

Southern California Edison
A.23-03-005 – Cal City PTC

DATA REQUEST SET E D - S C E - 0 0 5

To: Energy Division
Prepared by: Rey Gonzales
Job Title: Sr. Environmental Project Manager
Received Date: 7/24/2024

Response Date: 8/7/2024

Question 02. a-c:

With the understanding that the full species reports are not expected to be completed until September of 2024, please provide brief summaries of these reports to include the following basic information:

- a. Tortoise (survey dates, methods, and findings)
- b. Burrowing owl (dates, methods, and findings)
- c. Joshua tree (changes from prior report- are there new map locations?

Confirm/specify if any other new special plant specimens found).

Response to Question 02. a-c:

The requested survey summaries are included below, and PDF documents are attached (respective file names indicated below).

a. **Desert tortoise**

Desert Tortoise (DETO) surveys were conducted on the following 2024 dates: 4/22 – 4/25, 4/27 – 5/4, 5/13 – 5/17, 5/20 – 5/24, 5/27 – 6/1. All surveys were conducted based on the survey protocol described in the 2010 USFWS Desert Tortoise Survey Protocol (attached to this response as A. 23-003-005 ED-SCE-005 Q. 2_2010 USFWS Desert Tortoise Protocol).

Approximately 4,641 acres of potentially suitable DETO habitat were identified within the 4,789-acre Survey Area. The 2024 DETO survey resulted in the documentation of 10 adult DETO (≥ 180 mm midline carapace length [MCL]) and one (1) sub-adult (< 180 MCL, not young-of-year) DETO that had an MCL of 75 mm. No DETO hatchlings (young-of-year) were observed. In addition to the live individuals, biologists recorded 28 burrows or pallets, three carcasses, and eight scat. Incidental observations of desert tortoise documented by biologists during other surveys completed in 2024 to date included six live individuals, 16 burrows or pallets, and one carcass.

b. **Burrowing owl**

Burrowing owl (BUOW) surveys were conducted on the following 2024 dates:

- Survey 1: 3/4 - 3/8, 3/11 – 3/15, 3/18 – 3/27
- Survey 2: 4/23 – 4/25, 4/27, 4/29 – 5/2
- Survey 3: 6/3 – 6/4

- Survey 4: 7/9 – 7/11

All surveys were conducted based on the survey protocol described in the 2012 CDFW Staff Report on Burrowing Owl Mitigation (attached to this response as A. 23-003-005 ED-SCE-005 Q. 2_2012 CDFW Burrowing Owl Staff Report).

Approximately 9,308 acres of potentially suitable BUOW habitat were identified within the 9,610-acre Survey Area. The 2024 BUOW survey resulted in the documentation of five live BUOW (including one pair), nine active burrows, 10 inactive burrows (burrows with old BUOW sign but no evidence of being active during 2024 survey visits), and 56 potential burrows (suitable burrows including those being used by other species [canid, rodents] as well as burrows that had potential but later became unsuitable [e.g., collapsed]). No incidental observations of BUOW or sign were documented by biologists during other surveys completed in 2024 to date.

c. **Western Joshua tree**

Western Joshua tree (WJT) census surveys were conducted in March 2024 and followed the WJT census instructions outlined on the CDFW website:

<https://wildlife.ca.gov/Conservation/Environmental-Review/WJT/Permitting/Census-Instructions>).

The WJT census surveys recorded 30 WJT individuals within 250 feet of the Proposed Project, which is 14 more than were described in the 2023 Proponent's Environmental Assessment (PEA).

No additional special status plant species were recorded during the WJT census survey.

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Question 04:

Clarify how the more recent aquatic resources survey effort was different from the prior survey such that it is now identified as a “formal delineation.”

Response to Question 04:

A preliminary Aquatic Resource Assessment (ARA) was performed in support of the Proponent’s Environmental Assessment (PEA, 2023), with field work and reporting conducted in 2021 and 2022. The more recent Aquatic Resource Delineation (ARD, 2024) was performed in support of agency permitting and differs from the prior ARA in several ways. The study area for the ARA (2021-2022) was considerably larger, as it initially included a survey corridor along a planned alignment, then was adjusted and expanded where necessary to accommodate new or shifting Proposed Project components as design progressed. The study area surveyed for the ARD (2024) was more refined, based on the established Proposed Project design, and therefore smaller. Furthermore, the recent ARD focused only on aquatic features potentially under the jurisdiction of federal and state agencies, rather than all aquatic resources (including non-jurisdictional resources) within the study area.

In addition to the more focused geographic and jurisdictional extent, additional data were collected during the ARD that were not collected during the preliminary ARA. For example, each aquatic feature was more rigorously assessed in the ARD, with the vegetation community and soil texture recorded. For a representative sample of non-wetland waters, datasheets documenting the lateral limits of non-wetland waters were completed by recording the presence of physical characteristics indicative of the ordinary high-water mark, following applicable federal guidelines and procedures, including break in bank slope, evidence of bedload transport, and changes in vegetation. During the ARD, delineators also evaluated all potential wetland features for the presence of wetland indicators; specifically, hydrophytic vegetation, hydric soils, and wetland hydrology, according to routine delineation procedures. These additional data collected during the ARD and in support of an Aquatic Resources Delineation Report (ARDR; 2024) provide a more detailed description of the potentially jurisdictional aquatic features in the study area and are therefore more suitable for presentation to the appropriate agencies for verification and permitting purposes.

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Question 05:

Provide specific data related to the final wetland delineation/aquatic resources jurisdictional determination to show any changes to aquatic resources as compared to the prior version of aquatic resources mapping.

Response to Question 05:

A table comparing the acreages of potential waters of the United States, waters of the State, and California Department of Fish and Wildlife (CDFW) jurisdictional lakes and streambeds mapped within the Study Areas for each aquatic resources mapping effort (2021-2022 and 2024) is attached to this response (A. 23-003-005 ED-SCE-005 Q. 5 Potentially Jurisdictional Features Comparison). Aquatic resources mapped in the Study Area for the Proposed Project during the preliminary Aquatic Resources Assessment effort in 2021-2022 are summarized in Table 5.4-3 of the Proponent's Environmental Assessment (PEA). Aquatic resources mapped in the Study Area for the most recent aquatic resources delineation effort (2024) are summarized in Table 1 of the Aquatic Resources Delineation Report for the Cal City Substation 115 kV Upgrade Project (attached to this response as A. 23-003-005 ED-SCE-005 Q. 5 ARDR for the Cal City Substation 115 kV Upgrade Project).

The Study Area for the preliminary Aquatic Resources Assessment completed in 2021-2022 is considerably larger, as it was adjusted and expanded where necessary to accommodate Proposed Project components as design progressed. Consequently, the Study Area around the Proposed Project for the preliminary Aquatic Resources Assessment (2021-2022) data described in the PEA was approximately 3,645 acres, while the Study Area for the recently completed Aquatic Resources Delineation Report (2024)—which includes a 100-foot buffer of all Proposed Project components—is approximately 2,048 acres.

Lastly, GIS data for the recently completed jurisdictional delineation effort will be attached to the response to Question 1 of this data request and is also attached to this response (A. 23-003-005 ED-SCE-005 Q. 5 ARDR 2024 GIS Data).

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Question 06:

Please provide any related agency correspondence pertaining to the jurisdictional determination, if available.

Response to Question 06:

Pre-filing agency communication is summarized in Appendix G of the Proponent's Environmental Assessment (PEA). Since filing in March 2023, Southern California Edison (SCE) met with California Department of Fish and Wildlife (CDFW) staff via Microsoft Teams virtual conferencing on April 17, 2024. The meeting was attended by CDFW staff from both Region 4 (Benessa Galvan and Linda Connolly) and Region 6 (Heather Brashear and Kyle Maxwell), as well as SCE staff (Rey Gonzales) and Rincon Consultants (John Sisser, Andrew Sandahl, and Owen Routt). During the meeting, SCE and Rincon provided an overview of the project scope and status. SCE and Rincon also provided an update on all biological field surveys completed, in progress, or scheduled, including the jurisdictional delineation, burrowing owl and desert tortoise protocol surveys, and western Joshua tree census. At the time of the meeting, the jurisdictional delineation fieldwork had been completed. CDFW was made aware that nearly the entire alignment was surveyed on the ground, with limited desktop analysis required due to access restrictions. SCE also noted that it would be completing the jurisdictional delineation reporting in Summer 2024 and likely applying for a Lake and Streambed Alteration Agreement (LSAA) pursuant to Section 1600 *et seq.* of the California Fish and Game Code in Fall 2024. SCE inquired as to whether a single LSAA notification should be submitted to CDFW or whether two notifications (one to each region) would be required. CDFW suggested this may be determined at a later date and follow up was recommended.

No further agency correspondence with respect to the jurisdictional delineation has occurred. However, SCE does hold recurring monthly meetings with CDFW staff to discuss programmatic priorities and updates. The Cal City Substation 115 kV Upgrade Project is occasionally discussed at those meetings, though discussion is generally limited to project timeline and status updates and has not included information specific to the jurisdictional delineation effort to date.