

BIOLOGICAL RESOURCES REPORT

MICHELLE SUBSTATION PROJECT

IMPERIAL, CA

February 12, 2026





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1. INTRODUCTION

1.1 Project Location

The proposed Michelle Substation Project (Project) is located on Assessor Parcel Number (APN) 044-220-093, which is an approximately 2.95-acre parcel on the west side of Dogwood Road immediately north of Central Drain. As shown in Figure 1: Regional Location Map and Figure 2: Site Location Map, it is located in the southeastern corner of the City of Imperial and is approximately 0.45 miles south of Aten Road and 3.0 miles north of Interstate I-8 Freeway. The parcel is included in the Victoria Ranch Specific Plan (VRSP) area and has been dedicated to the IID as an easement area for the purpose of infrastructure uses.

1.2 Project Description

Michelle Substation Project

The Michelle Substation Project (Project) is located within the boundaries of Assessor Parcel Number (APN) 044-220-093 (Figure 3: Site Plan) and is bounded by an unpaved access road to the south, Dogwood Road on the east, and agricultural uses to the north and west. The proposed substation would include the installation of one 25-MVA substation transformer with four distribution feeders and associated equipment. The Project proposes to include the area and support equipment for an additional 25-MVA substation transformer accommodating four distribution feeders with the intent to install the second transformer as the need emerges. The entire 2.95-acre site is proposed to be cleared of agricultural uses and graded to accommodate the substation development.

The Project includes the following components:

- Control room
- Communication Fiber Optic
- Relay Protection Panels
- Station service
- Automatic transfer switch
- DC batteries
- 92/13.2 kV Transformer
- 92 kV Breakers
- 12.47 kV Breaker Feeders
- Regulators
- Capacitor Banks

Construction of the new distribution substation will include installation of reinforced structural concrete slabs to support the transformers, 92k Steel Structures, 92KV Breakers, 12.47 Breaker Feeders assemblies, control building and other necessary components.

Prior to installation of the electrical substation, the Project site would be cleared of debris and vegetation. Minimal site grading would be required for the installation of the system. Construction equipment would include the following: bobcat or tractor with mower attachment, dump truck, grader, water truck, backhoe, forklift, pile driving rig, and generator. Dust generation would be minimized by use of the water truck.

Installation of new distribution and transmission lines will be required for the high-voltage substation tie-ins and the outgoing connections for the four new distribution feeders. No new power poles will be required as lines will exit the substation underground and tie into existing poles on Dogwood.

IID CEQA Responsible Agency

The IID is a Responsible Agency as defined by CEQA Guideline Section 15381 as it relates to the proposed electrical substation. In this capacity, the IID has the discretionary authority to approve the development of the Michelle Substation.

2. REGULATORY BACKGROUND

2.1 Federal

2.1.1 Federal Endangered Species Act

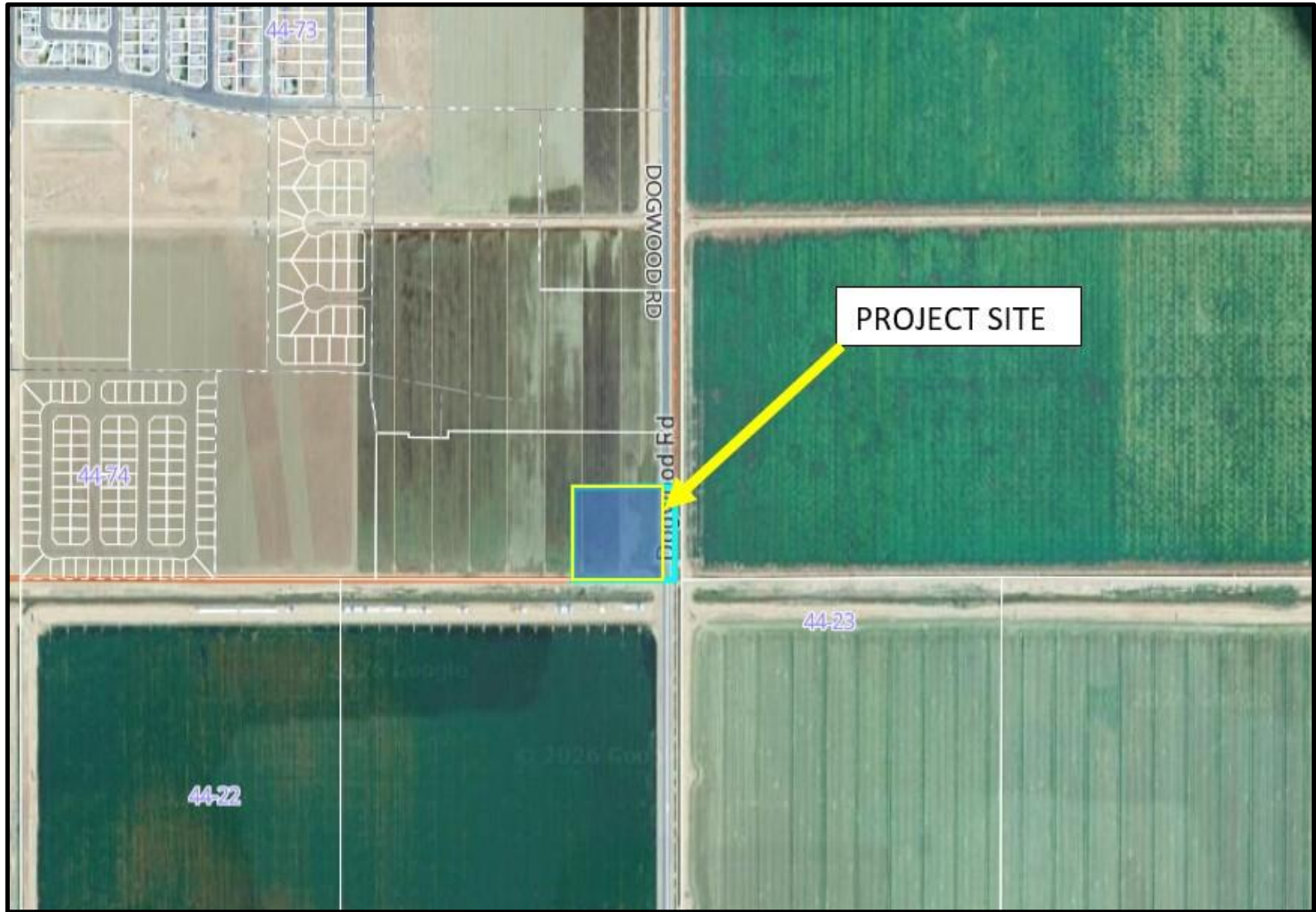
The Federal Endangered Species Act (FESA) protects threatened and endangered plants and animals and their critical habitat. Candidate species are those proposed for listing; these species are usually treated by resource agencies as if they were actually listed during the environmental review process. Procedures for addressing impacts to federally listed species follow two principal pathways, both of which require consultation with the United States Fish and Wildlife Service (USFWS), which administers the FESA for all terrestrial species. The first pathway, a Section 10(a) incidental take permit, applies to situations where a non-federal governmental entity must resolve potential adverse impacts to species protected under the FESA. The second pathway, a Section 7 consultation, applies to projects directly undertaken by a federal agency or private projects requiring a federal permit or approval.



Not to scale.

Source: Google Maps, 2026.

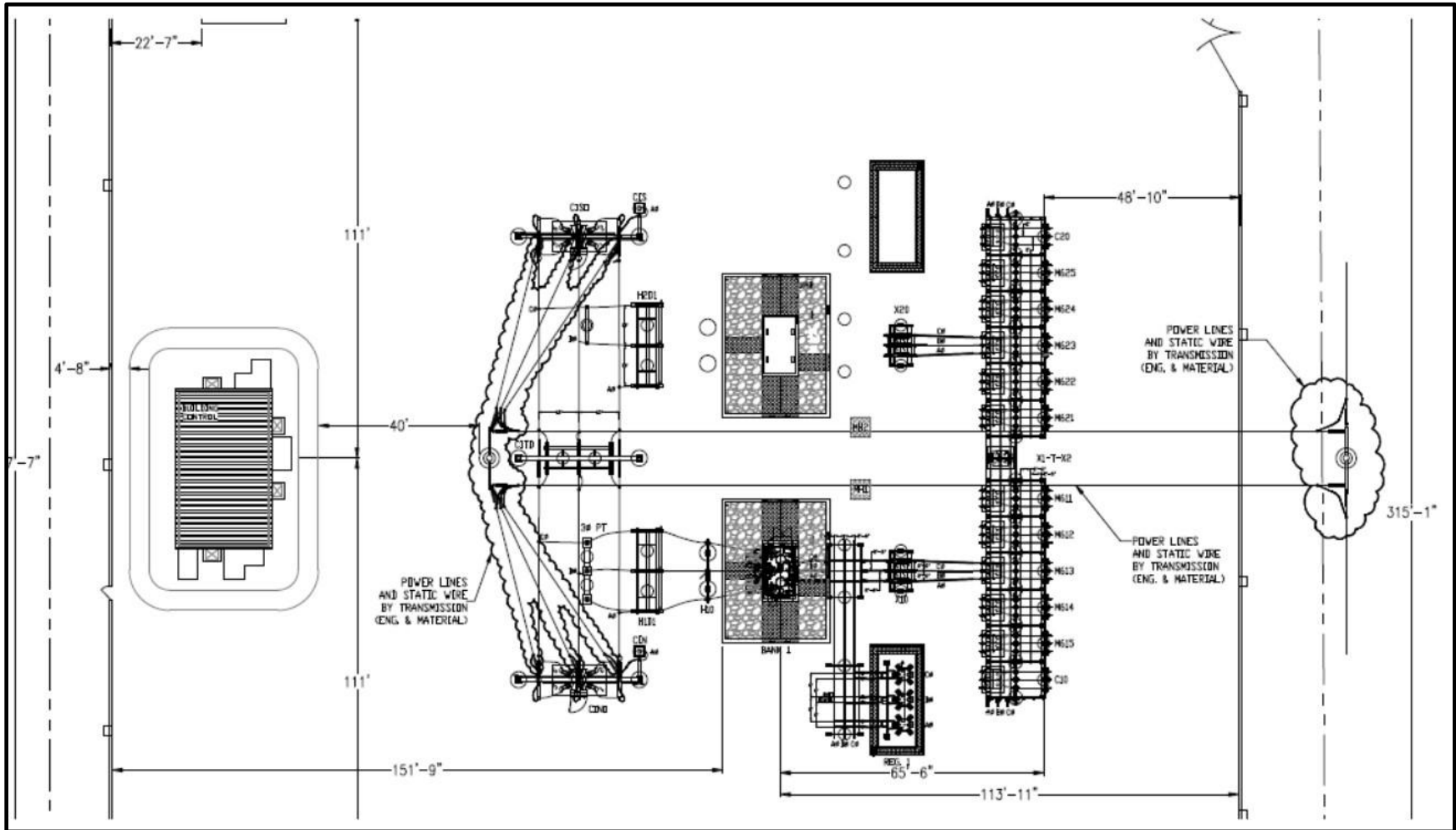
FIGURE 1: REGIONAL LOCATION MAP



Not to scale.

Source: Google Maps, 2026.

FIGURE 2: SITE LOCATION MAP



Not to scale.

FIGURE 3: SITE PLAN

2.1.2 Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 Code of Federal Regulations Part 10, including feathers, or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 Code of Federal Regulations 21).

All raptors and their nests are protected from take or disturbance under the MBTA (16 United States Code [USC], Section 703 et seq.). The golden eagle and bald eagle are also afforded additional protection under the Eagle Protection Act, amended in 1973 (16 United States Code, Section 669 et seq.).

2.1.3 Federal Clean Water Act

The purpose of the federal Clean Water Act (CWA) is to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” Section 404 of the CWA prohibits the discharge of dredged or fill material into Waters of the U.S. without a permit from the U.S. Army Corps of Engineers (USACE). The definition of Waters of the U.S. includes rivers, streams, estuaries, the territorial seas, ponds, lakes, and wetlands. Wetlands are defined as those areas:

“that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3 7b).

The U.S. Environmental Protection Agency also has authority over wetlands and may override a USACE permit.

Substantial impacts to wetlands may require an individual permit. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by the Regional Water Quality Control Board (RWQCB).

2.2 State

2.2.1 California Endangered Species Act

Sections 2050 through 2098 of the California Fish and Game Code outline the protection provided to California’s rare, endangered, and threatened species. Section 2080 of the Fish and Game Code prohibits the taking of plants and animals listed under the California Endangered Species Act (CESA). Section 2081 established an incidental take permit program for state-listed species. In addition, the Native Plant Protection Act of 1977 (Fish and Game Code Section 1900 et seq.) gives the California Department of

Fish and Wildlife (CDFW) authority to designate state endangered, threatened, and rare plants and provides specific protection measures for designated populations.

CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code Sections 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited, and CDFW cannot authorize their take in association with a general project except under the provisions of a Natural Communities Conservation Plan, 2081.7 or a Memorandum of Understanding for scientific purposes

The CDFW has also identified many "Species of Special Concern" (SSC). Species with this status have limited distribution or the extent of their habitats has been reduced substantially such that their populations may be threatened. Thus, their populations are monitored, and they may receive special attention during the environmental review process. While they do not have statutory protection, they may be considered rare under the California Environmental Quality Act (CEQA) and are thereby warranted specific protection measures. Unlike the FESA, CESA does not list invertebrate species.

Sensitive species that would qualify for listing but are not currently listed are afforded protection under CEQA. The CEQA Guidelines Section 15065 ("Mandatory Findings of Significance") identifies a substantial reduction in numbers of a rare or endangered species as a significant effect. CEQA Guidelines Section 15380 ("Rare or Endangered Species") provides for the assessment of unlisted species as rare or endangered under CEQA if the species can be shown to meet the criteria for listing. Plant species that are not state or federally listed, but that occur on the California Native Plant Society's (CNPS) California Rare Plant Rank Lists 1A (plants presumed extirpated in California and either rare or extinct elsewhere), 1B (plants are rare, threatened, or endangered in California and elsewhere), 2A (plants presumed extirpated in California but common elsewhere), and 2B (plants rare, threatened, or endangered in California but more common elsewhere) would typically be considered under the CEQA.

The CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, eggs, and nests include Sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

2.2.2 Lake and Streambed Alteration Program

The CDFW regulates water resources under Sections 1600 et seq. of the California Fish and Game Code. The CDFW has the authority to grant Streambed Alteration Agreements under Section 1602, which states:

An entity may not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

CDFW jurisdiction includes ephemeral, intermittent and perennial watercourses and extends to the top of the bank of a stream or lake if unvegetated or to the limit of the adjacent riparian habitat located contiguous to the watercourse if the stream or lake is vegetated.

Proposed actions that require a Streambed Alteration Agreements may also require a permit from USACE under Section 404 of the CWA. In these instances, the conditions of the Section 404 permit and the Streambed Alteration Agreements may overlap.

2.2.3 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act requires that each of the nine RWQCBs prepare and periodically update basin plans for water quality control. Each basin plan sets forth water quality standards for surface water and groundwater and actions to control nonpoint and point sources of pollution to achieve and maintain these standards. Basin plans offer an opportunity to protect wetlands through the establishment of water quality objectives. The RWQCB's jurisdiction includes federally protected waters, as well as areas that meet the definition of "waters of the state." Waters of the state are defined as any surface water or groundwater, including saline waters, within the boundaries of the state. RWQCB has the discretion to take jurisdiction over areas not federally regulated under Section 401, provided they meet the definition of waters of the state. Mitigation requiring no net loss of wetlands functions and values of waters of the state is typically required by RWQCB.

2.2.4 California Environmental Quality Act

CEQA requires state and local agencies to identify impacts on the environment that might be caused by their actions. Sensitive species that would qualify for listing but are not currently listed are afforded protection under CEQA. The CEQA Guidelines Section 15065 (Mandatory Findings of Significance) identifies a substantial reduction in numbers of a rare or endangered species as a significant impact. CEQA Guidelines Section 15380 (Rare or Endangered Species) provides for the assessment of unlisted species as rare or endangered under CEQA if the species can be shown to meet the criteria for listing. For example, plant species that are not federally or state listed but that occur on the California Native Plant Society's (CNPS) California Rare Plant Rank Lists 1 and 2 would typically be considered under CEQA. Plant populations of species

meeting the California Rare Plant Rank List 3 and 4 designations that are locally significant may also warrant consideration under CEQA.

2.3 Local

2.3.1 *Habitat Conservation Plan/Natural Community Conservation Plan*

No Habitat Conservation Plan or NCCP Plan has been adopted in or adjacent to the planning area.

3. METHODOLOGY

3.1 Literature Review

A literature review was conducted to determine the existence or potential occurrence of special-status plant and animal species on the project footprint and in the project vicinity. Database records for the *El Centro, Brawley, Alamo, Holtville West, Calexico, Heber, Mount Signal, Seeley, and Brawley NW, California* USGS 7.5-minute series quadrangles were searched on January 26, 2026 using the CDFW Natural Diversity Data Base *Rarefind 5* online (CNDDDB, 2026) and the California Native Plant Society's *Online Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 2026, V9.5.1, <http://www.cnps.org/inventory>). A USFWS Information for Planning and Conservation (IPaC) Trust Resource Report was generated for the project footprint on January 28, 2026. Soils within the Project area were identified using the Natural Resources Conservation Service's (NRCS) Web Soil Survey (USDA 2026).

3.2 Site Survey

EGL biologist, Brant Primrose, conducted a site visit on February 3rd, 2026, in order to identify general site conditions, vegetation communities, and suitability of habitat for various special-status species. The biological survey area (BSA), project footprint plus 500-foot buffer, was surveyed by foot within the Project site and binoculars were used to aid in the identification of species, potential nest locations, and foraging areas within the buffer area. A survey was conducted following the CDFW and the U.S. Fish and Wildlife's (USFW) accepted survey protocols for and professional standards for raptors, Burrowing Owl, and Flat-Tailed Horn Lizard.

All wildlife and plant species encountered during the field surveys were identified and recorded in Appendix A: Species Found in the Survey Area.

FIGURE 4: SITE PHOTOGRAPHS



Photo 1: View from the just south of the Project boundary looking east along the concrete Stream Channel.



Photo 2: View from the central portion of the Project boundary looking west at agricultural lands and the Victoria Ranch Subdivision.



Photo 3: View from just outside the southeastern corner of the Project boundary looking north at Stream Channel plants and the eastern boundary of the site.



Photo 4: View from the southwestern corner of the Project boundary looking north-northwest at agricultural lands and the Victoria Ranch Subdivision.

4. RESULTS

4.1 Environmental Setting

4.1.1 Existing and Adjacent Land Use

The Project site will be located on a 2.95-acre parcel of undeveloped agricultural land that is surrounded on the western, northern, eastern, and southern sides by undeveloped agricultural land. Approximately 0.2 miles to the north-northwest and 0.25 miles to the west are residential uses from the VRSP. The next closest residential uses are a single-family home approximately 0.5 miles to the south and approximately 1.0 miles to the southwest.

4.1.2 Soils

The online NRCS Web Soil Survey was referenced to identify potential hydric soils occurring within the BSA (USDA NRCS 2026). According to the survey, one map unit, or soil type, has been mapped within the Study Area (Figure 3. *Natural Resources Conservation Service Soil Types*):

- **115 – Imperial-Glenbar silty clay loams complex, 0 to 2 percent slopes, wet**

The Imperial Series consists of very deep, calcareous soils with very slow permeability. This soil series typically occurs on floodplains and old lakebeds and is well and moderately well-drained. The Glenbar Series consists of very deep, well-drained soils formed in stratified stream alluvium. These soils have moderately slow permeability, typically occur in desert floodplains and lacustrine basins, and are moderately alkaline in the A horizon.

The Imperial-Glenbar association comprises the entire project site; however, these areas are currently dominated by agricultural use in existing condition.

4.1.3 Hydrology

The BSA is located within the Upper Whitewater River watershed, approximately 201,200 acres in size, which is located within the larger Whitewater River Hydrologic Unit (HUC-8 # 180100201). The major surface water within the watershed includes the Whitewater River and originates within the summit of Mount San Gorgonio in the San Bernardino Mountains. The river travels southeast joining with three other tributaries before ultimately draining into the Salton Sea at the southeastern end of the Coachella Valley (Riverside County Watershed Protection, 2020)

4.1.4 Vegetation Communities and Other Land Types

Agricultural

Agricultural lands are an anthropogenic habitat and are not described by CDFW (2023d) or by CNPS (CNPS 2023b). Within the Project site, agricultural lands consist of alfalfa (*Medicago sativa*), date palms (*Phoenix dactylifera*), Bermudagrass (*Cynodon dactylon*), and herbaceous vegetables, as well as several fallow fields. On-site farming practices include soil disking, plowing, herbicide application, and regular anthropogenic maintenance and disturbance associated with ongoing management actions. Compacted dirt roads and brow ditches are included within this land cover type.

Stream Channel

Although not recognized by the Manual of California Vegetation, Online Edition (CNPS 2023b), or the Natural Community List (CDFW 2023d), stream channel is described by Oberbauer et al. (2008) as areas that exhibit ephemeral or intermittent flow and are barren or sparsely vegetated as a result of the scouring effects of floods or other anthropogenic causes. These areas include irrigation ditches that are unvegetated or vegetated with ruderal species such as giant reed (*Arundo donax*), nettleleaf goosefoot (*Chenopodium murale*), and asthmaweed (*Erigeron bonariensis*). Stream channel is not located within the Project site but is adjacent to the southern boundary and within the BSA.

Special-Status Vegetation Communities

Special status natural communities are those that are considered to be of special concern based on (1) federal, state, or local laws regulating their development; (2) limited distributions; and/or (3) the habitat requirements of special status plants or animals occurring in those habitats.

None of the vegetation communities within the project footprint is considered sensitive or of special concern.

4.2 Plant Species

Special-status plant species include plants that meet one or more of the following criteria:

- Listed or proposed for listing as threatened or endangered under the Federal ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR Section 17.12)
- Listed or candidates for listing by the State of California as threatened or endangered under the California ESA (Fish Game Code Section 2050 et seq.)

- Listed as rare under the California Native Plant Protection Act (Fish and Game Code Section 1900 et seq.); a plant is rare when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens (Fish and Game Code Section 1901)
- Meet the definition of rare or endangered under CEQA Guidelines Section 15380, subdivisions (b) and (d), including:
 - Plants considered by CDFW to be “rare, threatened or endangered in California.” This includes plants tracked by the CNDDDB and the CNPS as California Rare Plant Rank 1 or 2
 - Plants that may warrant consideration on the basis of declining trends, recent taxonomic information, or other factors; this may include plants tracked by the CNDDDB and CNPS as California Rare Plant Rank 3 or 4
- Considered locally significant plants (i.e., plants that are not rare from a statewide perspective but are rare or uncommon in a local context such as within a county or region [CEQA Guidelines, Section 15125, subd. (c)], or as designated in local or regional plans, policies, or ordinances [3.2.6 CEQA]); examples include plants that are at the outer limits of their known geographic range or plants occurring on an atypical soil type.

A full list of rare plants occurrences within the surrounding nine quadrangles can be found in Appendix B. A list of all plants observed on site can be found in Appendix A.

Federally and/or State-Listed Plant Species

Each special-status species was evaluated and given a rating based on its potential to occur (i.e., not expected, low, moderate, or high), taking into consideration the relative location to known occurrences, vegetation communities, and elevation.

Based on the results of the literature review and database searches, 16 special-status plant species were identified as occurring within the region. Due to the current conditions present on site, including the vegetation communities; soils; elevation ranges; previous known locations documented in the CNDDDB, by CNPS, and/or by USFWS; and current disturbance levels none are expected to occur within the Project site. Additionally, none were observed during the site survey.

4.3 Wildlife Species

Special-status wildlife species include wildlife that meets one or more of the following criteria:

- Listed or proposed for listing as threatened or endangered under the ESA or candidates for possible future listing as threatened or endangered under the ESA (50 CFR Section 17.12)
- Listed or candidates for listing by the State of California as threatened or endangered under the California ESA (Fish and Game Code, Section 2050 et seq.)
- Meet the definition of rare or endangered under CEQA Guidelines Section 15380, subdivisions (b) and (d), including:
 - Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens
 - The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range
- Considered locally significant species (i.e., species that are not rare from a statewide perspective but are rare or uncommon in a local context such as within a county or region [CEQA Guidelines, Section 15125, subd. (c)], or as designated in local or regional plans, policies, or ordinances [CEQA Guidelines, Appendix A])

Federally and/or State-Listed Wildlife Species

Based upon the results of the literature review, twenty-four (24) special-status wildlife species are known to occur within the nine surrounding quadrangles of the project site. These species, their federal and State status, and habitat requirements are included in Appendix C.

One of these species, the Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), is listed as endangered under the FESA, but was determined to not be expected to occur, nest, or roost within the Project site. Four species

One species, the Gila woodpecker (*Melanerpes uropygialis*), is listed as endangered under the CESA, but was determined to not be expected to occur, nest, or roost within the Project site. One species, the California black rail (*Laterallus jamaicensis coturniculus*), is listed as threatened under the CESA, but was determined to not be expected to occur, nest, or roost within the Project site. Two species included in the search results, the burrowing owl (*Athene cunicularia*), Crotch's bumble bee (*Bombus crotchii*) are listed as candidate endangered. The Crotch's bumble bee was determined to have a low potential to occur on the Project site as a transient during foraging but is not expected to nest.

Burrowing Owl

Burrowing owl is a candidate for endangered listing under the CESA and is a CDFW bird species of special concern. The species has a broad distribution and in southern California is known to occur in lowlands over a large region, including agricultural areas. They can occur in open desert areas, along irrigation dikes and levees, or wherever burrows are available away from intense human activity.

The BSA does not contain suitable natural habitat for the species as open grasslands are absent and the Project site is an active agricultural area, located adjacent to Dogwood Road, a major roadway, which may serve as deterrents. However, the site is comprised entirely of agricultural uses that has the potential to provide suitable burrowing habitat for the species.

A survey was conducted following the CDFW and the USFW accepted survey protocols for and professional standards for raptors, burrowing owl, and flat-tailed horn lizard. No special-status wildlife species were observed during the biological field surveys and no ground squirrel populations were observed, which serve as potential nesting sites for burrowing owls. Wildlife species observed within the project footprint consisted of those common to disturbed areas and adapted to human presence. All wildlife species observed are listed in Appendix A.

4.4 Potential Jurisdictional Wetlands and Streambeds

The project footprint does not support any areas that would be considered jurisdictional under Sections 401 and 404 of the Clean Water Act or Section 1602 of the California Fish and Game Code. No further studies to determine potential USACE, CDFW, or RWQCB jurisdiction within the project footprint are required.

4.5 Nesting Birds

The Project footprint consists entirely of Agricultural lands and stream channels are located to the south of the Project site within the BSA. These areas can provide potentially suitable habitat to support nesting birds protected under the MBTA and California Fish and Game Code. Although no raptors were observed during the site visit, the disturbed habitat within project footprint does provide foraging habitat for raptors, such as hawks and owls, among other resident and other avian species.

4.6 Wildlife Movement, Corridors, and Nursery Sites

Wildlife movement corridors, also called dispersal corridors or landscape linkages, are linear features whose primary wildlife function is to connect at least two significant habitat areas. Other definitions of corridors and linkages are as follows:

- A corridor is a specific route used for movement and migration of species. A corridor may be different from a linkage because it represents a smaller or narrower avenue for movement.
- Linkage means an area of land that supports or contributes to the long-term movement of wildlife and genetic material. A linkage is a habitat area that provides connectivity between habitat patches, as well as year-round foraging, reproduction, and dispersal habitat for resident plants and animals.

Wildlife corridors and linkages are important features in the landscape, and the viability and quality of a corridor or linkage are dependent on site-specific factors. Topography and vegetative cover are important factors for corridors and linkages. These factors should provide cover for both predator and prey species. They should direct animals to areas of contiguous open space or resources and away from humans and development. The corridor or linkage should be buffered from human encroachment and other disturbances (e.g., light, loud noises, domestic animals) associated with developed areas that have caused habitat fragmentation (Schweiger et al. 2000). Wildlife corridors and linkages may function at various levels depending upon these factors and, as such, the most successful of wildlife corridors and linkages will accommodate all or most of the necessary life requirements of predator and prey species.

Areas not considered functional wildlife dispersal corridors or linkages are typically obstructed or isolated by concentrated development and heavily traveled roads, known as chokepoints. One of the worst scenarios for dispersing wildlife occurs when a large block of habitat leads animals into cul-de-sacs of habitat surrounded by development. These habitat cul-de-sacs frequently result in adverse human/animal interfacing.

The project footprint is disturbed and contains only agricultural vegetation, additionally, the site is bordered by the Victoria Ranch Specific residential subdivision to the west and north, which limits wildlife movement through the project site.

5. IMPACTS ANALYSIS

For the purpose of this impact analysis, the proposed project footprint is assumed to be the 2.95-acre parcel where the proposed electrical substation will be constructed, as depicted in Figure 3. Permanent and direct impacts are assumed within the project footprint.

Project construction and operational-related impacts are analyzed in the context of direct or indirect effects. Direct impacts are those on the physical environment that are immediately related to the proposed project; they occur at the same time and place as the proposed project (e.g., vegetation removal and grading associated with

construction). Indirect impacts are those that occur later in time or farther removed in distance than direct effects (e.g., long-term changes in water quality and offsite impacts from noise, dust, lighting, etc.). In this analysis, direct impacts from construction are treated as short term (temporary), while indirect impacts from operation are treated as long term (permanent).

5.1 Vegetation Communities/Land Cover Types

The proposed project would include the clearing of the entire 2.95-acre Project footprint and would affect the agricultural vegetation community but not disturb the stream channels located to the south of the project footprint. There are no special-status vegetation communities within the BSA.

5.2 Special-Status Plant Species

5.2.1 Federally and/or State-Listed Plant Species

No federally and/or state/other listed plant species have any probability of occurring or were observed during the field visit. In this context, no significant impacts on federally and/or state listed plant species would be expected.

5.3 Special-Status Wildlife Species

5.3.1 Federally and/or State-Listed Wildlife Species

As noted above, one state listed wildlife species would have a potential of occurring within the BSA. The burrowing owl has a low potential of occurring within the Project footprint and no burrowing owl individuals were observed during the field visit. No other federally and/or state listed wildlife species have any probability of occurring or were observed during the field visit. In this context, impacts to federally and/or state listed wildlife species would be less than significant and no mitigation is required.

5.3.2 Other Special-Status Wildlife Species

As noted in Appendix B, non-listed special-status wildlife species are not expected to occur within the Project footprint. No special status wildlife was observed during the site survey. However, as noted in section 4.5 Nesting Birds, the agricultural areas and ruderal vegetation adjacent to the Project footprint can provide potentially suitable habitat to support nesting birds protected under the MBTA. Although no raptors were observed during the site visit, the disturbed habitat within project footprint does provide foraging habitat for raptors, such as hawks and owls, among other resident and other avian species. Implementation of Mitigation Measures BIO-1 and BIO-2 would help to reduce

impacts to any nesting bird species during construction. In this context, impacts to non-listed special-status wildlife species would be less than significant.

5.4 Jurisdictional Aquatic Resources

No jurisdictional aquatic resources were found during the field visit. The proposed project would be limited to the Project site and utilize established access routes or previously disturbed or developed areas. No impacts to jurisdictional aquatic resources would be expected.

5.5 Wildlife Corridors

Development of the project footprint will not result in the loss of any potential wildlife movement areas, wildlife corridors or nursery sites as the project site is not located within but is adjacent to an established habitat corridor or linkage area. Implementation of Mitigation Measure BIO-2 will ensure the project will avoid potential impacts to nearby wildlife movement areas and corridors.

6. CUMULATIVE EFFECTS

Cumulative impacts of development on biological resources potentially include habitat fragmentation, increased edge effects, reduced habitat quality, and increased mortality of some common wildlife species. The proposed project would be the construction of a new electrical substation within an active agricultural area does not contain sensitive habitat or species and is not within a conservation area. Through implementation of Mitigation Measures BIO-1 through BIO-2, the Project would minimize or avoid impacts that could otherwise contribute to cumulative impacts to biological resources.

7. AVOIDANCE AND MINIMIZATION MEASURES

In order to ensure that the project reduces project effects on biological resources to a level considered less than significant with respect to CEQA, the following avoidance and minimization measures should be implemented:

BIO-1 Preconstruction Resource Survey.

Three days prior to any ground disturbing activities or vegetation removal related to the substation construction or transmission line installation, a qualified biologist shall conduct a preconstruction survey to identify any sensitive biological resource to flag for avoidance. Any sensitive species that may be present within the Project area shall be relocated outside of the impact areas.

Timing/Implementation: Three days prior to the initiation of any on-site grading.

Enforcement/Monitoring: Biological Monitor and Imperial Irrigation District.

BIO-2 Preconstruction Nesting Bird Survey.

If construction or other project activities are scheduled to occur during the bird breeding season (Typically February 1 through August 31 for raptors and March 15 through August 31 for the majority of migratory bird species), a pre-construction nesting-bird survey should be conducted by a qualified avian biologist to ensure that active bird nests, including those for the black-tailed gnatcatcher, burrowing owl, and loggerhead strike, will not be disturbed or destroyed. The survey should be completed no more than three days prior to the initial ground disturbance. The nesting-bird survey should include the Project Area and adjacent areas where project activities have the potential to affect active nests, either directly or indirectly due to construction activity or noise. If an active nest is identified, the biologist should establish an appropriately sized disturbance limit buffer around the nest using flagging or staking. Construction activities should not occur within any disturbance limit buffer zones until the nest is deemed inactive by the qualified biologist.

Timing/Implementation: Construction activities scheduled to occur during the breeding season and 3 days prior to vegetation removal.

Enforcement/Monitoring: Biological Monitor and Imperial Irrigation District.

8. REFERENCES

California Native Plant Society (CNPS). Rare Plant Program. 2026. Rare Plant Inventory (online edition, v9.5.1). Website <https://www.rareplants.cnps.org> [accessed 5 February 2026]

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Appendix A: Species Found in the Survey Area

SPECIES FOUND IN THE STUDY/SURVEY AREA	
Plants	
Scientific Name	Common Name
<i>Avena barbata</i>	Wild Oat
<i>Bromus diandrus</i>	Great brome
<i>Bromus madritensis</i>	Red brome
<i>Bassia hyssopifolia</i>	Five-Hook Bassia
<i>Centromadia pungens ssp. pungens</i>	Common Spikeweed
<i>Cressa truxillensis</i>	Spreadin alkaliweed
<i>Chenopodium murale</i>	Nettle-Leaf Goosefoot
<i>Cyodon dactylon</i>	Bermuda Grass
<i>Frankenia salina</i>	Alkali heath
<i>Helianthus gracilentus</i>	Slender Sun Flower
<i>Heliotropium curassavicum</i>	Salt heliotrope
<i>Hordium murum</i>	Barley
<i>Lactuca serriola</i>	Prickly Lettuce
<i>Malvellaleprosa</i>	Alkali Mallow
<i>Melilotus alba</i>	White sweetclover
<i>Pluchea sericea</i>	Arrow Weed
<i>Rumex crispus</i>	Curly dock
<i>Salsola tragus</i>	Tumble weed
Birds	
<i>Corvus corak</i>	Common Raven
<i>Zenaida macroura</i>	Morning Dove
<i>Streptopelia decaocto</i>	Eurasian collard dove
<i>Charadrius vociferus</i>	Kill deer
<i>Passer domesticus</i>	House sparrow
<i>Sturnella neglecta</i>	Western meadowlark
<i>Ardea Herodias</i>	Great blue heron
<i>Buteo jamaicensis</i>	Red tail hawk
Mammals	
<i>Sylvilagus audubonii</i>	Desert Cottaintail rabbit
<i>Canis latrans</i>	Coyote

Appendix B: Literature Search – Special Status Plant and Wildlife Species Occurrence Results

Special-Status Plant Species Known From the Vicinity of the Project Footprint

SPECIES	STATUS	HABITAT	BLOOMING PERIOD	POTENTIAL TO OCCUR
<i>Abronia villosa</i> var. <i>aurita</i> chaparral sand-verbena	US: None CA: None CNPS: 1B.1	Chaparral, coastal scrub, desert dunes; sandy (75-1,600 meters)	(Jan)Mar-Sep	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Amaranthus watsonii</i> Watson's amaranth	US: None CA: None CNPS: 4.3	Occurs in Mojavean desert scrub and Sonoran desert scrub (20-1,700 meters).	Apr-Sep	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Astragalus sabulonum</i> gravel milk-vetch	US: None CA: None CNPS: 2B.2	Occurs in desert dunes, Mojavean desert scrub, and Sonoran desert scrub (-60 to 930 meters).	Feb-Jun	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Calliandra eriophylla</i> pink fairy-duster	US: None CA: None CNPS: 2B.3	Occurs in Sonoran desert scrub sandy (0-330 meters)	Jan-Mar	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Cylindropuntia wolfii</i> Wolf's cholla	US: None CA: None CNPS: 4.3	Occurs in Sonoran desert scrub (100-1,200 meters)	Mar-May	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Euphorbia abramsiana</i> Abrams' spurge	US: None CA: None CNPS: 2B.2	Occurs in Mojavean desert scrub, and Sonoran desert scrub (-5 to 1310 meters).	(Aug)Sep-Nov	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Imperata brevifolia</i> California satintail	US: None CA: None CNPS: 2B.1	Occurs in chaparral, coastal scrub, meadows and seeps (often alkali), Mojavean desert scrub, riparian scrub; mesic (0-1,215 meters)	Sep-May	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
<i>Johnstonella costata</i> ribbed cryptantha	US: None CA: None CNPS: 4.3	Occurs in Desert dunes, Mojavean desert scrub, and Sonoran desert scrub (-60 to 500 meters).	Feb-May	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.

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Johnstonella holoptera winged cryptantha	US: None CA: None CNPS: 4.3	Occurs in Mojavean desert scrub, and Sonoran desert scrub (100 to 1,690 meters).	Mar-Apr	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Juncus acutus ssp. Leopoldii southwestern spiny rush	US: None CA: None CNPS: 4.2	Occurs in coastal dunes (mesic), Coastal scrub, Marshes and swamps (coastal salt), (alkaline seeps) (3 to 900 meters)	(Mar)May-Jun	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Lycium parishii Parish's desert-thorn	US: None CA: None CNPS: 2B.3	Occurs in coastal scrub, Sonoran desert scrub (135 to 1,000 meters)	Mar-Apr	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Malperia tenuis brown turbans	US: None CA: None CNPS: 2B.3	Occurs in Sonoran desert scrub (sandy, gravelly) (15 to 335 meters)	(Feb)Mar-Apr	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Mentzelia hirsutissima hairy stickleaf	US: None CA: None CNPS: 2B.3	Occurs in Sonoran desert scrub (rocky) (0 to 700 meters)	Mar-May	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Nama stenocarpa mud nama	US: None CA: None CNPS: 2B.2	Occurs in marshes and swamps (riverbanks) (5 to 500 meters)	Jan-Jul	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Pholisma sonorae sand food	US: None CA: None CNPS: 1B.2	Occurs in Desert dunes, and Sonoran desert scrub (sandy) (0 to 200 meters)	(Mar)Apr-Jun	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.
Pilostyles thurberi Thurber's pilostyles	US: None CA: None CNPS: 4.3	Occurs in Sonoran desert scrub (0 to 365 meters)	Dec-Apr	Not expected to occur. No suitable habitat is present and the site is outside of the species' known elevation range.

Status Legend

- None: No Status

CNPS Rank

- 1B: Plants rare, threatened, or endangered in California and elsewhere
- 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
- 4: Plants are not currently rare or threatened, but require monitoring to ensure their status does not decline

Threat Rank

- 0.1 - Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 0.2 - Moderately threatened in California (20%-80% occurrences threatened/moderate degree and immediacy of threat)
- 0.3 - Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

Appendix C: Literature Search – Special Status Wildlife Species Occurrence Results

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SPECIES	FEDERAL/ STATE STATUS	HABITAT AND DISTRIBUTION	POTENTIAL FOR OCCURRENCE
INSECTS			
Bombus crotchii Crotch's bumble bee	US: None CA: CE	Coastal California east to the Sierra-Cascade crest and south into Mexico.	Not expected to occur. The entire site is used for agriculture.
Bombus pensylvanicus American bumble bee	US: None CA: None	Coastal prairie to the Great Basin grasslands and within valley & foothill grasslands.	Not expected to occur. The entire site is used for agriculture.
REPTILES			
Phrynosoma mcallii flat-tailed horned lizard	US: None CA: None	Desert dunes, Mojavean desert scrub, and Sonoran desert scrub. Restricted to desert washes and desert flats in central Riverside, eastern San Diego, and Imperial counties.	Not expected to occur. Suitable desert wash habitat is not present on the Project site.
Uma notata Colorado Desert fringe-toed lizard	US: None CA: None	Colorado Desert region; in sand dunes, dry lakebeds, sandy beaches or riverbanks, desert washes, or sparse desert scrub.	Not expected to occur. The entire site is used for agriculture.
AMPHIBIANS			
Incilius alvarius Sonoran Desert toad	US: None CA: None	Breeds in temporary pools and irrigation ditches along the Colorado River and southern Imperial Valley.	Not expected to occur. Marginal suitable habitat is present within drainage canals adjacent to Project site.
Lithobates pipiens northern leopard frog	US: None CA: None	Native range is east of Sierra Nevada-Cascade Crest. Near permanent or semi-permanent water in a variety of habitats.	Not expected to occur. The entire site is used for agriculture.
Lithobates yavapaiensis lowland leopard frog	US: None CA: None	Were found along the Colorado River and in streams near the Salton Sea.	Not expected to occur. The entire site is used for agriculture.
BIRDS			

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Anarhynchus montanus mountain plover	US: None CA: None	Short vegetation, bare ground, and flat topography. Prefers grazed areas and areas with burrowing rodents.	Low potential to forage; no potential to nest. Agricultural fields could provide suitable wintering habitat for this species but none were observed during the site visit.
Athene cunicularia burrowing owl	US: None CA: CE	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation.	Low: The site does not contain suitable natural habitat to support this species and was not observed during the site visit.
Buteo regalis ferruginous hawk	US: None CA: None	Open grasslands, sagebrush flats, desert scrub, low foothills and fringes of pinyon and juniper habitats.	Not Expected: The site does not contain suitable habitat to support this species.
Laterallus jamaicensis coturniculus California black rail	US: None CA: ST	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays.	Not Expected: The site does not contain suitable habitat to support this species.
Melanerpes uropygialis Gila woodpecker	US: None CA: SE	In California, inhabits cottonwoods and other desert riparian trees, shade trees, and date palms.	Not Expected: The site does not contain suitable habitat to support this species.
Pyrocephalus rubinus vermillion flycatcher	US: None CA: None	During nesting, inhabits desert riparian adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas.	Not Expected: The site does not contain suitable habitat to support this species.
Rallus obsoletus yumanensis Yuma Ridgway's rail	US: FE CA: ST	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; principle food is crayfish.	Not Expected: The site does not contain suitable habitat to support this species.

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Setophaga petechia yellow warbler	US: None CA: None	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada.	Not expected to occur. No suitable vegetation present.
Toxostoma crissale Crissal thrasher	US: None CA: None	Resident of southeastern deserts in desert riparian and desert wash habitats.	Not Expected: The site does not contain suitable habitat to support this species.
MAMMALS			
Eumops perotis californicus western mastiff bat	US: None CA: None	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.	Not Expected: The site does not contain suitable habitat to support this species.
Lasiurus xanthinus western yellow bat	US: None CA: None	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats.	Not Expected: The site does not contain suitable habitat to support this species.
Neotoma albigula venusta Colorado Valley woodrat	US: None CA: None	Low-lying desert areas in southeastern California. Closely associated with beaver-tail cactus and mesquite.	Not Expected: The site does not contain suitable habitat to support this species.
Nyctinomops femorosaccus pocketed free-tailed bat	US: None CA: None	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc.	Not Expected: The site does not contain suitable habitat to support this species.
Nyctinomops macrotis big free-tailed bat	US: None CA: None	Low-lying arid areas in Southern California. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	Not Expected: The site does not contain suitable habitat to support this species.
Perognathus longimembris bangsi Palm Springs pocket mouse	US: None CA: None	Desert riparian, desert scrub, desert wash and sagebrush habitats. Most common in creosote-dominated desert scrub.	Not Expected: The site does not contain suitable habitat to support this species.

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<p><i>Sigmodon hispidus eremicus</i> Yuma hispid cotton rat</p>	<p>US: None CA: None</p>	<p>Along the Colorado River and in grass and agricultural areas near irrigation waters.</p>	<p>Not Expected: The site does not contain suitable habitat to support this species.</p>
<p><i>Taxidea taxus</i> American badger</p>	<p>US: None CA: None</p>	<p>Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.</p>	<p>Not Expected: The site does not contain suitable habitat to support this species.</p>