

Appendix L

Coast Live Oak Disturbance

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February 4, 2014

Mr. Jensen Uchida, Energy Division
California Public Utilities Commission

Ms. Rachel James, Project Manager
Ecology & Environment, Inc.

Subject: SCE Santa Barbara County Reliability Project, Project Disturbances to Coast Live Oak Riparian Forest and Other Special Status Natural Communities, Response to CPUC's Request for Additional Information

Dear Mr. Uchida and Ms. James:

Southern California Edison (SCE) is submitting this letter in response to the California Public Utilities Commission's (CPUC) request for additional information concerning special status natural communities that may be disturbed by the Santa Barbara County Reliability Project (SBCRP). As requested by the CPUC during a conference call with SCE on January 23, 2015, this report includes the methodology for calculating the acreages of potential disturbance to Southern Coast Live Oak Riparian Forest that were included in SCE's comments on Table 4.4-3 on page 4.4-34 of the Draft Environmental Impact Report (DEIR; included below). A discussion of potential disturbance acreages to all other special status natural communities has also been included.

Coast Live Oak Riparian Forest Determination for DEIR

The DEIR states that "because the applicant's field survey did not distinguish between the different [Coast Live Oak Woodland alliance] communities, all Coast Live Oak Woodland in the project area is considered special status in this document." However, only the Southern Coast Live Oak Riparian Forest is deemed sensitive by the California Department of Fish and Wildlife (CDFW). Therefore, SCE updated the project's Coast Live Oak Woodland mapping to identify where Southern Coast Live Oak Riparian Woodland occurs within the project area. The following describes how SCE identified Southern Coast Live Oak Riparian Forest in the project area utilizing existing field survey data and GIS analysis, to determine potential project related disturbances to this special status vegetation community.

The "Southern Coast Live Oak Riparian Forest" layer designation was generated through a GIS analysis consisting of attribute filters, buffering of features, and the clip, union, and intersect geoprocessing tools. The analysis was conducted using ESRI's ArcMap 10.1. Field and project data utilized for this analysis were provided to the CPUC for the DEIR and included the 2012 mapped vegetation data (BRC GIS, 2012), the 2013 jurisdictional delineation (Wetland and Other Waters Delineation Report; BRC, 2013), and the 2012 and 2013 update SCE project engineering design files (SCE GIS, 2012-2013). The methodology for calculating the project disturbance acreages to Southern Coast Live Oak Riparian Forest is outlined below.

Step 1 – Identify riparian corridors: Drainages throughout the project area were buffered by 50 feet on each side (100 feet total diameter). This buffer was selected as it was the average maximum mapped width of the CDFW’s jurisdiction within the project area (excluding Cañada Larga Creek which is no longer a location where part of the project will be constructed). The buffered drainage layer was then combined with the existing CDFW jurisdictional layer to include any additional CDFW mapped riparian areas greater than 100 feet in width and/or outside of the original drainage buffer. The resulting layer was designated the “riparian corridor.”

Step 2 – Identify coast live oak riparian habitat: The coast live oak vegetation community was extracted from the 2012 mapped vegetation layer. Additionally, any coast live oak woodland communities that were mapped during the jurisdictional delineation and any areas mapped as coast live oak riparian forest by the California Natural Diversity Database (CNDDDB; December, 2013) were merged with the 2012 coast live oak vegetation data layer. This combined layer, which represented all coast live oak habitat mapped within the project area, was then overlaid onto the riparian corridor layer from Step 1. All coast live oak designated areas which fell within the mapped riparian corridor from Step 1 were retained and designated as the final “Southern Coast Live Oak Riparian Forest” layer.

Step 3 – Identify ground disturbing activities: The disturbance area was defined as all proposed sites where ground disturbance activities would occur, including but not limited to: crane pads, tower and pole laydown areas, demolition sites, pull-tensioning sites, tower foundation removal sites, helicopter landing sites, guard structures, material yards, drainage control sites, new access roads, and existing access road improvement areas. Note, to remain consistent with how disturbances acreages were calculated by the CPUC for the DEIR, the disturbance area did *not* include existing access road maintenance which will be conducted as part of the project (discussed in further detail below).

The tower footing removal locations were identified as point data features (as opposed to an area feature); therefore a 0.13 acre disturbance footprint was added around each footing removal location (estimated disturbance footprint per tower; SCE, 2012).

All proposed ground-disturbing project components were identified as either permanent or temporary disturbances. Permanent or temporary disturbance areas that overlapped were merged to create individual polygons. Any individual polygon subject to both temporary and permanent disturbances (e.g., temporary footprint to install a permanent drainage control device) was classified as a permanent disturbance. The resulting layer was designated as the “ground disturbance layer.”

Step 4 – Identify potential project disturbance acreages: The ground disturbance layer was overlaid onto the Southern Coast Live Oak Riparian Forest layer. Temporary and permanent disturbance acreage calculations were generated based on areas of Southern Coast Live Oak Riparian Forest that fell within the ground disturbance layer.

Utilizing this methodology, SCE calculated the potential disturbance acreages to Southern Coast Live Oak Riparian Forest and submitted comments to the DEIR with the following suggested edits to Table 4.4-3 (SCE also noted that temporary and permanent disturbance acreages did not sum across or down correctly):

“Table 4.4-3. Special Status Plant Communities found within the Project Area

Special Status Plant Communities	Segment (s) of Occurrence	Temporary Disturbance Acreage ¹	Permanent Disturbance Acreage	Total Disturbance Acreage
Coast Live Oak <u>Riparian</u> Woodland	1, 2, 3B, 3A, 4	6.69 <u>0.06</u>	6.69 <u>0.18</u>	14.70 <u>0.24</u>
Southern California Black Walnut Woodland	2	0.12	0.12	0.20
Southern Sycamore Alder Riparian Woodland	2	0.01	0.01	0.11
Total Acreage		1.54	6.83	8.18
Riparian Communities ²	4	n/a	n/a	0.49

Source: SCE 2012, BioResources 2013e

Notes:

¹ Disturbance area is defined as all proposed project sites where ground disturbance could occur, including crane pads, laydown areas, pull-tensioning sites, tower foundation removal sites, associated yards, new spur roads, and sections of existing roads to be widened.

² The estimate for riparian habitat impacts is based on the calculated impacts on waters of the state (BioResources 2013e), and the actual amount of riparian habitat may change.”

Updated Potential Disturbances to Special Status Natural Communities

As part of the current regulatory permitting efforts for the SBCRP, SCE has recently completed a Biological Resource Assessment (BRA). The purpose of the BRA is to provide an update and supplement to the Biological Technical Report (BRC, 2012) prepared as part of the Proponent’s Environmental Assessment (PEA; SCE, 2012). Updated field and project data utilized for the BRA included the 2014 mapped vegetation data (BRC GIS, 2014), the 2014 jurisdictional delineation (BRC, 2015), and the 2014 SCE project engineering design files (SCE GIS, October 31, 2014). Potential temporary and permanent disturbances to special status natural communities were calculated utilizing the same general methodology described above, but also included disturbances that may result from existing access road maintenance activities that would be completed as part of the SBCRP. The following special status plant communities’ disturbance table has been included in the BRA (reorganized to be comparable to Table 4.4-3 in the DEIR). Special status natural communities occurring within the project area are shown on Figure 1A-C below (also included in the BRA in Appendix A: Figure 5A-C).

Table 2. Potential Disturbance to Special Status Natural Communities

Special Status Plant Communities	Temporary Disturbance Acreage ¹	Permanent Disturbance Acreage ¹	Total Disturbance Acreage ¹	Segment(s) With Disturbances
Southern Coast Live Oak Riparian Forest	1.62	1.31	2.93	1, 2, 3B, 4, 5
Southern California Black Walnut Woodland	0.16	0.20	0.36	2, 3B
Southern Sycamore Alder Riparian Woodland	0.24	0.01	0.25	2
Southern Riparian Scrub	0.47	0.46	0.93	1
Total Acres	2.49	1.98	4.47	

¹ Disturbance area is defined as all proposed sites where ground disturbance activities would occur, including but not limited to: crane pads, tower and pole laydown areas, demolition sites, pull-tensioning sites, tower foundation removal sites, helicopter landing sites, guard structures, material yards, new access roads, existing access road improvement areas, and existing access road maintenance areas.

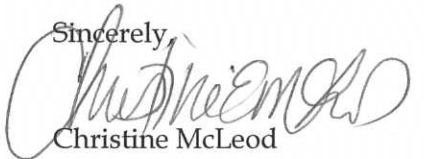
During our call on January 23, 2015, the CPUC noted that disturbance acreages to special status natural communities included in the DEIR were conservative to ensure that potential disturbances would be no greater than what was analyzed in the DEIR. However, based on an examination of the temporary and permanent disturbance acreages to Southern California Black Walnut Woodland and Southern Sycamore Alder Riparian Woodland reported in Table 4.4-3 of the DEIR, SCE concluded that potential disturbances to these communities did not include disturbances due to existing access road maintenance, as noted earlier in this letter. Therefore, to remain consistent with how disturbances to these communities had been determined by the CPUC, SCE did not include access road maintenance activities in the above referenced ground disturbance layer when determining potential disturbances to Southern Coast Live Oak Riparian Forest for the purpose of commenting on the DEIR. As noted above, however, these disturbances were included in the BRA.

SCE anticipates that potential disturbances to special status natural communities will be similar to what is currently provided in the DEIR (with the exception of the original Coast Live Oak Woodland disturbance acreage). However, with inclusion of the existing access road maintenance activities to the disturbance area, coupled with the updated project engineering and field resource data, SCE anticipates that the temporary and permanent disturbance acreages to special status natural communities may be greater than what has been included in the DEIR (see above tables). Accordingly, SCE recommends that the FEIR include the updated disturbance acreages, as provided in the attached BRA. Per our call on January 23, 2015, SCE understands that it is not the CPUC's expectation that mitigation for impacts to special status natural communities would be based on the DEIR, but rather the final disturbance acreages included in the project's Habitat Restoration and Mitigation Plan (HRMP; MM BIO-5 in the DEIR), which will be provided to the CPUC for review and approval upon finalization of project engineering design and prior to execution of the project. Therefore, SCE further recommends that the FEIR also note that the actual amount of habitat disturbed may be subject to change based on final engineering, but that such changes would not be significantly different

than what has been analyzed in the DEIR and would be reviewed and approved by the CPUC upon receipt of the HRMP.

Please let me know if you have any questions.

Sincerely,



Christine McLeod
Regulatory Principal Advisor

Enclosure