run ESU	Fish	Endangered	Threatened	N/A	AFS: EN	Sacramento River below Keswick Dam. Spawns in the Sacramento River, but not in tributary streams.	Requires clean, cold water over gravel beds with water temperatures between 6 and 14 C for spawning.	None	No	Suitable habitat for this species is not present at the SVRA or adjacent property. The SVRA is well outside of the known range of this species. There are no CNDDB or park records of this species in the vicinity of the park.
Podaxis pistillaris desert shaggymane	Fungus	None	None	N/A	N/A	Deserts and semi-deserts. Roadsides and disturbed areas.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA. This species was last observed by park staff on 12/8/2017.
Edrotes ventricosus fuzzy cannonball	Insect	None	None	N/A	N/A	Southwestern deserts.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA. Park staff last observed this species on 12/2/2017.

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Eleodes armata armored stink beetle	Insect	None	None	N/A	N/A	Southwestern deserts.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA. Park staff last observed this species on 12/10/2017.
Erpetogomphus compositus white-belted ringtail	Insect	None	None	N/A	IUCN: LC	Depositional habitats with fine sediments, including sandy rivers and streams.	N/A	High	Yes	Marginal habitat for this species is present within the SVRA and adjacent canals. This species was last identified by park staff on 5/9/2017.
Stictiella villegasi Algodones sand wasp	Insect	None	None	N/A	N/A	Endemic to the Algodones Dunes in Imperial County. [Alternatively referred to as the Imperial Sand Dunes or the Glamis Dunes.]	N/A	Low	No	Little is known about the habitat requirements of this species, but it is currently considered endemic to the Algodones Dunes in Imperial County, SVRA. The SVRA is outside of the presumed range of this species. There are no CNDDB or park records of this species in the vicinity of the park.
Antrozous pallidus pallid bat	Mammal	None	None	N/A	BLM: S CDFW: SSC	Resident of southeastern deserts in desert riparian and desert wash habitats.	Nests in dense vegetation along streams/washes; mesquite, screwbean mesquite, ironwood, catclaw, acacia, arrow weed, willow.	Moderate	No	Suitable habitat is present for this species. Pallid bat have been observed in the general region, and there are no known limitations on their utilization of Heber Dunes SVRA. Per CNDDB, the nearest record is from Brawley, CA. Pallid bats have not been detected through auditory surveys; mist netting or roost surveys may be more effective for this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Canis latrans coyote	Mammal	None	None	N/A	IUCN: LC	Open country; broad. Sagebrush steppe, woodlands, prairies, deserts, oak savannahs, subalpine forests, alpine meadows, open ponderosa pine forests, and temperate rainforests.	Tolerant of human-modified areas.	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within the range of this species, and it is regularly observed by park staff.
Chaetodipus formosus long-tailed pocket mouse	Mammal	None	None	N/A	IUCN: LC	Mixed sandy and rocky soils in relatively open arid areas.	Typical habitat contains small rocks that resemble it in size and color.	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property to the east. While rocky soils are not present, sandy soils are. This species is regularly observed during field surveys, most recently on 10/8/2020.
Chaetodipus penicillatus desert pocket mouse	Mammal	None	None	N/A	IUCN: LC	Sandy soils, sometimes on sand and small stones; open areas with scattered, low bushes.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property to the east. This species is regularly observed during field surveys, most recently on 4/8/2021.
Chaetodipus spinatus spiny pocket mouse	Mammal	None	None	N/A	IUCN: LC	Rocky slopes and boulders with sparse vegetation. Sea level to 3,000 feet elevation.	N/A	High	Yes	Marginal habitat for this species is present within the SVRA. The park does not contain rocky habitat but is within the range for the species. This species has been observed during field surveys at the park. The most recent observation was on 4/16/2019.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Eptesicus fuscus big brown bat	Mammal	None	None	N/A	IUCN: LC	Forests, farms, cities, from arid lowlands to 9,000 feet elevation.	Roosts in hollow trees.	High	Yes	Suitable foraging habitat is present at the SVRA and adjacent properties. Marginal roosting habitat may be present within the SVRA. Auditory calls of this species were last observed in summer 2020.
Eumops perotis californicus western mastiff bat	Mammal	None	None	N/A	CDFW: SSC WBWG: HP	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc.	Roosts in crevices in cliff faces, high buildings, trees and tunnels.	High	Yes	Suitable foraging and potential, marginal roosting habitat is present at the SVRA. Auditory observations of this species have been made during the summer at the SVRA, most recently in summer 2020.
Lasiurus blossevillii western red bat	Mammal	None	None	N/A	CDFW: SSC IUCN: LC WBWG: HP	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests.	Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	High	Yes	Suitable habitat is present within the SVRA for this species, although adjacent properties may only support foraging. This species has been auditorily observed within the SVRA, last in summer 2020. Due to species' relative rarity in the region, additional verification of this species may be needed (Stokes, personal communication).
Lasiurus cinereus hoary bat	Mammal	None	None	N/A	IUCN: LC WBWG: MP	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding.	Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	High	Yes	Suitable habitat is present for this species within the SVRA and property to the east. This species was observed, through an acoustic detection, within the SVRA mostly recently in summer 2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Lasiurus xanthinus western yellow bat	Mammal	None	None	N/A	CDFW: SSC IUCN: LC WBWG: HP	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.	Roosts in trees, particularly palms. Forages over water and among trees.	High	Yes	Suitable foraging and potential roosting habitat are present at the SVRA. Auditory observations of this species have been made during winter and summer monitoring at the SVRA, most recently in summer 2020.
Lepus californicus black-tailed jackrabbit	Mammal	None	None	N/A	IUCN: LC	Sagebrush flats, overgrazed pastures and rangelands, deserts, prairies, and agricultural land. Sea level to 12.500 feet elevation.	N/A	Moderate	No	Suitable habitat is present within and adjacent to the SVRA. This species was listed in the 2001 Heber Dunes SVRA WHPP, however an observation record for the park has not been found. Per current park staff, this species is not present.
Lynx rufus bobcat	Mammal	None	None	N/A	IUCN: LC	Highly variable: coniferous and deciduous forests, swamps, thickets, arid rocky areas, and mountains.	Prefers rocky outcrops and canyons.	High	Yes	Suitable habitat is present within the SVRA and adjacent properties. This species was last observed in 2018 at the SVRA.
Macrotus californicus California leaf-nosed bat	Mammal	None	None	N/A	BLM: S CDFW: SSC IUCN: LC WBWG: HP	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats.	Needs rocky, rugged terrain with mines or caves for roosting.	High	Yes	Suitable foraging habitat is present within and adjacent to the SVRA. Roosting habitat is not presumed present. An acoustic call of this species may have been detected in summer 2020 but additional work is needed to verify. Mist netting may be needed to verify call.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Mephitis mephitis striped skunk	Mammal	None	None	N/A	IUCN: LC	Brushy fields, farmland, open woods, deserts, and suburbs, usually not far from water.	N/A	Moderate	No	Suitable habitat is present both within and adjacent to the SVRA. In 2008, a specimen was observed deceased on a nearby road to the SVRA. Based on this observation, staff suspect this species may be present within the park, however no observations within the SVRA have been made.
Moytis yumanensis Yuma myotis	Mammal	None	None	N/A	BLM: S IUCN: LC WBWG: LMP	Optimal habitats are open forests and woodlands with sources of water over which to feed.	Distribution is closely tied to bodies of water. Maternity colonies in caves, mines, buildings, or crevices.	High	Yes	Suitable habitat is present within and adjacent to the SVRA. An acoustic recording of this species was detected in summer 2020.
Myotis californicus California myotis	Mammal	None	None	N/A	IUCN: LC	Desert scrub, riparian woodland, canyons, and forest. Lowlands to at least 8,000 feet elevation.	N/A	High	Yes	Suitable habitat is present within and adjacent to the SVRA. An acoustic recording of this species was detected in summer 2020.
Myotis occultus Arizona myotis	Mammal	None	None	N/A	CDFW: SSC IUCN: LC WBWG: MHP	Lowlands of the Colorado River and adjacent desert mountain ranges. Conifer forests.	Lowlands of the Colorado River and adjacent desert mountain ranges.	High	Yes	While much is still unknown about this species' habitat, the SVRA and adjacent lands provide suitable foraging habitat. A possible acoustic detection of this species was recorded in summer 2020 but additional work is needed to verify presence.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Neotoma albigula venusta Colorado Valley woodrat	Mammal	None	None	N/A	IUCN: LC	Low-lying desert areas in southeastern California. Closely associated with beaver-tail cactus & mesquite.	Intolerant of cold temps. Eats mainly succulent plants. Distribution influenced by abundance of nest building material	Low	No	Suitable habitat for this species is not present at the SVRA or adjacent lands. Preferred vegetation is not found on-site. The nearest CNDDB record is from 1909 and was observed within the El Centro quad, approximately 13.5 miles from the SVRA.
Neotoma fuscipes annectens San Francisco dusky-footed woodrat	Mammal	None	None	N/A	CDFW: SSC	Forest habitats of moderate canopy & moderate to dense understory. May prefer chaparral & redwood habitats.	Constructs nests of shredded grass, leaves & other material. May be limited by availability of nest-building materials.	None	No	Suitable habitat for this species is not present at the SVRA or adjacent property. The SVRA is well outside of the known range of this species. There are no CNDDB or park records of this species in the vicinity of the park.
Notiosorex crawfordi desert shrew	Mammal	None	None	N/A	IUCN: LC	Desert and desert scrub, dry woodland, pinon-juniper, and ponderosa pines.	N/A	High	Yes	Suitable habitat for species is present at the SVRA and adjacent property to the east. Staff observed this species during pitfall trapping and uploaded a picture on 3/9/2009.
Nyctinomops femorosaccus pocketed free-tailed bat	Mammal	None	None	N/A	CDFW: SSC IUCN: LC WBWG: MHP	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc.	Rocky areas with high cliffs.	High	Yes	Suitable foraging habitat is present at the SVRA; roosting habitat is not present. Auditory observations of this species have been made during winter and summer monitoring at the SVRA, most recently in summer 2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Nyctinomops macrotis big free-tailed bat	Mammal	None	None	N/A	CDFW: SSC IUCN: LC WBWG: MHP	Low-lying arid areas in Southern California.	Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	High	Yes	Suitable foraging habitat is present at the SVRA; roosting habitat is not present. Auditory observations of this species have been made during winter and summer monitoring at the SVRA, most recently in summer 2020.
Onychomys torridus Southern grasshopper mouse	Mammal	None	None	N/A	IUCN: LC	Low desert with scattered shrubs such as creosote bush and mesquite.	N/A	Moderate	No	Suitable habitat is present within the SVRA, although adjacent agricultural lands likely provide minimal habitat. This species has not been detected at the SVRA and there are no regional records of its presence.
Parastrellus hesperus canyon bat	Mammal	None	None	N/A	IUCN: LC	Desert scrub, arid grassland, canyons, and woodland, always close to water.	N/A	High	Yes	Suitable habitat is present within the SVRA and adjacent properties. An acoustic detection of this species was recorded in summer 2020.
Perognathus longimembris little pocket mouse	Mammal	None	None	N/A	IUCN: LC	Desert scrub, on sandy or gravelly soils with sparse vegetation. Also found in dry grassland and coastal sage.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property to the east. This species was observed on 4/19/2018.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Peromyscus crinitus canyon mouse	Mammal	None	None	N/A	IUCN: LC	Desolate rocky terrain with very sparse vegetation, on canyon walls, mesas, and talus slopes.	N/A	Moderate	No	Suitable habitat for this species is not present within the SVRA or adjacent properties. Park records show this species was observed on 10/6/2020 but it is probable that the species was misidentified. *P. eremicus* is similar in appearance and known to occur at the SVRA. The park is within the range of PECR.
Peromyscus eremicus cactus mouse	Mammal	None	None	N/A	IUCN: LC	Deserts, usually on rocky soil with sparse vegetation, but also occurs on sandy flats and in desert grassland and chaparral.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and on property to the east. This species was most recently observed on 4/8/2021.
Peromyscus maniculatus deer mouse	Mammal	None	None	N/A	IUCN: LC	Broad. Boreal forest, tundra, desert, prairies, swamps, and high mountains.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property. This species was most recently observed on 4/8/2021.
Procyon lotor raccoon	Mammal	None	None	N/A	IUCN: LC	Varied. Most common in wetlands, damp woods, and suburban areas.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within the known range. Staff took a picture of tracks on 12/7/2006. No observations have been made since.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Sigmodon hispidus eremicus Yuma hispid cotton rat	Mammal	None	None	N/A	CDFW: SSC	Along the Colorado River and in grass and agricultural areas near irrigation waters.	Wetlands and uplands with dense grass and herbaceous plants. Makes runways through vegetation. Nests on surface and in burrows.	Moderate	No	Suitable habitat is present in the eastern portion of the SVRA next to the canal as denser thickets of vegetation are present. Per CNDDB records, this species has been recorded in the Holtville East quad, approximately 8.4 miles from the park. This species has never been recorded at the park unit.
Spilogale gracilis spotted skunk	Mammal	None	None	N/A	IUCN: LC	Open woods, canyons, and farmland.	N/A	High	Yes	Marginal habitat for this species is present within the SVRA and adjacent properties. Eric Hollenbeck, a past Environmental Scientist, trapped a spotted skunk in the park in or before 2008. The 2011 General Plan, states that a spotted skunk had been observed in saltbush scrub at the SVRA.
Sylvilagus audubonii desert cottontail	Mammal	None	None	N/A	IUCN: LC	Varied, mainly in dry lowlands including deserts, grasslands, riparian brush, and pinon-juniper woodlands.	N/A	High	Yes	Suitable habitat is present within the SVRA and adjacent land. Park staff regularly observe this species at the SVRA.
Tadarida brasiliensis Mexican free-tailed bat	Mammal	None	None	N/A	IUCN: LC	Scrub, desert, rural areas, and towns. Not found in forested areas.	N/A	High	Yes	Suitable habitat is present within the SVRA and on adjacent property. An acoustic recording of this species was most recently observed in summer 2020.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Taxidea taxus American badger	Mammal	None	None	N/A	CDFW: SSC IUCN: LC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Moderate	No	Suitable habitat for this species is present within the SVRA. As the site is surrounded by agricultural fields, badgers may have limited movement throughout the area, but the SVRA is within the known range. Per CNDDB, there are two historic records of badger near Heber Dunes SVRA - one approximately 6 miles southwest of El Centro and another from Calexico.
Thomomys bottae Botta's pocket gopher	Mammal	None	None	N/A	IUCN: LC	Found in a wide range of soil types and vegetation zones, from below sea level to above timberline.	N/A	High	Yes	Suitable habitat for this species is present within and adjacent to the SVRA. Past staff observed this species during pitfall trapping and uploaded a picture on 3/9/2009.
Vulpes macrotis kit fox	Mammal	None	None	N/A	IUCN: LC	Arid open areas, shrub grassland, and desert.	N/A	Moderate	No	Suitable habitat for this species is present within and adjacent to the SVRA. This species has not been detected within the SVRA and there are no local regional records.
Xerospermophilus tereticaudus round-tailed ground squirrel	Mammal	None	None	N/A	IUCN: LC	Deserts; in canyons, dry plains, and river valleys. Low desert to about 4,250 feet elevation.	N/A	High	Yes	Suitable habitat for this species is present within and adjacent to the SVRA. Park staff observed this species in 2020.
Abronia villosa hairy sand verbena	Plant	None	None	N/A	N/A	Sandy places.	N/A	High	Yes	Suitable habitat for this species is present within and adjacent to the SVRA. This species was last recorded on 12/10/2017 within the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Abronia villosa var. aurita chaparral sand-verbena	Plant	None	None	1B.1	BLM: S USFS: S	Chaparral, coastal scrub, desert dunes.	Sandy areas. -60-1570 m.	Moderate	No	Suitable habitat for this species is present within the SVRA, although agricultural fields surrounding the park are not suitable and may hinder recruitment. CNDDB lists one record for this species from 1912 in Calexico, approximately 5.2 miles southeast of the SVRA. The park is within Calscape's Estimated Plant Range. This species is not listed in park records.
Achyronychia cooperi onyx flower	Plant	None	None	N/A	N/A	Sandy slopes, flats, washes.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. The nearest observation of this species on Calflora is from 1949, approximately 5.5 miles southeast of the SVRA.
Amaranthus palmeri Palmer's amaranth	Plant	None	None	N/A	N/A	Disturbed areas, agricultural fields.	N/A	Moderate	No	Suitable habitat is present adjacent to the SVRA. This species was observed 2.9 miles north of the SVRA in 2020, per Calflora. An *Amaranthus* spp. was identified on 12/2/2017 by park staff.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Amaranthus watsonii Watson's amaranth	Plant	None	None	4.3	N/A	Mojavean desert scrub, Sonoran Desert scrub	Tolerant of disturbed areas.	Moderate	No	Suitable habitat for this species is present within the SVRA, although the agricultural fields surrounding the park are not suitable and may hinder recruitment. The closest historic record, from 1903, on CNPS is approximately 5.5 miles southeast of the park near Calexico. The park is within Calscape's Estimated Plant Range. This species is not listed in park records, but an *Amaranthus* spp. was identified on 12/2/2017 by park staff.
Ambrosia dumosa white bursage	Plant	None	None	N/A	N/A	Creosote bush scrub.	N/A	Moderate	No	Suitable habitat for this species is present at the SVRA and AMDU is associated with both creosote scrub and dune habitats. The 2011 General Plan indicates this species is absent from the SVRA. The park is within Calscape's Estimated Plant Range.
Ammannia coccinea valley redstem	Plant	None	None	N/A	N/A	Wet places, drying ponds, lake, creek margins.	N/A	Low	No	Suitable habitat for this species is not present at the SVRA, although adjacent property may be suitable. There are no local or park observations of this species. The park is within Calscape's Estimated Plant Range.
Aristida adscensionis sixweeks three-awn	Plant	None	None	N/A	N/A	Disturbed areas; dry, open places; rocky sites; shrubland.	N/A	Moderate	No	Suitable habitat for this species is present at the SVRA and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Astragalus aridus annual desert milkvetch	Plant	None	None	N/A	N/A	Sandy places.	N/A	Moderate	No	Suitable habitat for this species is present in the SVRA and the park is within Calscape's Estimated Plant Range. There are no park records of this species, but Calflora indicates a 1938 observation approximately 3.8 miles southeast of the SVRA.
Astragalus crotalariae Salton milkvetch	Plant	None	None	N/A	N/A	Valleys, washes, in desert foothills or open, sandy, gravelly areas.	N/A	Moderate	No	Suitable habitat for this species is present in the SVRA and the park is within Calscape's Estimated Plant Range. There are no park records of this species, but Calflora indicates a 1902 observation approximately 5.5 miles southwest of the SVRA.
Astragalus sabulonum gravel milk-vetch	Plant	None	None	2B.2	N/A	Desert dunes, Mojavean desert scrub, Sonoran Desert scrub.	Sandy or gravelly flats, washes, and roadsides. -60-885 m.	Moderate	No	Suitable habitat for this species is present within the SVRA. Nearby agricultural fields may limit recruitment. CNPS lists one historic record, from 1902, approximately 5.5 miles southeast of the park near Calexico. The park is within Calscape's Estimated Plant Range. The park does not have a record of this species' presence.
Atriplex canescens fourwing saltbush	Plant	None	None	N/A	N/A	Sites with poor soils, often salty, alkaline or clay slopes, stabilized sand dunes, gravelly washes.	N/A	High	Yes	The SVRA contains suitable habitat for this species, is within the known range, and this species is regularly observed on-site. The park is within Calscape's Estimated Plant Range.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Atriplex elegans wheelscale saltbush	Plant	None	None	N/A	N/A	Saline or alkaline soils, such as alkali flats and desert dry lakebeds.	N/A	High	Yes	The SVRA contains suitable habitat for this species, is within the known range, and this species has been observed on-site. The park is within Calscape's Estimated Plant Range.
Atriplex hymenelytra desert holly	Plant	None	None	N/A	N/A	Alkaline locations such as desert dry wash and creosote scrub in the Mojave and Sonoran deserts.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property to the east. The park is outside Calscape's Estimated Plant Range by several miles.
Atriplex lentiformis quailbush	Plant	None	None	N/A	N/A	Alkaline or saline washes, dry lakes, alkali sinks, and shadscale scrub; sometimes found in grasslands or coastal sage scrub.	N/A	High	Yes	The SVRA contains suitable habitat for this species, is within the known range, and this species has been observed on-site. The park is within Calscape's Estimated Plant Range.
Atriplex polycarpa saltbush	Plant	None	None	N/A	N/A	Alkaline flats, dry lakes.	N/A	High	Yes	The SVRA contains suitable habitat for this species, is within the known range, and this species has been observed on-site. The park is within Calscape's Estimated Plant Range.
Baccharis salicina willow baccharis	Plant	None	None	N/A	N/A	Sandy edges of rivers and washes, salt marshes, alkaline flats.	N/A	High	Yes	Suitable habitat for this species is present on-site and the SVRA is within Calscape's Estimated Plant Range. Per Calflora, this species was observed approximately 3.3 miles southeast of the SVRA in 1970. This species was listed in the 2011 General Plan.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Baccharis sarothroides broom baccharis	Plant	None	None	N/A	N/A	Gravelly, sandy washes, roadsides.	N/A	High	Yes	Marginal habitat is present on-site, particularly along the perimeter road. Staff last observed this species on 12/9/2017.
Baileya pauciradiata laxflower	Plant	None	None	N/A	N/A	Sandy desert soils, especially dunes.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. This species has not been observed in the SVRA, but Calflora lists a 1912 observation 1.3 miles southeast of the park.
Baileya pleniradiata wooly marigold	Plant	None	None	N/A	N/A	Desert roadsides, sandy soils.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. The nearest observation of this species on Calflora is from 1932, approximately 7 miles northeast of the SVRA.
Bolboschoenus maritimus alkali bulrush	Plant	None	None	N/A	N/A	In dense stands locally. Fresh to brackish marshes, shores, wildlife refuges, rice-fields.	N/A	Low	No	Suitable habitat is not present within the SVRA, but the park is within Calscape's Estimated Plant Range. There are no local or park records.
Bouteloua barbata six-weeks grama	Plant	None	None	N/A	N/A	Generally open, sandy to rocky slopes, flats, washes, roadsides, disturbed sites, scrub, woodland, pine forest.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. There are no park records of this species; Calflora lists several records near Calexico, approximately 5.5 miles southwest of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Brassica nigra black mustard	Plant	None	None	N/A	N/A	Disturbed areas, fields.	N/A	High	Yes	This species is naturalized to the SVRA and has been observed on-site. Calflora shows records out of El Centro, approximately 10 miles northeast of the SVRA, from 1961. The 2011 General Plan associates this species with creosote scrub at the SVRA.
Caulanthus lasiophyllus California mustard	Plant	None	None	N/A	N/A	Desert flats, sandy banks, gravelly or rocky areas, talus slopes, shrubland, grassy fields, disturbed sites.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the SVRA is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Chilopsis linearis ssp. arcuata desert willow	Plant	None	None	N/A	N/A	Perennial desert streams, or sandy washes or canyons where there is likely to be subsurface water for most of the year.	In low desert, typically surrounded by creosote scrub. In high desert, Joshua tree woodland.	Low	No	Suitable habitat for this species is not present within the SVRA and the park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records listed on Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Chloracantha spinosa spiny chloracantha	Plant	None	None	N/A	N/A	Seeps, moist streamsides, often saline or arid sites.	N/A	Moderate	No	Suitable habitat is not present within the SVRA, but adjacent property may be suitable. The park is within Calscape's Estimated Plant Range. There are no park records of this species; Calflora shows several observations near Calexico, approximately 5.5 miles southwest of the SVRA.
Chorizanthe corrugata wrinkled spineflower	Plant	None	None	N/A	N/A	Sand or gravel.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. There are no park records of this species; the nearest Calflora observation is out of Calexico in 1949, approximately 5.5 miles southwest of the SVRA.
Chorizanthe rigida devil's spineflower	Plant	None	None	N/A	N/A	Sand or gravel.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Chylismia cardiophylla heartleaf suncup	Plant	None	None	N/A	N/A	Sandy and rocky desert scrub.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. This species has not been observed in the SVRA, but Calflora lists a 1902 observation near Calexico, approximately 5.5 miles southwest of the SVRA.

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Chylismia claviformis brown-eyed primrose	Plant	None	None	N/A	N/A	Broad.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park or local records.
Cistanthe ambigua desert cistanthe	Plant	None	None	N/A	N/A	Desert scrub, sandy to silty soil, often alkaline.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park or local records.
Condea emoryi desert-lavender	Plant	None	None	N/A	N/A	Gravelly, sandy washes, canyon bottoms, and alluvial fans. Typically associated with creosote scrub.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and adjacent property to the east. The park is within Calscape's Estimated Plant Range. There are no local records of this species listed on Calflora.
Cryptantha angustifolia narrow-leaved cryptantha	Plant	None	None	N/A	N/A	Desert scrub and woodland.	N/A	High	Yes	The SVRA contains suitable habitat for this species and the park is within the known range. Calflora records show an observation near Calexico, approximately 5.5 miles southeast of the SVRA. *Cryptantha* species have been observed on-site before, however, the species was not distinguished. Narrow-leafed cryptantha is easier to distinguish from other *Cryptantha* species, and it is regionally common. This species is presumed to be present when annual conditions are suitable.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Cryptantha costata [alt. *Johnstonella costata*] ribbed cryptantha	Plant	None	None	4.3	N/A	Sonoran desert scrub, Mojavean desert scrub, desert dunes.	Sandy and gravelly places. -60-500 m.	High	Yes	The SVRA contains suitable habitat for this species and the park is within the known range. Cryptantha species have been observed on-site before, however, it is challenging to distinguish species in the field. The park is within Calscape's Estimated Plant Range. This species is presumed to be present when annual conditions are suitable.
Cryptantha holoptera [alt. *Johnstonella holoptera*] winged cryptantha	Plant	None	None	4.3	N/A	Mojavean desert scrub, Sonoran desert scrub.	Gravelly to rocky soils in washes, on slopes and ridges. 100-1690 m.	Low	No	Suitable habitat for this species is not present within the SVRA or adjacent property. The park is within Calscape's Estimated Plant Range and the nearest observation, per Calflora, is approximately 5.5 miles southwest of the SVRA from 1902. The SVRA is composed of sandy soils, while surrounding land has been converted to agriculture. There are no CNDDB or park records of this species in the vicinity of the unit, however *Cryptantha* species are difficult to distinguish. This species is not presumed present due to habitat type, but it has a low potential to occur.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Cryptantha micrantha redroot cryptantha	Plant	None	None	N/A	N/A	Sonoran and Mojave Desert.	N/A	High	Yes	The SVRA contains suitable habitat for this species and the park is within the known range. Calflora lists a 1966 record of this species approximately 6 miles northeast of the SVRA. *Cryptantha* species have been observed on-site before, however, it is challenging to distinguish individual species. This species is presumed to be present when annual conditions are suitable.
Cucurbita palmata coyote melon	Plant	None	None	N/A	N/A	Sandy places.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park records of this species. The nearest observation on Calflora is from 1902 near Calexico, approximately 6 miles southwest of the SVRA.
Cylindropuntia bigelovii teddy-bear cholla	Plant	None	None	N/A	N/A	Rocky fans, benches, with creosote bush.	N/A	Low	No	The SVRA does not contain suitable habitat for this species. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no park or local records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Cylindropuntia ganderi Gander's cholla	Plant	None	None	N/A	N/A	Desert, chaparral, pinyon/juniper woodland, sandy flats, rocky hillsides, and boulder fields.	N/A	Low	No	The SVRA does not contain suitable habitat for this species. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are local records of this species in the SVRA.
Cyperus erythrorhizos red rooted cyperus	Plant	None	None	N/A	N/A	Ditches, riverbanks, shores.	N/A	Low	No	The SVRA does not contain suitable habitat for this species, but the park is within Calscape's Estimated Plant Range. There are no park records of this species; Calflora lists several observations out of Calexico, approximately 5.5 miles southwest of the SVRA.
Cyperus esculentus chufa sedge	Plant	None	None	N/A	N/A	Wet soils, irrigated fields and yards, golf courses.	N/A	Low	No	The SVRA does not contain suitable habitat for this species, but adjacent property may. The park is within Calscape's Estimated Plant Range. There are no local or park records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Cyperus odoratus fragrant flatsedge	Plant	None	None	N/A	N/A	Wet, disturbed soils	N/A	Low	No	The SVRA does not contain suitable habitat for this species, but adjacent property may. The park is within Calscape's Estimated Plant Range. There are no park records of this species; Calflora lists several observations near Holtville, approximately 5.5 miles north of the SVRA.
Dalea mollis silky dalea	Plant	None	None	N/A	N/A	Creosote bush flats, washes, and roadsides.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park records of this species; the nearest Calflora record is from 1920, approximately 7 miles northeast of the SVRA.
Dalea mollissima silky dalea	Plant	None	None	N/A	N/A	Desert flats, washes.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park records of this species; the nearest Calflora record is from Calexico in 1902, approximately 5.5 miles southwest of the SVRA.
Dicoria canescens desert twinbugs	Plant	None	None	N/A	N/A	Alkaline or sandy soils, dunes, washes, flats.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park records of this species; Calflora lists a 1938 record approximately 1.7 miles south of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Dithyrea californica spectacle pod	Plant	None	None	N/A	N/A	Abundant in sandy places, washes, scrub.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Eclipta prostrata false daisy	Plant	None	None	N/A	N/A	Damp places.	N/A	Low	No	Suitable habitat is not present within the SVRA, although adjacent property may be suitable. The park is within Calscape's Estimated Plant Range. There are no park records of this species and the nearest record on Calflora is out of El Centro, approximately 10.5 miles northwest of the park.
Encelia farinosa brittlebush	Plant	None	None	N/A	N/A	Colorado and Mojave Deserts. Arid slopes, canyons, washes, and alluvial fans in fast draining sandy, gravelly soil, often among boulders but also in pure sand.	N/A	Low	No	Suitable habitat for this species is present on-site. The SVRA is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Encelia frutescens button brittlebush	Plant	None	None	N/A	N/A	Southwestern deserts, especially the Mojave Desert.	N/A	Low	No	Suitable habitat for this species is present on-site. The SVRA is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.
Ephedra californica desert tea	Plant	None	None	N/A	N/A	Scattered in arid grassland, chaparral, creosote scrub.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local or park observations of this species.
Ephedra trifurca longleaf ephedra	Plant	None	None	N/A	N/A	Creosote scrub, sandy washes, flats, stabilized sand dunes	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no park observations of this species; the nearest Calflora record is from 1929 in Holtville, approximately 5.5 miles north of the SVRA.
Eragrostis pectinacea tufted lovegrass	Plant	None	None	N/A	N/A	Varied. Open spaces, including disturbed areas and roadsides.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local or park observations of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Eremothera boothii Booth's evening primrose	Plant	None	None	N/A	N/A	Deserts.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local or park observations of this species.
Eriogonum deflexum flatcrown buckwheat	Plant	None	None	N/A	N/A	Desert scrub.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local or park observations of this species.
Eriogonum deserticola Colorado Desert wild buckwheat	Plant	None	None	N/A	N/A	Desert sand dunes.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no park records of this species. The nearest Calflora record is from 1925, approximately 2.2 miles southeast of the SVRA.
Eriogonum thomasii Thomas' wild buckwheat	Plant	None	None	N/A	N/A	Desert sands. Broad.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Eriogonum trichopes little desert trumpet	Plant	None	None	N/A	N/A	Desert sand or gravel.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no park records of this species and limited local records. The nearest Calflora record is from 1928, approximately 3.2 miles north of the SVRA.
Euphorbia abramsiana Abrams' spurge	Plant	None	None	2B.2	N/A	Mojavean desert scrub, Sonoran desert scrub.	Sandy sites. -45-1445 m.	Moderate	No	Suitable habitat for this species is present within SVRA although adjacent agricultural lands are not suitable. CNDDB shows historic records (1912) approximately 0.35 miles from the SVRA entrance. The park is within Calscape's Estimated Plant Range. There is no record of this species within the SVRA boundary.
Euphorbia polycarpa smallseed sandmat	Plant	None	None	N/A	N/A	Deserts and other dry, sandy areas.	N/A	Low	No	The SVRA contains suitable habitat for this species, but the park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Ferocactus cylindraceus barrel cactus	Plant	None	None	N/A	N/A	Gravelly, rocky, or sandy places.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property, although rainfall is likely inadequate to support this species. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.
Fouquieria splendens ocotillo	Plant	None	None	N/A	N/A	Arid slopes, canyons, washes, and alluvial fans in fast draining sandy, gravelly soil, often among boulders but also in pure sand.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property, although rainfall is likely inadequate to support this species. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Geraea canescens hairy desert sunflower	Plant	None	None	N/A	N/A	Sandy desert soils.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no park records of this species. The nearest local observation, per Calflora, is from 2013 near Calexico, approximately 5.5 miles southwest of the SVRA.
Helianthus annuus common sunflower	Plant	None	None	N/A	N/A	Disturbed areas such as road shoulders, edges of farm fields, and vacant lots.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within Calscape's Estimated Plant Range. There are no local records of this species on Calflora.
Heliotropium curassavicum seaside heliotrope	Plant	None	None	N/A	N/A	Moist to dry, saline to alkaline soils, generally near water.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within Calscape's Estimated Plant Range. SVRA staff last observed this species on 11/17/2017.
Hesperocallis undulata desert lily	Plant	None	None	N/A	N/A	Sandy flats.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within Calscape's Estimated Plant Range. There are no local records of this species listed on Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Hilaria rigida big galleta grass	Plant	None	None	N/A	N/A	Dry, open places; sandy, rocky places.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within Calscape's Estimated Plant Range. There are no local records of this species listed on Calflora.
Hoffmannseggia glauca pig-nut	Plant	None	None	N/A	N/A	Dry, alkaline flats in deserts, disturbed areas.	N/A	Moderate	No	Suitable habitat for this species is on-site and the park is within Calscape's Estimated Plant Range. There are no park records of this species. Per Calflora, the nearest observation is from 1961 outside Heber, approximately 6 miles west of the SVRA.
Hymenoclea salsola cheesebush	Plant	None	None	N/A	N/A	Deserts. Sandy soils, alkaline environments, and disturbed sites.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property, although rainfall is likely not adequate to support this species. The park is outside Calscape's Estimated Plant Range. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species listed on Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Imperata brevifolia California satintail	Plant	None	None	2B.1	USFS: S	Coastal scrub, chaparral, riparian scrub, mojavean desert scrub, meadows, and seeps (alkali), riparian scrub.	Mesic sites, alkali seeps, riparian areas. 3-1495 m.	Low	No	Suitable habitat for this species is not present within the SVRA, although adjacent canals may provide marginal habitat. CNDDB returned one record of this species from 1963 near the Wistaria Canal approximately 10.8 miles from the SVRA. The park is far outside of Calscape's Estimated Plant Range. There is no record of this species within the SVRA boundary.
Isocoma acradenia alkali goldenbush	Plant	None	None	N/A	N/A	Arid, sandy areas, particularly mineral-rich area such as alkali flats and gypsum soils.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and adjacent property. The park is within Calscape's Estimated Plant Range. Calflora lists a 2018 record of this species approximately 8 miles northwest of the SVRA.
Kallstroemia californica California caltrop	Plant	None	None	N/A	N/A	Flat, sandy, or disturbed areas.	N/A	High	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The nearest Calflora record is from 1902 near Calexico, approximately 5.5 miles southwest of the SVRA. This species was potentially identified within the SVRA on 11/26/2017 per iNaturalist.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Krameria bicolor [alt. *Krameria grayi*] white rhatany	Plant	None	None	N/A	N/A	Deserts. Dry, rocky, or sandy places, especially on lime soils.	N/A	Low	No	Suitable habitat for this species is present within the SVRA and adjacent property. The park is outside of Calscape's Estimated Plant Range. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records listed in Calflora.
Laennecia coulteri Coulter's horseweed	Plant	None	None	N/A	N/A	Disturbed sites, clayey or sandy soils, often seasonally wet, alkaline.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park observations of this species. Per Calflora, the nearest observation is from 1904 near Calexico, approximately 5.5 miles southwest of the SVRA.
Larrea tridentata creosote	Plant	None	None	N/A	N/A	Mountains, valleys, and washes in deserts.	N/A	High	Yes	Suitable habitat for this species is present in the SVRA and adjacent property to the east. The park is within Calscape's Estimated Plant Range. This species is dominant in the Native Vegetation MU. Known to occur on-site.
Lepidium lasiocarpum shaggyfruit pepperweed	Plant	None	None	N/A	N/A	Dry flats, washes, streambeds, roadsides, sagebrush scrub, pinyon/juniper woodland.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park or local records.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Lepidium oblongum veiny pepperweed	Plant	None	None	N/A	N/A	Bluffs, slopes, disturbed areas, roadsides, flats, pastures.	N/A	Moderate	No	Suitable habitat is minimally present on-site, as well as on adjacent properties. The park is within Calscape's Estimated Plant Range. There are no park or local records.
Leptochloa fusca bearded sprangletop	Plant	None	None	N/A	N/A	Salty, wet conditions. Salt marshes and shallow depressions.	N/A	Low	No	Suitable habitat is not present on-site. Adjacent properties contain suitable habitat. The park is within Calscape's Estimated Plant Range. There are no park records of this species. Per Calflora, the nearest record of this species is from Holtville in 1912, approximately 5.1 miles north of the SVRA.
Lycium andersonii water jacket	Plant	None	None	N/A	N/A	Gravelly or rocky slopes, washes.	N/A	Low	No	Suitable habitat is not present on-site or adjacent property. The park is within Calscape's Estimated Plant Range. There are no park records of this species. Calflora lists a 1941 record in Calexico, approximately 6 miles southwest of the SVRA.
Lycium brevipes desert thorn	Plant	None	None	N/A	N/A	Desert or arid coastal bluffs, slopes, and washes.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA. The park is within Calscape's Estimated Plant Range. There are no local records listed in Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Malvella leprosa alkali mallow	Plant	None	None	N/A	N/A	Valleys, generally saline.	N/A	Low	No	Suitable habitat for this species is not present within the SVRA. The park is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Mentzelia hirsutissima hairy stickleaf	Plant	None	None	2B.3	N/A	Sonoran desert scrub.	Washes, fans, slopes; coarse rubble and talus slopes; rocky sites. -5-720 m.	Low	No	Marginal habitat for this species is present within the SVRA and adjacent habitat is not suitable. Per CNDDB, the nearest record of this species was recorded in 1963 outside Mount Signal, approximately 13.3 miles from the SVRA. This observation stated the population was not abundant. The park is outside of Calscape's Estimated Plant Range.
Monoptilon bellioides Mojave desertstar	Plant	None	None	N/A	N/A	Sandy flats, washes.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local or park observations of this species.
Oenothera deltoides dune primrose	Plant	None	None	N/A	N/A	Sandy habitats from desert to beach.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no park observations of this species; the nearest Calflora record is from 1949 in Calexico, approximately 6 miles from the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Oligomeris linifolia lineleaf whitepuff	Plant	None	None	N/A	N/A	Deserts, plains, and coastline.	Tolerant of disturbed areas.	High	Yes	Suitable habitat for this species is present within the SVRA. The park is within Calscape's Estimated Plant Range. There are no local records listed in Calflora. The General Plan states this species is a common understory species in the creosote scrub at the SVRA.
Olneya tesota ironwood	Plant	None	None	N/A	N/A	Washes and hillside drainages in the Sonoran Desert.	N/A	Low	No	Suitable habitat for this species is not present on-site or in the vicinity of the park. The SVRA is outside of Calscape's Estimated Plant Range and there are no local records listed in Calflora.This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA.
Opuntia basilaris beavertail cactus	Plant	None	None	N/A	N/A	High and low desert, in sandy valley floors, alluvial fans, and rocky slopes and canyons	N/A	Low	No	Suitable habitat for this species is present within the SVRA but the park is outside Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records listed in Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Palafoxia arida Spanish needle	Plant	None	None	N/A	N/A	Desert.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The species was last observed by park staff on 12/9/2017.
Parkinsonia florida blue palo verde	Plant	None	None	N/A	N/A	Mesas, bajadas, canyons, washes, and flood plains of the Sonoran Desert.	N/A	Low	No	The SVRA does not contain suitable habitat for this species. The park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no park or local records of this species in the SVRA.
Parkinsonia microphylla yellow palo verde	Plant	None	None	N/A	N/A	Desert slopes to around 3,000 feet elevation.	N/A	Moderate	No	The SVRA contains suitable habitat for this species and is within the known range. The park is within Calscape's Estimated Plant Range. There are no park records of this species within the SVRA. Calflora lists a 1963 observation of this species approximately 4.9 miles north of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Pectis papposa chinchweed	Plant	None	None	N/A	N/A	Arid plains, rocky slopes, in creosote scrub.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The nearest Calflora record is from 1912, approximately 1 mile directly south of the SVRA. Per iNaturalist this species was last observed by park staff on 11/17/2017.
Pectocarya heterocarpa mixed-nut pectocarya	Plant	None	None	N/A	N/A	Washes, roadsides, openings in creosote scrub, Joshua tree woodland.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no park observations of this species. Per Calflora, the nearest record is from 1902 near Calexico, approximately 6 miles southwest of the SVRA.
Peucephyllum schotti desert fir-pygmy cedar	Plant	None	None	N/A	N/A	Rocky slopes, washes, creosote scrub.	N/A	Low	No	Suitable habitat for this species is present within the SVRA but the park is outside Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records listed in Calflora.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Pholisma sonorae sand food	Plant	None	None	1B.2	BLM: S USFS: S	Desert dunes, Sonoran desert scrub.	Loose, deep sand dunes, usually on the more stable, windward face. 0-125 m.	Moderate	No	Suitable habitat for this species is present within the SVRA, but adjacent agricultural lands are not suitable, likely hindering recruitment. Per CNDDB, the closest historic record is from 1915 along East Evan Hewes Highway, approximately 5.1 miles northeast of the SVRA. The park is within Calscape's Estimated Plant Range.
Phoradendron californicum desert mistletoe	Plant	None	None	N/A	N/A	Desert. Hemiparasitic to host plants, often leguminous woody desert trees such as *Cercidium* and *Prosopis*.	N/A	Moderate	No	Marginal habitat is present for this species within the SVRA, and the park is within Calscape's Estimated Plant Range. Preferred tree species are not on-site and much of the surrounding area has been converted to agriculture. There are no local records of this species on Calflora.
Phragmites australis common reed	Plant	None	None	N/A	N/A	Pond and lake margins, sloughs, marshes.	N/A	Low	No	Suitable habitat is not present within the SVRA; adjacent property may provide marginal habitat. There are no park or local records of this species. The park is within Calscape's Estimated Plant Range.
Physalis acutifolia sharp-leaf ground cherry	Plant	None	None	N/A	N/A	Disturbed places, roadsides.	N/A	Moderate	No	Suitable habitat is present within the SVRA. The park is within Calscape's Estimated Plant Range. There are no park records of this species. Per Calflora, the nearest observation is from 1924 outside Meloland, approximately 6 miles northwest of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Plantago ovata woolly plantain	Plant	None	None	N/A	N/A	Sandy or gravelly soils.	N/A	Moderate	No	Suitable habitat is present within the SVRA, and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Pluchea sericea arrow weed	Plant	None	None	N/A	N/A	Stream bottoms, washes, and wet places.	N/A	High	Yes	Suitable habitat for this species is present on-site and it is common in multiple portions of the SVRA. The park is within Calscape's Estimated Plant Range.
Populus fremontii Fremont cottonwood	Plant	None	None	N/A	N/A	Riparian or other wetland habitats such as alluvial bottom lands, streamsides, and seeps throughout the state.	In desert riparian areas, it occurs adjacent to creosote scrub or desert transition chaparral.	Low	No	Suitable habitat for this species is not present within the SVRA. The park is within Calscape's Estimated Plant Range but there are no local observations.
Prosopis glandulosa honey mesquite	Plant	None	None	N/A	N/A	Flats and washes in arid regions with underground water.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no local records of this species listed on Calflora.
Prosopis pubescens screwbean mesquite	Plant	None	None	N/A	N/A	Creek, river bottoms, sandy or gravelly washes or ravines.	N/A	Low	No	Suitable habitat for this species is not present within the SVRA. The park is within Calscape's Estimated Plant Range. There are no park observations of this species; the nearest Calflora record is from 1903 near Calexico, approximately 6 miles from the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Pseudognaphalium stramineum Chilean cudweed	Plant	None	None	N/A	N/A	Many habitats, dunes, chaparral slopes, roadsides.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. There are no local or park records of this species.
Psorothamnus emoryi dyebush	Plant	None	None	N/A	N/A	Desert flats, washes, dunes.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The nearest Calflora observation is approximately 7 miles northeast of the SVRA from 2018.
Psorothamnus schottii indigo bush	Plant	None	None	N/A	N/A	Gravelly to sandy slopes, benches, washes.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The nearest Calflora observation is approximately 10.5 miles northwest of the SVRA from 1906.
Psorothamnus spinosus smoke tree	Plant	None	None	N/A	N/A	Desert washes.	N/A	Low	No	Suitable habitat for this species is not present on-site and the park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Salix exigua sandbar willow	Plant	None	None	N/A	N/A	Streamsides, marshes, pond margins, drainage ditches, and other wet areas.	N/A	Low	No	Suitable habitat is not present within the SVRA; marginal habitat may be present on adjacent properties. The park is within Calscape's Estimated Plant Range. There are no park records of this species. The nearest Calflora observation is from 1902 in Calexico, approximately 6 miles southwest of the SVRA.
Salix gooddingii Goodding's black willow	Plant	None	None	N/A	N/A	Streamsides, marshes, seepage places, washes, meadows.	N/A	Low	No	Suitable habitat for this species is not present on-site, but the park is within Calscape's Estimated Plant Range. There are no local records of this species. Listed in the 2011 General Plan.
Salsola tragus Russian thistle	Plant	None	None	N/A	N/A	Disturbed places.	N/A	High	Yes	Suitable habitat for this species is present on-site. This species was listed in the 2011 General Plan.
Schismus barbatus common Mediterranean grass	Plant	None	None	N/A	N/A	Dry, open, generally disturbed areas.	N/A	High	Yes	Suitable habitat for this species is present on-site. There are no local records. The 2011 General Plan associates this species with creosote scrub at the SVRA.
Sesuvium verrucosum Western sea-purslane	Plant	None	None	N/A	N/A	Moist or seasonally dry flats, margins of generally saline wetlands.	N/A	Low	No	Suitable habitat for this species is not present on-site but adjacent properties may contain marginal habitat. There are no park records of this species; the nearest Calflora observation is from 2010 near Date City, approximately 7 miles northeast of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Sphaeralcea ambigua apricot mallow	Plant	None	None	N/A	N/A	Desert and semi-desert areas, often with boulders.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no local observations listed in Calflora. The General Plan indicates this species is associated with saltbush scrub at Heber Dunes SVRA.
Sphaeralcea coulteri Coullter's globemallow	Plant	None	None	N/A	N/A	Desert. Dry, sandy places.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no confirmed records of this plant within the SVRA or any local records. However, Dr. Jon Rebman suggested that a *Sphaeraclea* sp. observed within the SVRA on 11/26/2017 may be this species.
Sphaeralcea emoryi Emory's globemallow	Plant	None	None	N/A	N/A	Desert scrub.	N/A	Moderate	No	Suitable habitat is present on-site, and the park is within Calscape's Estimated Plant Range. There are no park observations of this species and the nearest local observation, per Calflora, is from 1902 near Calexico, approximately 6 miles southwest of the SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Suaeda nigra bush seepweed	Plant	None	None	N/A	N/A	Saline/alkaline soils with subsurface moisture.	N/A	High	Yes	Suitable habitat for this species is present on-site and it is known to occur in areas of the SVRA. The nearest Calflora record is from 1937, approximately 0.5-mile northeast of the SVRA. The park is within Calscape's Estimated Plant Range. The General Plan states that this species is associated with the saltbush scrub at Heber Dunes SVRA.
Symphyotrichum subulatum annual saltmarsh aster	Plant	None	None	N/A	N/A	Naturalized in California deserts.	N/A	Moderate	No	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. There are no park records of this species and the nearest Calflora record is from 1928 in El Centro, approximately 10 miles northwest of the SVRA.
Tamarix aphylla Athel tamarisk	Plant	None	None	N/A	N/A	Washes, roadsides.	N/A	High	Yes	Suitable habitat for this species is present on-site and it is known to occur in a large portion of the SVRA, except for the Native Vegetation MU. Based on the size of the tamarisk, it is probable that it is historic.
Tamarix ramosissima saltcedar	Plant	None	None	N/A	N/A	Washes, streambanks.	N/A	High	Yes	Marginal habitat for this species is present within the SVRA. This species is invasive and can easily spread in an area. Per the General Plan, this species is associated with the saltbush scrub habitat at Heber Dunes SVRA.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Tiquilia palmeri Palmer's tiquilia	Plant	None	None	N/A	N/A	Sandy gravel soils, on terraced flats.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and the park is within Calscape's Estimated Plant Range. The nearest Calflora record is from 1938, approximately 3.5 miles southeast of the SVRA. This species is an understory shrub in the creosote scrub habitat (2011 General Plan).
Tiquilia plicata fan-leaved tiquilia	Plant	None	None	N/A	N/A	Dunes, sandy gravel flats.	N/A	Moderate	Yes	Suitable habitat for this species is present on-site and the park is within Calscape's Estimated Plant Range. Calflora shows a record 1.5 miles southeast of the SVRA from 1938, as well as more recent observations further from the park. Park records from 2010 list this species.
Washingtonia filifera California fan plam	Plant	None	None	N/A	N/A	Groves, moist places, seeps, springs, streamsides.	N/A	Low	No	Suitable habitat is not present on-site, and the park is outside of Calscape's Estimated Plant Range. There is a local record, approximately 5.5 miles southwest of the SVRA, from 2021 but the species appears to be misidentified.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Xanthium strumarium cocklebur	Plant	None	None	N/A	N/A	Disturbed, seasonally wet, often alkaline sites, in grassland, marshes, watercourses.	N/A	Low	No	Suitable habitat is not present on-site, although adjacent property may contain suitable habitat. The park is within Calscape's Estimated Plant Range. There are no park records of this species. The nearest Calflora observations are approximately 6 miles from the SVRA - one from Calexico in 1904 and another near Meloland in 1916.
Xylorhiza orcuttii Orcutt's woody aster	Plant	None	None	1B.2	N/A	Arid canyons, barren slopes; creosote-bush scrub	N/A	Low	No	Marginal habitat is present on-site, but the park is outside of Calscape's Estimated Plant Range. This species was listed in informal park records, but no observation data was associated. It is presumed this list was generated with species present at other district units, rather than observations specifically from Heber Dunes SVRA. There are no local records of this species.
Aspidoscelis tigris Western whiptail	Reptile	None	None	N/A	IUCN: LC	Deserts and semiarid habitats, typically with sparse vegetation and open patches.	N/A	High	Yes	Suitable habitat is present on-site, and the park is within the known range of this species. Staff observed this species during pitfall trapping on 4/17/2018.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Chionactis annulata resplendent desert shovel-nosed snake	Reptile	None	None	N/A	IUCN: LC	Desert washes, dunes, sandy flats, loose soil, and rocky hillsides with sandy gullies or pockets of sand among rocks.	Scant vegetation - creosote bush, desert grasses, cactus, or mesquite.	Moderate	No	Suitable habitat is present on-site, and the park is within the known range of this species. The nearest iNaturalist observation is from 6/3/2015, approximately 3.4 miles northeast of the SVRA. An email exchange from past staff indicates that species has been observed in or before 2008.
Coleonyx variegatus Western banded gecko	Reptile	None	None	N/A	IUCN: LC	Desert. Creosote scrub, sagebrush, pinyon-juniper woodlands, and chaparral areas.	Often associated with rocks.	High	Yes	Suitable habitat is present on-site, and the park is within the known range of this species. Park staff last observed this species on 12/1/2017.
Coluber flagellum coachwhip	Reptile	None	None	N/A	IUCN: LC	Desert, prairie, scrubland, juniper-grassland, woodland, thornforest, and farmland.	Typically avoids dense vegetation.	High	No	Suitable habitat is present on-site, and the park is within the known range of this species. Last observed by park staff on adjacent Caltrans property on 5/11/2018. An email exchange from past staff indicates that species has been observed in or before 2008.
Crotalus atrox Western diamondback rattlesnake	Reptile	None	None	N/A	IUCN: LC	Arid and semi-arid regions - desert, grassland, shrubland, woodland, open pine forests, and rank growth of river bottoms.	Sandy flats to rocky upland areas.	High	Yes	Suitable habitat is present on-site, and the park is within the known range of this species. Heber Dunes staff observe this species on occasion. This species was last observed by park staff in 2019.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Crotalus cerastes sidewinder	Reptile	None	None	N/A	IUCN: LC	Desert. Most common in sandy creosote scrub but may also occur on windswept flats, barren dunes, hardpan, and rocky hillsides.	N/A	High	Yes	Suitable habitat is present on-site, and the park is within the known range of this species. The Heber Dunes General Plan states that this species is found in the SVRA's tamarisk dunes.
Dipsosaurus dorsalis desert iguana	Reptile	None	None	N/A	IUCN: LC	Creosote bush scrub with mixture of loose sand and firm ground with scattered rocks.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA and the park is in the species' range. This species was listed in the 2011 General Plan. Staff uploaded a picture on 4/28/2007.
Hemidactylus turcicus Mediterranean house gecko	Reptile	None	None	N/A	IUCN: LC	Desert. Human dwellings.	N/A	Moderate	No	Suitable habitat for this species is present within the SVRA. This species in nonnative to California but it has readily adapted to the environment. The nearest iNaturalist observation is from 11/17/2019 near Calexico, approximately 5.1 miles from the SVRA. Per a 2008 email exchange, this species may have been observed within the SVRA; however, the species could have been a western banded gecko as well.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Kinosternon sonoriense Sonoran mud turtle	Reptile	None	None	N/A	CDFW: SSC IUCN: VU	The lower Colorado River system in southeastern California.	Permanent slackwater habitats along intermittent or perennial streams with abundant submergent vegetation and benthic inverts.	None	No	Suitable habitat is not present within the SVRA or immediately adjacent. Per CNDDB, the last observation was in 1941 approximately 5 miles southeast of the park along the All American Canal and according to Jennings (1983), this species is extinct in California. This species has not been recorded within the park boundary.
Lampropeltis californiae kingsnake	Reptile	None	None	N/A	IUCN: LC	Coniferous forest, woodland, swampland, coastal marshes, river bottoms, farmland, prairie, chaparral, and desert.	Often found near rock outcrops and clumps of vegetation and under rotting logs, old lumber, and rocks.	High	Yes	Suitable habitat is present within the SVRA, and the park is in the known range of this species. This species was last observed within the SVRA in 2020.
Phrynosoma mcallii flat-tailed horned lizard	Reptile	None	None	N/A	BLM: S CDFW: SSC IUCN: NT	Restricted to desert washes and desert flats in central Riverside, eastern San Diego, and Imperial counties.	Critical habitat element is fine sand, into which lizards burrow to avoid temperature extremes; requires vegetative cover and ants.	Low	No	Suitable habitat is present for this species within the SVRA, but the surrounding landscape is not suitable. Per CNDDB, this species has possibly been extirpated due to regional conversion to agriculture. The park is within the historic range of the species, but the most recent CNDDB records were from the 1960s. iNaturalist shows recent records of this species east of the Alamo River (approximately 2.1 miles east of the SVRA), suggesting a population is present in remaining habitats.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Pituophis catenifer gopher snake	Reptile	None	None	N/A	IUCN: LC	Desert, prairie, brushland, woodland, open coniferous forest, and farmland.	Especially common in grassland and open brushland.	High	Yes	Suitable habitat is present within the SVRA, and the park is within the known range of this species. This species was last observed by park staff in 2019.
Sceloporus magister desert spiny lizard	Reptile	None	None	N/A	IUCN: LC	Arid and semiarid regions, including deserts, plains, and lower slopes of mountains.	N/A	High	Yes	Suitable habitat is present within the SVRA, but preferred slopes and rocky substrates are not present. The park is within the known range of this species. Per iNaturalist, the nearest observation is from 11/19/2018 approximately 1.4 miles northeast of the SVRA. Park staff observed this species in 2021.
Uma notata Colorado Desert fringe-toed lizard	Reptile	None	None	N/A	BLM: S CDFW: SSC IUCN: NT	Colorado Desert region; in sand dunes, dry lakebeds, sandy beaches or riverbanks, desert washes, or sparse desert scrub.	Requires fine, loose, windblown sand (for burrowing); shrubs or annuals for arthropod production.	Low	No	Suitable habitat is present for this species, but adjacent lands are not suitable due to conversion to agriculture, hindering potential recruitment. The nearest CNDDB record is approximately 10.2 miles northeast of the SVRA and north of Interstate 8 in the Glamis SW quad.
Urosaurus graciosus long-tailed brush lizard	Reptile	None	None	N/A	IUCN: LC	Desert. Areas of loose sand and scattered bushes and trees.	Creosote bushes with exposed roots favored.	High	Yes	Suitable habitat for this species is present on-site and the park is within the known range. Staff observed this species on 4/17/2018 during pitfall surveys.

Species Name	Taxon	Federal Status	State Status	CA Rare Plant Status	Other Status	General Habitat	Microhabitat	Potential to Occur within SVRA	Known to Occur within SVRA	Justification
Uta stansburiana side-blotched lizard	Reptile	None	None	N/A	N/A	Desert, various.	N/A	High	Yes	Suitable habitat for this species is present within the SVRA and the park is in the species' known range. Staff observed this species in December 2021.

Table Key:

CA Rare Plant Status: Information about CNPS rare plant ranks can be found at https://www.cnps.org/rare-plants/cnps-rare-plant-ranks.

Other Status: BCC=Bird of Conservation Concern, EN=Endangered, FP=Fully Protected, HP=High Priority, LC= Least Concern, LMP=Low-medium Priority, MHP=Medium-high priority, MP=Medium Priority, NT=Near Threatened, RWL=Red Watch List, S=Sensitive, SSC=Species of Special Concern, VU=Vulnerable, WL=Watchlist

8 APPENDIX 2: MANAGEMENT ACTION DETAILS

The goals and objectives of the WHPP guide the management of natural resources at Heber Dunes SVRA. Management actions are responses that can be taken to improve habitat, reduce impacts to habitat, respond to triggers, and attempt to reach success criteria that will progress the WHPP's goals and objectives. These actions are informed by the SVRA resource objectives, success criteria, and management triggers. All proposed management actions are compatible with the park's General Plan.

Implementing a management action, may require CEQA review. Once a project or action is planned, the district will assess whether the activity is subject to CEQA. If CEQA applies, review will commence using the State Parks Project Evaluation Form.

When a specific project or action is planned, CEQA review will commence using the State Parks Project Evaluation Form.

Listed below is a comprehensive list of management actions that are currently used or could feasibly be applied to meet WHPP objectives at the SVRA.

8.1 MANAGEMENT ACTIONS RELATED TO RESOURCE MANAGEMENT

1. Conduct restoration or other projects to meet the goals of the Heber Dunes SVRA Soil Conservation Plan, as needed.
2. Limit significant expansion of social trails within the Native Vegetation MU.
    a. Measures could range from lower intensity actions (i.e., use of interpretive messaging, signage, etc.) to high intensity (i.e., temporary or permanent closures, formal management as trails only area, etc.).
3. Manage spread of invasive species with chemical and mechanical controls throughout the unit.
    a. Control methods (e.g., opportunistic hand pulling, herbicide application, etc.) would be determined for the species of interest and its extent, as appropriate.
4. Use suitable avoidance measures (e.g., avoidance buffers, seasonal restrictions on work, exclusion zones, etc.) to minimize impacts to sensitive species.
5. Train park staff and volunteers on sensitive species that may be present in the SVRA. This training should consist of identification, avoidance measures, and reporting requirements.
6. Host up to two clean-up events at Heber Dunes SVRA annually.
7. Remove identified hazard trees or branches within 30 days of post-inspection notification.

8.2 Management Actions Related to Recreation and Facilities Activities

1. Plan and implement small scale projects in the Native Vegetation MU, such as removal of invasive species, planting native vegetation, and scrubbing volunteer trails.

8.3 Management Actions Related to Policy and Regulatory Compliance

1. Develop and implement a Heber Dunes SVRA Soil Conservation Plan by 2023.
2. Ensure project compliance per the California Environmental Quality Act.
    a. Document project impact and CEQA analysis on a State Parks Project Evaluation Form (DPR 183).
    b. Apply for project required regulatory permits.
    c. Incorporate Ocotillo Wells District's standard impact avoidance measures into projects.
    d. Conduct pre-construction surveys for sensitive species, including but not limited to breeding birds and special status plant and animal species prior to the start of construction activities, when appropriate.
    e. When burrowing owls are observed on site, Mitigation Measure Biology-1, which was identified in the park's General Plan, will be employed. Mitigation Measure Biology-1 states:

        > "In the event that western burrowing owl are discovered within a construction area or in an area that interferes with operation and management of Heber Dunes SVRA, CDFG [*sic*] will be consulted to determine the proper course of action, which may include avoidance or measures such as limiting construction to the nonbreeding season, burrow exclusion outside of the breeding season, collapsing of excluded burrows, and the creation of artificial burrows" (AECOM 2011)
3. If previously unknown wildlife species (sensitive and non-sensitive) are detected, assess the WHPP's adaptive management strategy, and, if found to be necessary, implement new or modified monitoring and management actions.
4. Per SB 249, temporarily or permanently close noncompliant areas until the WHPP is met.

9 APPENDIX 3: MONITORING METHODOLOGY

This appendix details the different types of monitoring, including performance indicators and methodology, that will occur to assess WHPP objectives. Some monitoring efforts are new to the SVRA and will require time to establish baseline and target conditions, as well as refine methods. During the pilot phase of monitoring, changes may be made to the methodology, and it may be several years until a protocol is established. This is normal for the introduction of changes to survey protocols and assessments. Changes to any monitoring will be addressed in future WHPP annual reports and updates.

9.1 VEGETATION COMMUNITIES MONITORING

9.1.1 Performance Indicator(s)

9.1.1.1 Description

Understand and manage the composition and distribution of habitats and associated vegetation communities throughout the unit.

9.1.1.2 Expectation

Conserve or improve the composition, distribution, and health of habitats and associated vegetation communities present at Heber Dunes SVRA.

9.1.1.3 Metric(s)

These metrics will be updated and evaluated biennially as part of the WHPP Report to OHMVRD.

1. Vegetation coverage percentage of the Native Vegetation MU.
2. Changes to landcover within the Native Vegetation MU over time.

These metrics will be updated and evaluated every five years during the WHPP update cycle, which will be reviewed by OHMVRD and NRD.

3. Fine-scale acreage and extent of vegetation communities at Heber Dunes SVRA.

9.1.1.4 Baseline

Landcover baseline to be established by 2025. Large-scale imagery and remote sensing monitoring will be a new effort at Heber Dunes SVRA that will begin in 2022. Early efforts will focus on ensuring property equipment and permitting is in order and initial data gathering to establish baseline conditions.

Vegetation community baselines were established in 2021 (Table 4). VegCAMP surveys were first conducted in 2021 for Heber Dunes SVRA, with ground-truthing occurring in spring 2022. This survey effort will serve as the baseline for future assessments. Data has also been mapped and stored within in ArcGIS Online geodatabase.

Table 4. Vegetation alliances identified for Heber Dunes in 2021-2022 VegCAMP mapping.

Habitat Type	Baseline Acres (2022 VegCAMP)
Arrow Weed Thickets Shrubland Alliance	31
Bare Sand	64
Bush Seepweed Shrubland Alliance	4
Creosote Bush Scrub Shrubland Alliance	52
Developed	10
Quailbush Scrub Shrubland Alliance	5
Tamarisk Thickets Shrubland Semi-Natural Alliance: Athel tamarisk	143
Tamarisk Thickets Shrubland Semi-Natural Alliance: saltcedar	25
Total VegCAMP Acres	**334**

9.1.1.5 Target(s)

Landcover target to be developed by 2025 following the establishment of baseline conditions. Generally, targets will focus on maintaining the extent of vegetation communities at the park.

1. By 2027, maintain the existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.

9.1.1.6 Basis for Selection

Vegetation is an important component of any habitat and is often considered when assessing habitat condition and health. Vegetation presence and health is beneficial to habitats in numerous ways, including reducing soil loss from water or wind erosion (Castillo et al., 1997), lessening impacts of climate events and disturbances (Wright et al., 2017), and increasing species richness and influencing diversity (Sadoti et al, 2018; Cooper, 2018; Cooper et al., 2020). Additionally, many habitat factors influence vegetation health, including climate conditions (Hantson et al., 2021; Turner, 1990), land use and anthropogenic factors (Lovich and Bainbridge, 1999; Leu et al., 2008; Guo, 2004), and invasive species (Drake et al., 2016; Filazzola et al., 2020; Barrows et al., 2008). As a result of the broad importance of vegetation to a habitat, monitoring and improving vegetation cover benefit several resource categories at the SVRA.

Primary management considerations at the SVRA consist of maintaining existing extent of vegetation, particularly within the Native Vegetation MU. The MU contains the greatest diversity and continuous extent of native vegetation at the park unit.

Two methods were selected for ongoing monitoring. NDVI is a GIS tool that allows photosynthetically active vegetation to be measured within a given area. It allows land managers to map and visualize vegetation by health and distinguish them from non-vegetated areas. VegCAMP is a tool that similarly allows vegetation community and non-vegetated areas to be mapped, but health of given vegetation cannot be directly inferred. VegCAMP mapping is suitable for larger areas where changes are expected to occur at a slower rate, while NDVI allows for more focused analysis of areas where higher rates of change are anticipated, or the vegetation is more sensitive.

9.1.2 Methods

<u>NDVI</u>

Specific methodology to be established by 2024. District staff will work with GIS analysts and staff at Prairie City SVRA to learn more about the protocols in use at the park unit. The Ocotillo Wells district GIS analyst/drone pilot assisted Prairie City SVRA with their protocol development and will play an important role in fine tuning methodology for use at Heber Dunes SVRA.

NDVI is a GIS-based analysis that uses aerial imagery to measure the annual change in vegetation cover. NDVI measures the amount of near infrared light versus red light that is reflected from the surface of the earth. A NDVI value that is near one micrometer indicates a greener, healthier plant, while values close to zero indicate no vegetation is present and negative values indicate development or water.

Based on early discussions, tentative methodology would consist of using drones to capture high-resolution aerial imagery of the Native Vegetation MU every other year. Drone surveys would likely occur in the spring when vegetation growth is at its peak. Imagery collected would then be run through the NDVI tool in ArcMap. Data from this analysis would allow staff to assess vegetation coverage and health. Selective ground truthing will likely be required, especially in early years, as staff refine the protocol. The protocol will be appended to the annual WHPP report.

VegCAMP

VegCAMP classifies vegetation according to the standards of the National Vegetation Classification System (NVCS) and Survey of California Vegetation standards, which are hierarchal classifications of vegetation types, distinguishing alliances at the finest scale. Aerial imagery is used to identify vegetation alliances and/or associations at a minimum 1-acre scale. Special stands, such as wetlands or vernal pools, are mapped at a ¼-acre scale. Further information about CDFW's VegCAMP program and protocols can be found at Vegetation Publications, Protocols and Standards.

9.1.3 Program Risks and Uncertainties

NDVI is a useful tool for monitoring vegetation, but staff will need to use an array of other data, such as condition assessments within the MU and climate data, to assess whether changes were based on local or regional factors. As with all data, it is important to understand the underlying influences of increases or decreases. Climatic factors, such as precipitation, temperature, and sunlight, are strong influences on vegetation health. With analysis occurring biannually, it will be important to pay attention to ongoing climate conditions.

Using NDVI analysis requires access to high-quality imagery, which can be challenging to obtain in the area. A drone may be the most reliable source of imagery. The district currently has a trained drone operator but existing equipment, specifically the camera, is not suitable for multi-spectral imagery. With only one trained operator, staffing changes in the future could reduce the ability to consistently fly the MU and poses a risk to consistency of survey timing.

OHMVRD staff are currently required to complete VegCAMP mapping efforts. Staff changes between WHPP updates and sampling efforts will result in a knowledge gap in completing the mapping. If this mapping transitioned to district or SVRA responsibility, existing staffing may not be sufficient to absorb the task. Future training and management of this gap will be necessary.

9.2 INVASIVE SPECIES

9.2.1 Performance Indicator(s)

9.2.1.1 Description

Maintain or reduce the spread of invasive plant species at Heber Dunes SVRA.

9.2.1.2 Expectation

Map the extent of invasive plant species throughout the unit, and work to control or reduce the presence and distribution of invasive plant species within Heber Dunes SVRA.

9.2.1.3 Metric(s)

These metrics will be updated and evaluated annually as part of the WHPP Report to OHMVRD.

1. Acres and location of habitat within Heber Dunes SVRA where invasive plant species are present.
2. Acres and location of habitat within Heber Dunes SVRA treated for invasive plant species.

9.2.1.4 Baseline

Baseline spatial extent of invasive plant species at Heber Dunes SVRA to be established by 2024. Formal mapping of invasive plant species has not occurred at the park unit, although some data is available for specific species. VegCAMP surveys in 2021 identified that saltcedar is dominant in 25 acres of the SVRA (Figure 8). Other species, such as Russian thistle, have been identified in limited areas of the unit opportunistically.

9.2.1.5 Target(s)

To be developed by 2025 following the establishment of baseline conditions. Generally, targets will focus on maintaining the quality and health of native or naturalized habitats present at Heber Dunes SVRA, specifically related to managing and preventing the spread of invasive plant species at the unit.

1. By 2027, remove five acres of saltcedar from Heber Dunes SVRA.

9.2.1.6 Basis for Selection

Invasive species are organisms that cause ecological or economic harm in an environment they were introduced to and have the potential to significantly impact or harm natural resources in that ecosystem. Many times, invasive plants can outcompete native species as they often

produce large quantities of seed, are tolerant of disturbance, may have aggressive or dense root systems, can rapidly spread, and may alter the environment to inhibit other species. Invasive species are known to cause declines in native species, reducing plant diversity and degrading habitat, and altering soil composition and nutrients. Management of invasive species is a recurrent resource management concern in many systems.

It is important to note that not all non-native species are invasive, which is why management at Heber Dunes SVRA focuses on select species of concern that are likely to cause ecosystem harm. Currently, two species of concern have been identified – Russian thistle and saltcedar. Monitoring efforts will aim to detect if other invasive species are present at the unit. Efforts will be prioritized by proximity to native vegetation at the park.

A small population of Russian thistle was observed at the SVRA in 2021. This species has a variable rate of spread and may not pose an invasive threat at the unit. Initial monitoring will assess the appropriate threat level of the species. Russian thistle may be of concern due to its tendency to establish in disturbed and sandy soils, and abundant seed production.

Saltcedar is known to occur at the SVRA and, in the southwest, is a widespread invasive of concern. The species does not appear to spread rapidly at Heber Dunes SVRA, but it can increase salinity levels of the soil and alter site suitability for native species. Athel tamarisk was not identified as a species of management concern.

9.2.2 Methods

The 2020 Ocotillo Wells District Invasive Management Plan provides a framework for management of invasive species throughout the district. While the best control of invasive species is prevention, it is not feasible to stop all incursion. It is important to inventory and monitor so that species can be detected soon after invasion before they are established in an area or have established a large seed bank. Early Detection and Rapid Response (EDRR) surveys play an important role in locating and removing potential invasive species before they spread and cause harm.

Initial EDRR surveys will occur annually, generally in spring, during initial mapping efforts. Surveyors will systematically search the SVRA for potential invasive species. When detected, individuals or stands will be mapped using ArcGIS. Records will be kept of the location of surveyed areas, surveyors, date, and observations. New species that are detected, will be assessed, and removed quickly to avoid potential spread. Once baseline conditions are developed, monitoring frequency will be reassessed. The protocol will be appended to the annual WHPP report.

Removal methodology would be selected based upon for each species of focus and targeted area. Depending on project goals, numerous removal options could be considered including

biological, chemical, educational, and mechanical. At Heber Dunes SVRA, a mixture of chemical, educational, and mechanical controls are the likeliest to be used.

Saltcedar often requires mechanical and chemical treatment as the species is highly resilient and easily resprouts without herbicide application. Mechanical removal may consist of hand pulling, cutting, or using heavy equipment to pull individuals or mow stands. Chemical treatment would follow cutting or mowing to suppress resprouting. Currently, control of Russian thistle seems manageable with mechanical removal. Due to the smaller size of the plants, hand pulling is appropriate. As with all hand removal, effort should be made to remove the taproot. Interpretive messaging could easily be incorporated into any project, should staffing levels allow for it. Treated areas will be mapped in ArcGIS.

Following removal efforts, it is important to monitor treated areas to learn more about the effect of treatment on targeted species. Methods would be identified that are specific to a project. This type of monitoring provides management information about the effectiveness of control treatments towards meeting objectives and can be assessed over multiple years to show trends over time. It also helps refine removal methodology for a given location and target species. In certain areas, this monitoring can also be expanded to learn more about the effects of treatment on non-targeted species.

9.2.3 Program Risk and Uncertainties

Invasive plant species are an ongoing threat to park management, but dedicated surveys cannot occur with the same frequency. While efforts will made to consistently survey the SVRA, there are no dedicated resources staff available at the unit to complete this task. District staff should work closely with maintenance staff to ensure that potential species of concern are able to be identified by park staff and that, when observed, district staff is notified shortly after observation to avoid rapid spread of new invasive species.

9.3 Sensitive Species Avoidance Monitoring

9.3.1 Performance Indicator(s)

9.3.1.1 Description

Conserve sensitive species over time throughout Heber Dunes SVRA.

9.3.1.2 Expectation

Avoid and/or minimize impacts to sensitive species that may be present at Heber Dunes SVRA through inventory and pre-construction presence-absence surveys.

9.3.1.3 Metric(s)

These metrics will be updated and evaluated annually as part of the WHPP Report to OHMVRD.

1. Individual bat species auditorily recorded at Heber Dunes SVRA by season and recurrence.
2. Location of identified or probable bat roosting habitat at Heber Dunes SVRA.
3. Presence or absence of burrowing owl annually at Heber Dunes SVRA. If present, the location, and approximate dates the individual(s) were present will be recorded.
4. A list of projects that occurred at Heber Dunes SVRA that had the potential to impact sensitive species. For each project, sensitive species that were observed in or around the project area during pre-construction surveys, successful avoidance, or observed impacts will be denoted.

9.3.1.4 Baseline

Baseline conditions vary by taxon and methodology; baseline conditions will be established for all taxon by 2024. Project specific baselines may be utilized when pre-construction surveys are utilized.

<u>Bats</u>

Between 2019 and 2021, 13 total bat species have been auditorily observed at Heber Dunes SVRA, including seven sensitive species (Table 5). Assessment of bat roosting habitat has never occurred at the unit; baseline conditions will be established by 2024.

<u>Birds</u>

Burrowing owl are known to be present on occasion within the SVRA. Other sensitive species have the potential to be present and baseline conditions will be established for individual projects.

<u>Plants</u>

Sensitive plant species have the potential to be present. Baselines will be established for individual projects.

Table 5. Acoustic Detections from 2019-2021 at Heber Dunes SVRA (Alvarez 2021)

Species	Status	2019 Detection	2020 Detection	2021 Detection	More Data Required	N	%
Arizona Bat *Myotis occultus*	SSC	S, F	F	S	Yes	6	43
Big Brown Bat *Eptesicus fuscus*	N/A	S, F	F	S, F	No	11	79
Big Free-tailed Bat *Nytcinomops macrotis*	SSC	S, F	F	S, F	No	11	79
California Leaf-nosed Bat *Macrotis californicus*	SSC	N/A	F	N/A	Yes	1	7
California Myotis *Myotis californicus*	N/A	F	F	S	No	3	21
Canyon Bat *Parastrellus hesperus*	N/A	N/A	F	N/A	No	1	7
Hoary Bat *Lasiurus cinereus*	N/A	S	F	S, F	No	8	57

Species	Status	2019 Detection	2020 Detection	2021 Detection	More Data Required	N	%
Mexican Free-tailed Bat *Tadarida brasiliensis*	N/A	S, F	F	S, F	No	14	100
Pocketed Free-tailed Bat *Nyctinomops femorosaccus*	SSC	S, F	F	S, F	No	13	93
Western Mastiff Bat *Eumops perotis*	SSC	F	F	S	No	5	36
Western Red Bat *Lasiurus blossevillii*	SSC	S, F	F	N/A	No	9	64
Western Yellow Bat *Lasiurus xanthinus*	SSC	S, F	F	S	No	12	86
Yuma Myotis *Myotis yumanensis*	N/A	F	F	S, F	No	9	64

Table Key:

"SSC" = California Species of Special Concern. Detections are denoted by observation season; "S" = Spring and "F" = Fall.

9.3.1.5 Target(s)

To be developed by 2024 following the establishment of baseline conditions. Generally, targets will focus on understanding and maintaining the quality and health of sensitive species present at the unit.

9.3.1.6 Basis for Selection

Conservation of rare and sensitive species is a core value of State Parks, which was reinforced by the passage of SB 249. There are currently no endangered or threatened species resident to Heber Dunes SVRA, but several rare or sensitive species have the potential to occur. Through improving staff's understanding of the resources that are present at the unit, and by using that knowledge to incorporate avoidance measures into projects, State Parks can steward resources at the park.

Bat species have historically been understudied, which is the case at Heber Dunes SVRA. A robust inventory will allow park management to be better informed potential repercussions or benefits of actions that are taken. Similarly, while limited roost habitat is presumed to be present at the unit, investigating the likelihood of roosting will better inform management. For sensitive birds and plants, focus will primarily be on reducing project impacts through implementation of successful avoidance measures.

9.3.2 Methods

<u>Bats</u>

Passive acoustic recording of bat calls will occur twice per year in summer and winter at three locations at Heber Dunes SVRA. SM4 bat detectors are allowed to run for approximately one month, beginning recording one hour before sunset and continuing until one hour after sunrise. Data is analyzed Using Kaleidoscope 4.0.1 software and/or Sonobat 4.0, with review by an experienced bat biologist. Ambiguous recordings are discarded. The protocol is included in annual acoustic bat survey monitoring reports provided by Division contractors, and the report is attached to the annual WHPP report.

A protocol to evaluate roost sites, particularly for the pallid bat and California leaf-nosed bat (Stokes, personal communication), and identify probable locations will be established in conjunction with Division contractors that have subject matter expertise. It is expected that locations will be surveyed periodically for visible sign or direct observations of bat presence. Once established, the protocol will be appended to the annual WHPP report.

Future efforts may consider the use of mist netting in addition or in lieu of auditory recording to improve confidence in species' presence.

Birds

Annual presence absence surveys will occur at Heber Dunes SVRA to identify if burrowing owl are present or not. A protocol based on CDFW's 2012 Staff Report on Burrowing Owl Mitigation and The California Burrowing Owl Consortium's 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines will be modified for use at Heber Dunes SVRA. Existing protocols are based for construction mitigation and require an initial habitat assessment, which is not necessary at Heber Dunes SVRA as burrowing owl have been previously observed and the entirety of the park could be utilized for foraging and/or nesting. Broadly, surveys should be repeated at least three times during the breeding season, defined as February 1st to August 31st, with each survey occurring several weeks apart. Non-breeding season surveys are currently not deemed appropriate as the park has not historically been used as wintering habitat. Once established, the protocol will be appended to the annual WHPP report.

Ideally, projects will be scheduled to avoid the breeding bird season to maximize avoidance, but if projects cannot be rescheduled, pre-construction surveys will be completed no more than one week prior to work. Pre-construction surveys will be required for any projects that occur during the breeding bird season, which is broadly defined in California as February 1st through August 15th. Surveyors will conduct point or transect surveys to identify species that are in the project area and buffer zones. Acoustic recordings may be used. If sensitive species are observed, an Environmental Scientist will prescribe appropriate minimization measures including, but not limited to, avoidance buffers, a biological monitor, and project postponement. The annual WHPP report will include a summary description of method(s) used for each project, observed sensitive species, avoidance measures prescribed, and measure success.

Plants

Pre-construction plant surveys will be conducted in the project area and an appropriate buffer around the work area and routes of travel, when working in areas that have a potential for sensitive plant species to occur. Surveys will consist of transects in suitable habitat. If sensitive plants are observed, they will be flagged for avoidance for the duration of work and a GPS point will be collected. A biological monitor may be on-site during work, at the discretion of an Environmental Scientist.

9.3.3 Program Risks and Uncertainties

Differing levels of effort will likely be required year-to-year depending on the number of projects that occur at the unit, and the presence of sensitive species relative to the projects. As monitoring proceeds, it will be important to assess the typical level of effort required to ensure staff capacity can meet demand. Staff will also need to be trained in protocol-level surveys, particularly if biologist requirements or trainings are implemented. While surveys will occur as

appropriate, there is always risk that a species is present but remains undetected during surveys. Monitoring may be an appropriate avoidance option when repeat surveys to ensure adequate detection probability are not feasible.

The species inventory will need to be regularly evaluated for updates and status changes to capture changes over time. Similarly, best available science regarding species avoidance may change over time or fine-tuned for various habitats. These changes will be important to capture throughout each iteration of the WHPP.

9.4 Trash Clean-Up

9.4.1 Performance Indicator(s)

9.4.1.1 Description

Anthropogenic, non-organic trash and micro-trash pose risks to wildlife and reduce habitat quality.

9.4.1.2 Expectation

Reduce non-organic trash, and micro-trash, from Heber Dunes SVRA to reduce wildlife and habitat impacts.

9.4.1.3 Metric(s)

These metrics will be updated and evaluated annually as part of the WHPP Report to OHMVRD.

1. Projected priority treatment acreage within SVRA.
2. Acres of treated areas following cleanup events.

9.4.1.4 Baseline

A well-established baseline of existing trash does not exist; however, staff have anecdotal knowledge about the density and frequency of build-up in areas of the park. As cleanup events begin in 2023, baseline conditions will be better understood. Early efforts will focus on identifying priority areas for treatment, with cleanup events targeting those areas.

9.4.1.5 Target(s)

This objective will be achieved through clean-up events. Specific targets will be developed per clean-up event and reported within annual reports.

9.4.1.6 Basis for Selection

Windblown trash accumulates underneath vegetation stands at Heber Dunes SVRA. The removal of this trash will improve habitat quality, as well as other resource categories, for many species at the unit (Browne et al., 2015). Additionally, cleanup events allow visitors to actively contribute and benefit the park unit, creating stronger stakeholder bonds over time.

The primary focus of any cleanup event is to target a select subsection of the park. Individual cleanup events may also have a collection goal (i.e., targeted weight of collected trash or other metric) that will serve as motivation to volunteers. Without a clear understanding of how much trash is currently on-site, this metric will likely have limited management implications beyond event goal setting. Tracking the acres of individual clean-up events and estimated improvement, will be the primary focus.

9.4.2 Methods

Locations will be inventoried based on anecdotal or opportunistic staff knowledge of problem areas and periodic informal assessments of areas that are likely to be problem areas. These different locations should be prioritized for treatment across the unit. Priorities should be periodically assessed as needed to ensure areas of concern are focused on.

Prior to the cleanup, volunteers should be recruited through social media, posters, park newsletter, and other mediums. Additionally, supplies for the event should be prepared including disposable gloves, garbage bags, hand sanitizer, and a scale (i.e., luggage or fishing scale). On the day of the event, park staff should be available to assist with volunteer waiver forms, present a safety and resource briefing, help with the cleanup, and track the acres treated. If historic resources may be present, the district historic resources guide should be shared with volunteers and a briefing should be conducted.

Organizations that regularly conduct community cleanup events have helpful resources about event preparation. These guides will be used to develop a more in-depth protocol for the park during 2023. The protocol will be appended to the annual WHPP report.

9.4.3 Program Risks and Uncertainties

It is uncertain how much trash is currently on-site, which makes it challenging to estimate need. However, trash will likely be an ongoing management issue at the unit to ensure ongoing accumulation does not exceed removal activities. While staff efforts are easy to schedule, coordinating volunteers at the park unit may prove to be challenging. In the future, it may be worth coordinating with a group that regularly organizes cleanup events to cohost events in the future (i.e., Clean-Dezert).

9.5 SCIENTIFIC MONITORING

9.5.1 Taxa Monitoring

Avian Methodology

Three avian plots are surveyed biennially at Heber Dunes SVRA – once in spring and again in fall. Plots are located within saltbush, arrow weed, and dune habitats. Each plot consists of a point-count transect. At each point within the transect, surveyors observe birds for five minutes before moving to the next point. Observations made while surveyors move from one point to another are recorded.

In 2021, resource staff worked with The Institute for Bird Populations to field test Autonomous Recording Units (ARU) at Heber Dunes SVRA. These stations are easy to set up, and record ambient sound, including bird calls. During initial testing, ARU were set out at designated points along existing survey transects and left running for a week. Recordings can then be analyzed by a trained surveyor or bird call software analysis programs. Depending on results from the first year of surveys, ARU may be used to augment or replace in-person surveys in the future.

The protocol will be appended to the annual WHPP report.

Reptile Methodology

Reptile monitoring has previously occurred at Heber Dunes SVRA using visual searches of transects and pitfall trapping. Neither method was overly successful and reptile monitoring was discontinued in 2019. Periodic reptile monitoring may occur in the future using different methodology, and the protocol would be attached to the annual WHPP report.

Small Mammal Methodology

Four transect lines are surveyed at Heber Dunes SVRA biannually – once in spring and once in fall – using Sherman live traps to capture small mammals. Two plots contain twenty-five traps, while two others contain fifty traps. Traps are opened and baited with a seed and peanut butter mixture overnight, then checked and closed in the early morning to limit risk to diurnal species. The protocol will be appended to the annual WHPP report.

9.5.2 Weather Data

A HOBO USB Micro Station weather station (H21-USB) was installed within the maintenance yard at Heber Dunes SVRA in fall 2021. The weather station continually collects data for local precipitation, daily temperature, relative humidity, wind speed and direction, as well as gust speed. Data is periodically collected by district staff and imported into the habitat monitoring database.

C. 2025 Final Heber Dunes State Vehicular Recreation Area Soil Conservation Plan

Heber Dunes State Vehicular Recreation Area

2025 Soil Conservation Plan



Prepared by:

California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division and Natural Resources Division
Ocotillo Wells District

April 2025

TABLE OF CONTENTS

1 Introduction 4
2 Project Area 6
3 State and Regional Conservation Plans Considered 24
4 Goals and Objectives 27
5 Maintenance Plan 29
6 Monitoring Plan 31
7 Reporting 35
8 Constraints 35
9 References Cited 37
10 Appendix 1: Monitoring Methodology 40
11 Appendix 2: Pictures of Leach Field Soil Loss 46

LIST OF FREQUENTLY USED ACRONYMS

BAS	Best Available Science
CARB	California Air Resources Board
CDFW [formerly CDFG]	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
EDRR	Early Detection Rapid Response
HDSVRA	Heber Dunes State Vehicular Recreation Area
HU	Hydrologic Unit
ICAPCD	Imperial County Air Pollution Control District
IID	Imperial Irrigation District
MU	Management Unit
NAAQS	National Ambient Air Quality Standard
NDVI	Normalized Difference Vegetation Index
OHMVRD	Off-Highway Motor Vehicle Recreation Division
OHV	Off-Highway Vehicle
PM_{10}	Particulate Matter Less Than 10 Microns in Diameter
PRC	Public Resources Code
SB	Senate Bill
SCP	Soil Conservation Plan
SDG&E	San Diego Gas and Electric
SIP	Statewide Implementation Plan
SSAB	Salton Sea Air Basin
SSC	California Species of Special Concern
SVRA	State Vehicular Recreation Area
VegCAMP	Vegetation Classification and Mapping Program
WHPP	Wildlife Habitat Protection Plan

1 INTRODUCTION

Heber Dunes State Vehicular Recreation Area (SVRA) offers 341 acres for off-highway vehicle (OHV) recreation in Imperial County. The California Department of Parks and Recreation (DPR; State Parks) manages Heber Dunes SVRA in accordance with Public Resources Code (PRC) Section (§) 5090 et seq. and department policies, as defined in the Department Operations Manual. The 2020 Soil Conservation Standard requires each SVRA to prepare a Soil Conservation Plan; this document is intended to meet that obligation for Heber Dunes SVRA.

1.1 2020 SOIL CONSERVATION STANDARD

PRC §5090.35(b)(1) requires the Off-Highway Motor Vehicle Recreation Division (OHMVRD; Division) to "review, and, if deemed necessary, update the 2008 Soil Conservation Standard and Guidelines to establish a generic and measurable soil conservation standard." This standard is meant to ensure appropriate resource management and maintenance in areas of OHV use, including SVRAs. Following the review, the OHMVRD updated the 2008 document to create the 2020 Soil Conservation Standard and Guidelines for purposes of clarification and to account for technological changes in vehicles used for OHV recreation.

In full, the 2020 Soil Conservation Standard (Soil Standard) states:

> Off-highway vehicle recreation facilities shall be managed for sustainable long-term prescribed use without generating soil loss that exceeds restorability, and without causing erosion or sedimentation which significantly affects resource values beyond the facilities. Management of OHV facilities shall occur in accordance with Public Resources Code, Sections 5090.2, 5090.35, and 5090.53.

The Heber Dunes SVRA Soil Conservation Plan (SCP) has been developed to demonstrate compliance with the 2020 Soil Standard by documenting assessment, maintenance and monitoring actions related to OHV road and trail management. A compliance report, which includes an annual action plan, will also be incorporated as part of the SCP to document activities and projects undertaken to continually demonstrate compliance with the Soil Standard and to detail planned actions and projects aimed at improving soil conservation efforts at the OHV recreational facility.

1.2 RELATIONSHIP WITH OTHER SVRA PLANS

An SCP is only one of several planning documents used at State Parks, so it must relate to and complement other park plans (Figure 1). Heber Dunes SVRA has a limited number of planning documents. In late 2011, a General Plan was approved for Heber Dunes SVRA that guides the management for all aspects of the unit. A Wildlife Habitat Protection Plan (WHPP) was finalized in 2022. The WHPP will address compliance with PRC requirements to improve and conserve

wildlife habitat. While the SCP and WHPP focus on different resources, there is overlap between the two documents and they were designed to be complementary. Additionally, a Dust Control Plan was developed in 2013 (Tetra Tech 2013) for the park unit, and is updated biennially. The most recent update occurred in 2023 (CDPR 2023).

State Park General Plans are broad, goal-oriented plans that serve as the primary management documents for park units within the California State Parks system. A general plan is expected to stand for 20 years or longer so it must provide a consistent vision, while providing flexibility for replying to changing conditions. In 2011, the first General Plan was developed for Heber Dunes SVRA, providing a vision and guide for the long-term management of the park and its resources. The goals of this General Plan focus on providing an enjoyable recreational experience, enhancing OHV recreational opportunities, and protecting the SVRA's resources, including plants, wildlife, and cultural resources.

For further details on the park facilities and park operations, the 2011 Heber Dunes SVRA General Plan may be found online at: https://ohv.parks.ca.gov/?page_id=26033.



Figure 1. State Parks' Park Planning Structure.

1.3 CEQA Compliance

As a part of this process, the SCP identifies resource objectives, and general types of projects and/or actions that can or will be taken to ensure progress on meeting the SCP objectives. The California Environmental Quality Act (CEQA) process begins at this stage. If discretionary projects or actions are identified, State Parks will follow Department procedure for meeting

CEQA compliance. Once a project or action has been selected for implementation, it will undergo CEQA review at that time using the State Parks Project Evaluation Form.

1.4 Update Cycle

This SCP will be reevaluated at least once every five years. The SCP is meant to be a living document with changes incorporated to ensure conditions are documented and actively improved. All maintenance and monitoring plans included in the document will be updated as necessary.

1.5 Adaptive Management

Adaptive management is a common strategy and fundamental component of implementing best available science (BAS) in natural resource management. PRC §5090.14 defines the use of adaptive management as:

> "*Adaptive management" means to use the results of information gathered through a monitoring program or scientific research to adjust management strategies and practices to conserve cultural resources and provide for the conservation and improvement of natural resources.*

An adaptive management loop for a SCP includes assessing park resources and facilities, defining objectives based on those conditions, targeting maintenance and management to meet objectives, monitoring to determine success of maintenance and management actions, and determining necessary adjustments. The Heber Dunes SVRA SCP will define the adaptive management approach that guides soil conservation at the unit.

2 Project Area

2.1 Location

Heber Dunes SVRA is located within an unincorporated area of Imperial County, approximately six miles south from the town of Holtville (Figure 2). Imperial County is primarily a rural, agricultural region in the southeastern portion of the state. The SVRA is accessible by regional transportation routes such as Interstate 8 (I-8) and State Route 7 (SR-7). The greater San Diego area and the greater Palm Desert area are each approximately 125 miles west and northwest, respectively. The SVRA is surrounded by agricultural land with an intricate series of canals providing irrigation water for cropland. The communities of Calexico, El Centro, Holtville, Imperial, Heber, and Mexicali are within short driving distance of the park (10 miles). The international border with Mexico is approximately 2.5 miles south of Heber Dunes SVRA.

2.1.1 Regional Land Use

In general, Heber Dunes SVRA is surrounded by agricultural fields (Figure 3). The park is bound to the north by Heber Road. The South Alamo Canal forms most of the southern and eastern boundaries of Heber Dunes SVRA. The canal traverses north and south along the entire eastern site boundary of Heber Dunes SVRA and forms a portion of the southern boundary. Immediately east of and adjacent to the canal is a 306-acre undeveloped parcel of land that was purchased by the California Department of Transportation (Caltrans) for mitigation purposes associated with previous improvements to SR-7. Agricultural fields lie west of the SVRA. A few residential home sites in the midst of the agricultural fields are within one-half mile of the SVRA.

There are multiple easements that cross Heber Dunes SVRA boundaries related to power transmission and irrigation canal access. Imperial Irrigation District (IID) supplies water to Heber Dunes SVRA and has water conveyance structures in the vicinity of the park, including the Alamo Canal. San Diego Gas and Electric (SDG&E) has three transmission towers that bisect Heber Dunes SVRA, carrying high-voltage 500-kilovolt overhead electric lines across the park. SDG&E has a 200-foot-wide easement that follows the electric lines through the SVRA. These facilities are maintained by their associated entity, and do not prohibit OHV recreation.

2.1.2 SVRA and Regional History

Heber Dunes SVRA falls within the traditional territory of the Kumeyaay. The Kumeyaay settled primarily along the New and Alamo Rivers (Kirkish et al., 2000) through the early 19th century, when traditional use of the area declined due to increased European settlement. The Kumeyaay were gatherers, living off what the land provided and supplementing their diet with floodplain horticulture along rivers and springs (Underwood and Gregory, 2006).

In the late 18th century, Spanish exploration and settlement began in what would become eastern San Diego and Imperial Counties. Mexican settlers began to enter the area after California came under Mexican rule in 1821. Anglo-European contact precipitated the spread of cattle grazing and agriculture throughout the region. The development of a water conveyance system for agriculture and residential development in the early 20th century facilitated additional agricultural development and associated population growth.

The dunes located within Heber Dunes SVRA were part of a much more extensive network of dunes before being graded in 1905 for the construction of irrigation canals (Craft personal communication, 1998). Anecdotally, unauthorized dumping of trash has occurred along the canals, although there are no records quantifying that this occurred, the extent of debris remaining, or locations where this activity this occurred (Fong personal communication, 2022).

Although little recorded history is available about the Heber Dunes property, oral interviews with long-time residents have provided some information. Local residents refer to the area as

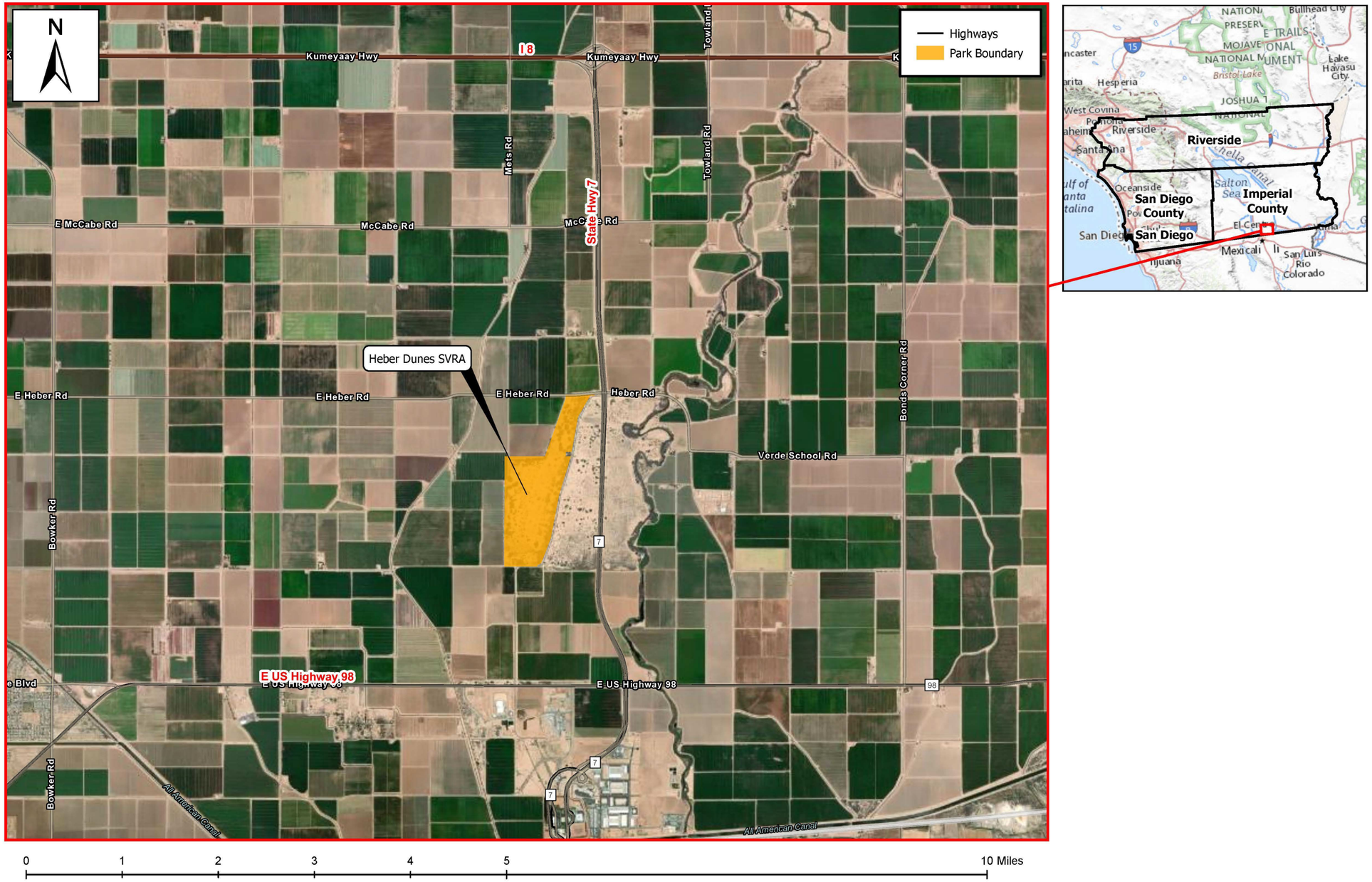

Figure 2. Regional location of Heber Dunes SVRA.



Figure 3. Regional land use at Heber Dunes SVRA. The red crosshatch represents a SDGE easement in which three towers are installed.

"Heber Beach," in reference to the consistent presence of water next to the sand dunes, although there are differing stories about how this name originated.

Before the OHMVRD and DPR managed Heber Dunes as a SVRA, Imperial County operated the area as an OHV facility for more than 30 years. In 1998, the OHMVRD entered into a lease with the County to assume responsibility for park operations. Heber Dunes was officially deeded to the OHMVRD in 2007 and was subsequently classified as a SVRA.

Today, Heber Dunes SVRA offers a unique recreation opportunity in Imperial County as it is located within several miles of Imperial County population centers and provides a good opportunity for novice riders to gain experience. Due to the relatively low sand dunes, limited day use hours, and small park size, most visitation occurs from the local area. In addition to OHV recreation, the park is also popular as a gathering place for barbeques and picnics.

2.2 Park Operations

Heber Dunes SVRA is part of the Ocotillo Wells District of DPR. The Ocotillo Wells District manages four other park units (Figure 4). They are the Ocotillo Wells SVRA, Picacho State Recreation Area (SRA), Salton Sea SRA, and Indio Hills Palms property, which is managed as part of the Coachella Valley Preserve. The headquarters for the Ocotillo Wells District is at Ocotillo Wells SVRA, approximately 55 miles northwest of the Heber Dunes SVRA.

The park has limited dedicated staff including a Park Maintenance Worker I, a State Park Interpreter I, a State Park Peace Officer, and several seasonal staff hired as needed. District staff offer support as needed, including resource protection.

2.2.1 Facilities

Heber Dunes SVRA is largely undeveloped with limited infrastructure and improvements. Much of the park is composed of sand dunes and vegetation, with a network of social trails and perimeter road (Figure 5). The park unit is zoned for open riding, although the General Plan indicates that the southwestern portion of the SVRA could be operated as trails only. A small, developed area in the north-central portion of the site off Heber Dunes Road includes administrative and maintenance buildings, visitor restroom and shower facility, large picnic area, and dirt track for young OHV riders. A water treatment plant is located in the maintenance yard. A camp host area with a residence and three compacted gravel pads are in the northern portion of the facility. A dozen shade ramadas are scattered in the center of the facility, as well as one unloading ramp for OHVs.

Aside from the SVRA's paved entrance road, Heber Dunes Road, and a dirt perimeter road, there are no designated trails in the SVRA. However, there are well-established user-created routes of travel, referred to as social or volunteer trails, throughout the unit.

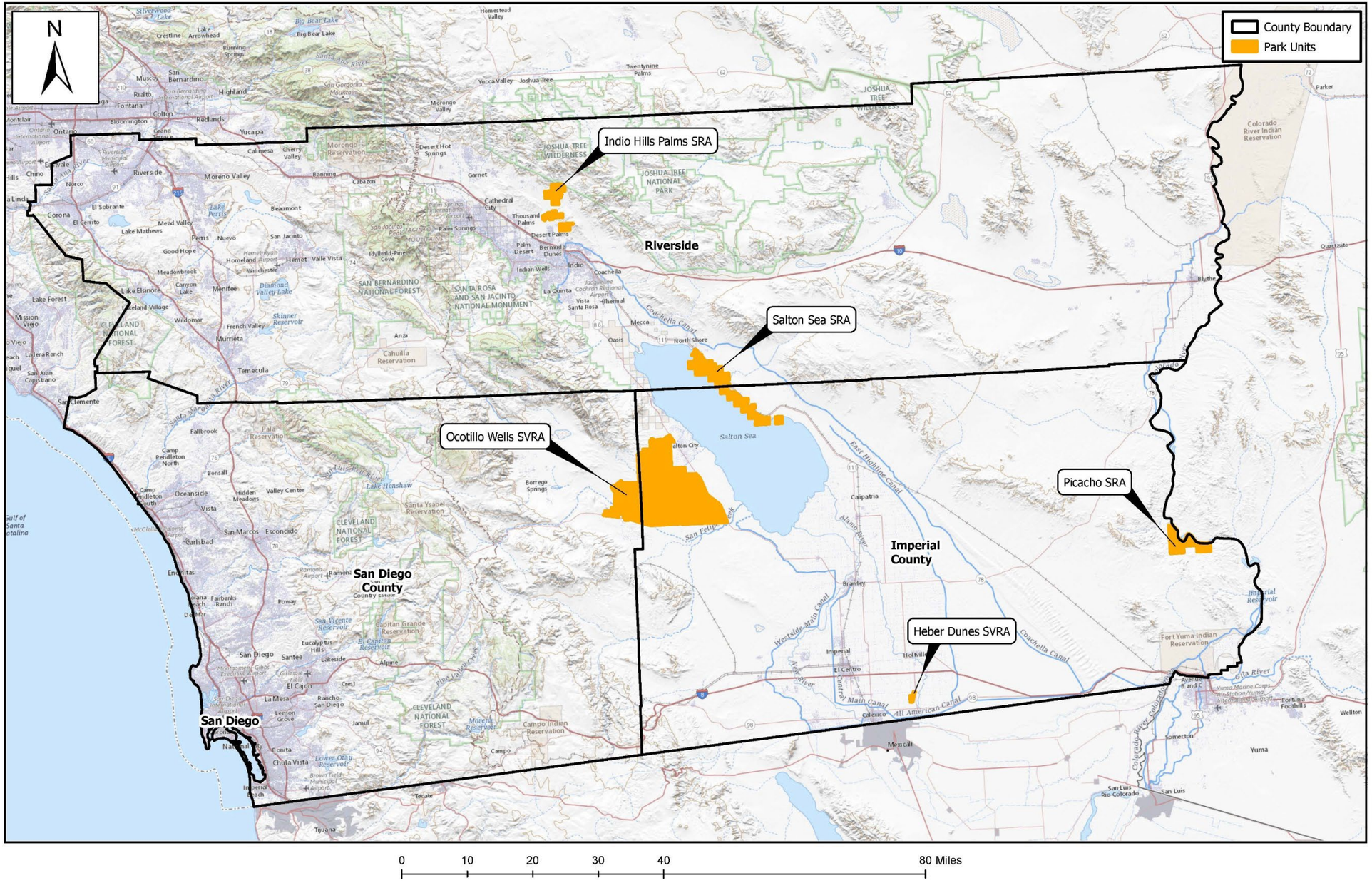

Figure 4. Park units in the Ocotillo Wells District.

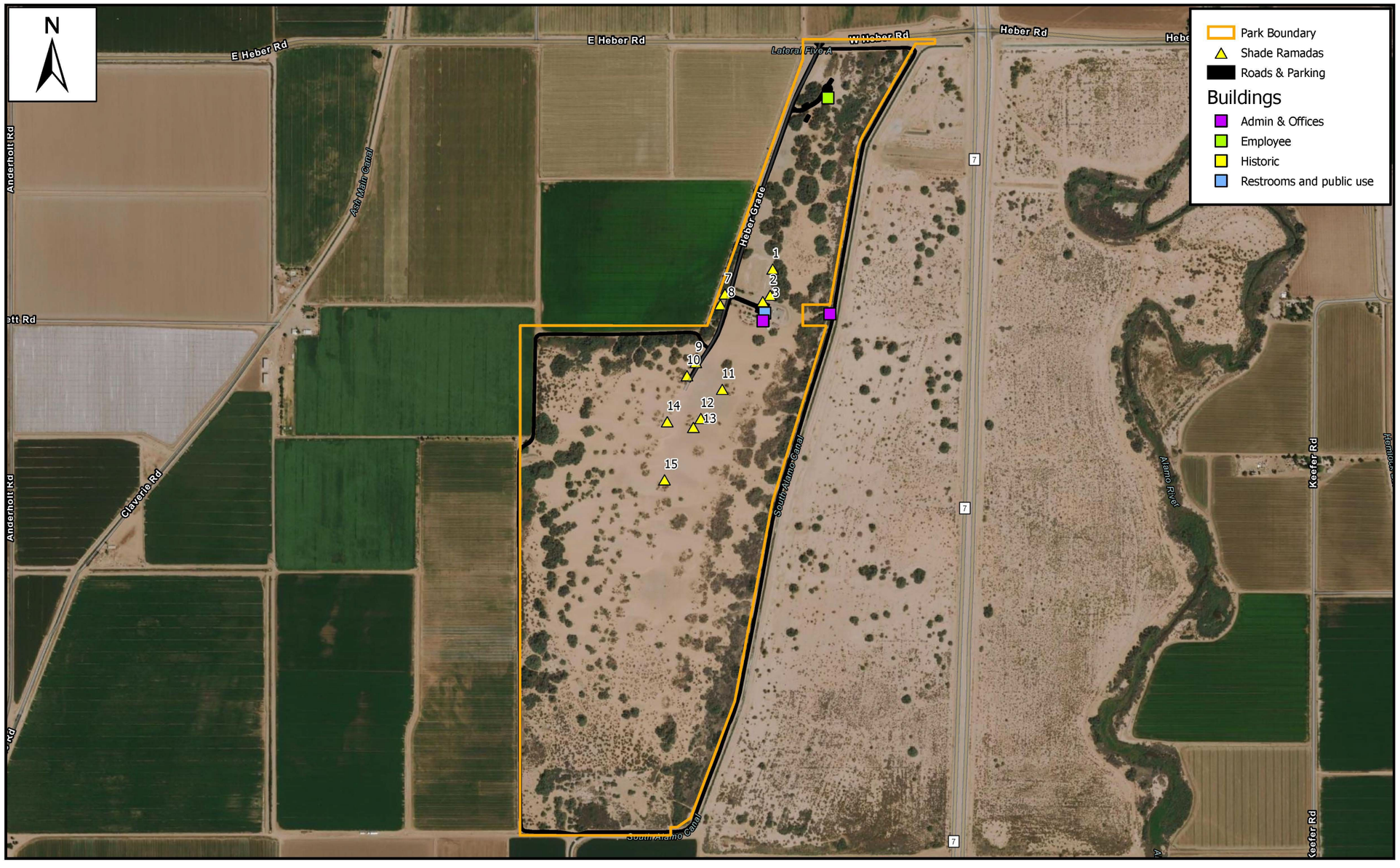

Figure 5. Heber Dunes SVRA facilities, including shade ramadas.

A pump house is located on IID property in the eastern portion of the SVRA, which is used for water delivery operations for the park. Park water is obtained from surface water in the South Alamo Canal, which is owned by IID. SDG&E has three transmission towers that run diagonally through Heber Dunes SVRA, starting in the southeastern corner.

2.2.2 Visitation and Use Levels

The terrain of Heber Dunes SVRA consists of low sand dunes, sparse vegetation, and an informal network of social trails. Infrastructure at the SVRA consists of an office building with public restrooms, a day-use picnic area, a training track for young motorcycle and all-terrain vehicle (ATV) riders, and scattered shade ramadas. The terrain of the Heber Dunes SVRA offers OHV recreation for the beginner and intermediate OHV enthusiast. It does not have features that provide more advanced OHV recreational opportunities. ATVs, also known as quads, are the predominant type of OHV used by recreationists at the SVRA. Larger four-wheel drive vehicles and motorcycles designed for trails (dirt bikes) are also used.

Heber Dunes SVRA is for day-use visitation only. Visitation consists primarily of OHV recreationists from neighboring communities. Typically, weekend visitation is higher than weekday use. Overall, visitation varies by season, with the highest levels occurring between fall and early spring. Visitation is significantly lower during the late spring and summer, when temperatures are considerably higher. Annual visitation is estimated at 13,000 vehicles with total attendance around 35,000 (Erickson et al., 2014).

Visitors tend to gather in shaded areas, including ramadas and under trees, with family and friends in small to large groups (five to ten individuals). Besides OHV recreation, socializing, picnicking and barbecuing, watching OHV recreation, and viewing scenery are popular activities.

Most visitors drive street-legal vehicles into Heber Dunes SVRA with OHVs in trailers or the bed of pick-up trucks. Visitors typically park their street-legal vehicles at picnic tables; formal parking areas are not provided within Heber Dunes SVRA. Informal parking at day-use sites tends to be preferred by visitors so that they can access supplies in their vehicles throughout the day.

2.2.3 Dust Control Plan

Imperial County Air Pollution Control District (ICAPCD) Rule 800 [General Requirements for Control of Fine Particulate Matter (PM-10)] requires a dust control plan (DCP) for operations capable of generating fugitive dust (PM-10) from anthropogenic sources. In 2013, the first DCP was finalized for both Heber Dunes and Ocotillo Wells SVRAs in Imperial County, with updates occurring biennially. The most recent update was submitted in 2023 (CDPR 2023).

The DCP prioritized paved and high-use unpaved roads (greater than 50 vehicles per day activity) for control measures; only two paved roads were prioritized at Heber Dunes SVRA. In total, 0.77 miles of road or trail were prioritized for control at the unit. Additionally, during off-

road special events and/or competitions that average 50 or more vehicles per day, control measures are required.

While the DCP lists several options for dust control, at Heber Dunes SVRA, control typically consists of paving high use roads or watering select trails when they are in high use. Large off-road special events are rarely requested or permitted at Heber Dunes SVRA, however an appropriate control method from the DCP would be selected for use at such an event.

2.3 Project Area Characteristics

2.3.1 Natural and Physical Setting

2.3.1.1 Climate/Air Quality

Heber Dunes SVRA is located in Imperial County, in the Imperial Valley, just north of the border between the United States and Mexico. Imperial County is located within the Salton Sea Air Basin (SSAB). The climate is typical of a desert with low annual precipitation, very hot summers, mild winters, high evaporation rates, and strong temperature differentials and inversions.

One of the main determinants of climatology in the SSAB is a semipermanent high-pressure area (the Pacific High) over the Pacific Ocean. In the summer, the Pacific High is located well to the north, directing storm tracks north of California and maintaining clear skies for much of the year. When the Pacific High moves southward during the winter, weakened low pressure storms and the mountains to the north bring little rainfall. The combination of subsiding air pressure, surrounding mountain barriers, and sufficient distance from the cold waters of the Pacific Ocean severely limits precipitation in Imperial County.

Annual rainfall averages approximately three inches within the vicinity of Heber Dunes SVRA. Precipitation over the entire area occurs mostly from November through April, and August through September, but its distribution and intensity are often sporadic. Local thunderstorms may contribute all of the average seasonal precipitation at one time, or only a trace of precipitation may be recorded at any locale for the entire season (CRBRWQCB 2006).

The flat terrain of the SSAB, coupled with strong temperature differentials created by intense solar heat, produces moderate winds and deep thermal convections. The county experiences mild and dry winters with daily maximum temperatures that range from 65 to 75 degrees Fahrenheit (°F), while the daily maximum temperatures during the hot summer months are in the 104 to 115°F range (AECOM 2011a). The mean monthly temperature ranges from 55 to 90°F (AECOM 2011a).

Wind speeds are generally less than 10 mph; however, between April and May, the county may occasionally experience wind speeds greater than 30 mph. Predominant wind directions are to the west and west-southwest during all four seasons, and the average annual daily wind speed is 6.9 mph.

A common atmospheric condition between November and June in the county is known as a temperature inversion, where air temperatures become warmer with increasing elevation. An inversion can be associated with little air movement and stagnant conditions, and can persist for one or more days, thereby trapping air pollutants below and preventing their dispersion, thus increasing pollutant concentrations. The height of the inversion determines the size of the mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by winds or solar heating. Inversions appear to be relatively rare between July and October.

The Imperial County Air Pollution Control District is the agency responsible for protecting public health and welfare in the county by administering federal and state air quality laws and policies. ICAPCD's tasks include monitoring air pollution, preparing the Imperial County portion of the State Implementation Plan (SIP), and promulgating its rules and regulations. The SIP includes strategies and tactics to attain and maintain acceptable air quality in Imperial County. In 2010, the county's primary sources of air emissions were from fossil fuel combustion, on-road vehicles, industrial processes, agricultural tilling, fertilizer and live-stock, and road dust (AECOM 2011a).

Both the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA) designate areas according to their attainment status for criteria air pollutants. These designations aim to identify the areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified based on available information as meeting or not meeting the standards.

The Clean Air Act allows a nonattainment area to be redesignated as attainment if the EPA determines that the 24-hour PM_{10} National Ambient Air Quality Standard (NAAQS) has been attained, in addition to other requirements. The 24-hour PM_{10} NAAQS allows for one exceedance of the 24-hour average PM_{10} standard (150 $\mu g/m^3$) per year averaged over a three consecutive calendar year period, excluding exceptional events, measured at each monitoring site within an area based on quality-assured air quality monitoring data (ICAPCD Staff Report 2018). If an area is redesignated from nonattainment to attainment, the federal Clean Air Act requires a revision to the SIP. This revision, called a maintenance plan, demonstrates how the air quality standard will be maintained for ten years. Until 2018, the SSAB had been designated by federal EPA standards as a moderate nonattainment area for the 8-hour ozone standard and a serious nonattainment area for respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (PM_{10}).

In 2018, the ICAPCD submitted the 2018 Redesignation Request and Maintenance Plan for Particulate Matter Less than 10 Microns in Diameter (2018 PM_{10} Plan) to CARB requesting redesignation of the Imperial Valley as attainment for PM_{10} standards. According to ongoing monitoring of the SSAB, the ICAPCD demonstrated that when excluding exceptional events, the

Imperial Valley did not violate the federal 24-hour PM_{10} NAAQS during the relevant time period. CARB approved the redesignation request in December 2018, and subsequently the request was approved by EPA in October 2020 (EPA 2020). The SSAB is in attainment for the other criteria air pollutants.

In conjunction with ICAPCD, the park finalized a Dust Control Plan for the SVRA in 2013 to comply with Imperial County's Rule 800 – General Requirements for Control of Fine Particulate Matter (PM_{10}). The Dust Control Plan calls for control measures on two paved roads within Heber Dunes SVRA that average greater than 50 vehicle trips per day. Off-road special events or races with more than fifty vehicle trips per day would also require control measures. Primary control consists of road treatments, such as gravel or pavement, to main routes of travel within Heber Dunes SVRA. The DCP is updated biennially, with the most recent update in 2023 (CDPR 2023), but treatments have largely remained consistent to the original DCP.

2.3.1.2 Geology and Soils

Heber Dunes SVRA is in the Imperial Valley, which is part of the Salton Trough, a structural and topographic depression that lies within the Colorado Desert geomorphic province. The Salton Trough marks the northern extent of tectonic plate rifting that created the Gulf of California. Over the millennia, the Colorado River has periodically meandered to the Salton Trough, filling it to create iterative versions of ancient Lake Cahuilla, before reestablishing its path to the north end of the Gulf of California.

In repeatedly filling the Salton Trough depression, the Colorado River deposited its nutrient-rich fluvial soils onto the submerged desert floor. The soils of the Imperial Valley owe their fertility and productivity to this past wandering quirk of the Colorado River. Sands and silts deposited into Lake Cahuilla by the Colorado River were exposed to westerly prevailing winds when Lake Cahuilla dried in the late 17th Century (Laylander 1995). The sediments accumulated based on the regional wind patterns and silt from deposition, eventually creating the dunes that would become the Heber Dunes SVRA, as well as the much larger Algodones Dunes found along eastern edge of the Imperial Valley.

The agricultural production potential of the Lake Cahuilla soils in their present desert setting was recognized in the later portion of the 19th century, as the country was expanding westward. Engineering attempts to more modestly divert Colorado River water to irrigate the soils of the Salton Trough began at the turn of the twentieth century. Repeated levee failures related to these early attempts caused the Colorado River to flow once again unchecked into the Salton Trough for about two years. Massive amounts of rock were repeatedly dumped into the levee breach, but it wasn't until 1907, when the Southern Pacific Railroad Company joined the effort, that the breach was closed. By that time the Salton Sea had formed, a more modest, but still massive, modern-day equivalent of ancient Lake Cahuilla.

The Salton Trough is bordered on the west and southwest by low-lying mountains comprised of deformed marine and non-marine sediments overlying older igneous and metamorphic units. Numerous active faults within the Salton Trough suggest the area is part of a depressed block at the northern end of crustal rifting caused by seafloor spreading that is still widening the Gulf of California to the south. As the trough continues to sink over time, uplift occurs in the surrounding areas, resulting in the tilting of the sedimentary deposits.

As a result of activity associated primarily with the San Andreas Fault System east of the Salton Sea, and the San Jacinto Fault System, the SVRA and region are subject to earthquakes. Related geothermal features, such as hot springs, are found along these fault traces, and commercial energy production from the regional geothermal activity is ongoing.

Geologic maps show the region as underlain by Quaternary lake deposits and alluvium (Strand 1962). Quaternary sand dunes are mapped on the property. The Imperial Fault crosses the property from southeast to northwest (Kahle et al. 1984; Real et al. 1979)(Figure 6). A 1937 aerial photograph (Youd and Wieczorek 1982) shows that the area surrounding the property was predominantly covered with sand dunes with a stream channel to the west of Heber Dunes SVRA. The overall large size of the dune substrate at Heber Dunes SVRA precluded its development for agriculture, unlike many of the smaller dune areas throughout the Salton Trough, which were easier to remove or level for other uses.

Today, Heber Dunes SVRA consists of sand dunes and areas of claypan soils. The dunes are as high as 50 feet, but most are 25 feet high and lower (AECOM 2011). A county-wide soil survey indicates that six soil types exist at Heber Dunes SVRA (USDA 1981)(Figure 7). The majority of Heber Dunes SVRA, 83 percent, is composed of Rositas fine sand (284 acres). Other on-site soil types are Meloland and Holtville loams (21 acres), Vint loamy very fine sand (13 acres), Meloland very fine sandy loam (12 acres), Vint and Indio very fine sandy loams (9 acres), and Indio loam (1 acre). Fine sand can pose an issue for vehicles and facilities. Fine sand is regularly present along the southwestern corner of the SVRA and near the base of the middle utility tower. Additionally, many sections of the SVRA regularly experience sand build-up from aeolian sands. Generally, this is not a management concern, but two areas in particular have required recurring maintenance – Ramada 15 and the rock wall behind the large day use picnic area.

In 2024, district staff was informed that areas around both the residence and south RV pad (near the residence) leach fields erode following rainfall. After visiting the area, the possibility that the soil is compacting, rather than eroding, was discussed. Work will need to be done to improve the area; however, it is currently unclear how to proceed and an objective has been developed around future improvements.

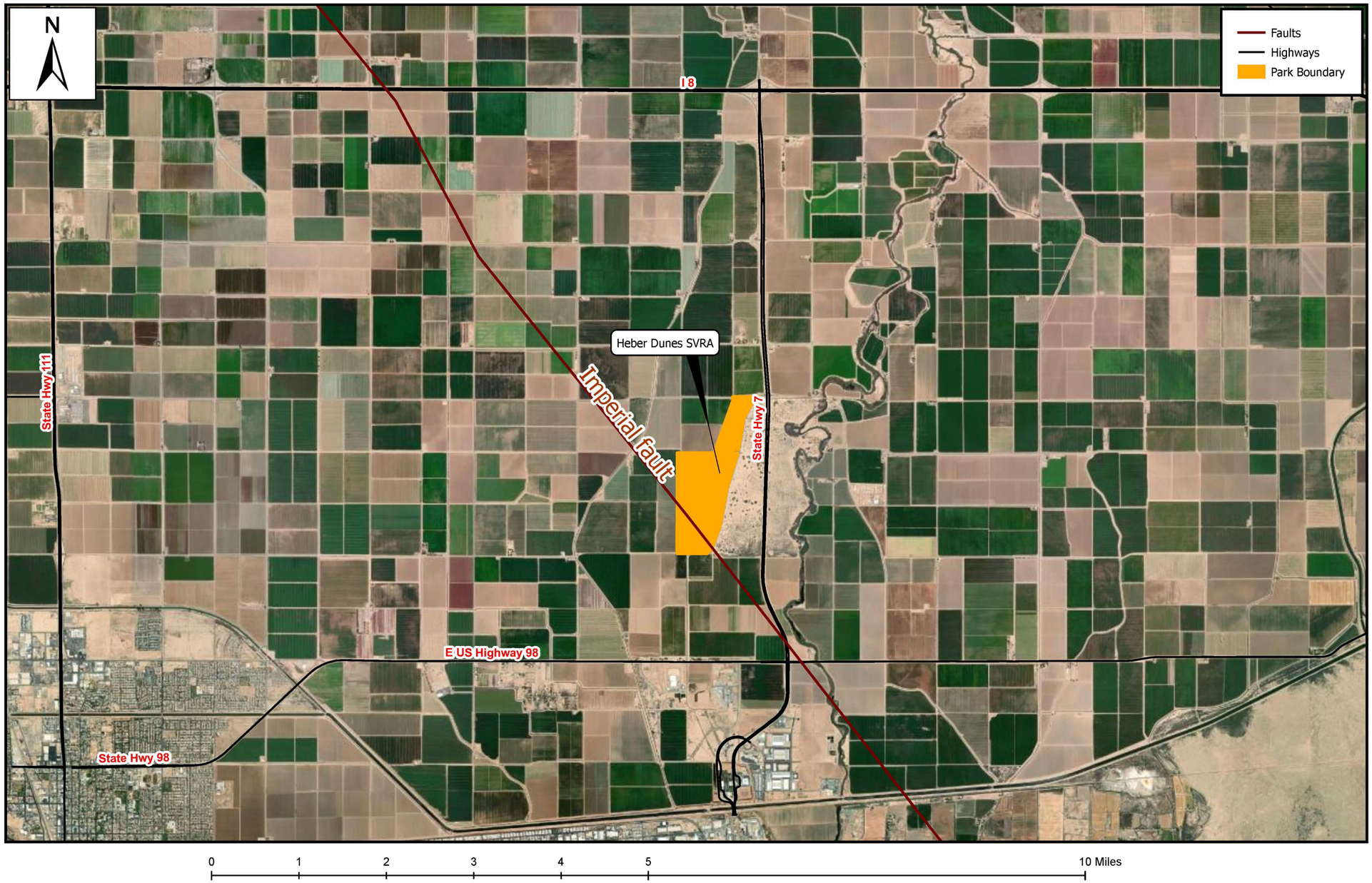

Figure 6. Heber Dunes is bisected diagonally by the Imperial Fault.

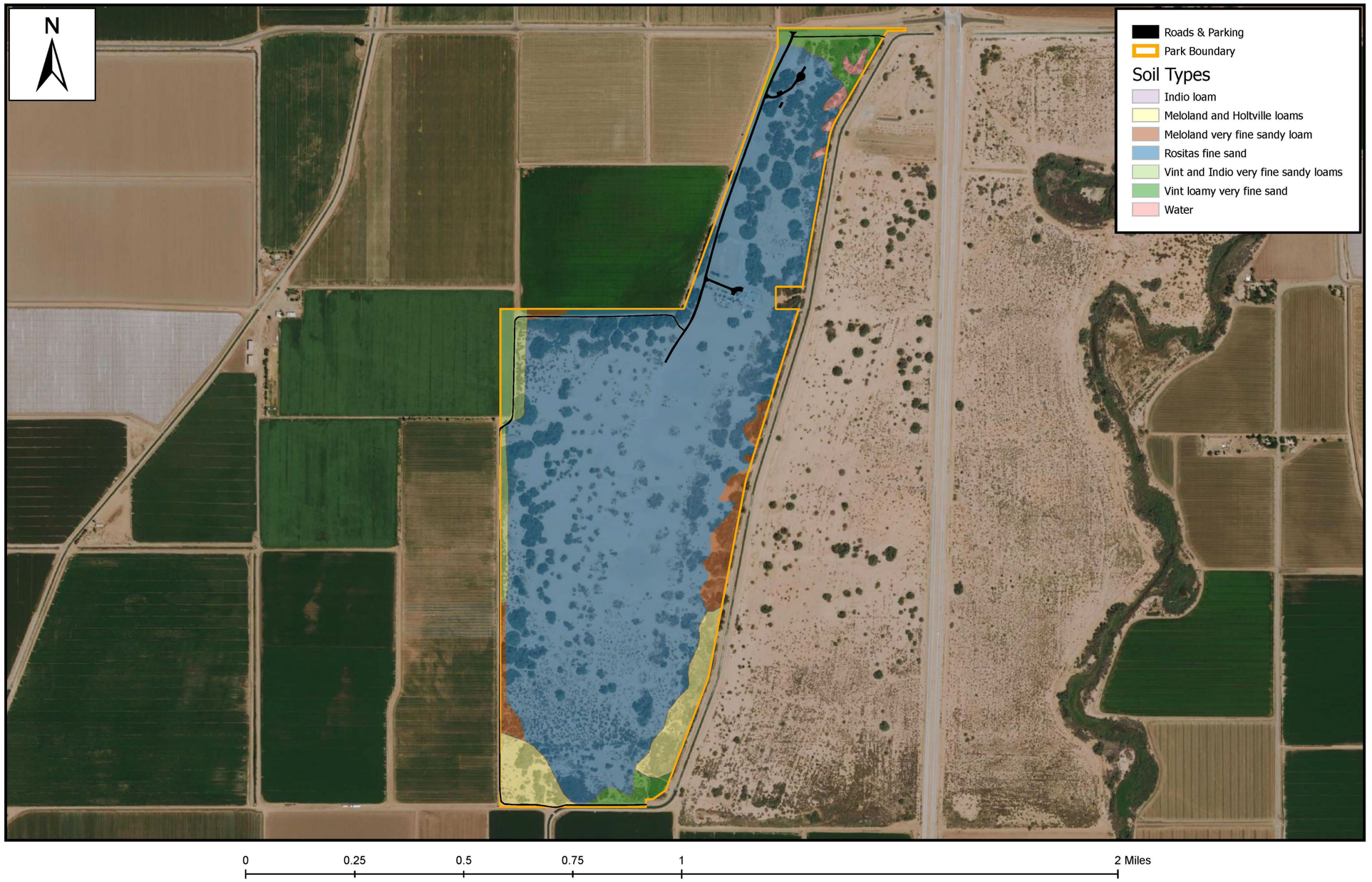

Figure 7. There are six unique soil types at Heber Dunes SVRA (USDA 1981).

The entire southern California region is a seismically active area with multiple fault lines, and Imperial County is an area of high seismic activity. Most of the seismic activity is in the Salton Trough (Imperial Valley) and, consequently, the Imperial Valley is subject to potentially destructive and devastating earthquakes. Several regional faults are known to be quite active in the Salton Basin, including the San Andreas Fault and the San Jacinto Fault. Numerous other faults are near the SVRA, including the Imperial and Brawley faults. Rupture and/or ground distress has been noted at the South Alamo Canal and on the property. Lateral spreading, likely generated by earthquake-induced liquefaction, has been observed along Heber Road following the 1979 Imperial Valley Earthquake (Wright Environmental Services 2009).

2.3.1.3 Hydrology

Heber Dunes SVRA is located within the Imperial Hydrologic Unit (HU) of the Colorado River Basin. The Imperial HU encompasses an area of approximately 2,271 square miles. The major drainages within the Imperial HU consist of the Alamo and New Rivers. The Alamo and New Rivers lie approximately 0.5 miles east and nine miles west of Heber Dunes SVRA. Both rivers drain to the Salton Sea approximately 30 miles to the north of Heber Dunes SVRA. These rivers convey agricultural irrigation drainage water from farmlands in the Imperial Valley, surface runoff, and lesser amounts of treated municipal and industrial wastewaters. The flow in the New River also contains agricultural drainage, treated and untreated sewage, and industrial waste discharges from Mexicali, Mexico (CRBRWQCB, 2006).

Colorado River water, imported via the All American Canal, is the predominant water supply for the area and is used for irrigation and industrial and domestic purposes (CRBRWQCB, 2006). Numerous canals and agricultural drainages also occur within the Imperial HU. The Ash Main Canal lies approximately 0.5 miles to the west of Heber Dunes SVRA, while the South Alamo Canal borders Heber Dunes SVRA on the east and west boundaries.

Most of the surface drainage from the Heber Dunes SVRA appears to infiltrate the groundwater. Overall drainage is west and northwest (Wright Environmental Services, 2009). Water may pond before infiltrating in the clay flats south of the office, particularly behind the rock wall of the day use area. Groundwater is estimated to occur within 50 feet of the surface (Wright Environmental Services, 2009).

2.3.1.4 Vegetation

In 1998, San Diego State University classified the SVRA into six vegetation communities (McClenaghan et al., 1998) using aerial imagery and field surveys. An update to this vegetation community map was started in 2021 and ground-truthed in 2022, using the state's current standard for vegetation classification and mapping: California Department of Fish and Wildlife's Vegetation Classification and Mapping Program (VegCAMP). VegCAMP classifies vegetation according to the National Vegetation Classification System standards, which is a hierarchal classification of vegetation types, distinguishing alliance and association at the finest scale. An

association is a characteristic range of species composition, while an alliance is composed of one or more associations. Field surveys identify vegetation alliances and/or associations, and mappers delineate landcover into alliance or association polygons based on information from field surveys and interpretation of aerial imagery. The resulting maps and data provide a foundation for tracking vegetation change, land use, and protection and restoration actions undertaken at the SVRA. More information about this protocol can be found in Appendix 3 of the 2022 HDSVRA WHPP.

In total, six vegetation community alliances were identified at Heber Dunes SVRA, along with two non-vegetative landcover types (Figure 8). Details about each alliance can be found in the 2022 HDSVRA WHPP. The 2022 survey and mapping effort found the same vegetation communities as in the 1998 classification; however, the current map delineates the community types at a finer scale, using the VegCAMP standard of a 1-acre minimum mapping unit.

The nonnative tamarisk (Athel tamarisk and saltcedar) thickets semi-natural alliance is the most common vegetation type within the park and plays an important role in soil conservation. Historically, Athel tamarisk was planted in the southwest as a windbreak around property lines as it grows into large trees. It grows in tall rows around much of the park and provides structure for dune formation. The most common native vegetation community is creosote bush scrub shrubland alliance. At times, arrow weed, which is part of the arrow weed thickets shrubland alliance, along the perimeter road must be mowed to maintain a trail corridor. Heber Dunes SVRA is not directly connected to any other undisturbed or native open space or wildlife habitat.

2.4 Management Units

Heber Dunes SVRA has been subdivided into three Management Units (MU): Canal Zone, Native Vegetation, and Tamarisk Dunes (Figure 9). MUs allow park managers to make decisions on a smaller scale than the park unit. These units were delineated primarily based on vegetation type, then on proximity to the canal (CDPR 2021). While recreation may differ slightly in each MU, overall recreation is comparable throughout the park. Subsequent discussions on maintenance and monitoring will be subdivided by MU.

2.4.1 Canal Zone MU

The Canal Zone MU totals 39.7 acres and consists of a 100-foot buffer along the eastern portion of the SVRA. The MU is open riding, with no formally established OHV trails, and contains the eastern portion of the perimeter road. OHV riders use social trails to connect from the interior of the park to the perimeter road, but overall riding is limited due to the presence of dense vegetation thickets. Primary vegetation communities in this area consist of Athel tamarisk and dense arrow weed/baccharis. At the southern end of the MU, arrow weed/saltbush communities are dominant.

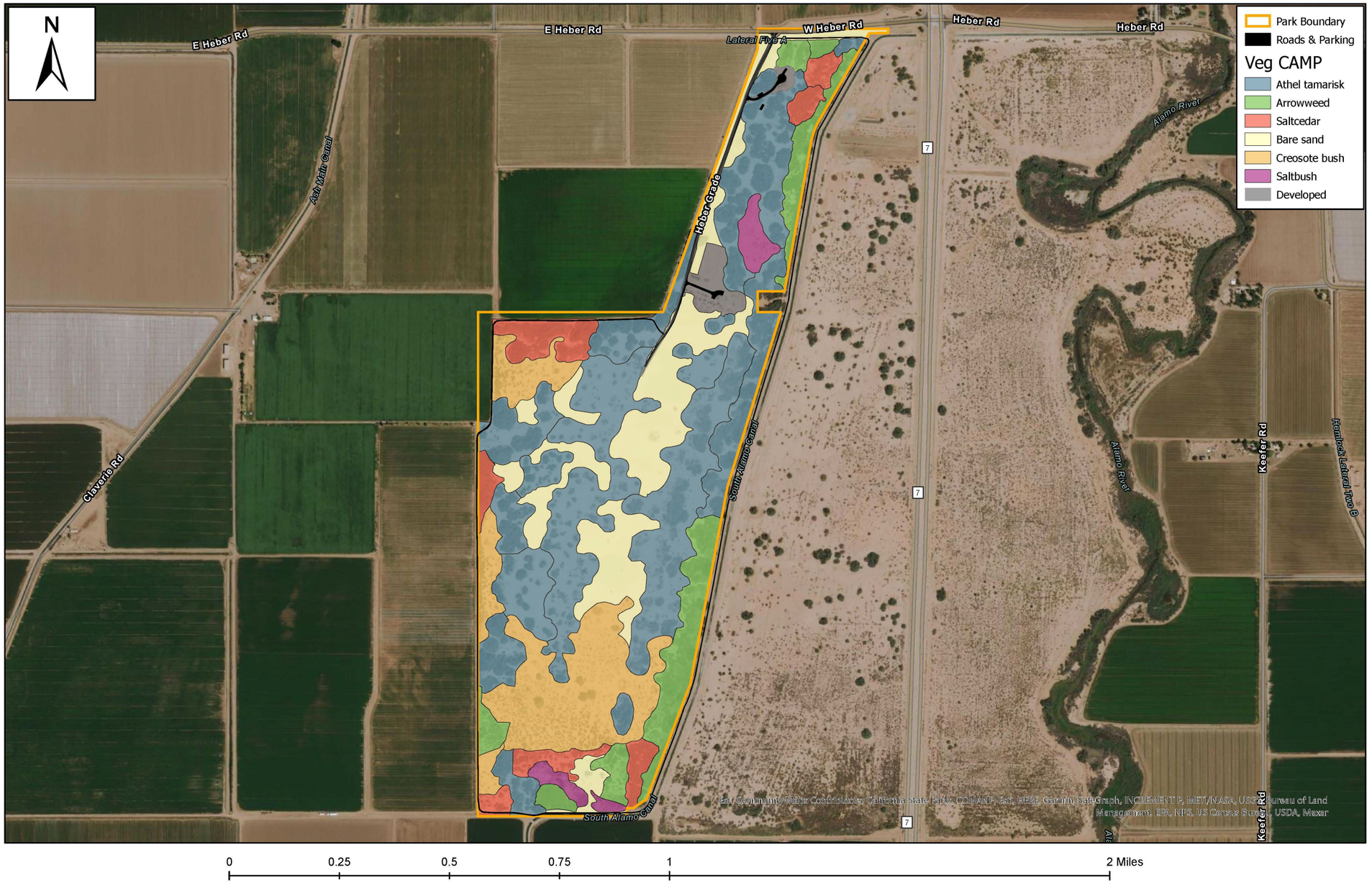

Figure 8. Six distinct vegetation alliances were mapped in VegCAMP in 2021-2022, along with open and developed landscapes. Two types of tamarisk were mapped, but both are part of one alliance.

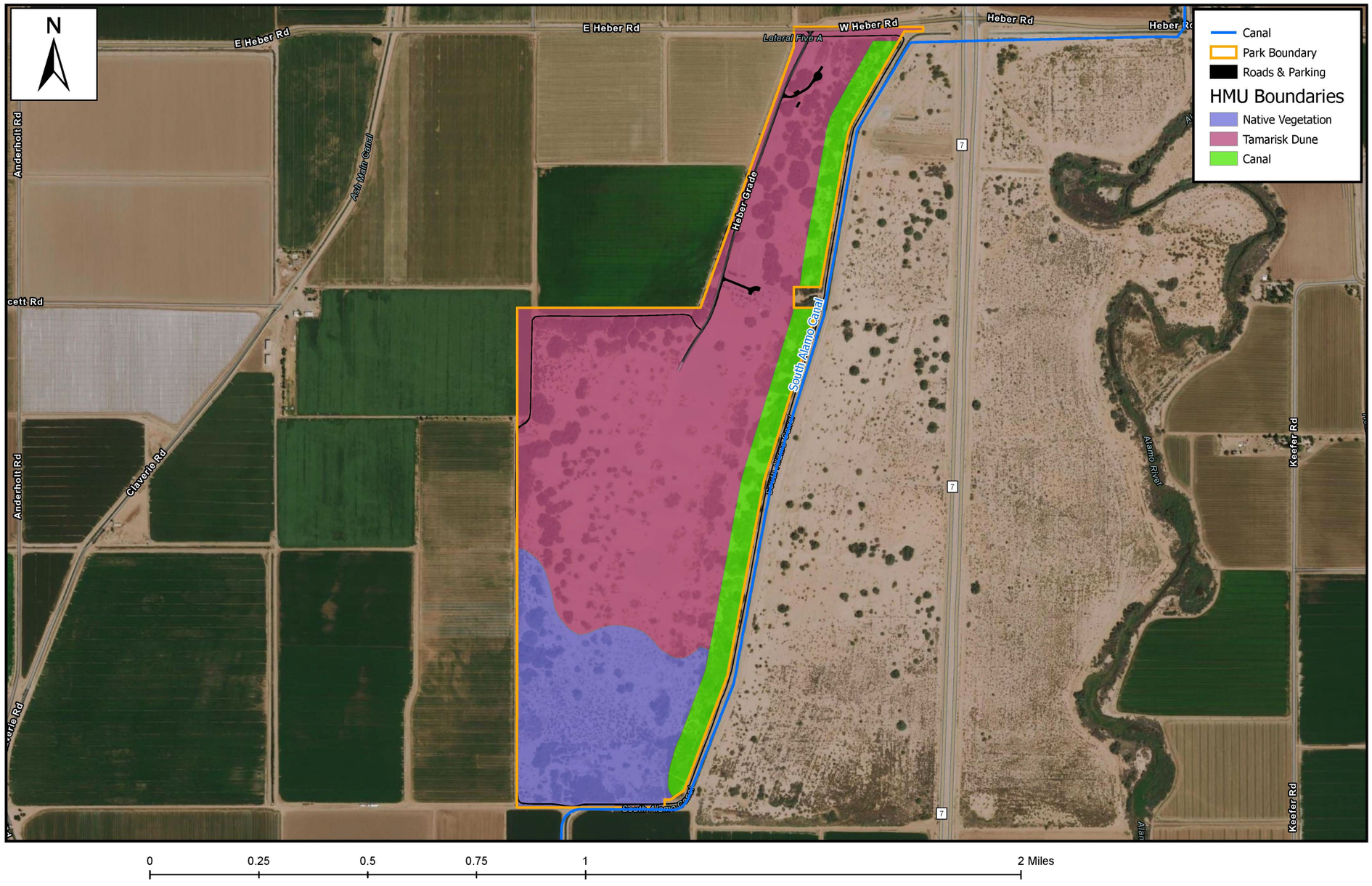

Figure 9. Heber Dunes SVRA Management Units.

2.4.2 Native Vegetation MU

The Native Vegetation MU is dominated by creosote and saltbush scrub in loamy and sandy soils. The MU is designated for open riding and a network of social trails runs throughout the area. The 2011 General Plan identified the potential for a trail system to be developed in this area. An SDG&E utility easement runs diagonally across the MU; two towers that are supported by over-head electrical lines are contained within the Native Vegetation MU, while a third tower is in the Tamarisk Dunes MU. Occasional maintenance of towers is completed by SDG&E. The Native Vegetation MU is 75.4 acres.

2.4.3 Tamarisk Dunes

Athel tamarisk and barren, stabilized sand dunes are dominant in the Tamarisk Dunes MU. It is designated as an open riding area. Day use facilities are scattered throughout the MU, and these areas are often used for family picnics with a portion of the group riding while others recreate near shade ramadas. Tall sand dunes exist throughout this MU. One tower from the SDG&E easement is located within the western portion of this MU. The Tamarisk Dunes MU is the largest MU at 225.5 acres.

3 State and Regional Conservation Plans Considered

PRC §5090.32(g) requires that SVRA management plans be developed in consideration of statutorily required state and regional objectives. An important step of identifying park-specific objectives is understanding broader regional conservation goals. This information is critical to defining objectives that are beneficial beyond the park's boundaries, while still focused on the needs of Heber Dunes SVRA. Several state and regional conservation objectives were identified that are relevant to Heber Dunes SVRA.

3.1 State Conservation Objectives

3.1.1 California Healthy Soils Action Plan

From the interagency Healthy Soils Initiative, the California Department of Food and Agriculture developed the California Healthy Soils Action Plan. The plan focuses on improving organic soil composition through farm and ranch land management practices, resulting in increased carbon sequestration and reduction of greenhouse gas emissions. While the SCP is outside of the primary scope of the Healthy Soils Action Plan, both plans share common goals targeting soil health. This includes reducing erosion and dust, improving wildlife diversity and habitat, and increasing water retention.

3.1.2 State Wildlife Action Plan

The State Wildlife Action Plan (SWAP), developed by the California Department of Fish and Wildlife in concert with several partners statewide, provides a blueprint for conservation of wildlife and their habitats in the context of a growing human population and a changing climate. One of the priority goals of the Plan is to maintain and improve ecological conditions vital for sustaining ecosystems in California by, in part, improving ecosystem connectivity and community structure.

This 2025 SCP supports these SWAP goals by conserving soils over time within the SVRA. The SWAP has divided the state of California into seven provinces and developed regional conservation strategies for each. Heber Dunes SVRA falls within the Colorado Desert Ecoregion of the Desert Province, which has one identified conservation target, Sparsely Vegetated Desert Dune habitat, relevant to the park.

The five goals listed for Sparsely Vegetated Desert Dune in the 2015-2025 SWAP are:

- Increase acres where native species are dominant by at least 5%,
- Maintain or increase acres of habitat by at least 5%,
- Increase acres of habitat with suitable soil characteristics regimes by at least 5%,
- Increase acres of habitat with desired groundwater levels by at least 5%, and
- Increase acres of habitat with desired connectivity by at least 5%.

Several of these goals would be supported with the Heber Dunes SVRA SCP, particularly supporting habitat with suitable soil characteristics regimes. As part of the California State Parks System, the park meets the SWAP objective to maintain acres of habitat.

3.1.3 2018 Safeguarding California Plan

Developed by the California Natural Resources Agency, the updated 2018 Safeguarding California Plan's purpose is to lay out guidelines for how agencies can incorporate strategies necessary to address climate change into their future planning efforts. The 2018 update included a chapter specific to parks, chapter PC-5, and included the following recommendation to incorporate climate change in all California State Park and conservancy planning and decision-making. To meet the chapter PC-5 recommendation, the plan identifies the steps to prioritize conservation, protection and restoration of natural resources in climate change adaptation projects and planning to ensure sustainable recreational opportunities for the public.

In addition to conserving soils, the 2025 SCP provides Heber Dunes SVRA management information and recommendations necessary to maintain sustainable recreation opportunities for the public.

3.2 Regional Conservation Objectives

3.2.1 Imperial County General Plan

While State Parks is not subject to or required to comply with the Imperial County General Plan, the objectives listed within the plan were considered during the development of SCP objectives. The County's General Plan balances land-use policies and programs throughout the county while considering socioeconomics, resource management, development density, and many other factors. Of particular relevance to the SCP is the County's Conservation and Open Space Element. This portion of the General Plan considers resource management for ecological, development suitability, public health, and sensitive resource values. The Element was updated in 2014 and adopted in 2016.

The Conservation and Open Space Element identifies nine broad conservation goals, of which the following will be supported either directly or indirectly by the 2025 SCP:

- Conserve resources through land-use decisions and public education,
- Conserve critical habitats for their integrity, function, production, and long-term viability,
- Conserve, protect, and enhance water resources,
- Actively seek to improve regional air quality, and
- Maintain open space for aesthetics, natural resources, recreational opportunities, and minimize hazards to human activity.

3.2.2 Imperial County Air Pollution Control District

The Imperial County Air Pollution Control District (ICAPCD) monitors and regulates air quality. Of relevance to Heber Dunes SVRA, the ICAPCD manages the emission of particulate matter less than ten microns in diameter (PM_{10}). Historically, the county has been in serious non-attainment for PM_{10} within a 24-hour period. An update to federal standards has allowed the ICAPCD to request re-designation to attainment when exceptional events (i.e., high winds) are excluded from the dataset. Based on historical monitoring, the ICAPCD was able to show that all exceedances of the 24-hour PM_{10} threshold were during exceptional events.

The ICAPCD's Regulation VIII covers fugitive dust through a variety of rules. Rule 800, General Requirements for the Control of Fine Particulate Matter, applies to Heber Dunes SVRA. Heber Dunes SVRA has a Dust Control Plan that addresses the requirements of Rule 800, with further implementation support from the Soil Conservation Plan. The Dust Control Plan is updated every two calendar years and submitted to ICAPCD.

4 GOALS AND OBJECTIVES

4.1 HEBER DUNES SVRA SOIL CONSERVATION GOALS AND OBJECTIVES

Given the language provided by the Soil Standard, the fundamental goals of each SCP are to:

1. Manage OHV recreation facilities for sustainable, long-term prescribed use that does not generate soil loss that exceeds restorability; and
2. Avoid causing erosion or sedimentation which significantly affects resource values beyond the facilities.

Based upon these goals, the SVRA has identified objectives to meet these goals. These objectives were developed following assessing park resources, reviewing state and local conservation objectives, and identifying maintenance activities that are currently being conducted. The establishment of objectives allows monitoring programs to be implemented that have performance standards identified, so success and/or progress can be effectively measured.

Objectives have been designed to be S.M.A.R.T., where feasible, meaning they have been designed to be specific, measurable, achievable, realistic, and timely. The use of S.M.A.R.T. goals is compatible with the requirement of SCPs to incorporate BAS.

If new monitoring programs are established through the SCP or baseline data is insufficient, objectives may not currently meet the S.M.A.R.T. threshold. Anticipated timelines and data needs for developing S.M.A.R.T. objectives are addressed under each applicable objective's monitoring discussion. Once developed, these updated objectives will be addressed in the SCP annual report, as well as the action plan.

4.1.1 Conservation Objectives

Goal 1. Manage Heber Dunes SVRA's soils for long-term prescribed use and prevent erosion or sedimentation that can significantly impact resource values at the SVRA.

- **Soil Conservation Objective 1 (SCO1.1).** Through 2030, identify if anthropogenic sources of erosion or sedimentation are present on designated or improved routes of travel at Heber Dunes SVRA.

  Management Actions:

  1. Establish a trail assessment protocol and determine baseline trail conditions.
  2. Establish reporting framework.
  3. Address non-desirable field conditions through the appropriate application of maintenance or project development.

Soil conservation is an important component of the resource program at Heber Dunes SVRA. The park is zoned for open riding and is primarily composed of dunes, with limited designated routes of travel. Primary efforts will consist of developing a management and reporting framework for the park that complies with the 2020 Soil Conservation Standard. Once this is established, ongoing maintenance and monitoring will target elements identified in the framework. While erosion and sedimentation are of limited concern currently, it is important to monitor the property for long-term sustainability. Trail assessments will be used to assess the success of meeting this goal.

- **Soil Conservation Objective 2 (SCO1.2).** By 2028, resolve soil loss under two leach fields.

  Management Actions:

  1. Work with consultants to identify the issue, extent, and resolution for soil loss at the leach fields.
  2. Develop and implement a project to resolve the problem.

In 2024, district staff were informed that the soil around the residence and south RV pad (near the residence) leach fields erode following rainfall. An initial site visit determined that the issue may be with soil compaction, rather than direct erosion. External technical expertise is needed to determine how to resolve the issue prior to performing work. Monitoring currently consists of visiting the location following storm events to document conditions.

Goal 2. Conserve plants and vegetation communities at Heber Dunes SVRA long-term to benefit soil stability and improve site restorability.

- **Soil Conservation Objective 2 (SCO2.1).** Over the next five years, conserve the existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.

  Management Actions:

  1. Limit significant expansion of social trails (i.e., through interpretive signage, temporary closures, etc.) within the Native Vegetation MU.
  2. Plan and implement small-scale projects such as invasive plant removal, planting native vegetation, and scrubbing volunteer trails.
  3. Manage spread of invasive species with chemical and mechanical controls throughout the unit.
  4. Maintain inventory of native species at district's native plant nursery for use in restoration projects.

Vegetation plays an important role at Heber Dunes SVRA. Vegetation is a significant component of soil stability, tying back to soil conservation. In the Native Vegetation MU in particular, the

goal is to allow for OHV recreation while minimizing the footprint and avoiding vegetation loss. This goal will be met by assessing community-level changes park-wide and monitoring changes to landcover within the Native Vegetation MU.

Heber Dunes SVRA is a unique environmental setting as it contains healthy remnant native vegetation communities in an area that has primarily been converted to agriculture. Soils in portions of the park provide suitable habitat for these native species to grow. Additionally, the non-native Athel tamarisk communities are also important to the park as they play a critical role in holding down dunes that would otherwise become windblown.

5 MAINTENANCE PLAN

5.1 UNIT-WIDE

Heber Dunes SVRA is an open-ride park, with limited established routes of travel. The entire unit (341-acres) is zoned for open-ride. There are no designated OHV routes in the unit, however visitors have created social or volunteer OHV routes. Additionally, there are no exclusion zones within the 341-acre unit. Within the interior of the park, there are two paved roadways, and along the exterior of the park, an improved perimeter roadway.

Around the perimeter of the park, there is a lightly improved perimeter road that is owned in part by surrounding landowners, and maintained by State Parks. Around most of the park, this road is composed of native material that is graded, but along the eastern boundary, class II road base covers most of the native material. The eastern portion of the trail is primarily used by State Parks staff and easement holders, while the southern and western sections are utilized by agricultural workers and State Parks staff. Along the route, there are several connecting OHV social trails that tie-in to the perimeter road.

A variety of road maintenance is conducted either on a schedule or as needed. Arrow weed *(Pluchea sericea*), a native plant that can grow into dense thickets, regularly encroaches on portions of the perimeter road, particularly along the west boundary. State Park Equipment Operators (SPEO) utilize a skid steer tractor with a mower attachment to mow the arrow weed back from the roadway annually in fall. The SPEO conducts multiple passes over areas of problematic arrow weed until the section has been flattened and compacted, similar to track walking. Work is conducted outside of the nesting bird season. Additionally, the roadway is graded using a grader depending on conditions. Small berms may be removed using a small to mid-size tractor backhoe. In compliance with the Dust Control Plan, a water truck is used to water the unpaved perimeter road as needed.

Occasional erosion along the western boundary has been observed in the past, primarily when adjacent agricultural fields are being watered. Depending on the scale of erosion, a grader, mini backhoe, or loader may utilize native materials on-site to make repairs as needed.

5.2 Canal Zone MU

The Canal Zone MU is a narrow MU along the eastern portion of the SVRA. It includes the eastern section of the perimeter road along the South Alamo Canal, and a handful of OHV trails that connect riders back to the primary riding area. The MU is zoned for open riding but due to the density of vegetation, riding is mostly along the canal frontage roads. These frontage roads are also regularly used by IID and SDG&E staff during maintenance of their facilities.

Outside of previously discussed maintenance of the perimeter road (section 3.1), there is no other regularly occurring maintenance in this MU.

5.3 Native Vegetation MU

The Native Vegetation MU is the southernmost MU at the park. The MU is zoned for open riding, with social trails created by riders running through the MU. There are no formally established routes of travel within the Native Vegetation MU, however southern and western portions of the perimeter road are adjacent to MU boundaries. Additionally, State Parks staff brush vegetation in trail corridors throughout the season, as needed, to maintain access. This is typically done once per season.

With the implementation of the 2022 Heber Dunes SVRA Wildlife Habitat Protection Plan, newly identified management goals focus on this MU. While many of these goals were developed to focus on wildlife habitat, certain measures will likely result in benefits to soils or other resource values. Relevant work will be discussed in future annual reports.

Two areas within the MU are composed of fine sands – along the southwestern corner and near the base of the middle utility tower. While these areas currently do not require unique maintenance or management, consideration should be given in the future to assess needs. Beyond perimeter road maintenance (section 3.1), no regularly occurring maintenance occurs in this MU.

5.4 Tamarisk Dunes MU

The Tamarisk Dunes MU is an open riding area that contains almost all park facilities. There are two paved roads that provide access from the entrance to main attractions such as shade ramadas and the park office. Outside of a youth OHV training course, there are no maintained OHV routes of travel within the MU. Within the MU, tall sand dunes form and are popular for OHV riding. In areas without sand cover, clay soil is present.

There are two asphalt roads within the interior of the park. Heber Dunes Road runs north to south, from the SR-7 entrance to approximately Ramada 9. Heber Beach Road intersects Heber Dunes Road and runs east to west to the park offices and main day use facilities. Both roads

were constructed in approximately 2012 and have required minimal maintenance beyond periodic resurfacing.

The youth OHV training course is graded about five times per season. The track is maintained by an all-terrain utility tractor pulling a scraper, which drives around the track until it is smoothed out.

In 2024, park staff raised concerns that rainfall prompted erosion around the residence and south RV pad leach fields. Initially, the plan was to deposit additional materials into the eroded areas, however, a site visit determined that the issue was potentially more complex. Materials did not appear to be eroding from the area, but rather condensing in place. It is assumed that an insufficient amount of soil compaction occurred after the systems were put in place. Additionally, the system height may not have been appropriately installed. A resolution has not yet been determined, but SCO1.2 addresses the need to identify the extent of the problem, potential solutions, and implement a project in response. Pictures of the area are incorporated in Appendix 2.

Sand build-up is commonly observed within the MU. In most cases, this is not of maintenance concern, however there are two areas that are maintained as needed to reduce sand. Ramada 15 is the southernmost shade ramada in the park and it can become filled with sand. Every few years, a loader and backhoe are used to clear sand from underneath the ramada and redeposit it in other dune areas. On-site maintenance staff monitor and report excessive sand build-up in this area so removal can be scheduled. SPEO redistribute sand in the adjacent area at their discretion. Another area that needs occasional maintenance of excess sand is behind the rock wall located by the large day use picnic area. Sand was removed using a loader and backhoe, then the area was filled and regraded to resolve water ponding issues. Sand removal is conducted as needed.

Water can pond in clay flats areas near shade ramadas and by the park office. Typically, maintenance does not occur in response to this ponding but occasionally occurs, such as behind the aforementioned day use area rock wall.

6 MONITORING PLAN

6.1 ASSESSMENTS OF EROSION POTENTIAL

6.1.1 Trail Assessments

Formal trail assessments will be implemented through the Soil Conservation Plan to meet SCO1.1. Historically, these assessments were done informally by SPEO, but through this iteration of the Soil Conservation Plan, efforts will be made to formalize when and how these trail assessments are completed. As a result of assessments being completed informally, a true

baseline has not been established but anecdotally a few sections of the perimeter road have been noted to have erosion, dependent on neighboring agricultural land use.

The 2020 Soil Conservation Standard and Guidelines Appendix 3 contains an example Trail Evaluation Form for conducting trail assessments. From this document, district staff are modifying some of the metrics to better match assessment needs at Heber Dunes and Ocotillo Wells SVRAs. The results of the trail assessment will contribute to the development of the annual maintenance plan.

Due to the limited number of formal routes of travel at Heber Dunes SVRA, it is anticipated that all routes can be assessed once annually by either park or district staff. A trail assessment protocol was drafted and tested in 2023, then formally used for the first time in 2024. Only four trails and/or roads are included in the trail assessment. Further details on monitoring protocols can be found within Appendix 1.

The results of the trail assessment will be reported in the annual Soil Conservation Plan Compliance Report. The protocol, once established, will be appended to the SCP and the annual report.

- **Metric:** The trail condition of each trail will be established using a green/yellow/red rating scale that accounts for various conditions, including tread, trail width, trail depth, berms, sand drift presence, and amount of off-trail travel.
- **Baseline:** Baseline was established in 2024. Four trails (i.e., Heber Dunes Road, Perimeter Road, hillside trail from pumphouse to day use area, and entrance road to maintenance yard) were surveyed in full and all were classified as green.
- **Target:**
    - Through 2030, maintain overall trail condition rating as green for all four surveyed routes at Heber Dunes SVRA.

6.1.2 Open Riding Area Assessment

Within the open riding area, monitoring will largely focus on characterizing changes to landcover and vegetation communities over time. Aerial imagery will allow for vegetation cover and disturbance to be estimated over a larger area and will allow staff to monitor changes in cover and bare ground over time.

Informal photo points may be taken, particularly along the perimeter road where annual mowing occurs, to show changes in vegetation over time. If utilized, a protocol would be established and appended to the annual Soil Compliance Report.

The results of the open riding area assessment will be reported in both the annual Soil Conservation Plan Compliance Report and the annual Wildlife Habitat Protection Plan Compliance Report.

6.1.2.1 Unit-wide VegCAMP Monitoring

VegCAMP updates will be completed every five years, coinciding with WHPP updates. VegCAMP uses the Manual of California Vegetation to establish a hierarchal classification of vegetation on a fine scale. Data is evaluated through aerial imagery and strict protocols established by CDFW, then field surveys are conducted to assess accuracy. These surveys provide a spatial inventory of vegetation communities throughout the park. See Appendix 1 for further information.

- **Metric:** CDFW's VegCAMP protocol will categorize fine-scale vegetation communities and their extent (in acres) throughout the SVRA.
- **Baseline:** VegCAMP aerial surveys were first completed in 2021 for Heber Dunes SVRA; field surveys occurred in spring 2022. This survey effort will serve as the baseline for future assessments. Six vegetation alliances were mapped within the SVRA, along with two non-vegetation landcover types (Figure 8).
- **Target:**
    - Through 2030, maintain existing 92 acres of native vegetation communities throughout Heber Dunes SVRA.

6.1.2.2 Native Vegetation MU Landcover Monitoring

Vegetation plays an important role in providing soil stability. While the park is composed of both native and non-native vegetation communities, management largely focuses on native vegetation. Non-native and non-invasive vegetation communities are left in place to provide soil stabilization but are not actively removed or treated.

Most of the native vegetation is located within the Native Vegetation MU. The 2011 General Plan identified that the vegetation in this area has some sensitivity as a remnant habitat and, while the area is managed as an open ride area, recognized that reducing future disturbance is desirable (AECOM, 2011a). The General Plan also noted erosion at the base of some vegetation within the Native Vegetation MU.

Staff will utilize Normalized Difference Vegetation Index (NDVI) to identify the landcover characteristics, including percent vegetation coverage, of the Native Vegetation MU. NDVI is a GIS tool, which can be used to assess changes to vegetation health, as well as areas that are unvegetated (see Appendix Section 9.2.2 for further information). Changes in cover over time will be assessed to identify whether disturbance, shown through loss of percent vegetation coverage not associated with natural effects, is increasing or decreasing within the MU. NDVI will occur every two years. When vegetation loss is identified, VegCAMP data will be used to inform the specific native vegetation communities that are impacted. This data will guide management and restoration efforts within the Native Vegetation MU. A State Parks protocol, initially developed for Prairie City SVRA, will be utilized. See Appendix 1 for further information.

- **Metric:** NDVI will be used to identify changes in landcover, particularly the percent vegetation cover, within the Native Vegetation MU.
- **Baseline:** NDVI has not been utilized within the Native Vegetation MU to map disturbance. The first efforts will establish baseline landcover values and percent cover. The baseline will be established in 2026.
- **Target**: Targets will be established in 2026, following the availability of initial baseline data.

6.2 Additional Monitoring

6.2.1 Post-Stochastic Event Monitoring

Following a sizeable stochastic event (i.e., earthquake, flooding, storm event, etc.), district or park staff monitor roads and improved trails for erosion issues resulting from the event. Additionally, monitoring of the leach fields identified in SCO1.2 will occur following storm events. Depending on the scale of event, a portion or all roads and trails may be assessed. Past monitoring would be used to determine problem areas that require repeated monitoring following similar events.

This type of monitoring would focus on:

- Erosion sources
- Large areas of pooled water on trails or near facilities
- Downed trees or other hazards
- Facility damage, such as broken water lines

Following monitoring, staff document the date monitoring was conducted, the location of monitoring, the type of event that prompted monitoring, observations, and any maintenance needs. This type of monitoring is meant to be rapidly deployed as needed so that information can be quickly gathered to prioritize maintenance needs, identify hazards, and allow for preventative action from park management.

Data will be transmitted from field staff to their supervisor through email. These records will be maintained until that year's annual report is finalized.

6.2.2 Monitoring Following a High-Use Weekend

Following a high-use weekend, monitoring of the perimeter road may be conducted to determine if there are any maintenance needs. All other improved routes within the SVRA are paved or for employee-use only, therefore they do not require monitoring.

Park staff will drive along the perimeter road to identify any maintenance needs. Following monitoring, staff would document the date monitoring was conducted, the location of

monitoring, and any maintenance needs observed. This type of monitoring is meant to be rapidly deployed as needed so that information can be quickly gathered to prioritize maintenance needs, identify hazards, and allow for responsive preventative maintenance from park management.

Data will be transmitted from field staff to their supervisor through email. These records will be maintained until that year's annual report is finalized.

7 Reporting

An annual Soil Conservation Plan Compliance Report will be developed by the district and will contain the following elements to demonstrate compliance with the 2020 Soil Conservation Standard: Trail Assessment, a list of maintenance activities performed during the previous season, a review of any restoration and/or rehabilitation projects undertaken during the previous season, and a review of any development projects undertaken during the prior season. The Compliance Report will also contain an Action Plan that details soil conservation efforts to be undertaken during the upcoming year. The Compliance Report is anticipated to be completed annually in late summer.

District program areas will jointly be responsible for maintaining records of work completed throughout the year and developing the annual Action Plan.

8 Constraints

Constraints are factors that may limit the district and/or State Parks' ability to achieve the soil conservation management and monitoring elements described in this document. While the Soil Conservation Plan was designed with potential constraints in mind, planning for every possibility is impossible. The annual Soil Conservation Plan Compliance Report would include a discussion if scheduled work did not occur in response to a constraint. Examples of constraints that may limit or alter described elements of the Soil Conservation Plan include:

8.1 Annual Weather Cycles

Annual weather cycles are an important driver of environmental conditions, and they can be highly variable. Drought conditions are a source of stress to the system, while wet seasons can boost wildlife populations and result in annual wildflower blooms. Due to the importance of annual weather cycles at Heber Dunes SVRA, a weather station has been installed at the unit. The weather station allows staff to better understand current trends at the SVRA to inform progress on WHPP goals and objectives, but this understanding does not negate the challenge associated with certain weather cycles.

8.2 Legal or Regulatory Obligations

Heber Dunes SVRA operates under several existing legal obligations. These existing requirements and potential future legal or regulatory obligations may change or redirect staff priorities. For example, if the language of PRC §5090 were to change or a species were to be listed, staff would need to temporarily reprioritize efforts and consider whether an update to the SCP is appropriate to meet these new commitments. The decision to update a SCP outside the five-year update cycle would be determined in conjunction with OHMVRD and NRD.

8.3 Operational Limitations

Operational limitations include financial obligations and staff capacity. These limitations may arise at any level within the state, not just from Heber Dunes SVRA or the district. Financial constraints may arise with competing district priorities, recessions, budget cuts, or other changes to district funding or funding sources. Depending on the scale of the financial constraint, staff will need to reprioritize efforts, which may alter capacity to meet annual targets laid out in the SCP.

Similarly, staffing at Heber Dunes SVRA is limited and district staff will primarily be responsible for meeting SCP goals and objectives. These efforts do require at least opportunistic support from unit staff, as well as administrative support from district staff. As direct changes to unit or district staff occur, staff capacity will be reduced, and challenges will arise in the ability to meet goals and objectives. When these challenges arise, staff will consider the use of statewide assistance or contracts to bolster staffing capacity, in addition to reprioritizing efforts.

8.4 Stochastic Events

Stochastic events are unpredictable events that may impact resources, land, or divert resources that would've otherwise been directed towards planned management actions. Examples of stochastic events include both natural events such as storms and earthquakes, as well as human-generated events such as plane crashes and hazmat events. Impacts from stochastic events may be either short or long duration.

8.5 Other Constraints

The constraints listed above are not intended as a comprehensive list as a variety of constraints could impact staff's ability to meet WHPP goals and objectives, but rather as a sample of potential constraints that may arise. If any other constraint were to arise, it would be documented appropriately within an annual report.

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10 Appendix 1: Monitoring Methodology

This appendix details the different types of monitoring, including performance indicators and methodology, that will occur to assess SCP objectives. These monitoring efforts are new to the SVRA and will require time to establish baseline and target conditions, as well as refine methods. During the pilot phase of monitoring, changes may be made to the methodology, and it may be several years until a protocol is established. This is normal for the introduction of changes to survey protocols and assessments. Changes to any monitoring will be addressed in future SCP annual reports and updates.

10.1 Soil and Trail Assessments

10.1.1 Performance Indicator(s)

10.1.1.1 Description

Manage Heber Dunes SVRA soil resources for sustainable long-term (25 years) prescribed use without exceeding restorability of soil loss and without causing erosion or sedimentation that significantly affects resource values beyond the facilities.

10.1.1.2 Expectation

Demonstrate compliance with the 2020 Soil Conservation Standards and Guidelines by assessing OHV recreational facilities at the unit that could contribute to soil loss, erosion, or sedimentation.

10.1.1.3 Metric(s)

These metrics will be updated and evaluated annually as part of the annual SCP Report to OHMVRD.

1. Number of acres throughout the unit that are treated or closed and passively restored.
2. Condition, location, and extent of facilities (i.e., improved roads or trails) monitored or treated for erosion, sedimentation, or other related impacts.
3. The trail condition of each trail will be established using a green/yellow/red rating scale of various conditions, including tread, trail width, trail depth, berm height, presence of sand drifts, and amount of off-trail travel.

10.1.1.4 Baseline

A protocol was tested in 2023, with data subsequently collected in 2024. Four trails (i.e., Heber Dunes Road, Perimeter Road, hillside trail from pumphouse to day use area, and entrance road to maintenance yard) were surveyed in 2024 and all were classified as green.

10.1.1.5 Target(s)

Through 2030, maintain overall trail condition rating as green for all four surveyed routes at Heber Dunes SVRA.

10.1.1.6 Basis for Selection

Managing Heber Dunes SVRA's soil resources for sustainable long-term prescribed use is an important component of PRC §5090.35. Additionally, OHMVRD's 2020 Soil Conservation Standard and Guidelines are a requirement of the SVRA as an OHV facility. Annual maintenance, inspection, and repairs will be critical elements of meeting soil conservation objectives at the unit.

Monitoring will be appropriately scaled for the small unit size, limited staff capacity, and low number of known problem areas. There are no existing erosion control features at the unit, and, at this time, there does not appear to be a need for these features to be put in place. Similarly, the unit does not have a formal trail system, although a few improved roads are present, and open riding is permitted throughout the park.

10.1.2 Methodology

A trail assessment protocol was developed in early 2023 based on the 2020 Soil Conservation Standard and Guidelines Appendix 3. Assessments of the entire park's road and trail system will occur annually. Four trails or roads – Heber Dunes Road, Perimeter Road, maintenance yard entrance road, and hillside trail from the pumphouse to the day use parking area – will be monitored.

Trail assessments will rate individual trails based on seven trail conditions, tread, trail width, trail depth, berms, sand drift, off-trail travel in open ride areas, and intersection tread slope. Each trail condition will be rated either green, yellow, or red which will provide a number score of 1, 2, or 3, respectively. Trail conditions number scores are to be averaged to provide an overall score for each trail (trail condition rating). The overall score will inform maintenance needs and contribute to the development of the annual maintenance plan.

10.1.3 Program Risks and Uncertainties

While the SVRA can control for property within its boundary, ownership or land management changes to adjacent property may result in future impacts to SVRA soil resources. For example,

as the adjoining cropland is irrigated, a portion of the perimeter road floods, and requires maintenance. Similarly, the SVRA boundary is not in agreement between local landowners, Imperial County, and State Parks. Without clear understanding of the legal boundary, there may be disputes regarding maintenance of or improvements to the perimeter road.

10.2 Vegetation Communities Monitoring

10.2.1 Performance Indicator(s)

10.2.1.1 Description

Maintain the composition and distribution of vegetation communities throughout the unit.

10.2.1.2 Expectation

Limit the loss of vegetation and large-scale changes to landcover values throughout Heber Dunes SVRA.

10.2.1.3 Metric(s)

These metrics will be updated and evaluated biennially as part of the annual SCP Report to OHMVRD.

1. Vegetation coverage percentage of the Native Vegetation MU.
2. Changes to landcover within the Native Vegetation MU over time.

These metrics will be updated and evaluated every five years during the WHPP update cycle, which will be reviewed by OHMVRD and NRD. Updates will also be incorporated into the appropriate annual SCP Report to OHMVRD.

3. Fine-scale acreage and extent of vegetation communities at Heber Dunes SVRA.

10.2.1.4 Baseline

Landcover baseline to be established by 2026. Large-scale imagery and remote sensing monitoring will be a new effort at Heber Dunes SVRA that will begin in 2025. Early efforts will focus on ensuring property equipment and permitting is in order and initial data gathering to establish baseline conditions.

Vegetation community baselines were established in 2021 (Table 4). VegCAMP surveys were first conducted in 2021 for Heber Dunes SVRA, with ground-truthing occurring in spring 2022. This survey effort will serve as the baseline for future assessments. Data has also been mapped and stored within an ArcGIS geodatabase.

Baseline acreage is known to differ from the park's acreage (2023 Ocotillo Wells District).

Table 4. Vegetation alliances identified for Heber Dunes in 2021-2022 VegCAMP mapping.

Habitat Type	Baseline Acres (2022 VegCAMP)
Arrow Weed Thickets Shrubland Alliance	31
Bare Sand	64
Bush Seepweed Shrubland Alliance	4
Creosote Bush Scrub Shrubland Alliance	52
Developed	10
Quailbush Scrub Shrubland Alliance	5
Tamarisk Thickets Shrubland Semi-Natural Alliance: Athel tamarisk	143
Tamarisk Thickets Shrubland Semi-Natural Alliance: saltcedar	25
Total VegCAMP Acres	**334**

10.2.1.5 Target(s)

Landcover target to be developed by 2026 following the establishment of baseline conditions. Generally, targets will focus on maintaining the extent of vegetation communities at the park.

1. Through 2030, maintain 92 acres of native vegetation communities throughout Heber Dunes SVRA.

10.2.1.6 Basis for Selection

Vegetation is an important component of any habitat and is often considered when assessing habitat condition and health. It plays a key role in soil retention, reducing erosivity (Castillo et al., 1997), and can be a visual cue to maintain riding corridors. Vegetation health can likewise be influenced by land use and anthropogenic factors (Lovich and Bainbridge, 1999; Leu et al., 2008; Guo, 2004). Primary management considerations at the SVRA consist of maintaining the existing extent of vegetation, particularly within the Native Vegetation MU.

Two methods were selected for ongoing monitoring. NDVI is a GIS tool that allows photosynthetically active vegetation to be measured within a given area. It allows land managers to map and visualize vegetation by health and distinguish them from non-vegetated areas. VegCAMP is a tool that similarly allows vegetation community and non-vegetated areas to be mapped, but health of given vegetation cannot be directly inferred. VegCAMP mapping is suitable for larger areas where changes are expected to occur at a slower rate, while NDVI allows for more focused analysis of areas where higher rates of change are anticipated, or the vegetation is more sensitive.

10.2.2 Methods

NDVI

Specific methodology to be established in 2025. District staff will work with GIS analysts and staff at Prairie City SVRA to learn more about the protocols in use at the park unit. The Ocotillo Wells district GIS analyst/drone pilot assisted Prairie City SVRA with their protocol development and will play an important role in fine tuning methodology for use at Heber Dunes SVRA.

NDVI is a GIS-based analysis that uses aerial imagery to measure the annual change in vegetation cover. NDVI measures the amount of near infrared light versus red light that is reflected from the surface of the earth. A NDVI value that is near one micrometer indicates a greener, healthier plant, while values close to zero indicate no vegetation is present and negative values indicate development or water.

Based on early discussions, tentative methodology would consist of using drones to capture high-resolution aerial imagery of the Native Vegetation MU every other year. Drone surveys would likely occur in the spring when vegetation growth is at its peak. Imagery collected would then be run through the NDVI tool in ArcMap. Data from this analysis would allow staff to assess vegetation coverage and health. Selective ground truthing will likely be required, especially in early years, as staff refine the protocol. The protocol will be appended to the annual SCP report.

VegCAMP

VegCAMP classifies vegetation according to the standards of the National Vegetation Classification System (NVCS) and Survey of California Vegetation standards, which are hierarchal classifications of vegetation types, distinguishing alliances at the finest scale. Aerial imagery is used to identify vegetation alliances and/or associations at a minimum 1-acre scale. Special stands, such as wetlands or vernal pools, are mapped at a ¼-acre scale. Further information about CDFW's VegCAMP program and protocols can be found at Vegetation Publications, Protocols and Standards.

10.2.3 Program Risks and Uncertainties

NDVI is a useful tool for monitoring vegetation, but staff will need to use an array of other data, such as condition assessments within the MU and climate data, to assess whether changes were based on local or regional factors. As with all data, it is important to understand the underlying influences of increases or decreases. Climatic factors, such as precipitation, temperature, and sunlight, are strong influences on vegetation health. With analysis occurring biannually, it will be important to pay attention to ongoing climate conditions.

Using NDVI analysis requires access to high-quality imagery, which can be challenging to obtain in the area. A drone may be the most reliable source of imagery. The district currently has a

trained drone operator but existing equipment, specifically the camera, is not suitable for multi-spectral imagery. With only one trained operator, staffing changes in the future could reduce the ability to consistently fly the MU and poses a risk to consistency of survey timing.

NRD staff are currently required to complete VegCAMP mapping efforts. Staff changes between SCP updates and sampling efforts will result in a knowledge gap in completing the mapping. If this mapping transitioned to district or SVRA responsibility, existing staffing may not be sufficient to absorb the task. Future training and management of this gap will be necessary.

11 Appendix 2: Pictures of Leach Field Soil Loss





Two pictures were included from the initial report of erosion on January 3, 2024.



Leach field area photographed during site visit on January 18, 2024.



Leach field area photographed during site visit on January 18, 2024.



Leach field area photographed during site visit on January 18, 2024.

José Manzo, Resident, Mecca, CA, 09/21/2026

From: Jose Mz [redacted]
Sent: Monday, September 21, 2026 1:25 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Jose Manzoand I live in Mecca, California .I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project.

The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:
• Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
• Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
• Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering
José Manzo , Mecca ,CA

Sent from my iPhone

H. Jill McCormick (Letter 1), Historic Preservation Office, Fort Yuma Quechan Tribe, 09/21/2026

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Monday, September 21, 2026 10:44 AM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: CPUC Ironwood Transmission Line Project - Scoping Comments

Please see Scoping Comments below from the Ft. Yuma Quechan Tribe.

The proposed Ironwood Transmission Line corridor intersects with the traditional territory of the Quechan Tribe, encompassing sacred sites, Traditional Cultural Properties (TCPs), cultural landscapes, and ancestral resources of deep religious importance. The Tribe's traditional territory and cultural connections to these lands extend far beyond the present-day boundary of the Fort Yuma Quechan Reservation. Avoiding reservation lands should not be considered the same as avoiding impacts to the Quechan cultural resources or culturally significant landscape. The tribe strongly opposes the proposed alignment through the Cargo Muchacho Mountains, which are sacred to the Quechan Tribe. The cultural significance of this area should not be evaluated only by the presence or absence of individual archaeological sites. The relationship between mountains, trails, viewsheds, plants, wildlife, gathering areas, traditional travel corridors, and other culturally significant landscapes must also be considered. Construction, operation, maintenance, and associated road development will cause severe, lasting damage that would create a cumulative impact from the project.

Key concerns of this project include visual intrusion, physical land disturbance, environmental degradation, wildlife habitat disruption, and irreparable harm to Quechan cultural patrimony. These impacts are not limited to the locations where transmission towers will be placed. New and improved roads, grading, vegetation clearing, construction and staging areas, equipment access, maintenance routes, and other project components will create other disturbance across the landscape for the life of the project and beyond. To address these threats to culturally significant areas, the project requires ongoing, high-level consultation and collaborative negotiations with the Quechan Tribe to establish a route that is preferrable to the Quechan Tribe and ensure best management practices for the life of the project and beyond.

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

H. Jill McCormick (Letter 2), Fort Yuma Quechan Tribe, 09/21/2026

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Monday, September 21, 2026 11:03 AM
To: Sanchez, Boris <Boris.Sanchez@cpuc.ca.gov>
Subject: [EXTERNAL] Ft. Yuma Quechan Tribe Ironwood Project Scoping Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Boris,
I am providing you with the confidential scoping comments for the Ironwood Transmission Line Project (See below).

The proposed Ironwood Transmission Line corridor intersects with the traditional territory of the Quechan Tribe, encompassing sacred sites, Traditional Cultural Properties (TCPs), cultural landscapes, and ancestral resources of deep religious importance. The Tribe's traditional territory and cultural connections to these lands extend far beyond the present-day boundaries of the Fort Yuma Quechan Reservation. Avoiding reservation lands should not be considered the same as avoiding impacts to Quechan cultural resources or culturally significant landscapes. The tribe strongly opposes the proposed alignment through the Cargo Muchacho Mountains, which are sacred to the Quechan Tribe. Construction, operation, maintenance, and associated road development will cause severe, lasting damage. Key concerns of this project include visual intrusion, physical land disturbance, environmental degradation, wildlife habitat disruption, and irreparable harm to Quechan cultural patrimony. The cultural significance of this area should not be evaluated solely by the presence or absence of individual archaeological sites. The relationship between the mountains, trails, plants, wildlife, traditional gathering areas, travel corridors and viewsheds, and other culturally important places must also be considered in the review of this project.

Road development in support of the transmission line will create access into areas that were previously not accessible. The impacts from these activities will be severe and long lasting to cultural resources, sacred spaces, and the environment and wildlife of this area. Additionally, several of the proposed access routes would require travel through the Ft. Yuma Quechan Reservation which will create additional traffic, noise and impacts on surface roads. All of these impacts will be sustained fully by the Tribe.

proposed Undertaking would also be in direct conflict with the proposed Protect Kw'tsán Campaign, an initiative lead by the Quechan Tribe, whose goals are to protect desert landscapes, wildlife habitats and culturally significant sites within its boundaries. This landscape is home to several protected species and critical wildlife habitats that will be directly impacted through the creation of the transmission line and permanent access roads through this area.

To address these threats to culturally significant areas, the project requires ongoing, high-level consultation and collaboration with the Quechan Tribe throughout the review and project planning process. Consultation should occur before decisions regarding the preferred route are finalized and should continue through route selection, mitigation planning, construction, operation and the eventual decommissioning. Consultation should focus first on avoiding culturally significant areas and identifying a route that is acceptable to the Quechan Tribe and will not create a long-lasting effect on this culturally sensitive landscape.

The Quechan Tribe believes the current preferred alternative route is not the culturally or environmentally superior option. Additional alternatives routes should be explored along with co-location of the proposed line on the existing Southwest Powerlink, and consideration of a double circuit transmission line. Viable alternative routes must be explored that will limit the effects and impacts of this project on the environment and the culture of the Quechan people. The Quechan Tribe is actively exploring alternative routes and access roads that will be provided directly to CPUC.

H. Jill McCormick, M.A.
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Cell: 928-920-6521

Morgan Sjogren, Resident, Escalante, UT, 09/21/2026

From: Morgan Sjogren [redacted]
Sent: Monday, September 21, 2026 5:57 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping comment — Ironwood Transmission Line Project, A.25-09-008

To the California Public Utilities Commission,

My name is Morgan Sjogren and I live in Escalante, UT. I have camped extensively in the area that the transmission line is proposed for, and spent time learning about the region directly from Fort Yuma Quechan Tribal members and Tribal government employees.

I am writing about the scope of the environmental impact report for the Ironwood Transmission Line Project. The applicant's own routing study says the preferred route parallels the northern border of the Fort Yuma Quechan Reservation and crosses the Colorado River near Imperial Dam. It also records that Quechan representatives identified that area as holding deep cultural and spiritual significance, including sacred mountains and possible ceremonial and burial sites. The applicant examined a more southerly alternative at the Tribe's request and concluded no viable alternative existed there.

I am asking the Commission to do three things in the EIR:

- Study the alternative route the Fort Yuma Quechan Indian Tribe asked for, in full, rather than setting it aside at the applicant's conclusion. A scoping process exists so that alternatives the applicant declined to carry forward can still be examined.
- Treat cultural resources as a full impact category with the Tribe as a consulting party throughout — not as a survey completed once and filed. That means the Tribe at the table when the route is refined, not after.
- Examine the project's purpose and need against current conditions. Operators have publicly suspended Salton Sea geothermal and lithium projects this year. If the demand this line is sized for is not arriving on the schedule assumed, the Commission should say so and weigh alternatives accordingly.

These lands hold the history of people who are still here. Once a 250-foot right-of-way is cut through them, no mitigation puts them back.

Thank you for considering this comment.

Morgan Sjogren
Escalante, UT

Bea Vizcarra, Community Member, 09/21/2026

From: Bea Vizcarra [redacted]
Sent: Monday, September 21, 2026 8:53 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Subject: Scoping Comment – Ironwood Transmission Line Project A.25-09-008

Dear Mr. Sánchez,

I submit this scoping comment regarding the Ironwood Transmission Line Project and potential impacts to the California leaf-nosed bat, Macrotus californicus, and its roosting, maternity, foraging, and movement habitat within the Cargo Muchacho Mountains. I am a wildlife and bat biologist with extensive field experience conducting surveys throughout the Desert Southwest and the Lower Colorado River region. I have participated on numerous surveys with Patricia Brown in the Cargo Muchacho Mountains, including mine work and surveys focused on Macrotus californicus. I have also conducted surveys with Lynn Pease, a regional biologist for the Arizona Game and Fish Department, who often assisted Ms. Brown. Based on my direct field experience, I can personally verify the presence of Macrotus californicus in the Cargo Muchacho Mountains and the importance of this landscape to the species. Given the ecological importance of these sites, I respectfully request that known and potential roosting, maternity, foraging, and movement habitats for the California leaf-nosed bat within the Cargo Muchacho Mountains be fully identified, evaluated, and protected as part of the environmental review. Patricia Brown served as principal investigator for many years and has extensive historical survey knowledge for this area. She is available to provide additional information and can be reached at [redacted], phone [redacted]. I am also available to provide further information and request to be kept informed of updates and opportunities for public input. Bea Vizcarra, email [redacted], phone [redacted].

Rose Winn, California Four Wheel Drive Association (Cal4Wheel), 09/21/2026

From: Rose Winn <rwinn@cal4nrc.com>
Sent: Monday, September 21, 2026 10:53 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Cc: Rose Winn <rwinn@cal4wheel.com>
Subject: Ironwood Transmission Line Project, Application No. A.25-09-008; Scoping Comment (Cal4Wheel)

Dear Mr. Sanchez, A. Surdzial, and Ironwood Transmission Line Project Planners,

California Four Wheel Drive Association (Cal4Wheel) submits the attached comments regarding the scope of environmental review for Horizon West Transmission, LLC's proposed Ironwood Transmission Line Project.

Cal4Wheel would like to be considered an interested public for the Ironwood Transmission Line Project.

We appreciate your consideration of our feedback and suggestions.

Sincerely,
Rose

Rose Winn | Natural Resources Consultant
California Four Wheel Drive Association
559.862.6382 | rwinn@cal4nrc.com
cal4wheel.com

September 21, 2026

California Public Utilities Commission
Boris Sanchez, CPUC
Ironwood Transmission Line Project / Attn. A. Surdzial
c/o ECORP Consulting, Inc.
215 North 5th Street
Redlands, CA 92374

Submitted via email to: CEQA@IronwoodTransmissionProject.com

RE: Ironwood Transmission Line Project, Application No. A.25-09-008; Scoping

Dear Mr. Sanchez, A. Surdzial, and Ironwood Transmission Line Project Planners:

California Four Wheel Drive Association (Cal4Wheel) submits these comments regarding the scope of environmental review for Horizon West Transmission, LLC's proposed Ironwood Transmission Line Project (ITL). Cal4Wheel represents over eight thousand four-wheel-drive recreationists throughout California, including thousands who live and regularly recreate within the ITL project impact area in Imperial Valley, CA. Cal4Wheel has worked earnestly for more than six decades to preserve responsible motorized access, promote active stewardship of public lands, and participate constructively in federal, state, and local public-land planning.

Cal4Wheel recognizes the legitimate public interest in maintaining a reliable electrical transmission system and appreciates that major infrastructure planning requires reconciliation of engineering, environmental, economic, community, land-use, and public-access considerations. Our position is therefore not categorical opposition to the ITL. We are interested in working constructively with Horizon West Transmission (Horizon West), the California Public Utilities Commission (CPUC), the Bureau of Land Management (BLM), California State Parks, Imperial County, affected communities, tribes, recreation organizations, and other stakeholders to identify a workable routing concept that accommodates transmission needs without unnecessarily sacrificing established public recreation.

That collaborative posture, however, rests upon a clear principle: **the ITL should be routed fully outside existing State Vehicular Recreation Areas, designated federally-managed public land OHV recreation areas, and other public lands specifically designated and intensively managed for motorized recreation wherever a feasible routing concept can avoid those lands.**

This principle is especially important for Heber Dunes State Vehicular Recreation Area (HDSVRA) and the Imperial Sand Dunes Recreation Area (ISDRA). These are not vacant parcels awaiting an economically productive use. They are existing public recreation assets whose present functions result from decades of legislative policy, land-use planning, public investment, resource-management commitments, and extensive participation by the recreation community. Their established recreational purpose should be treated as a substantive siting constraint, not merely another impact category to be mitigated after a transmission corridor has already been selected.

Horizon West proposes an 86-mile, 500-kilovolt transmission line connecting the North Gila Substation in Arizona to the Imperial Valley Substation in California, 80 miles of which would be located in California. The project would require a new 250-foot-wide right-of-way and would traverse lands administered by several governmental entities, including BLM, the Bureau of Reclamation, and California State Parks (Horizon West Transmission, LLC [HWT], 2026a). CPUC is the lead agency for environmental review under the California Environmental Quality Act (CEQA), while BLM will separately serve as the lead federal agency under the National Environmental Policy Act for federal lands (CPUC, 2026).

The magnitude and geographic reach of the ITL make recreation a substantial land-use consideration, not a peripheral issue.

I. Designated OHV Recreation Areas Must Be Treated as Established Public Uses, Not Open Space Available for Industrial Conversion

Cal4Wheel's primary request is straightforward: **CPUC and Horizon West should develop the final routing concept around designated recreation areas, rather than through them.**

California's Legislature has expressly recognized the public importance of managed OHV recreation. The Off-Highway Motor Vehicle Recreation Act declares that effectively managed areas and adequate facilities for OHV use are essential to meet the recreation needs of California while protecting environmental resources (Cal. Pub. Res. Code § 5090.02). The statutory framework establishes a dedicated Off-Highway Motor Vehicle Recreation Division and provides for the acquisition, planning, operation, maintenance, and resource management of State Vehicular Recreation Areas. Within SVRAs, the Legislature has directed State Parks to manage public safety, appropriate land utilization, conservation, trails, natural and cultural resources, and sustainable recreation through a specialized statutory program (Cal. Pub. Res. Code §§ 5090.32, 5090.35).

These provisions matter to the ITL review. An SVRA is not simply state-owned real estate upon which OHV use happens to occur. Its recreational use is the product of a specific legislative program established to provide managed motorized recreation.

Similarly, BLM's Imperial Sand Dunes Recreation Area is governed through an extensive federal planning framework. The 2013 ISDRA Recreation Area Management Plan and California Desert Conservation Area Plan Amendment deliberately allocate areas for intensive motorized recreation, limited motorized recreation, conservation, camping, environmental education, and other uses. BLM expressly identifies camping and OHV recreation as primary activities within portions of the planning area and recognizes the regional tourism benefits associated with those opportunities (BLM, 2013).

The ITL should respect these existing land-use determinations.

II. Heber Dunes SVRA Must Be Avoided

Heber Dunes presents the clearest example of why recreation avoidance must occur during routing, rather than through mitigation after siting. Heber Dunes is a 343-acre SVRA located near Imperial Valley population centers. California State Parks describes the unit as providing winding trails through creosote-

studded dunes, large fine-sand dunes, and dry lake beds with hard-packed clay for ATVs, dune buggies, utility vehicles, motorcycles, and other OHVs (California State Parks, 2026a). Its General Plan recognizes that the park provides a distinctive, family-oriented OHV experience close to local communities and that, because of its small size, most of the property itself is dedicated to open sand-dune and trail recreation (California State Parks, 2011).

Its small acreage magnifies the significance of any industrial encroachment. A 250-foot transmission right-of-way, permanent towers, access roads, construction staging, vegetation disturbance, safety clearances, maintenance access, and operational constraints cannot reasonably be evaluated solely by calculating the square footage occupied by tower foundations. At a 343-acre SVRA, the relevant question is: what is the **functional loss of recreation opportunity?**

The EIR must examine whether the project would:

- sever or redirect existing riding patterns;
- constrain usable open terrain;
- introduce permanent fixed obstacles into riding areas;
- require separation or safety buffers;
- alter narrow-trail circulation;
- affect beginner or family-oriented riding areas;
- create conflicts between OHVs and utility maintenance vehicles;
- displace recreation into a smaller usable footprint; or
- materially alter the setting that makes Heber Dunes valuable as a local public recreation resource.

Horizon West's own routing analysis demonstrates that avoidance is possible and warrants further investigation. Its Routing Study identifies Heber Dunes as a significant routing constraint and shows that some routing concepts cross Heber Dunes while others avoid it. The study further acknowledges additional permitting complexity associated with crossing Heber Dunes and identifies routing configurations that place transmission infrastructure within the foreground of the SVRA (HWT, 2025). This is consequential. Where the developer's own planning work has already identified routing concepts capable of avoiding Heber Dunes, the EIR should not treat industrial occupation of the SVRA as an unavoidable starting assumption.

Cal4Wheel therefore requests that CPUC establish complete avoidance of Heber Dunes SVRA as a principal routing objective and require Horizon West to refine a technically feasible routing concept outside the park boundary.

Industrial Development Within Heber Dunes Conflicts with the Unit's Established Recreational Purpose

The concern extends beyond acreage. Heber Dunes was transferred to California State Parks and incorporated into the OHMVR program specifically as a State Vehicular Recreation Area. Its General Plan is the controlling long-range planning document for the unit and establishes OHV recreation as its central use. The General Plan process itself evaluated the park's resources, visitor experience, management zones, trails, facilities, and long-term recreation function (California State Parks, 2011). Installing major

high-voltage transmission infrastructure inside the park would introduce an industrial land use fundamentally different from the recreation and resource-management purposes for which the property is administered.

We do not contend that every non-recreational facility within an SVRA is categorically unlawful. Necessary park utilities, maintenance facilities, public-safety infrastructure, and compatible support uses plainly can serve the recreational mission. A regional 500-kV transmission corridor, however, serves an external industrial purpose. Its compatibility therefore requires considerably greater scrutiny.

The CPUC should evaluate whether routing through Heber Dunes would:

1. Impair the purposes embodied in Public Resources Code sections 5090.02, 5090.32, and 5090.35;
2. Conflict with the adopted Heber Dunes General Plan;
3. Require discretionary authorization from California State Parks;
4. Diminish the public recreation investment represented by the SVRA; or
5. Establish a precedent under which designated recreation acreage can be progressively consumed by unrelated infrastructure because public ownership makes the land administratively convenient.

Cal4Wheel urges CPUC not to establish that precedent.

III. Imperial Sand Dunes Recreation Area Requires Comparable Avoidance and Detailed Route-Level Analysis

The Imperial Sand Dunes are among the most important OHV recreation landscapes in the United States. BLM describes the dunes as California's largest dune mass, extending more than 40 miles, with dunes reaching approximately 300 feet high. South of Highway 78, extensive open areas support cross-country motorized recreation, while adjacent limited-use lands support designated-route travel and camping (BLM, 2026a).

This landscape is not monolithic. Recreation occurs through a network of open dunes, designated routes, campgrounds, staging locations, access corridors, overlooks, historical destinations, and dispersed-use areas. The ITL must therefore be evaluated against the actual geography of recreation rather than a generalized designation of surrounding acreage as "BLM land."

The project's own PEA identifies numerous sensitive recreation resources within the study area, including the Imperial Sand Dunes OHV Designated Area, Dunes Vista/Dune Buggy Flats Campground, Buttercup Campground, Grays Well Camping, Midway Campground, Ogilby Camp Area, the Plank Road historic marker, East Mesa, Hot Springs Long Term Visitor Area, Tamarisk Long Term Visitor Area, Kennedy's Day Use Site, and other federal recreation resources (HWT, 2026a). The PEA also recognizes that recreationists have moderate-to-high visual sensitivity because their exposure to views may be prolonged, and specifically identifies I-8 as providing access to the Imperial Dunes OHV Area, Dune Buggy Flats, Holtville Hot Springs, and other desert recreation destinations (HWT, 2026a).

These admissions should establish the minimum scope of CPUC's analysis.

A. Dune Buggy Flats

Dune Buggy Flats warrants particular attention. The area functions as both a camping destination and a gateway into the broader dunes and surrounding limited-use route network. BLM's ISDRA management plan identifies the Dune Buggy Flats area as an access point into the Limited Recreation Management Zone and recognizes camping and OHV recreation as primary activities in that zone (BLM, 2013). A transmission corridor near this location could affect more than the immediate tower footprint. Fixed structures within or adjacent to active motorized terrain create collision and visibility concerns; construction could temporarily interrupt circulation; permanent access roads may redirect existing travel patterns; and tower placement could diminish the open visual character that is integral to the dune experience.

Cal4Wheel understands that Horizon West has engaged in field review and routing discussions with the American Sand Association concerning the Dune Buggy Flats area, including consideration of a routing concept intended to move infrastructure away from areas of intensive OHV use. We appreciate Horizon West's willingness to undertake that ground-truthing rather than relying exclusively on desktop mapping. Cal4Wheel encourages Horizon West to expand this collaborative model.

Specifically, Horizon West should invite Cal4Wheel and other organizations with substantial institutional knowledge of Imperial Valley recreation to participate in field-based routing review. Long-time users can identify travel corridors, seasonal camping patterns, informal but lawful connectors, heavily traveled dune approaches, safety concerns, staging behavior, and destination access that GIS layers alone may fail to capture.

B. Buttercup, Grays Well, Midway, and the Southern Dunes

The southern dune complex deserves the same level of analysis. Buttercup, Grays Well, Midway, Gordon's Well and surrounding riding terrain form an interconnected recreation landscape rather than isolated campground polygons. Construction or permanent facilities affecting one component can shift use into another. A closed or constrained access corridor can increase traffic elsewhere. A tower line may create a barrier that riders must repeatedly cross. Construction traffic may conflict with recreational traffic during peak winter periods. Restrictions on existing access roads can affect both riding and emergency response.

<u>The EIR should therefore map the relationship between the proposed transmission corridor, existing riding areas, campgrounds, major circulation corridors, emergency-access routes, and the patterns by which recreationists move between camps and open dunes.</u>

BLM visitation data demonstrate the magnitude of this use. For the period from October 1, 2024 through May 12, 2025 alone, BLM reported approximately **952,630 visitors to ISDRA**. BLM also maintains specialized OHV emergency-response capability for the area, reflecting the intensity and distinctive operational requirements of dune recreation (California State Parks OHMVR Commission/BLM, 2025). A recreation resource receiving visitation on that scale warrants analysis commensurate with its actual public use.

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IV. Valley of Names and Other Unique Public-Land Destinations Must Be Evaluated as Recreation Networks, Not Isolated Points

Cal4Wheel also requests detailed consideration of the **Valley of Names** and other dispersed public-land destinations within the project's sphere of influence.

Remote desert recreation frequently differs from conventional developed recreation. Its value lies not only at a destination point but in the journey to that destination. Four-wheel-drive routes, primitive roads, dispersed camping locations, historic sites, geologic features, overlooks, and scenic travel corridors collectively form the recreation experience. A destination does not remain functionally unaffected merely because a transmission tower is not constructed directly on top of it.

The EIR should identify whether construction or operation could alter the routes used to reach the Valley of Names; affect adjacent dispersed camping; introduce gates, restricted utility roads, or construction closures; change the visual setting; or concentrate use onto fewer remaining access corridors. The same network analysis should extend to recreation resources already identified by Horizon West, including:

Plank Road Historic Marker. This area combines historic, scenic, educational, and recreational values. Transmission structures can affect both physical access and the integrity of the historic desert setting.

Ogilby-area recreation and camping. The Ogilby corridor supports dispersed camping and serves as an important gateway to surrounding BLM routes and desert destinations. Utility access restrictions and construction activity must be evaluated against existing recreational circulation rather than merely mapped against developed facilities.

Holtville Hot Springs and the Hot Springs Long Term Visitor Area. These resources attract long-duration visitors whose recreation experience depends upon access, desert setting, and surrounding public lands.

Dunes Vista, Midway, Grays Well, Buttercup, and other developed or semi-developed camping locations. These sites function as gateways to larger recreation landscapes. Their value cannot be separated from access to the riding areas surrounding them.

This analysis should include both designated recreation facilities and dispersed recreation. The absence of a paved parking lot, formal trailhead, or developed campground does not establish an absence of recreational value.

V. Visual Effects Are Recreation Effects

The visual-resource analysis must also be integrated into the recreation analysis. A 500-kV transmission line is a large-scale industrial feature. The recreational consequence of placing such infrastructure within a desert landscape cannot be evaluated only from conventional highway viewpoints or residential receptors. Horizon West's PEA appropriately recognizes recreationists as a viewer group with moderate-

to-high sensitivity because they may experience views for extended periods (HWT, 2026a). That recognition should carry through to the EIR's significance analysis.

For motorized recreationists, the landscape unfolds dynamically over miles of travel. A tower line may be encountered from numerous angles and elevations during a single trip. In open dune terrain, long sight distances can make industrial structures visible across broad portions of the riding area. On primitive BLM routes, a line may remain within the foreground or middle-ground view for extended periods. At campsites, exposure can persist for days rather than seconds.

Accordingly, CPUC should require visual simulations from actual recreation viewpoints, including major BLM OHV routes, Dune Buggy Flats, Buttercup, campground approaches, Heber Dunes SVRA, and other locations identified through stakeholder ground-truthing.

Visual analysis should not be confined to whether towers meet a generalized contrast threshold. The EIR should evaluate whether the project would substantially change the character of a recreation area by reducing scenic qualities that contribute to its recreational value, a question CPUC itself expressly identified during review of the PEA (CPUC, 2025).

VI. Existing Public Roads and OHV Routes Must Not Become De Facto Utility-Only Corridors

The proposed project anticipates using existing roads and trails where practicable for construction and maintenance access (HWT, 2026a). That strategy may reduce new surface disturbance, but it creates another issue requiring explicit protection. Use of an existing public route for utility access must not extinguish, subordinate, or restrict its existing recreational use. The EIR should inventory every public road, BLM route, OHV connector, and primitive road proposed for construction or maintenance access and disclose its existing legal status, current recreation function, anticipated construction modification, temporary closure requirements, and post-construction management.

Cal4Wheel specifically requests enforceable provisions prohibiting the conversion of currently lawful public routes into permanent utility-only access roads merely because the route has been improved, widened, hardened, gated, or incorporated into the ITL maintenance system.

Where temporary closures are genuinely necessary for public safety during construction, they should be geographically narrow, limited to the shortest feasible duration, scheduled to avoid peak recreation periods where practicable, accompanied by functionally equivalent temporary access, and terminated immediately when the underlying safety condition ends. Temporary construction management must not become permanent recreation displacement.

VII. Avoidance First, Mitigation Second

Cal4Wheel urges CPUC to apply an **avoidance-first, mitigation-second** framework to recreation impacts. This is not merely a policy preference. It reflects the basic structure of CEQA. California has declared that public agencies should not approve projects as proposed when feasible measures or feasible project configurations are available that would substantially lessen significant environmental

effects (Cal. Pub. Res. Code § 21002). An EIR exists in substantial part to identify significant effects and disclose means by which those effects can be mitigated or avoided (Cal. Pub. Res. Code §§ 21002.1, 21061).

The California Supreme Court has repeatedly emphasized the central role of meaningful avoidance and mitigation analysis. In *Laurel Heights Improvement Association v. Regents of the University of California* (1988), the Court explained that CEQA's fundamental goal is the mitigation or avoidance of environmental harm and requires meaningful consideration of mechanisms capable of diminishing that harm. In *Citizens of Goleta Valley v. Board of Supervisors* (1990), the Court reiterated the Legislature's policy that projects should not be approved as proposed when feasible means exist to substantially lessen significant environmental effects.

For purposes of Cal4Wheel's requested project design, the practical hierarchy should be:

- **First, avoid designated recreation areas.** Routing should remain outside Heber Dunes SVRA and should avoid ISDRA open riding areas, concentrated OHV use zones, campgrounds, staging areas, and other designated recreation resources wherever technically feasible.
- **Second, minimize impacts to recreation resources outside those areas.** Where the transmission line must cross broader multiple-use public lands, route selection should minimize interference with designated roads and trails, dispersed camping, scenic corridors, destination access, and route connectivity.
- **Third, mitigate genuinely unavoidable residual impacts.** Only after avoidance and minimization have been exhausted should CPUC rely upon restoration, replacement facilities, screening, temporary detours, timing restrictions, or other compensatory measures.

<u>Mitigation should not be used to rationalize an avoidable routing decision.</u>

This is particularly compelling at Heber Dunes. If a routing concept outside the 343-acre SVRA is technically feasible, compensating for a route through the park with trail reconstruction elsewhere within the same constrained acreage is inferior to simply keeping the transmission corridor outside the park.

VIII. The EIR Must Examine Routing Concepts That Protect Recreation as a Primary Siting Objective

CPUC should require the EIR to meaningfully evaluate routing concepts whose express design objective is protection of established recreation. We deliberately use the term **routing concept** here because the immediate question presented during scoping is where the transmission line can physically and operationally be located while meeting project objectives. The environmental document should not merely compare minor variations around a substantially predetermined corridor.

At minimum, CPUC should require development and comparative analysis of one or more routing concepts that:

1. remain completely outside Heber Dunes SVRA;
2. avoid open and concentrated-use OHV areas within ISDRA wherever feasible;
3. avoid Dune Buggy Flats and other high-intensity camping and staging areas;

4. minimize impacts to Buttercup, Grays Well, Midway, Gordon's Well, Ogilby-area recreation, Valley of Names, and other established recreation destinations;
5. preserve existing BLM route connectivity;
6. maximize use of already-disturbed utility corridors where doing so does not transfer impacts into designated recreation areas;
7. minimize foreground visual intrusion at high-use recreation locations; and
8. avoid converting public recreation routes into restricted utility access.

CEQA requires more than a paper exercise. *Laurel Heights* requires meaningful analysis, not cursory dismissal. If CPUC concludes that a recreation-protective routing concept is infeasible, the EIR should identify the specific engineering, economic, legal, environmental, or technological evidence supporting that determination rather than relying upon generalized assertions of cost or convenience.

IX. Recreation Economics Must Be Quantified

The EIR should also undertake a substantially more robust socioeconomic analysis of recreation. OHV recreation is an economic activity. Visitors purchase fuel, food, lodging, camping supplies, vehicle parts, tires, repairs, groceries, permits, safety equipment, and other goods and services. They support powersports businesses, restaurants, hotels, convenience stores, repair facilities, vendors, and seasonal employment.

ISDRA alone received approximately 952,630 visitors between October 1, 2024 and May 12, 2025 according to BLM reporting (California State Parks OHMVR Commission/BLM, 2025). The federal ISDRA management plan also recognizes increased regional tourism revenues as a socioeconomic benefit associated with recreation management (BLM, 2013).

An EIR that quantifies project construction expenditures while treating recreation displacement qualitatively would present an incomplete economic picture.

CPUC should require analysis of:

- visitor volume and seasonal use patterns;
- average visitor spending;
- recreation-related employment;
- permit and fee revenue;
- local fuel and retail expenditures;
- lodging and restaurant spending;
- powersports and repair expenditures;
- duration of visitor stays;
- effects of temporary construction closures during peak seasons;
- displacement to other recreation areas; and
- potential long-term changes in visitation if the recreation experience is materially degraded.

The analysis should distinguish between temporary construction effects and permanent operational effects.

It should also consider cumulative economic consequences. Recreation losses occur incrementally. A campground constrained here, a route severed there, a viewshed industrialized elsewhere, and an SVRA reduced by another infrastructure corridor may individually appear modest when measured against Imperial County as a whole. Collectively, however, those changes can alter the attractiveness and functionality of a regional recreation destination.

X. Social Effects and Generational Recreation Values Require Serious Analysis

The social value of Imperial Valley recreation is equally important. ISDRA, Heber Dunes, Valley of Names, Dune Buggy Flats, Buttercup, and surrounding desert routes are not interchangeable recreation commodities. Many families and clubs return to the same camps, trails, and destinations year after year and across generations. These places form social networks, family traditions, club histories, volunteer stewardship relationships, and community identity.

The 2011 Heber Dunes planning process specifically recognized the SVRA's importance as a local gathering and recreation area near Imperial Valley communities. State Parks has described Heber Dunes as a small island of natural dune terrain surrounded by agricultural lands and as a locally significant place to gather and recreate close to home (California State Parks OHMVR Commission, 2017). That local function deserves particular weight. Displacement from Heber Dunes cannot simply be answered by asserting that substantially larger federal OHV areas exist elsewhere in Imperial County. A nearby 343-acre community-oriented SVRA serves a different population, trip length, recreation pattern, and accessibility function than a destination-scale federal dune complex.

The EIR should therefore examine social effects on local residents as well as destination visitors, including families, youth riders, beginning riders, older recreationists, persons with mobility limitations who depend upon motorized access, organized clubs, and users for whom vehicle access makes remote public-land recreation possible.

XI. Cal4Wheel Brings Decades of Institutional Knowledge to This Process

Cal4Wheel's interest in this project is not newly acquired. Our organization has advocated for responsible access in the Imperial Sand Dunes and California Desert for decades. During the 1970s and 1980s, Cal4Wheel participated in the land-use controversies that shaped the California Desert Conservation Area and fought to preserve motorized access to the southern Algodones Dunes. Cal4Wheel participated in litigation concerning the CDCA planning framework, worked through Desert Advisory Council and technical-review processes, intervened in litigation threatening ISDRA access, participated in biological monitoring, contributed to BLM's recreation-management planning, and worked alongside partner organizations to defend scientifically supportable public access. When litigation and administrative closures temporarily removed substantial portions of the dunes from motorized use, Cal4Wheel remained engaged through planning and judicial review. In 2014, 22,000 acres were ultimately reopened to motorized recreation. Cal4Wheel has also supported improvements in the Buttercup area, South Dunes facilities, restoration of access corridors, and continuing implementation of the ISDRA management framework (Cal4Wheel, 2022).

Our members likewise have long-standing connections to Heber Dunes and the broader Imperial Valley public-land network.

This institutional knowledge is available to the project team. Cal4Wheel is prepared to participate in field review, route mapping, recreation-use identification, identification of high-value access corridors, and development of workable routing concepts.

XII. Expand Horizon West's Recreation Stakeholder Collaboration

Cal4Wheel appreciates Horizon West's ongoing engagement with the American Sand Association regarding the ISDRA and Dune Buggy Flats area. Ground-truthing proposed infrastructure with stakeholders who understand actual recreation patterns is precisely the kind of early collaboration that can prevent unnecessary conflict later. We urge Horizon West to continue close engagement with ASA, and expand that process. The Imperial Valley recreation landscape is too diverse to be represented through consultation focused upon a single organization or a single recreation area. The project crosses or affects resources managed by BLM, California State Parks, and other agencies and encompasses dune recreation, four-wheel-drive touring, dispersed camping, historic-site visitation, long-term camping, scenic driving, hiking, wildlife observation, and other uses.

Horizon West should convene a recreation working group or series of field sessions involving Cal4Wheel, ASA, other relevant motorized recreation organizations, California State Parks OHMVR staff, BLM recreation staff, local clubs, Imperial County representatives, and other knowledgeable stakeholders.

The objective should not be to ask recreationists how to mitigate a predetermined alignment. It should be to use their knowledge **before routing is finalized** to identify a concept that avoids the most consequential conflicts.

XIII. Federal Land-Management Requirements Reinforce the Need to Protect Established Recreation

BLM's subsequent federal review will operate under a distinct statutory framework, but CPUC should account now for the federal land-management context because the feasibility of a routing concept necessarily depends upon whether it can be authorized across federal land. Under the Federal Land Policy and Management Act (FLPMA), BLM must manage public lands pursuant to approved land-use plans and under the principles of multiple use and sustained yield, which expressly include recreation among the resources and uses to be balanced (43 U.S.C. §§ 1701, 1702(c), 1732).

The Imperial Sand Dunes RAMP and CDCA Plan Amendment represent a deliberate federal allocation of recreation uses across the dune landscape. The Desert Renewable Energy Conservation Plan similarly recognizes outdoor recreation as one of the values to be accommodated within landscape-level planning for California's desert while directing energy development toward appropriate locations (BLM, 2016).

More recently, the EXPLORE Act, Pub. L. No. 118-234, enacted January 4, 2025, established a broad federal policy framework intended to improve recreation opportunities and facilitate greater access to federal public lands. Executive Order 14313, *Establishing the President's Make America Beautiful Again*

Commission, likewise directs federal land-management agencies, to the extent practicable and consistent with law, to promote responsible stewardship while expanding access to public lands for a broad range of recreation, expressly including off-roading (Exec. Order No. 14,313, 2025).

These authorities do not categorically prohibit transmission infrastructure on BLM lands. They do, however, reinforce why recreation access cannot be treated as an incidental interest when BLM evaluates a right-of-way through lands already planned and managed for substantial recreation.

CPUC should coordinate its routing analysis with this federal planning reality rather than advancing a California routing concept that unnecessarily creates foreseeable conflicts for the subsequent federal review.

XIV. Cumulative Impacts Must Address the Progressive Industrialization and Fragmentation of Desert Recreation Landscapes

The cumulative-impact analysis should examine the broader pattern of energy, transmission, transportation, conservation, and land-use actions affecting recreation across the Imperial Valley and California Desert. The question is not merely whether one transmission tower eliminates one trail. The relevant cumulative inquiry includes whether successive projects reduce open riding acreage; fragment route networks; constrain dispersed camping; add permanent industrial infrastructure to recreation viewsheds; create new restricted-access corridors; concentrate users into smaller areas; increase conflicts among recreationists; or diminish the regional supply of high-quality motorized recreation.

This analysis is especially important because designated OHV areas function partly as mitigation for broader restrictions elsewhere. When land-use planning concentrates motorized recreation into specified areas, those remaining areas acquire heightened importance. Subsequent industrial development should not then consume or fragment the very lands upon which recreation was concentrated.

XV. Requested Scope and Remedies

Cal4Wheel requests that CPUC incorporate the following requirements into the scope of the ITL EIR and into subsequent project routing and approval decisions:

1. **Require complete avoidance of Heber Dunes SVRA.** The final ITL routing concept should remain outside the legislatively established SVRA boundary and avoid functional impairment of the park from adjacent construction, access, or operational restrictions.
2. **Establish avoidance of designated OHV recreation areas as a primary routing criterion.** The ITL should be routed outside ISDRA open riding areas and other lands specifically designated for concentrated motorized recreation wherever technically feasible.
3. **Develop and rigorously evaluate a recreation-protective routing concept.** This concept should be designed from the outset to avoid Heber Dunes, minimize intrusion into ISDRA recreation areas, preserve Dune Buggy Flats and other high-use camping and staging locations, and protect established public-land routes and destinations.

4. **Conduct route-level recreation inventory and ground-truthing.** Map all affected OHV routes, primitive roads, open riding areas, campgrounds, staging areas, dispersed camping zones, trail connections, destination routes, emergency corridors, and major recreation viewpoints.
5. **Expand stakeholder collaboration.** Build upon Horizon West's engagement with ASA by conducting field review with Cal4Wheel and other organizations possessing direct knowledge of Heber Dunes, ISDRA, Valley of Names, Ogilby, East Mesa, and surrounding Imperial Valley public lands.
6. **Evaluate functional recreation loss rather than tower-footprint acreage.** Analyze fragmentation, connectivity, displacement, fixed-obstacle hazards, access restrictions, riding-pattern changes, and reduction in usable terrain.
7. **Protect Dune Buggy Flats, Buttercup, Grays Well, Midway, Gordon's Well, Valley of Names, Plank Road, Ogilby-area recreation, Holtville Hot Springs, and other established destinations.** Evaluate both direct effects and effects to the routes and landscapes through which those destinations are accessed.
8. **Protect existing public routes from utility conversion.** No public road, designated BLM route, or lawful OHV connector should become permanently restricted merely because it is incorporated into ITL construction or maintenance access.
9. **Require functionally equivalent access during temporary closures.** Construction closures should be minimized geographically and temporally, coordinated around peak recreation seasons where practicable, and accompanied by safe and legal detours.
10. **Conduct recreation-specific visual analysis.** Prepare visual simulations from actual OHV routes, campgrounds, staging areas, Heber Dunes, Dune Buggy Flats, and other high-use recreation viewpoints.
11. **Quantify economic impacts.** Analyze visitor spending, recreation-related employment, local business activity, permit revenues, construction-season displacement, and long-term visitation effects.
12. **Analyze social and community effects.** Address multigenerational recreation, local community use, family recreation, club traditions, accessibility, stewardship participation, and the scarcity of comparable recreation opportunities.
13. **Apply avoidance before mitigation.** Do not rely on compensatory measures to justify routing through a designated recreation area when a feasible routing concept can avoid that impact.
14. **Coordinate CPUC routing with BLM land-use requirements.** Avoid advancing a state-approved routing concept that conflicts unnecessarily with ISDRA management allocations, the CDCA Plan, DRECP, or other applicable federal recreation and access policies.
15. **Evaluate cumulative recreation loss at the regional scale.** Account for the combined effects of existing and reasonably foreseeable infrastructure and land-use actions on the quantity, quality, connectivity, and character of Imperial Valley recreation.

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Closing

Cal4Wheel believes there is a constructive path forward for the Ironwood Transmission Line, but that path should not run through lands that California and the federal government have already deliberately set aside, planned, funded, and managed for concentrated public recreation when feasible routing concepts can avoid them.

Heber Dunes SVRA presents the clearest example. It is a 343-acre State Vehicular Recreation Area whose central public purpose is OHV recreation. Most of its limited acreage is devoted to open dune and trail use. Horizon West's own routing analysis recognizes Heber Dunes as a constraint, identifies the visual and permitting consequences of crossing it, and demonstrates that routing configurations exist that avoid it. The appropriate response is not to calculate how much industrial infrastructure can be accommodated within the park without exceeding a significance threshold. The appropriate response is to route the ITL outside the park.

The same planning discipline should guide decisions at Imperial Sand Dunes, Dune Buggy Flats, Buttercup, Grays Well, Midway, Valley of Names, Ogilby, and other high-value public-land recreation resources throughout the project corridor.

Cal4Wheel has spent decades working with BLM, California State Parks, other agencies, local communities, and partner organizations to preserve responsible public access in the California Desert. We understand that multiple use requires balance. We also understand that balance cannot mean that existing recreation is repeatedly expected to surrender acreage, access, connectivity, scenic integrity, or functionality whenever a new competing land use is proposed.

Infrastructure development and recreation are not inherently incompatible. Good siting is what makes coexistence possible.

We thank Horizon West for the ground-truthing and stakeholder engagement it has already undertaken, including its work with ASA in the Imperial Sand Dunes area. We encourage the company to broaden that collaboration and invite Cal4Wheel and other knowledgeable recreation stakeholders into the routing process before the project configuration hardens into a final proposal.

Cal4Wheel stands ready to participate constructively with Horizon West, CPUC, BLM, California State Parks, Imperial County, and affected communities. Our objective is an effective, durable solution that accommodates legitimate transmission needs while protecting public-land access, responsible stewardship, established land-use designations, and the recreation opportunities that generations of Californians have worked to preserve.

The governing principle should be simple: **avoid designated recreation lands first; minimize effects to surrounding recreation resources second; mitigate only those residual impacts that genuinely cannot be avoided.**

For Heber Dunes SVRA and other lands specifically established and managed for OHV recreation, avoidance should not be treated as an aspirational benefit. It should be a fundamental routing criterion.

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California Four Wheel Drive Association would like to be considered an interested public for the Ironwood Transmission Line Project.

We appreciate your consideration of our feedback and suggestions.

Sincerely,

Rose Winn
Natural Resources Consultant
California Four Wheel Drive Association

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Magdalena Rodriquez and Brandy Wood, California Department of Fish and Wildlife, 09/21/2026

From: Rodriguez, Magdalena@Wildlife <Magdalena.Rodriguez@wildlife.ca.gov>
Sent: Monday, September 21, 2026 5:04 PM
To: CEQA <CEQA@IronwoodTransmissionProject.com>
Cc: boris.sanchez <boris.sanchez@cpuc.ca.gov>
Subject: Ironwood Transmission Line NOP comment letter

Good afternoon,

Please find the attached comment letter from CDFW for the Ironwood Transmission Line Project.

Magdalena Rodriguez (Senior Environmental Scientist Supervisor)
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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Inland Deserts Region
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September 21, 2026
Sent via email CEQA@IronwoodTransmissionProject.com

Boris Sanchez
California Public Utilities Commission
Attn. A. Surdzial c/o ECORP Consulting, Inc.
215 North 5th Street
Redlands, CA 92374
Subject: Notice of Preparation of a Draft Environmental Impact Report
Ironwood Transmission Line Project
State Clearing House# 2026080073

Dear Boris Sanchez:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) from the Lead agency California Public Utilities Commission (CPUC) for the Ironwood Transmission Line Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project Proponent may seek related take authorization as provided by the Fish and Game Code.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

PROJECT DESCRIPTION SUMMARY

Proponent: Horizon West Transmission, LLC (HWT)

Objective: The Project is proposing construction of a new approximately 86-mile-long 500 kilovolt (kV) transmission line extending between Arizona Public Service Company's (APS) North Gila Substation in Arizona and San Diego Gas & Electric Company's (SDG&E) Imperial Valley Substation in California. The Project is proposed to improve regional transmission reliability and increase transmission system capacity between Arizona and California. Portions of the Project would cross lands administered by the U.S. Bureau of Land Management (BLM). The Proposed Project is intended to mitigate resource deliverability constraints as identified in the California Independent System Operator's (CAISO) 2022-2023 Transmission Plan to enable delivery of new generation in the resource portfolios approved by the CPUC.

The Proposed Project is planned to be operational by 2030 and would include a new transmission line, including a combination of approximately 308 single-circuit guyed and self-supporting steel tubular and lattice structures, conductor, and overhead ground wire (OHGW). The Proposed Project does not include system changes or upgrades within the existing North Gila Substation, which is owned by APS, nor within the existing Imperial Valley Substation, which is owned by SDG&E.

Location: The Project site is in Imperial County, California and Yuma County, Arizona. The Project is generally located south of Interstate 8 and east of the communities of El Centro, Heber, and Calexico in Imperial County, California.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist The Lead agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

CDFW recommends that the forthcoming DEIR addresses the following:

Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

CDFW recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following The Manual of California Vegetation, second edition (Sawyer, Keeler-Wolf, & Evens, 2009). Adjoining habitat areas should also be included in this assessment, where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.

2. A complete, recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern

(CSSC) and California Fully Protected Species (Fish & G. Code, § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary.

Special status species that the Project footprint has the potential to support, include but are not limited to: burrowing owl (*Athene cunicularia*), Crotch's bumble bee (*Bombus crotchii*), flat-tailed horned lizard (*Phrynosoma mcallii*), Desert Tortoise (*Gopherus agassizii*), Bats, Desert kit fox (*Vulpes macrotis*), American Badger (*Taxidea taxus*), Crissal thrasher (*Toxostoma crissale*), Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), vermillion flycatcher (*Pyrocephalus rubinus*), summer tanager (*Piranga rubra*), California black rail (*Laterallus jamaicensis coturniculus*), least bittern (*Ixobrychus exilis*), peregrine falcon (*peregrinus anatum*), ferruginous hawk (*Buteo regalis*), Cooper's hawk (*Accipiter cooperii*), Gila woodpecker (*Melanerpes uropygialis*), double-crested cormorant (*Nannopterum auritum*), osprey (*Pandion haliaetus*), black-tailed gnatcatcher (*Polioptila melanura*), yellow warbler (*Setophaga petechia*), Colorado fringe-toed lizard(*Uma notata*), and desert bighorn sheep (*Ovis canadensis nelsoni*).

Note that CDFW generally considers biological field assessments for wildlife to be valid for a one- year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.

3. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (California Department of Fish and Wildlife, 2018).

4. Species-specific surveys for special status species that the Project footprint has the potential to support, including:

Burrowing owl (*Athene cunicularia*)

On October 10, 2024, the Fish and Game Commission designated burrowing owl as a candidate species under CESA (Fish & G. Code, § 2050 et seq.). During the candidacy period, western burrowing owl will be afforded the same protection as threatened and endangered species under CESA. If Project activities, including relocation, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) should be obtained prior to commencement of Project activities.

Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or

Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

CDFW recommends that the Lead agency follows the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Wildlife, 2012); available for download from CDFW's website: Survey and Monitoring Protocols and Guidelines. The Staff Report on Burrowing Owl Mitigation specifies three steps for Project impact evaluations:

a. A habitat assessment;
b. Surveys; and
c. An impact assessment

As stated in the Staff Report on Burrowing Owl Mitigation, the three progressive steps are effective in evaluating whether a project will result in impacts to burrowing owls, and the information gained from the steps will inform any subsequent avoidance, minimization, and mitigation measures. Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with Fish and Game Code sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project.

Within the 2012 Staff Report, the minimum habitat replacement recommendation was purposely excluded as it was shown to serve as a default, replacing any site-specific analysis and discounting the wide variation in natal area, home range, foraging area, and other factors influencing burrowing owls and burrowing owl population persistence in a particular area. It hypothesized that mitigation for permanent impacts to nesting, occupied, and satellite burrows and burrowing owl habitat should be on, adjacent or proximate to the impact site where possible and where habitat is sufficient to support burrowing owls present. If mitigation occurs offsite, it should include (a) permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) be sufficiently large acreage with the presence of fossorial mammals. Furthermore, the report noted that suitable mitigation lands should be based on a comparison of the habitat attributes of the impacted and conserved lands, including but not limited to: type and structure of habitat being impacted or conserved; density of burrowing owls in impacted and conserved habitat; and significance of impacted or conserved habitat to the species range-wide.

Crotch's bumble bee (*Bombus crotchii*)

The proposed Project occurs within the range of Crotch's bumble bee, a candidate species pursuant to CESA. The Project has the potential to result in permanent and temporary loss, degradation and impacts to Crotch's bumble bee habitat. CDFW recommends the Lead agency conducts surveys consistent with the 2023 CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species over all areas (i.e., 100 percent coverage) proposed to be directly or indirectly affected by the Project using qualified biologists (California Department of Fish and Wildlife, 2023).

If Crotch's bumble bee is found within the Project area during surveys or construction activities, and complete avoidance is not possible CDFW strongly recommends the Lead agency acquires a CESA ITP prior to any vegetation- or ground-disturbing activities. Any take of Crotch's bumble bee without authorization would be a violation of Fish and Game Code section 2080.

Flat-tailed horned lizard (*Phrynosoma mcallii*)

The Project would impact suitable habitat of flat-tailed horned lizard (FTHL), a CDFW species of special concern. This species is found in the Colorado Desert in California, Arizona, and Mexico. It is restricted to areas of fine sand and sparse vegetation in desert wash and desert flat habitats. It is found in creosote bush scrub, succulent shrub, and alkali shrub habitats. This species mostly feeds on ant species – harvester ants being the most common. It requires fine sand for cover which this species will burrow into to avoid extreme temperatures. This species also requires well-drained, sandy, or friable soil for nest construction. Flat-tailed horned lizards are likely to occur in suitable desert wash and desert flat habitats present in the study area. There are CNDDB documented occurrences of the species within 5 miles of the study area.

The DEIR should include a recent inventory of FTHL in accordance with the methods described in the Plan. The DEIR should include an analysis of the Project's potential to directly and indirectly impact the species including direct mortality, loss of habitat, habitat fragmentation, incidental mortality associated with vehicular traffic, loss of primary prey, and predator subsidies. The DEIR should identify and implement all relevant management actions as defined by the Plan. CDFW recommends the Lead agency consults with the Flat-tailed Horned Lizard Interagency Coordination Committee prior to surveying for the Project site for FTHL and during the DEIR's preparation of CEQA avoidance, minimization, and mitigation measures.

Desert Tortoise (*Gopherus agassizii*)

The proposed Project occurs within the range of desert tortoise; a state and federally listed threatened species and state candidate for uplisting to endangered. CDFW recommends that the project proponent complete protocol level surveys over all areas (i.e., 100 percent coverage) proposed to be directly or indirectly affected by the Project, using appropriately qualified biologists, according to protocols in Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019). To reduce the likelihood of nonconcurrence with proposed surveys, methodology, and qualifications of biologists, CDFW recommends working with the USFWS and CDFW concurrently to ensure a consistent and adequate approach to planning your work (USFWS 2019). CDFW recommends that biologists retained to complete desert tortoise protocol level surveys submit their qualifications to CDFW and the USFWS prior to initiation of surveys.

Yuma Ridgway's rail (*Rallus obsoletus yumanensis*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for Yuma Ridgway's rail, a California fully protected species. Vegetation clearing may impact Yuma Ridgway's rails as they require a dense cover of emergent wetland vegetation for protection from predators. Removal of vegetation can also make communities vulnerable to colonization by invasive plant species. Noise from road use, generators, and other equipment may disrupt Yuma Ridgway's rail mating calls which could impact their reproductive success. Noise has been shown to reduce the density of nesting birds. Artificial light may disorient migrating Yuma Ridgway's rails and disrupt their navigation.

The EIR should address Project related impacts to Yuma Ridgway's rail. If Yuma Ridgway's rail are found within the Project area during surveys and complete avoidance is not possible, CDFW recommends the County of Imperial to require the Project proponents acquire a CESA Incidental Take Permit (ITP) according to California Fish and Game Code section 2081.15, prior to any vegetation or ground disturbing activities. Any take of California black rail without take authorization would be a violation of Fish and Game Code.

California black rail (*Laterallus jamaicensis coturniculus*)

The Project site has the potential to provide suitable foraging and/or nesting habitat for California black rail, a California fully protected species. California black rail populations have been documented as declining in California in recent decades primarily as a result of habitat loss and degradation, particularly in southern California. California black rail populations and their required habitat features are vulnerable to both human-caused and natural stressors. Grading, compacting, and filling aquatic habitat could cause direct habitat loss. Construction near a wetland or water feature supporting California black rail would impact the quality of the habitat if dust, debris, petroleum, or other contaminants are discharged off the construction site into the habitat. Vegetation clearing may impact California black rails where they require a dense cover of upland vegetation for protection from predators. Disturbance to nesting rails, such as humans or pets intruding in the marsh, have been reported to cause rails to abandon nests or to try to defend nests, exposing eggs. Intrusion can alter habitat and cause mortality through crushing of rails that generally freeze in place and are hesitant to flush.

The EIR should address Project related impacts to California black rail. If California black rail are found within the Project area during surveys and complete avoidance is not possible, CDFW recommends the County of Imperial to require the Project proponents acquire a CESA Incidental Take Permit (ITP) according to California Fish and Game Code section 2081.15, prior to any vegetation or ground disturbing activities. Any take of California black rail without take authorization would be a violation of Fish and Game Code.

Bats

The Project site has the potential to provide suitable habitat for several bat species (collectively, bats) potentially roosting (day, night and maternal) and foraging habitat, which may include some Species of Special Concern (SSC) including but not limited to: pallid bat (*Antrozous pallidus*) (SSC), Townsend's big-eared bat (*Corynorhinus townsendii*) (SSC), western mastiff bat (*Eumops perotis*) (SSC), western red bat (*Lasiurus blossevillii*) (SSC), western yellow bat (*Lasiurus xanthinus*) (SSC), hoary bat (*Lasiurus cinereus*) (SSC), California myotis (*Myotis californicus*), Arizona myotis (*Myotis occultus*) (SSC), Cave myotis (*Myotis velifer*) (SSC), Yuma myotis (*Myotis yumanensis*) (SSC), Pocketed free-tailed bat (*Myctinopops ferosaccus*) (SSC).

Project construction and activities may result in direct and indirect impacts to bats. Direct impacts include removal of structures occupied by roosting bats. This could result in injury or mortality to bats as well as loss of roosting habitat. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, excavating, and grading), and vibrations caused by heavy equipment.

Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, §251.1). Several bat species are considered SSC. An SSC is a species, subspecies, or distinct population of an animal native to California that

currently satisfies one or more of the following (not necessarily mutually exclusive) criteria: • is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role; • is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed; • is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or • has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status.

The EIR should include results of specific surveys for bats over the Project are proposed to be directly or indirectly affected by Project activities and the results of the surveys included in the EIR, along with avoidance, minimization and mitigation measures, if appropriate. CDFW recommends if active hibernacula or day roosts are identified in the work area or within 500 feet of the work area, during preconstruction surveys, they be avoided to the extent feasible. For maternity roosts, Project construction will only occur between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30). Maternity roosts shall not be evicted, excluded, removed, or otherwise disturbed.

Desert kit fox (*Vulpes macrotis*)

The Project occurs within the range of desert kit fox, a protected species pursuant to Title 14 of the California Code of Regulations Section 460, which prohibits the take of the species at any time. CDFW recommends surveys, following CDFW-approved protocols, be conducted over all areas proposed to be directly or indirectly affected by the Project to determine presence/absence and numbers of desert kit fox, and that this information be included in the EIR.

If desert kit fox is found, or has the potential to occupy the Project site, CDFW recommends the County of Imperial require species-specific mitigation to offset impacts and avoidance, minimization, and monitoring measures aimed at avoiding direct impacts to the desert kit fox be incorporated into the EIR. Avoidance and minimization measures should include pre-activity surveys following CDFW approved survey methods, including procedures used to classify identified dens as inactive dens, active and potentially active dens, and active natal dens, and methods utilized to quantify and locate single or paired animals that would need to be avoided or passively relocated, and the burrows or burrow complexes that would need to be collapsed to prevent re-occupancy. The measures should also include detailed monitoring requirements and methods of exclusion/passive relocation to be conducted, and methods and timing of den excavation.

American Badger (*Taxidea taxus*)

The Project occurs within the range of the American badger, a California species of special concern. CDFW recommends the Project complete surveys for American badger over the Project area proposed to be directly or indirectly affected by the Project activities and that the results of such surveys be included in the EIR, along with avoidance, minimization, and mitigation measures, if appropriate.

If American badgers are found, or have the potential to occupy the Project site, CDFW recommends the County of Imperial require species specific mitigation to offset impacts and avoidance, minimization and monitoring measures aimed at avoiding direct impacts to American badger be

incorporated into the EIR. Avoidance and minimization measures should include pre-activity surveys following CDFW approved survey methods, including procedures used to classify identified dens as inactive dens, active and potentially active dens, and active natal dens, and methods utilized to quantify and locate single or paired animals that would need to be avoided or passively relocated, and the burrows or burrow complexes that would need to be collapsed to prevent re-occupancy. The measures should also include detailed monitoring requirements and methods of exclusion/passive relocation to be conducted, and methods and timing of den excavation.

Desert bighorn sheep (*Ovis canadensis nelsoni*)

Desert bighorn sheep are a fully protected species under Fish and Game Code section 4700(b)(2). Take of this species is prohibited except as authorized consistent with Fish and Game Code section 2081.15. This species is a subspecies of bighorn sheep (*Ovis canadensis*) and is adapted to the desert regions of California, Nevada, Arizona, New Mexico, Utah, Colorado, Texas, and Baja California. California's desert bighorn ranges from the White Mountains in the north to the Mexican border in the south. Their diet includes cacti, grasses, herbaceous plants, shrubs, and a few trees. Desert bighorn sheep are present in the study area and were observed during recent biological reconnaissance surveys. Desert bighorn sheep are likely to occur in suitable open, rocky, steep habitat with available water and herbaceous forage within the study area.

In June 2024, CDFW issued a technical report that evaluated potential impacts to desert bighorn sheep from another Project and included a suite of recommended mitigation measures for those impacts. Among the recommended mitigation measures in that report was the implementation of a minimum 0.25-mile buffer between the Project's perimeter fencing and the 10% slope hinge point to mitigate impacts to foraging habitat, escape terrain, and access to planned wildlife crossings. Absent this mitigation measure, the report determined that long-term indirect impacts to the species would be significant and unavoidable. CDFW continues to recommend this minimum buffer measure. To avoid significant negative demographic impacts, it is essential that desert bighorn sheep access to the relatively flat ground beyond the toe of slopes by preventing project encroachment into a buffer area around those slopes. The flatter areas extending beyond the base of those slopes provide valuable forage during winters when sufficient precipitation combines with warmer temperatures to initiate new growth of grasses and forbs.

The high-quality forage therein provides nutrients essential to maintenance of healthy body reserves, particularly critical to pregnant and nursing female bighorn sheep in mid to late winter (McKinney et al. 2006). Maternal nutrition is in turn strongly correlated to successful recruitment of lambs into the adult population. Biologists understand that maximizing reproduction and recruitment through access to high-quality forage in relatively wet years is key to population persistence through multi-year droughts and ultimately essential to the viability and health of the desert bighorn metapopulation (Cain et al 2017). Desert bighorn sheep persist through challenges of drought, disease, and long-term shifts in temperature and vegetation composition by capitalizing on the abundance available at the base of slopes in wet winters. Although bighorn sheep demonstrate behavioral plasticity and adapt to some human developments and activities, such habituation does not alter the risk-averse nature of bighorn sheep that requires visibility that facilitates detection of predators at a distance(Risenhoover and Bailey 1980; Hayes et al. 1994).

Desert bighorn sheep will avoid a visually occluded sight-line, because any form of 'cover' could conceal their primary predator, the mountain lion. That predator-averse behavior, favoring unobstructed views, is manifest more strongly by females than males (Bleich et al. 1997), and is strongest when distant from steep escape terrain, such as on the flat areas adjacent to slopes. Desert bighorn sheep are expected to maintain a distance of hundreds of meters from the visual obstruction. To avoid significant negative impacts to the population, desert bighorn sheep must maintain the ability to forage on the flats beyond the toe of slopes, and maintain the 'stepping stone' connectivity function of intermediary hills. Avoidance of significant impacts on desert bighorn sheep requires conserving these key habitats by avoiding development on a sufficient buffer area from the toe of slopes.

Western Spadefoot (*Spea hammondii*)

The Project is within the geographic range of western spadefoot (WESP) and suitable habitat may be present within portions of the Project site (e.g., irrigation ditches, sumps, pumps, and wells located in the Project site). On September 24, 2025, the California Fish and Game Commission (Commission) received a petition to list the northern population of WESP as threatened species and the southern population of WESP as an endangered species under CESA. If the Commission takes action and WESP becomes listed as a Candidate for listing pursuant to CESA (possible in 2026), or ultimately becomes listed as threatened or endangered pursuant to CESA, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), is necessary to comply with CESA if full avoidance of WESP cannot be achieved. As such, CDFW recommends a qualified biologist conduct a habitat assessment to determine if the Project site and the immediate surrounding vicinity contain habitat suitable to support WESP as part of the technical studies conducted in support of the DEIR. If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for WESP, using appropriate survey methodologies, in consultation with CDFW. If surveys indicate the presence or potential presence of the species, consultation with CDFW is recommended for guidance on mitigation measures such as avoidance, minimization, and mitigation.

Wildlife Corridors and Habitat Connectivity

California wildlife is losing the ability to move and migrate as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors. California Senate Bill (SB) 790, Assembly Bill (AB) 2344, and AB 1889 all address wildlife connectivity in California and assert authority and responsibility to CDFW and/or local and State agencies to implement wildlife connectivity actions by identifying where they are needed, coordinate and implement those actions, and establish compensatory mitigation credits for actions taken.

The Project could impact wildlife connectivity for many wildlife species that utilize the waterbodies and adjacent habitats. These impacts can lead to reduction of habitat, reduced reproductive success; reduced health and vigor; nest abandonment; loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young); and introduction of debris and/or deleterious materials into river habitats. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosofske et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

As such, CDFW recommends the DEIR incorporates a discussion on foreseeable potential for impacts to wildlife connectivity. CDFW also recommends that activities adjacent to stream or riparian habitats limit impacts to wildlife

connectivity or enhance connectivity through restoration or enhancement of these habitats. CDFW recommends in-depth studies on existing use of the watershed and wildlife corridor adjacent to the project and surrounding areas in order to evaluate the extent of potential impacts on wildlife connectivity and to develop different alternatives. Data collection methods should enable detection of species that have been found to utilize the existing movement corridors. The cumulative impacts of adjacent projects on wildlife corridors should also be considered. For areas where wildlife corridor improvement is considered, pre-construction study results should be used to develop biologically feasible movement corridor improvements. Post-construction monitoring should also assess the use of wildlife movement corridors. CDFW recommends that monitoring data be analyzed, summarized, and results discussed in reports be posted for interested parties and submitted to CDFW and other agencies or organizations that have a duty or interest in the effectiveness of wildlife movement corridors. The DEIR should include an analysis of beneficial and feasible wildlife movement corridors and/or crossings at off-site locations that could be improved or constructed to enhance wildlife connectivity.

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project. To ensure that Project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation), defensible space, and wildlife-human interactions created by zoning of development projects or other Project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address Project-related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post- Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

2. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, groundwater dependent ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

3. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies, and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, groundwater dependent ecosystems, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation Measures for Project Impacts to Biological Resources

The DEIR should identify mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible. The Lead agency should assess all direct, indirect, and cumulative impacts that are

expected to occur as a result of the implementation of the Project and its long-term operation and maintenance. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time (with the exception of certain projects set forth in SB 147, which was passed on July 10, 2023). Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.

2. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and decline at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in The Manual of California Vegetation (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

3. *California Species of Special Concern* (CSSC): CSSC status applies to animals generally not listed under the federal Endangered Species Act or the CESA, but which nonetheless are declining at a rate that could result in listing or historically occurred in low numbers and known threats to their persistence currently exist. CSSCs should be considered during the environmental review process.

4. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement, and preservation should be evaluated and discussed in detail. Where habitat preservation is not available onsite, offsite land acquisition, management, and preservation should be evaluated and discussed in detail.

   The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

   If sensitive species and/or their habitat may be impacted from the Project, CDFW recommends the inclusion of specific mitigation in the DEIR. CEQA Guidelines section 15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (Sundstrom v. County of Mendocino (1988) 202 Cal. App. 3d. 296; Gentry v. County of Murrieta (1995) 36

Cal. App. 4th 1359; Endangered Habitat League, Inc. v. County of Orange (2005) 131 Cal. App. 4th 777).

CDFW recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the Project. Furthermore, for mitigation measures to be effective, they need to be specific, enforceable, and feasible actions that will improve environmental conditions.

5. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: Fish and Game Code section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act, as amended (16 U.S.C. § 703 et seq.).

   CDFW recommends that the DEIR includes the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project- specific avoidance and minimization measures may include but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. If pre-construction surveys are proposed in the DEIR, the CDFW recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project. It is the policy of CESA to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. The California Fish and Game Code requires that CDFW comply with CEQA for issuance of a CESA ITP. CDFW therefore recommends that the DEIR addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of CESA.

Lake and Streambed Alteration Program

Based on review of material submitted with the NOP and review of aerial photography, drainage features traverse the site. Depending on how the Project is designed and constructed, it is likely that the Project Proponent will need to notify CDFW per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to https://www.wildlife.ca.gov/Conservation/LSA/Forms.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a DEIR for the Ironwood Transmission Line Project (SCH No. 2026080073) and recommends that CPUC addresses CDFW's comments and concerns in the forthcoming DEIR. Questions regarding this letter should be directed to Dr. Shankar Sharma, Senior Environmental Scientist Specialist at Shankar.Sharma@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Magdalena Rodriguez
938A012E7285407...

For

Brandy Wood
Environmental Program Manager I

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