Appendix E-3

Supplemental Memorandum
Alternative Gen-tie and Access Road Survey

Date: November 17, 2020

To: Aspen Environmental, Clearway Energy

From: Ironwood Consulting, Inc.

Subject: Arica and Victory Pass Alternative Gen-tie and Access Road Survey, Fall 2020

This memo report presents the methods and results for a supplemental wildlife and plant survey conducted for the Victory Pass Solar Project (Project) during the Fall 2020 season to capture biological data for a gen-tie alignment alternative to the Red Bluff substation and an access road to the Project site.

BACKGROUND

Full coverage wildlife and plant surveys for the Project site were previously completed in Fall 2019 and Spring 2020 for the entirety of the Project site (Figures 1, 2). A gen-tie alternative was recently identified that travels west of the Project site, crossing the proposed Oberon Renewable Energy Project (Oberon) and south of Interstate Highway 10 (I-10) to the western edge of the Red Bluff substation. An access road from the I-10 Corn Springs exit heading northwest to the Project site was also identified.

Only areas not previously surveyed for the gen-tie alternative and access road routes were included in the Fall 2020 supplemental survey. The survey area for the gen-tie alternative excluded areas that crossed either the Project site itself or Oberon because those areas were previously surveyed in the Fall 2019 and Spring 2020 seasons. The survey area for the access road in Fall 2020 also excluded areas that were previously surveyed by the proposed DC-50 Solar Project in 2018 (Figure 3).

METHODS

Pedestrian belt transects for the Fall 2020 supplement survey were employed at 10-meter widths to comply with protocol desert tortoise surveys (USFWS 2019) and plant surveys (CNPS 2011). The survey corridor for the gen-tie alternative was 1100 feet (335 meters), with 550 feet (168 meters) on each side of the centerline. The survey corridor for the access road was 300 feet (91 meters) with 150 feet (46 meters) on each side of the centerline and employed the same 10-meter width pedestrian belt transects.

All wildlife and plant species observed were noted, regardless of conservation status. Any special status species and sign observed were recorded on standardized digital Zerion iForms software. This included:

- Desert tortoise live individuals and sign
- Special status birds, including large tree cavities
- Kit fox, coyote, and badger burrows/dens regardless of activity status
- Burro deer live individuals and sign
- Live bats or sign of roosts
- Special status plants, cacti (non-cholla) and creosote bush rings
- Invasive plant species

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A handheld Global Positioning System (GPS) unit was used to collect backup data for each occurrence of sensitive species recorded with a unique identifier number that was also recorded on the digital Zerion iForms.

RESULTS

Fall 2020 Supplemental Survey

The survey was conducted on October 30, 2020 by Ironwood biologists Jason St. Pierre and Mandy Wegman, both familiar with flora and fauna within the Chuckwalla Valley. Temperatures during that day were 55-87 degrees Fahrenheit, with a steady breeze at 0-5 mph and clear skies.

Vegetation communities observed consisted of primarily creosote bush scrub, synonymous to creosote bush (*Larrea-tridentata) burro bush (Ambrosia dumosa)* shrubland alliance and some desert dry wash woodland, synonymous with blue palo verde (*Parkinsonia florida*) ironwood (*Olneya tesota*) microphyll woodland alliance. Elevation was approximately 760 feet (232 meters).

Wildlife: The live individual and sign for special status species observed is summarized below and included in Table 1, Figure 2.

- Desert tortoise *(Gopherus agassizii)* – federally threatened, state threatened*:* Two class 2 (good condition) tortoise burrows were identified south of the I-10 west of the Red Bluff substation. One burrow had class 3 scat (good condition) associated with it (photos 1,2).
- Loggerhead shrike (*Lanius ludovicianus*) – USFWS bird of conservation concern, state species of special concern: One live individual observed flying near the access road.
- Burro deer *(Odocoileus hemionus eremicus)* – California protected game species*:* Three areas of burro deer sign was observed. There were two areas of tracks on the access road (photo 3) and one area just north of the survey area and I-10).
- Desert kit fox (*Vulpes macrotis arsipus*) - California fur-bearing mammal: Only a kit fox marking area with several pieces of scat was identified during the surveys. No new kit fox sign was observed within the survey area (photo 4).

Plants: No special status plant species were observed. All plant species observed were consistent with what was previously identified in earlier surveys the Project site.

All incidental species and plants observed were consistent with those previously observed on the Project surveys and summarized in Tables 2 and 3.

Overlapping Survey Results from Oberon Solar Project (Fall 2019, Spring 2020)

Survey results from the Oberon Solar Project that overlaps with the gen-tie alternative area include (Ironwood 2020):

- Burro deer: 2 areas observed with scat
- Couch's spadefoot toad – only one area of potential habitat observed; location of water accumulation that can be inspected should sufficient rain in appropriate temperatures occur
- Cacti
    - 6 individuals of barrel cactus (*Ferocactus cylindraceus*)
    - 3 individuals of beavertail cactus (*Opuntia basilaris*)

    - 2 individuals of Engelman's hedgehog cactus (*Echinocereus engelmannii*)
- Invasive plant species
    - 3 areas of Sahara mustard (*Brassica tournefortii*)
    - 1 area of tumble weed (*Salsola tragus*)

Spring 2018 surveys from DC-50 Project

Survey results from the DC-50 project did not have any sensitive data that overlapped with the access road. No sensitive plant or wildlife species were found within that survey area (Ironwood 2018).

Table 1. Special Status Species Observations, Fall 2020

Date	Species	Sign Type	Comments
10/30/2020	Desert tortoise	Burrow	Class 2
10/30/2020	Desert tortoise	Burrow	Class 2 burrow with class 3 scat
10/30/2020	Loggerhead shrike	Live individual	Flying, perching
10/30/2020	Burro deer	Tracks	-
10/30/2020	Burro deer	Tracks	-
10/30/2020	Burro deer	Tracks	-
10/30/2020	Kit fox	Marking area	Several pieces of scat

Table 2. Wildlife Species Observed, Fall 2020

Common Name	Scientific Name
Black tailed jackrabbit	*Lepus californicus*
Desert wood rat	*Neotoma lepida*
Bewick's wren	*Thryomanes bewickii*
Chipping sparrow	*Spizella passerina*
Coyote	*Canis latrans*
Verdin (inactive nest)	*Auriparus flaviceps*
Side blotched lizard	*Uta stansburiana*

Table 3. Plant Species Observed, Fall 2020

Family	Scientific Name	Common Name
Asteraceae	*Ambrosia salsola*	cheesebush
Asteraceae	*Bebbia juncea var. aspera*	rush sweetbush
Asteraceae	*Encelia farinosa*	brittlebush
Boraginaceae	*Cryptantha angustifolia*	narrow leaved cryptantha
Boraginaceae	*Cryptantha barbigera*	bearded cryptantha
Boraginaceae	*Cryptantha maritima*	Guadalupe cryptantha
Brassicaceae	*Brassica tournefortii*	Sahara mustard
Brassicaceae	*Lepidium lasiocarpum*	pepperweed
Cactaceae	*Cylindropuntia ramosissima*	diamond cholla
Fabaceae	*Olneya tesota*	desert ironwood
Fabaceae	*Parkinsonia florida*	blue palo verde
Fabaceae	*Senegalia greggii*	catclaw acacia
Krameriaceae	*Krameria bicolor*	white rhatany
Lamiaceae	*Condea emoryi (= Hyptis emoryi)*	desert lavender
Plantaginaceae	*Plantago ovata*	wooly plantain
Poaceae	*Schismus barbatus*	common mediterranean grass
Polygonaceae	*Chorizanthe brevicornu*	brittle spineflower
Polygonaceae	*Chorizanthe rigida*	devil's spineflower
Polygonaceae	*Eriogonum thomasii*	Thomas' buckwheat
Solanaceae	*Lycium andersonii*	Anderson's desert thorn
Zygophyllaceae	*Larrea tridentata*	creosote bush

REFERENCES

U.S. Fish and Wildlife Service (USFWS). 2019. Preparing for any Action that May Occur within the Range of the Mojave Desert Tortoise (*Gopherus agassizii*) 22 pp.

California Native Plant Society (CNPS). June 2, 2011. CNPS Botanical Survey Guidelines. 3pp

Ironwood Consulting Inc (Ironwood) 2018. Wildlife and Plant Memos for DC50 Biological Survey Areas for the Proposed Gen-tie Line and Access Roads, Spring 2018. Submitted to Tetra Tech on June 5, 2018.

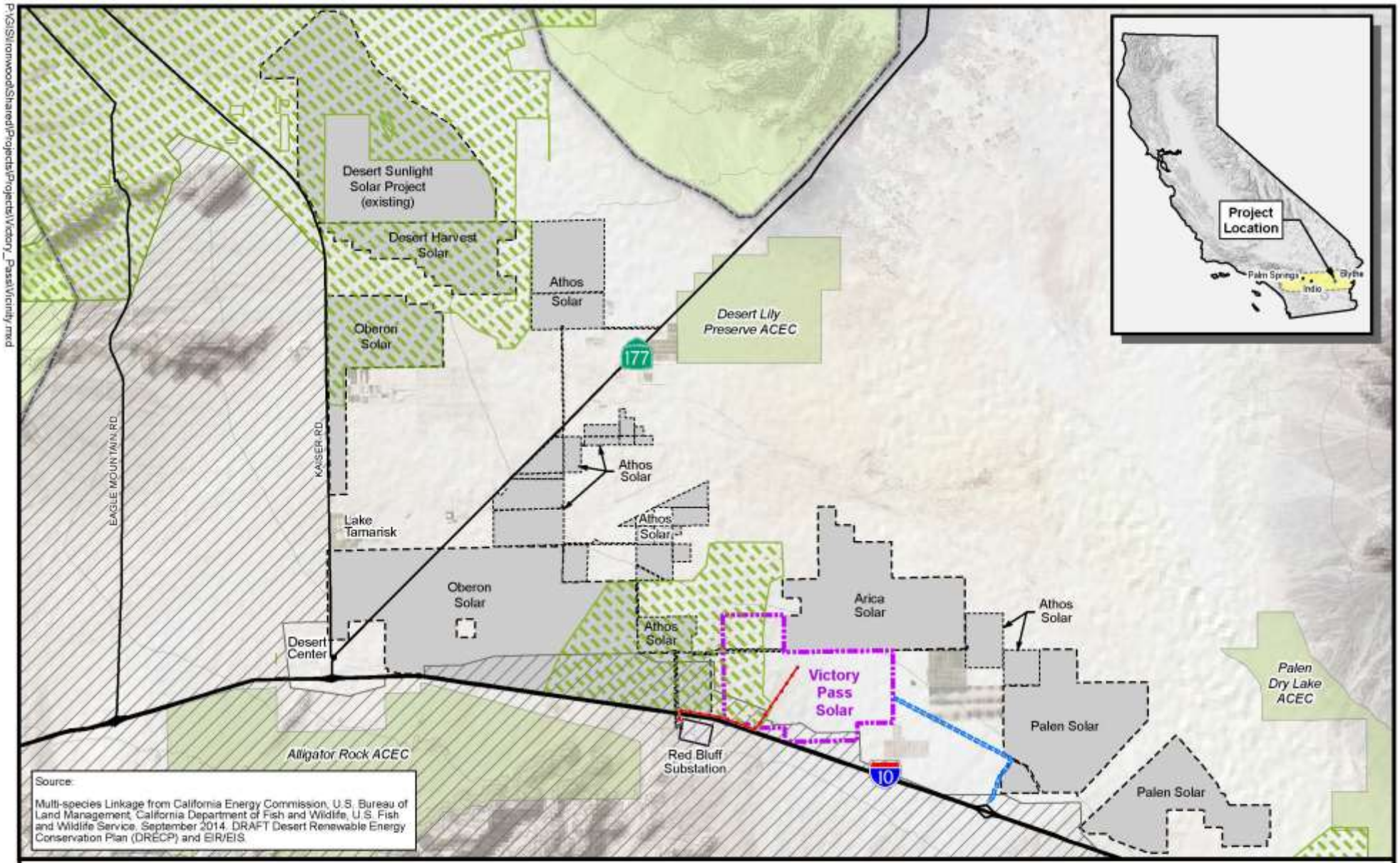
Ironwood Consulting Inc (Ironwood) 2020. Biological Resources Technical Report for Oberon Renewable Energy Project Draft. Submitted to Aspen Environmental and Intersect Power November 2020.

Photo 1. Desert tortoise burrow

Photo 2. Desert tortoise scat

Photo 3. Burro deer tracks

Photo 4. Kit fox marking area


P:\GIS\Ironwood\Shared\Projects\Victory_Pass\Vicinity.mxd
Project Location
Palm Springs
Blythe
Indio
Desert Sunlight Solar Project (existing)
Desert Harvest Solar
Athos Solar
Oberon Solar
Desert Lily Preserve ACEC
177
EAGLE MOUNTAIN RD
KAISER RD
Lake Tamarisk
Athos Solar
Athos Solar
Athos Solar
Oberon Solar
Arica Solar
Athos Solar
Desert Center
Athos Solar
Victory Pass Solar
Palen Solar
Palen Dry Lake ACEC
Alligator Rock ACEC
Red Bluff Substation
10
Palen Solar
Source:
Multi-species Linkage from California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service. September 2014. DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
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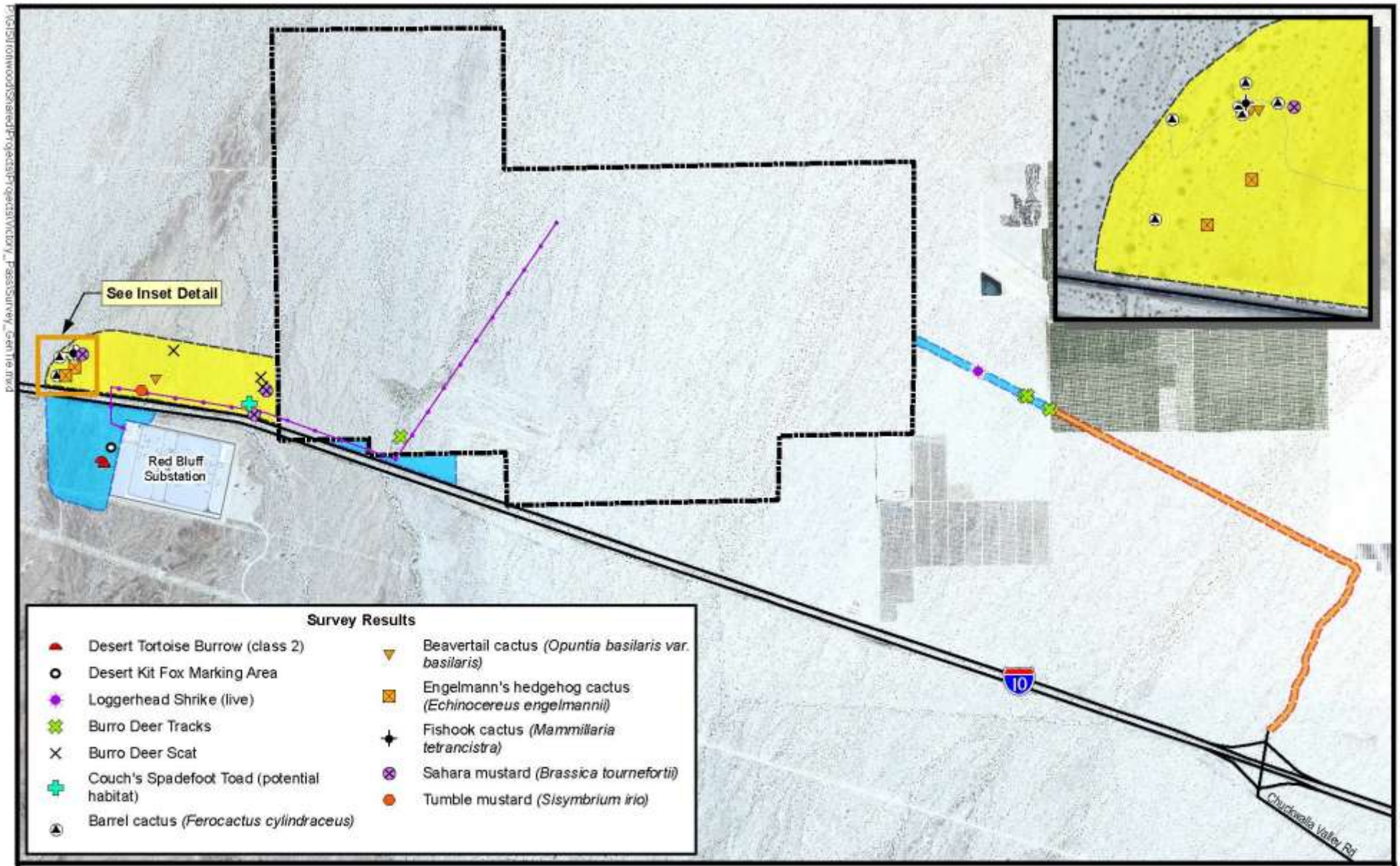
0
1
2
Miles
Alternative Gen-Tie Route
Proposed Access Road
Victory Pass Solar Project
Desert Tortoise Conservation Area
Multi-Species Linkage Area
Area of Critical Environmental Concern (ACEC)
Joshua Tree National Park
Solar Project Boundary
FIGURE 1
General Vicinity
Victory Pass Solar


See Inset Detail
Red Bluff Substation
10
Churchwalla Valley Rd
Survey Results
Desert Tortoise Burrow (class 2)
Desert Kit Fox Marking Area
Loggerhead Shrike (live)
Burro Deer Tracks
Burro Deer Scat
Couch's Spadefoot Toad (potential habitat)
Barrel cactus (Ferocactus cylindraceus)
Beavertail cactus (Opuntia basilaris var. basilaris)
Engelmann's hedgehog cactus (Echinocereus engelmannii)
Fishook cactus (Mammillaria tetrancistra)
Sahara mustard (Brassica tournefortii)
Tumble mustard (Sisymbrium irio)
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0 1,000 2,000
Feet
Alternative Gen-Tie Route
Victory Pass Solar Project Boundary
Survey Areas
Spring 2018
Fall 2019/Spring 2020
Fall 2020
FIGURE 2
Supplemental Gen-Tie Survey Areas and Results
Victory Pass Solar