

92 kV CS LINE UPGRADE PROJECT

BIOLOGICAL RESOURCES REPORT

PREPARED FOR:

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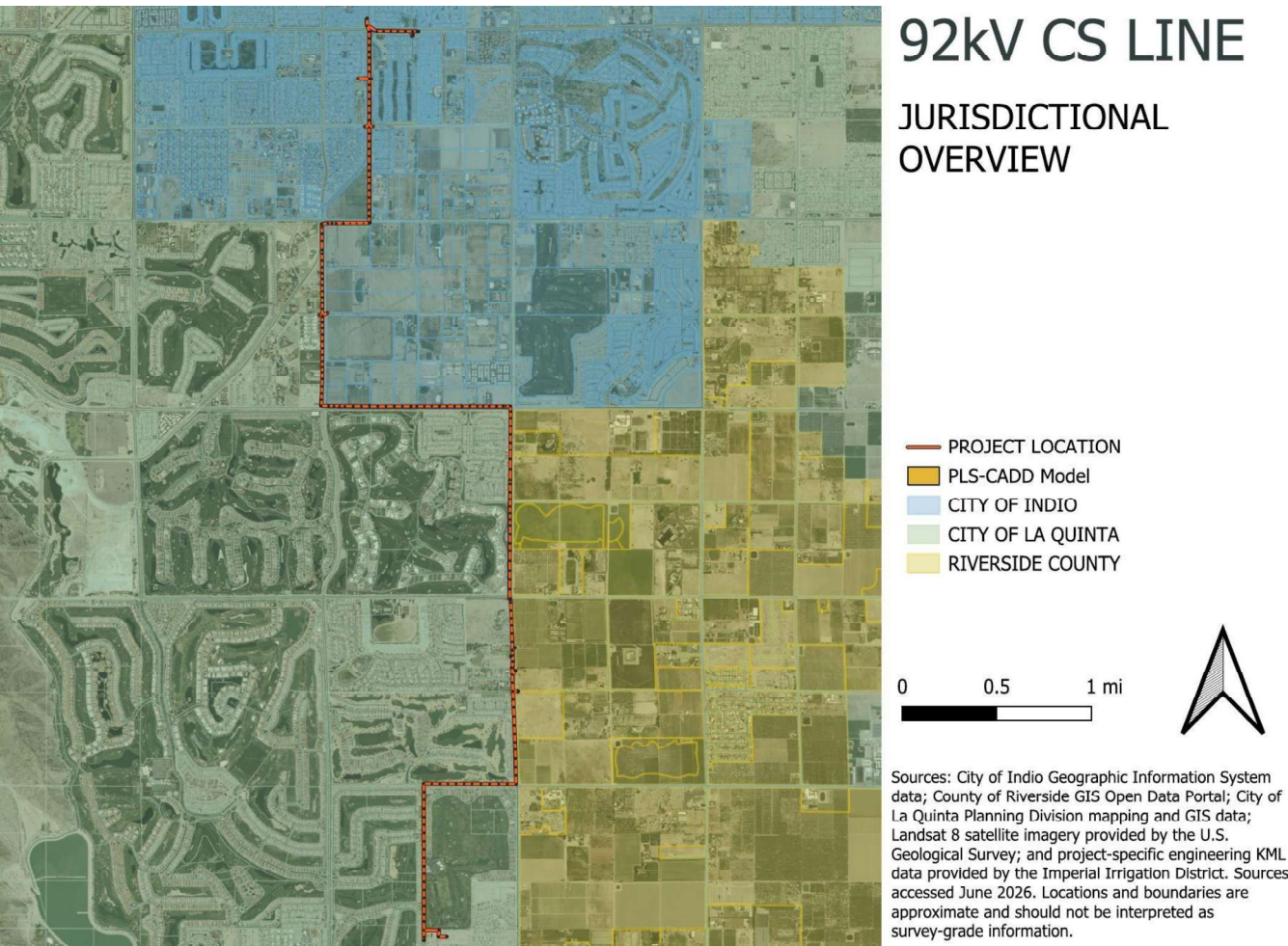
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1. Introduction

1.1 Project Location

The Imperial Irrigation District (IID) 92 kV CS Line Upgrade Project (Project) is located in the Coachella Valley in Riverside County, California. The Project extends approximately 6.9 circuit miles between the Avenue 58 Substation



and Avenue 48 Substation and traverses portions of the City of Indio, the City of La Quinta, and unincorporated Riverside County. The alignment generally follows existing public roadways and an established electrical-transmission corridor along Mountain View, Airport Boulevard, Monroe Street, 52nd Avenue, Madison Street, Avenue 50, Hjorth Street, and Avenue 48.

Land uses along the alignment include urban development, residential communities, golf courses and maintained landscaping, agricultural fields, orchards, pasture, vacant or disturbed parcels, irrigation and drainage infrastructure, and localized areas of native or semi-natural desert vegetation.

Figure 1. Jurisdictional and Regional Location.

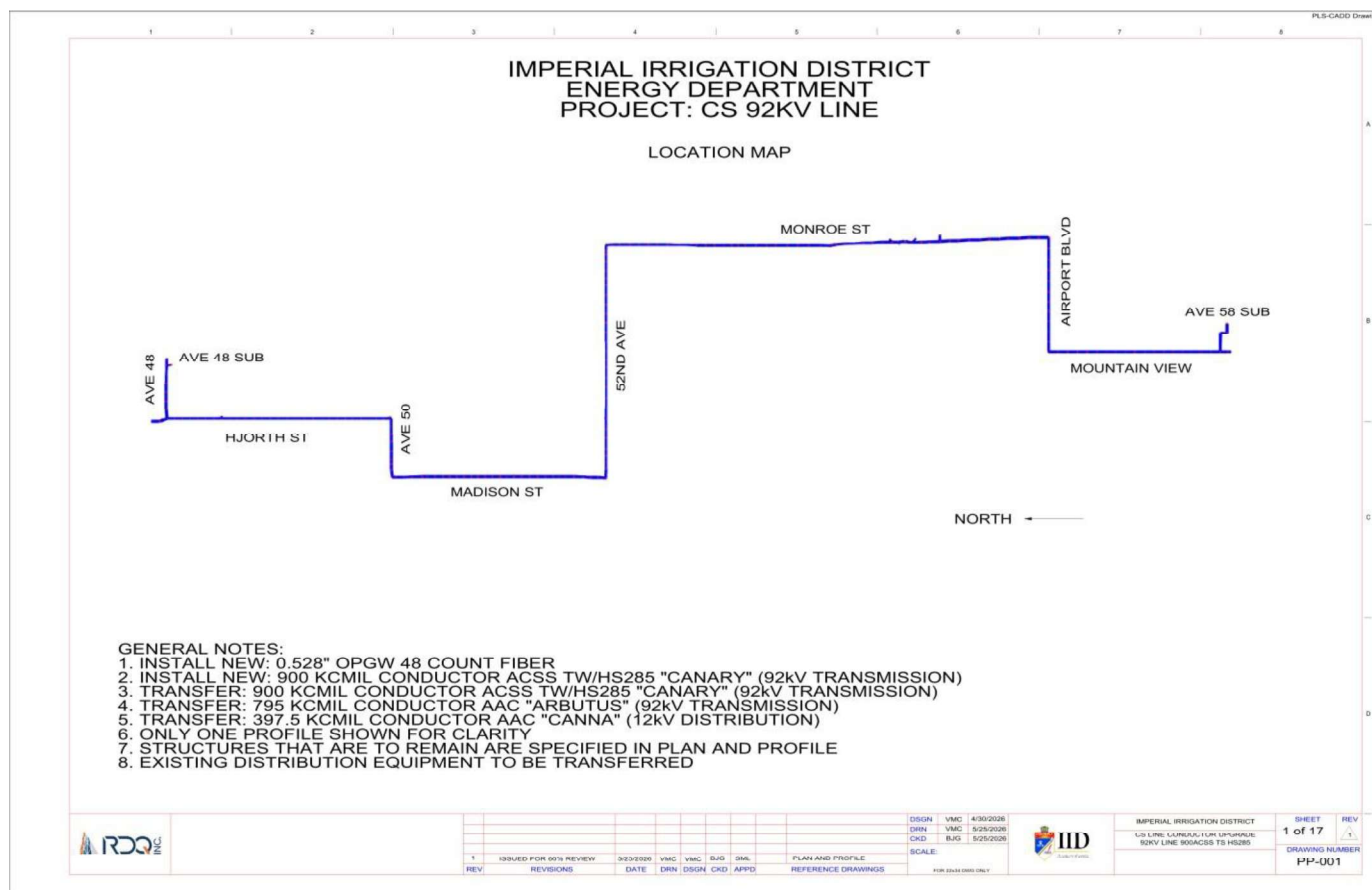
1.2 Project Description

The Project would reconstruct and upgrade the existing 92 kV CS Line to increase capacity and improve system reliability while retaining the established transmission corridor. The plan-and-profile drawings identify approximately 164 wood-pole replacements or reconstructions and ten engineered steel-pole locations.

The principal Project components include:

- Installation of new 900-kcmil ACSS/TW HS285 Canary 92 kV transmission conductor;
- Installation of new 0.528-inch, 48-count optical ground wire;
- Transfer or reinstallation of existing 92 kV conductors, distribution conductors, and distribution equipment where shown on the engineering plans;

- Replacement or reconstruction of wood poles generally ranging from approximately 70 to 85 feet in height;
- Installation or relocation of engineered steel poles generally ranging from approximately 65 to 70 feet in height;
- Pole-hole excavation, engineered foundation construction, grounding, hardware installation, conductor stringing, and equipment transfer;
- Temporary pull and tension sites, material staging, guard structures, and pole work areas; and
- Continued operation and maintenance of the upgraded line within the existing utility corridor.



1.3 Construction Footprint and Disturbance

For environmental analysis, construction work areas and disturbance intensity are based on the methods used for IID's comparable 92 kV CA Line Upgrade Project, adjusted to the CS Line length, structure count, and engineering configuration. Both projects involve reconstruction of existing 92 kV wood and steel pole infrastructure, conductor replacement, optical ground wire installation, pull and tension operations, and use of public roads and established utility access.

A typical pole work area is assumed to occupy up to approximately 100 feet by 100 feet. Pulling and tensioning sites are assumed to occupy up to approximately 100 feet by 200 feet and would be located at line angles, conductor-section endpoints, and other locations required for safe stringing operations. Temporary staging and material handling would occur within these work areas or on existing developed, paved, graveled, agricultural, or previously disturbed surfaces.

The Project is estimated to result in approximately 41 acres of temporary construction disturbance. Temporary disturbance includes pole work areas, pull and tension sites, short-duration equipment setup, material staging, and access from existing public roads or utility routes. Permanent disturbance would be limited to the footprints of new or enlarged poles and engineered foundations and is expected to total less than 0.1 acre. No new permanent access roads are proposed.

Construction is expected to occur over approximately four months. Equipment would include boom trucks, bucket trucks, digger derricks or augers, cranes, wire-pulling and rope-pulling trailers, material-handling trailers, water trucks, pickup trucks, and standard support equipment. Excavation would generally be limited to pole holes and engineered steel-pole foundations; localized foundation excavation may extend to approximately 30 feet below grade. Temporarily disturbed areas would be restored or stabilized after construction.

Project element	Environmental analysis assumption
Alignment length	Approximately 6.9 circuit miles
Wood-pole work	Approximately 164 pole replacements or reconstructions

Project element	Environmental analysis assumption
Engineered steel poles	Ten total locations, with nine new and one relocated
Typical pole work area	Up to approximately 100 by 100 feet
Typical pull/tension site	Up to approximately 100 by 200 feet
Temporary disturbance	Approximately 41 acres
Permanent disturbance	Less than 0.1 acre
Construction duration	Approximately four months
Access	Public roads and established utility access; no new permanent roads

1.4 Biological Study Area

The Biological Study Area (BSA) consists of the Project centerline and a 175-foot buffer on each side, forming a 350-foot-wide corridor of approximately 293 acres. The BSA encompasses the proposed construction footprint and provides sufficient surrounding context to evaluate adjacent habitat, nesting substrates, sensitive vegetation, aquatic features, and indirect construction effects. The BSA is broader than the approximately 41-acre temporary disturbance footprint.

1.5 Lead Agency

IID is the CEQA Lead Agency for the Project and has principal responsibility for approving the Project and ensuring implementation of biological-resource mitigation. The City of Indio, City of La Quinta, Riverside County, California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service (USFWS), and Coachella Valley Conservation Commission may exercise jurisdiction or consultation authority depending on the final location and nature of individual construction activities.

2. Regulatory Background

2.1 Federal

2.1.1 Federal Endangered Species Act

The federal Endangered Species Act (FESA) protects species listed as threatened or endangered and their designated critical habitat. Section 9 prohibits unauthorized take of federally listed wildlife. Section 7 requires federal agencies to consult with USFWS when a federally authorized, funded, or implemented action may affect a listed species or designated critical habitat. Section 10 provides a mechanism for incidental take authorization for nonfederal actions.

2.1.2 Migratory Bird Treaty Act and Eagle Protection

The Migratory Bird Treaty Act prohibits unauthorized take, possession, or destruction of protected migratory birds, nests, and eggs. Bald and golden eagles receive additional protection under the Bald and Golden Eagle Protection Act. Pole replacement, vegetation trimming, equipment operation, and conductor work may affect active nests if performed during the breeding season.

2.1.3 Clean Water Act

Section 404 of the Clean Water Act regulates the discharge of dredged or fill material into waters of the United States. Section 401 requires state water-quality certification for activities requiring a federal permit that may result in a discharge. Artificial canals and drains require feature-specific evaluation because jurisdiction depends on their origin, hydrologic connection, and current function.

2.2 State

2.2.1 California Endangered Species Act and Native Plant Protection Act

The California Endangered Species Act prohibits unauthorized take of state-listed and candidate species. The Native Plant Protection Act provides protection for plants designated rare or endangered by the State. Species not formally listed may also qualify as rare or endangered under CEQA.

2.2.2 California Fish and Game Code

Fish and Game Code Sections 3503, 3503.5, and 3513 protect native bird nests, eggs, birds of prey, and migratory nongame birds. Section 1602 requires notification to CDFW for activities that may substantially divert or obstruct natural flow, substantially change the bed, channel, or bank of a river, stream, or lake, or place material where it may pass into such features.

2.2.3 Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act regulates discharges to waters of the state, which may include aquatic features outside federal jurisdiction. The Colorado River Basin Regional Water Quality Control Board administers applicable water-quality requirements in the Project region.

2.2.4 California Environmental Quality Act

CEQA requires evaluation of substantial adverse effects on special-status species, riparian habitat, sensitive natural communities, protected wetlands, wildlife movement and nursery sites, locally protected biological resources, and adopted habitat conservation plans. CEQA Guidelines Section 15380 provides criteria for evaluating unlisted species that may qualify as rare or endangered.

2.3 Local and Regional

2.3.1 Coachella Valley Multiple Species Habitat Conservation Plan

The Project is within the planning area of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP). The CVMSHCP establishes a regional conservation framework for covered species and natural communities and includes requirements applicable to public infrastructure, operation and maintenance, conservation areas, and development adjacent to conserved lands. Project activities would be implemented consistent with applicable CVMSHCP avoidance, minimization, adjacency, and covered-activity provisions.

2.3.2 Local Biological Resource Policies

The City of Indio, City of La Quinta, and Riverside County General Plans contain policies supporting protection of sensitive habitat, wildlife, drainage features, and conservation lands. Project construction would remain within an existing utility corridor and would comply with applicable local tree, watercourse, grading, and habitat-protection requirements.

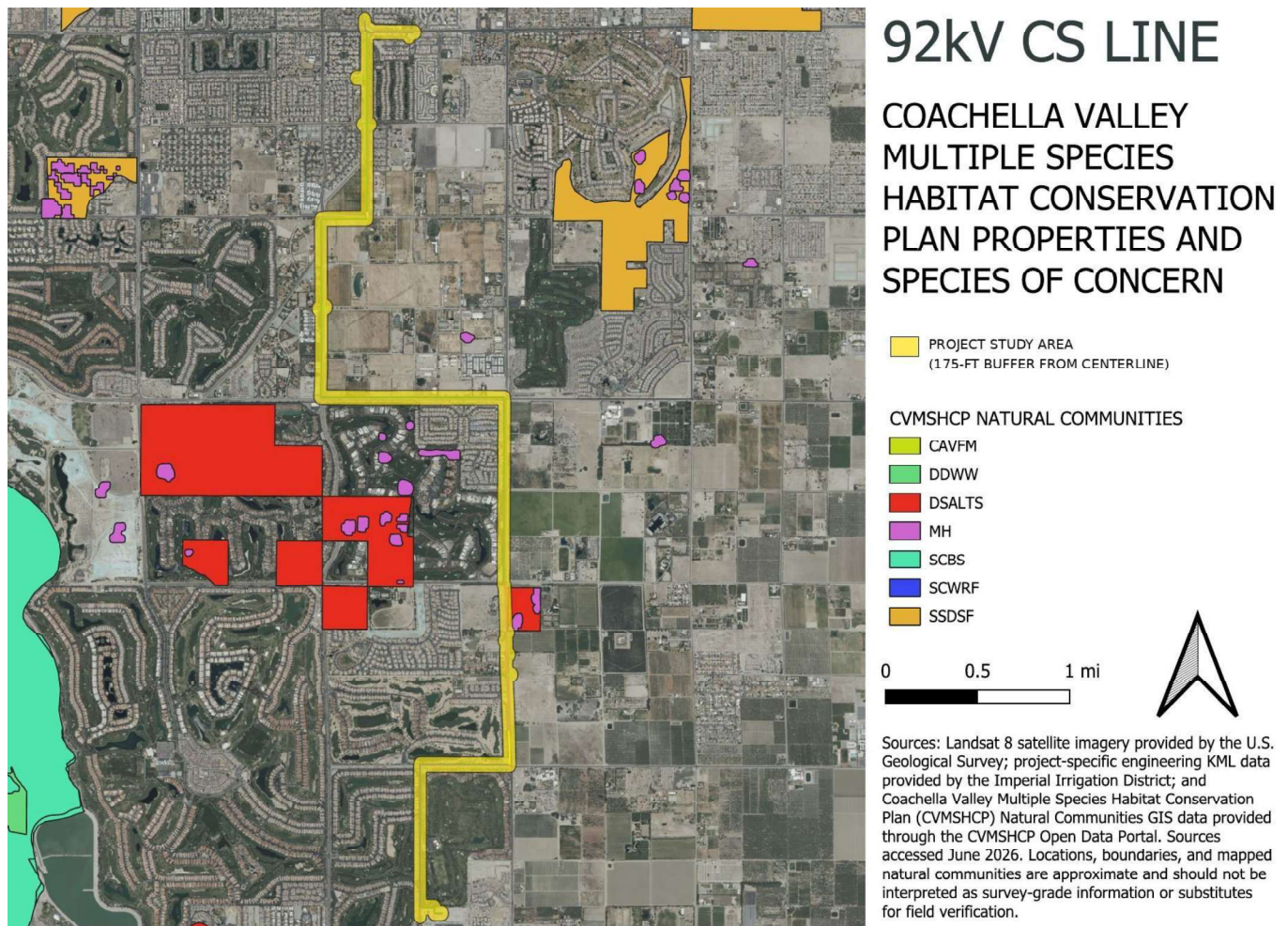


Figure 3. CVMSHCP Natural Communities and Species of Concern.

3. Methodology

3.1 Literature and Database Review

A literature and database review was conducted to determine the known or potential occurrence of special-status plants, wildlife, sensitive natural communities, aquatic resources, and conservation-plan features within the BSA and surrounding region.

The review included:

- CDFW California Natural Diversity Database RareFind 5 records for the Indio and La Quinta USGS 7.5-minute quadrangles, queried June 17, 2026;
- CDFW BIOS occurrence mapping, reviewed June 17, 2026;
- USFWS Information for Planning and Consultation official species list for Project Code 2026-0104773, generated June 17, 2026;
- California Native Plant Society Rare Plant Inventory results for the Indio and La Quinta quadrangles, generated June 17, 2026;
- CVMSHCP natural-community and species information;
- CDFW Colorado Desert vegetation mapping and NLCD-derived urban and developed land-cover mapping;
- NRCS SSURGO soil mapping clipped to the BSA;
- Current aerial imagery, project engineering mapping, and plan-and-profile drawings; and
- The 92 kV CA Line Upgrade IS/MND for comparable construction methods, work-area assumptions, equipment, and disturbance intensity.

Construction assumptions from the CA Line analysis were used only because the two projects employ substantially similar 92 kV pole reconstruction, conductor stringing, and pull-site methods. Biological conditions, species potential, habitat mapping, and impact conclusions in this report are specific to the CS Line Project.

3.2 Desktop Spatial Review

Project engineering geometry was overlaid with jurisdictional boundaries, soils, vegetation and land-cover data, CVMSHCP features, CNDDDB occurrences, and aerial imagery. The analysis distinguished the 350-foot-wide BSA from the approximately 41-acre construction footprint and evaluated whether mapped resources occurred within the broader review corridor, immediately adjacent to the alignment, or within areas likely to be disturbed.

Habitat suitability was evaluated using the combination of vegetation, soils, hydrology, current land use, disturbance history, species-specific habitat requirements, and proximity to documented occurrences. CNDDDB and CNPS records were treated as evidence of regional occurrence rather than proof of presence or absence at individual pole locations.

3.3 Basis for Desktop-Level Biological Review

CEQA does not prescribe a universal requirement that a biological resources evaluation include a general field reconnaissance. CEQA Guidelines Section 15063 allows an initial study to rely on expert opinion supported by facts, technical studies, and other substantial evidence. Sections 15064 and 15384 similarly direct significance determinations to be based, to the extent possible, on scientific and factual data, reasonable assumptions predicated on facts, and expert opinion supported by facts.

For the Project, the available information provides a sufficient factual basis to characterize existing biological conditions and evaluate potential impacts. The review incorporates geographically accurate engineering plans; current aerial and plan-and-profile imagery; project-specific vegetation, land-cover, soil, and CVMSHCP mapping; CNDDDB and BIOS occurrence information; the CNPS Rare Plant Inventory; an official USFWS IPaC species list; and the known land-use and disturbance history of the existing utility corridor. These sources consistently show that most of the alignment occurs within developed, agricultural, landscaped, roadside, or routinely maintained utility settings, while also identifying the localized sandy habitat, native scrub, mesquite, and aquatic features requiring focused protection.

A general reconnaissance conducted during preparation of this report would not be expected to materially change the project-level impact conclusions because the principal land-cover and habitat conditions are readily observable and corroborated by multiple current sources. The analysis conservatively assumes that special-status species may use localized suitable habitat and applies avoidance and minimization measures accordingly.

Temporary or seasonally variable resources, including active bird nests, occupied burrows, transient wildlife, and current use of localized sandy or aquatic habitat, are more effectively evaluated through focused preconstruction surveys completed close to the time of disturbance. Accordingly, a general baseline biological site survey was not conducted for this report. This determination does not replace the preconstruction surveys and biological clearance requirements established in Section 7.

3.4 Potential-to-Occur Criteria

Rating	Definition
Present	The species or occupied resource is confirmed within the Project footprint or BSA.
High	Suitable habitat is present and nearby occurrence information or habitat characteristics strongly support use.
Moderate	Suitable or potentially suitable habitat is present, but habitat quality, disturbance, isolation, or occurrence information limits expected use.
Low	Marginal habitat or transient-use potential is present, but one or more important habitat elements are absent or substantially degraded.
Not expected	The species is outside the relevant range or elevation, or essential habitat elements are absent.

4. Results

4.1 Environmental Setting

4.1.1 Existing and Adjacent Land Use

The BSA extends through a predominantly modified valley-floor landscape. Urban development, residential communities, golf courses, maintained landscaping, agricultural fields, orchards, pasture, public roads, utility corridors, and disturbed vacant parcels comprise most of the corridor. Localized native or semi-natural habitat occurs in unpaved sandy areas, Atriplex scrub, mesquite vegetation, canal and drain margins, and other undeveloped pockets.

Existing transmission and distribution facilities, roadways, grading, cultivation, landscaping, and routine maintenance have fragmented habitat throughout much of the BSA. These conditions reduce habitat value for species requiring large, contiguous natural areas but do not eliminate potential use by burrowing owl, nesting birds, bats, sand-associated species, or wildlife associated with canals, ponds, agricultural margins, and mesquite.

4.1.2 Soils

Map unit	Soil name	Biological relevance
GbA	Gilman fine sandy loam, 0 to 2 percent slopes	Alluvial valley soil; suitability depends on surface disturbance and land use.
GeA	Gilman silt loam, 0 to 2 percent slopes	Fine-textured alluvial soil with limited value for dune-dependent species.
Ip	Indio fine sandy loam	Common valley-floor soil associated with agricultural and disturbed settings.
Ir	Indio fine sandy loam, wet	Relevant to aquatic screening near irrigation and drainage features.
Is	Indio very fine sandy loam	Fine sandy alluvial soil; habitat value varies with current surface condition.
It	Indio very fine sandy loam, wet	Relevant to irrigated land, low areas, and aquatic-resource screening.
MaB	Myoma fine sand, 0 to 5 percent slopes	Potential substrate for sand-dependent plants, reptiles, mammals, and invertebrates where loose sand remains.
MaD	Myoma fine sand, 5 to 15 percent slopes	Potential sand-dependent habitat on unpaved slopes and sandy surfaces.

Myoma fine sands are the most biologically consequential mapped soils because they may support sand-dependent plants and wildlife. Mapped sandy soil does not constitute suitable habitat where the surface is paved, compacted, cultivated, irrigated, or landscaped. Wet-labeled soil map units do not independently establish a wetland or jurisdictional water.

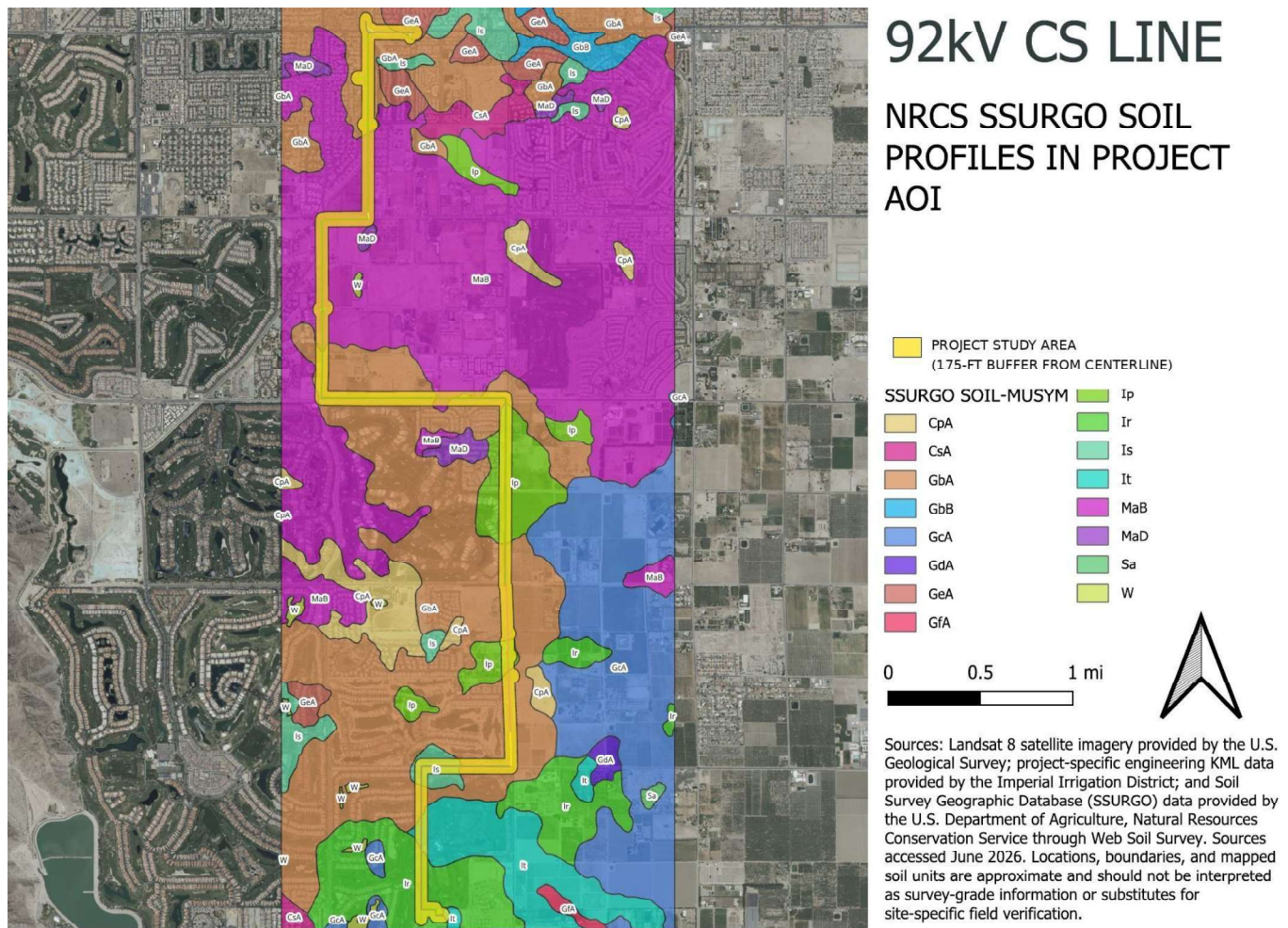


Figure 4. SSURGO Soil Map Units in the Project Area.

4.1.3 Hydrology and Aquatic Features

The Project is located on the Coachella Valley floor within the Whitewater River hydrologic system and Salton Sea drainage basin. Surface-water features in the Project setting are primarily irrigation canals, agricultural drains, stormwater channels, golf-course or landscape ponds, and other artificial flowing or standing waters. Riverine and lacustrine land-cover classes occur within the BSA.

Artificial aquatic features may provide habitat for marsh birds, riparian birds, bats, amphibians, fish, and other wildlife. Jurisdiction under the Clean Water Act, Porter-Cologne Water Quality Control Act, or Fish and Game Code Section 1602 depends on the origin, hydrologic connection, physical characteristics, and proposed activity at each feature.

4.1.4 Vegetation Communities and Land-Cover Types

Community or land-cover type	Classification	Project-area interpretation
Urban	Developed	Buildings, roads, utility facilities, landscaping, and maintained developed areas.
Irrigated row and field crops	Agricultural	Repeatedly cultivated habitat; may provide seasonal foraging and burrowing-owl use.
Orchard-vineyard	Agricultural	Tree crops and vineyards that may provide nesting, roosting, and foraging habitat.
Pasture	Agricultural/open	Open vegetation that may support foraging birds and burrowing owl where burrows are present.
Riverine	Aquatic	Drainage or flowing-water habitat requiring feature-specific avoidance review.
Lacustrine	Aquatic	Pond or standing-water habitat with potential bird and bat value.

Community or land-cover type	Classification	Project-area interpretation
Atriplex lentiformis Alliance	Native or semi-natural scrub	Saltbush habitat with potential value for desert and chenopod-associated species.
Atriplex polycarpa Alliance	Native desert scrub	Desert saltbush scrub with potential value for native desert wildlife.
Prosopis glandulosa-P. velutina-P. pubescens Alliance	Sensitive natural community, S3	Mesquite/desert-riparian woodland requiring avoidance and site-specific verification.

The BSA is predominantly developed, agricultural, landscaped, or otherwise disturbed. The mapped Prosopis alliance is identified as a sensitive natural community and may provide nesting, cover, foraging, and movement functions. Native Atriplex scrub, riverine, and lacustrine features also warrant focused avoidance review where they coincide with construction areas.

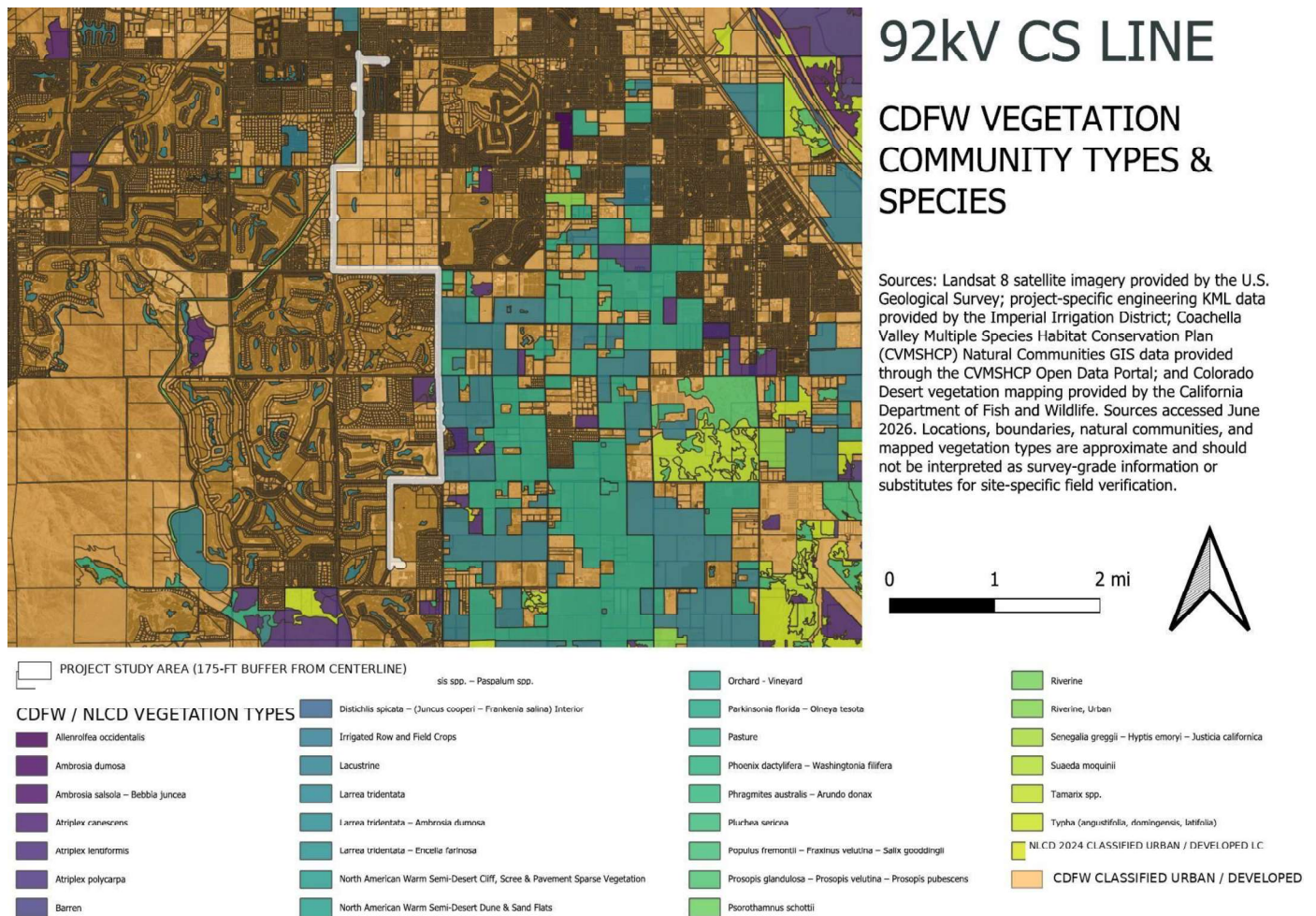


Figure 5. Vegetation Communities and Land-Cover Types.

4.1.5 CVMSHCP and Sensitive Natural Communities

CVMSHCP mapping identifies regional natural-community and species-conservation features near portions of the Project corridor. The Project follows an existing transmission alignment and does not establish a new utility corridor. Work within or adjacent to native desert scrub, mesquite, dune or sand habitat, or CVMSHCP conservation features would be subject to the applicable Plan measures and the avoidance requirements in Section 7.

4.2 Plant Species

The CNPS and CNDDB searches identified 19 special-status plant taxa for evaluation. Most are associated with desert dunes, loose sand, Sonoran desert scrub, chenopod scrub, desert washes, rocky desert habitat, or marsh and riparian environments. The complete evaluation is provided in Appendix A.

Coachella Valley milk-vetch, chaparral sand-verbena, gravel milk-vetch, slender cottonheads, and other sand-associated plants have low to moderate potential in localized unpaved areas where Myoma fine sand, loose aeolian sand, or remnant dune habitat remains. Potential is low or absent in paved, intensively landscaped, cultivated, compacted, or continuously maintained portions of the corridor.

Plants associated with Atriplex scrub, Sonoran desert scrub, or washes generally have low potential because native vegetation is localized and fragmented. Aquatic plant potential is limited to canals, ponds, drains, or other permanently or seasonally wet features.

4.3 Wildlife Species

The CNDDB, RareFind, and IPaC review identified 26 special-status wildlife taxa for evaluation. The complete evaluation is provided in Appendix B. The official IPaC species list identified peninsular bighorn sheep, least Bell's vireo, Coachella Valley fringe-toed lizard, desert tortoise, monarch butterfly, and Coachella Valley milk-vetch. No designated or proposed federal critical habitat overlaps the Project area.

Species	Federal status	Potential	Basis
Peninsular bighorn sheep	Endangered	Not expected	The valley-floor alignment lacks mountain, canyon, and escape-terrain habitat.
Least Bell's vireo	Endangered	Low	Potential is limited to dense riparian vegetation near canals, drains, or ponds.
Coachella Valley fringe-toed lizard	Threatened	Low to Moderate	Localized loose-sand habitat may occur within mapped Myoma soils.
Desert tortoise	Threatened	Low to Not expected	Most of the corridor is developed, agricultural, landscaped, or isolated from natural desert habitat.
Monarch butterfly	Proposed Threatened	Low, transient	Potential depends on milkweed or seasonal nectar plants.
Coachella Valley milk-vetch	Endangered	Low to Moderate	Potential is limited to localized unpaved sandy habitat.

4.3.1 Burrowing Owl

Burrowing owl is a state candidate for listing as endangered and a CDFW Species of Special Concern. The species uses open areas with low vegetation and available burrows, including agricultural fields, pasture, desert flats, vacant parcels, canal banks, road margins, and disturbed sites. These conditions occur intermittently along the Project corridor.

Potential to occur: Moderate.

4.3.2 Coachella Valley Fringe-Toed Lizard and Other Sand-Dependent Wildlife

The Coachella Valley fringe-toed lizard is federally threatened and state endangered and depends on loose, windblown sand. Flat-tailed horned lizard, Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, and several special-status invertebrates may also use sandy desert habitat. Myoma fine sand is mapped in the BSA, but habitat suitability is reduced where the surface is paved, cultivated, compacted, landscaped, or isolated.

Potential to occur: Low to Moderate in localized unpaved sandy habitat.

4.3.3 Desert Pupfish and Aquatic Wildlife

Desert pupfish is federally and state endangered and may occur in suitable drains, springs, ponds, or other aquatic features within its occupied range. Potential is limited to aquatic features and does not extend to dry upland pole locations.

Potential to occur: Low and feature-specific.

4.3.4 Bats

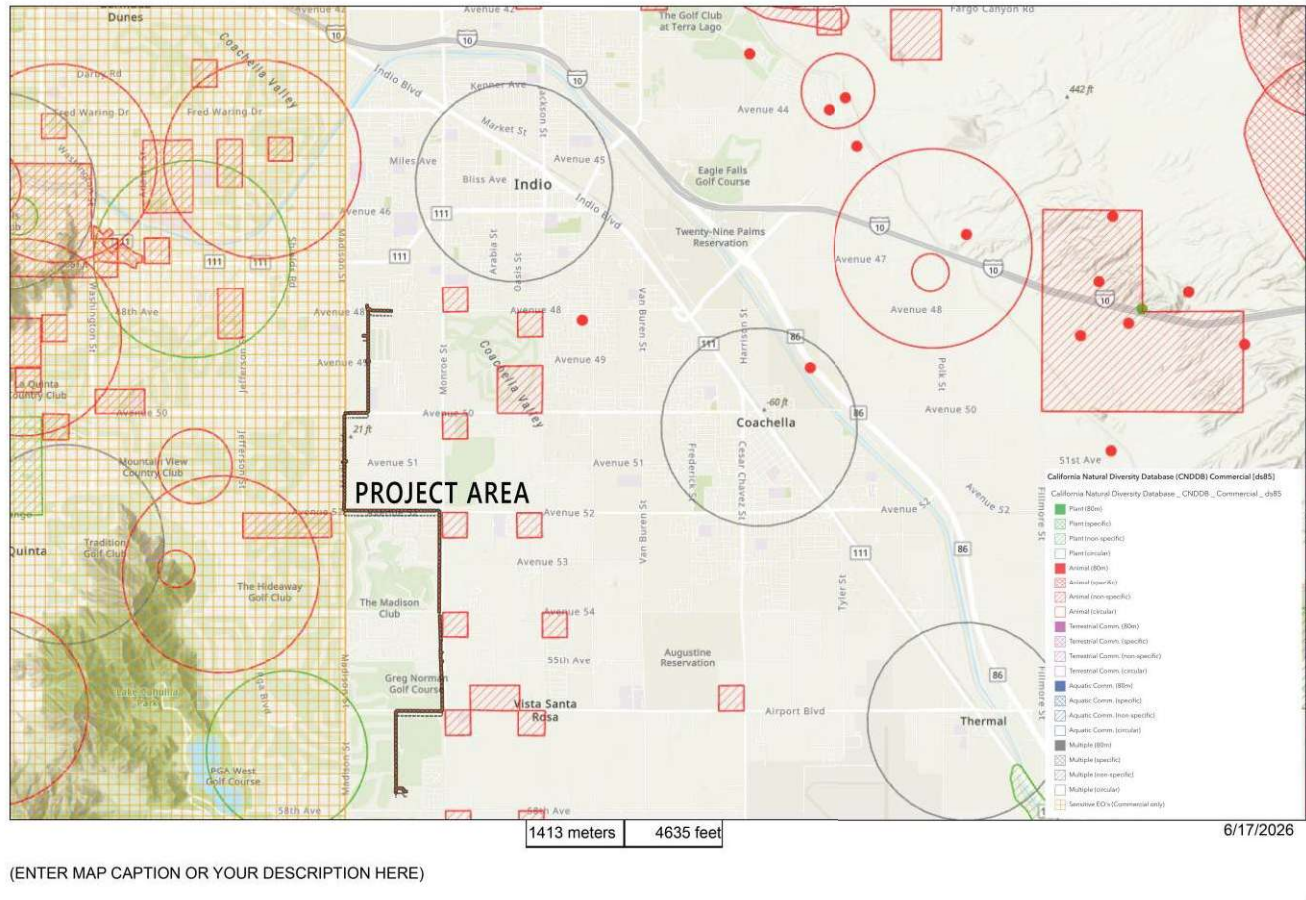
Western mastiff bat, western yellow bat, and pocketed free-tailed bat are documented regionally. Palms, mature trees, buildings, culverts, pole cavities, and other structures may provide roosting opportunities, while canals, ponds, golf courses, and irrigated landscapes may provide foraging habitat.

Potential to occur: Low to Moderate.

6/17/26, 10:13 AM

BIOS Viewer@CDFW

BIOS Report: 92kV CS-LINE



Map Legend

<https://apps.wildlife.ca.gov/bios6/?bookmark=327>

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Figure 6. CNDDDB Occurrence Overview. Sensitive occurrence locations are shown at the resolution provided by CDFW.

4.4 Potential Jurisdictional Wetlands and Streambeds

The BSA includes mapped riverine and lacustrine land cover and contains or approaches canals, drains, ponds, and stormwater features. Pole work and pull sites are expected to remain on existing upland utility, roadside, agricultural, or developed surfaces. Aquatic features would be avoided unless feature-specific review and applicable authorization are completed.

4.5 Nesting Birds

Trees, palms, shrubs, agricultural vegetation, ornamental landscaping, existing utility poles, electrical equipment, buildings, and other structures within and adjacent to the BSA provide potential nesting substrates. Agricultural land, golf courses, ponds, canals, and open disturbed areas also provide foraging habitat for raptors and other birds. Active nests may occur even where habitat is developed or routinely disturbed.

4.6 Wildlife Movement, Corridors, and Nursery Sites

The Project occurs in a fragmented landscape containing roads, residential and commercial development, golf courses, agriculture, fencing, and existing utility infrastructure. The corridor is not a continuous regional wildlife linkage, but local movement may occur along canals, drains, mesquite, agricultural margins, golf courses, open parcels, and landscaped greenways.

The Project would replace or reconstruct infrastructure within an existing overhead utility corridor and would not construct a new continuous wall, fence, or other ground-level barrier. Temporary construction may cause localized avoidance, but the upgraded line would not substantially alter terrestrial movement patterns. Trees, palms, structures, and aquatic features may function as localized nesting, roosting, or breeding sites.

5. Impacts Analysis

For this analysis, the direct construction footprint includes approximately 41 acres of temporary work areas and less than 0.1 acre of permanent pole and foundation disturbance. Direct effects are those that occur at the same time and place as construction, including vegetation removal, excavation, crushing, or disturbance of occupied habitat. Indirect effects include noise, vibration, dust, altered activity patterns, sedimentation, or other effects extending beyond the immediate work area. Temporary effects would occur during the approximately four-month construction period; permanent effects would be limited to pole and foundation footprints and the continued presence of the upgraded line.

5.1 Vegetation Communities and Land-Cover Types

Most temporary disturbance would occur on developed, agricultural, landscaped, roadside, or previously disturbed surfaces. These land-cover types are common in the Project area and are not sensitive natural communities. Temporary disturbance would not result in substantial regional habitat loss.

Localized Atriplex scrub, mesquite, riverine, or lacustrine features could be affected if work areas extend beyond disturbed surfaces. BIO-4 requires avoidance and demarcation of sensitive natural communities and aquatic features. BIO-5 confines construction to approved disturbance limits and requires restoration of temporary work areas.

Impact Determination: Less Than Significant with Mitigation Incorporated.

5.2 Special-Status Plant Species

Ground disturbance in unpaved Myoma fine sand, native desert scrub, or other suitable habitat could crush or remove special-status plants or alter localized habitat. The affected area would be small relative to the BSA and regional habitat, and most construction would occur on modified surfaces.

BIO-1 requires a preconstruction biological resource survey, and BIO-3 requires focused review of sandy and native desert habitat. Work areas would be shifted to disturbed surfaces where feasible. Listed plants or occupied rare-plant habitat would not be disturbed without applicable authorization and mitigation.

Impact Determination: Less Than Significant with Mitigation Incorporated.

5.3 Special-Status Wildlife Species

Construction could affect burrowing owl, sand-dependent reptiles and mammals, bats, aquatic wildlife, or other special-status species through direct mortality, burrow collapse, temporary habitat disturbance, vehicle strike, noise, vibration, or entrapment. The greatest potential occurs at unpaved sandy areas, open agricultural margins, canal banks, vacant parcels, mature palms or trees, and aquatic features.

BIO-1, BIO-3, BIO-5, and BIO-6 require preconstruction clearance, species-specific avoidance, work-area controls, worker training, and stop-work procedures. These measures would prevent unauthorized take and reduce temporary effects to a less-than-significant level.

Impact Determination: Less Than Significant with Mitigation Incorporated.

5.4 Nesting Birds and Raptors

Pole replacement, removal of existing hardware, conductor work, vegetation trimming, and equipment operation could disturb active nests or result in nest abandonment if work occurs during the breeding season. The existing corridor and surrounding developed and agricultural land contain numerous potential nesting substrates.

BIO-2 requires a nesting-bird survey no more than three days before work during the nesting season, species-appropriate buffers, monitoring where necessary, and release of buffers only after the nest is no longer active.

Impact Determination: Less Than Significant with Mitigation Incorporated.

5.5 Jurisdictional Aquatic Resources

Direct entry into or alteration of a canal, drain, pond, streambed, or associated riparian vegetation could affect aquatic habitat, water quality, or regulatory jurisdiction. The Project is designed to use existing upland access and pole locations and does not require routine work within aquatic features.

BIO-4 prohibits encroachment into mapped or field-verified aquatic resources unless the feature has been evaluated and applicable permits or agreements have been obtained. Erosion, spill, and sediment controls would be implemented near aquatic features.

Impact Determination: Less Than Significant with Mitigation Incorporated.

5.6 Wildlife Movement and Nursery Sites

The Project would not create a new continuous ground-level barrier or remove a regional habitat linkage. Temporary construction activity could cause localized avoidance, but movement opportunities along canals, golf courses, agricultural margins, and open parcels would remain available. Pole replacement and conductor upgrade would retain the existing linear utility use.

Impact Determination: Less Than Significant.

5.7 Local Policies and CVMSHCP Consistency

The Project would remain within an existing utility corridor and would comply with applicable local biological-resource policies and CVMSHCP requirements. BIO-6 requires confirmation and implementation of the applicable CVMSHCP covered-activity, conservation-area, adjacency, species, and natural-community measures before construction.

Impact Determination: Less Than Significant with Mitigation Incorporated.

CEQA biological-resource issue	Impact determination
Special-status species	Less Than Significant with Mitigation Incorporated
Riparian habitat and sensitive natural communities	Less Than Significant with Mitigation Incorporated
Wetlands and aquatic resources	Less Than Significant with Mitigation Incorporated
Wildlife movement and nursery sites	Less Than Significant
Local biological-resource policies	Less Than Significant with Mitigation Incorporated
CVMSHCP consistency	Less Than Significant with Mitigation Incorporated
Federal critical habitat	No Impact

6. Cumulative Effects

Cumulative biological effects in the Coachella Valley include conversion and fragmentation of desert habitat, modification of dune systems, urban and agricultural development, road and utility construction, loss of mesquite and riparian vegetation, altered hydrology, invasive species, wildlife mortality, noise, lighting, and climate-related stress.

The Project would upgrade an existing transmission line and would not create a new regional utility corridor. Permanent habitat conversion would be less than 0.1 acre and temporary disturbance would be concentrated in discrete pole, access, and pull-site work areas. Implementation of BIO-1 through BIO-6 would avoid or minimize effects on listed species, active nests, sensitive natural communities, aquatic features, and CVMSHCP resources.

The Project's contribution to cumulative biological-resource effects would not be cumulatively considerable.

Cumulative Impact Determination: Less Than Significant with Mitigation Incorporated.

7. Avoidance and Minimization Measures

The following measures shall be implemented to reduce Project effects on biological resources to less-than-significant levels under CEQA.

BIO-1 Preconstruction Biological Resource Survey

No more than three days before initial ground disturbance, vegetation removal, pole removal, or equipment setup, a qualified biologist shall survey the applicable work areas and accessible surrounding habitat for special-status species, active burrows, sensitive plants, aquatic features, and other biological constraints.

A qualified biologist shall possess a degree in biology, ecology, wildlife management, botany, or a related field; at least three years of relevant field experience; demonstrable experience with the species and habitats being evaluated; and any permits or authorizations required for handling or survey activities.

Sensitive resources shall be flagged or otherwise demarcated for avoidance. If a listed species or occupied protected resource is found within an impact area, work shall stop in the vicinity until IID and the biologist establish an authorized avoidance, monitoring, relocation, consultation, or permitting approach. Wildlife shall not be handled or relocated without appropriate authorization.

Timing/Implementation: No more than three days before initial disturbance at each work area.

Enforcement/Monitoring: Qualified Biologist and Imperial Irrigation District.

BIO-2 Preconstruction Nesting Bird Survey

If construction occurs during the bird breeding season, generally February 1 through August 31 for raptors and March 15 through August 31 for most other migratory birds, a qualified avian biologist shall conduct a nesting-bird survey no more than three days before initial disturbance.

The survey shall include the work area and adjacent habitat with potential to be affected by construction activity or noise. If an active nest is identified, the biologist shall establish an avoidance buffer. Unless a different distance is supported by site-specific conditions and documented by the biologist, the initial buffer shall be 500 feet for raptors and 250 feet for other protected birds.

Buffers may be adjusted based on species, nest location, nesting stage, existing disturbance, topography, visual screening, and the type and intensity of construction. Work shall not occur within the buffer until the nest is no longer active or monitoring demonstrates that construction can proceed without causing nest failure or abandonment.

Timing/Implementation: During the applicable breeding season and no more than three days before initial disturbance.

Enforcement/Monitoring: Qualified Avian Biologist and Imperial Irrigation District.

BIO-3 Burrowing Owl and Sandy-Habitat Species Protection

Before disturbance in open agricultural land, pasture, vacant or ruderal land, canal banks, road shoulders, Myoma fine sand, native desert scrub, or other suitable habitat, a qualified biologist shall conduct focused clearance for burrowing owl and other special-status species appropriate to the habitat.

Burrowing-owl take-avoidance surveys shall follow current CDFW guidance and shall include an initial survey within 14 days before disturbance and a final survey within 24 hours before disturbance where suitable habitat is present.

Unpaved loose-sand habitat shall be evaluated for Coachella Valley fringe-toed lizard, flat-tailed horned lizard, Coachella Valley milk-vetch, Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, and other sand-associated species identified in Appendices B and C. Work areas shall be shifted to developed or previously disturbed surfaces where feasible.

If an occupied burrow, listed species, or occupied special-status plant population is identified, work shall not proceed within the affected area until species-specific avoidance, agency coordination, take authorization, and mitigation requirements are satisfied.

Timing/Implementation: Before disturbance in suitable open, burrow, sandy, or native desert habitat.

Enforcement/Monitoring: Qualified Biologist and Imperial Irrigation District.

BIO-4 Sensitive Natural Community and Aquatic Resource Avoidance

Project disturbance shall avoid the mapped Prosopis sensitive natural community, field-verified riparian vegetation, riverine and lacustrine habitat, canals, drains, ponds, streambeds, and other aquatic features to the maximum extent feasible.

Where a sensitive community or aquatic feature occurs near a work area, a qualified biologist shall verify its limits and establish a clearly marked exclusion area. A minimum 25-foot setback shall be maintained where feasible, unless a larger distance is required by an agency, permit, or site-specific condition.

If avoidance is infeasible, IID shall complete the applicable aquatic-resource delineation, CDFW notification, Clean Water Act authorization, water-quality certification, CVMSHCP review, restoration, and compensatory mitigation before disturbance.

Timing/Implementation: During final work-area layout and throughout construction.

Enforcement/Monitoring: Qualified Biologist, Imperial Irrigation District, and applicable permitting agencies.

BIO-5 Limits of Disturbance and Worker Environmental Awareness

Approved pole work areas, pull and tension sites, access routes, staging areas, and exclusion zones shall be shown on construction plans or environmental exhibits and clearly marked in the field where necessary.

Before beginning work, construction personnel shall receive environmental awareness training addressing special-status species, nesting birds, burrowing owl, sensitive natural communities, aquatic features, vehicle speed, trash control, wildlife encounters, spill prevention, and stop-work procedures.

Vehicles and equipment shall remain within approved roads and work areas. Temporary disturbance shall be restored or stabilized after construction. Open excavations shall be covered or provided with wildlife escape ramps when unattended, and work areas shall be inspected for trapped wildlife before daily activities begin.

Timing/Implementation: Before and during construction.

Enforcement/Monitoring: Construction Contractor, Qualified Biologist, and Imperial Irrigation District.

BIO-6 CVMSHCP Consistency

IID shall implement the CVMSHCP requirements applicable to public infrastructure, operation and maintenance, covered species, natural communities, conservation areas, and adjacency to conserved lands.

Where Project activities occur within or adjacent to mapped CVMSHCP resources, the construction package shall incorporate applicable measures addressing lighting, drainage, toxics, noise, invasive species, barriers, grading, and species protection. Required coordination, fees, joint project review, take coverage, restoration, or compensation shall be completed before the affected activity begins.

Timing/Implementation: Before construction and throughout Project implementation.

Enforcement/Monitoring: Imperial Irrigation District in coordination with the Coachella Valley Conservation Commission and applicable jurisdictions.

8. References

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- California Native Plant Society (CNPS). 2026. Rare Plant Inventory. Indio and La Quinta USGS 7.5-minute quadrangle search. June 17, 2026.
- Coachella Valley Conservation Commission. Coachella Valley Multiple Species Habitat Conservation Plan and associated GIS data.
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- Imperial Irrigation District (IID). 2026. CS Line 92 kV Engineered Steel Pole Structure Drawings.
- Natural Resources Conservation Service (NRCS). 2026. Soil Survey Geographic Database and Web Soil Survey data for the Project area.
- U.S. Fish and Wildlife Service (USFWS). 2026. Official Species List for 92 kV CS Line, Project Code 2026-0104773. Carlsbad Fish and Wildlife Office. June 17, 2026.
- U.S. Geological Survey (USGS). Landsat 8 satellite imagery. Accessed June 2026.

Appendix A. Special-Status Plant Species Evaluation

Special-status plants identified through the CNPS, CNDDDB, RareFind, and IPaC review were evaluated using geographic range, elevation, vegetation, soils, substrate, hydrology, disturbance, and known regional occurrence information.

Species	Status	Habitat, blooming period, and elevation	Potential	Basis
<i>Abronia villosa</i> var. <i>aurita</i> chaparral sand-verbena	CRPR 1B.1	Chaparral, Coastal scrub, Desert dunes; Sandy Blooming: (Jan)Mar-Sep Elevation: 245 to 5,250 ft	Low to Moderate	Mapped sandy substrate may occur locally, but most of the corridor is developed, landscaped, cultivated, or compacted.
<i>Astragalus lentiginosus</i> var. <i>cochellae</i> Coachella Valley milk-vetch	FESA FE; CRPR 1B.2	Desert dunes, Sonoran desert scrub (sandy) Blooming: Feb-May Elevation: 130 to 2,150 ft	Low to Moderate	Potential is limited to remaining loose, unpaved sandy habitat associated with dunes or sandy desert scrub.
<i>Astragalus preussii</i> var. <i>laxiflorus</i> Lancaster milk-vetch	CRPR 1B.1	Chenopod scrub Blooming: Mar-May Elevation: 2,295 to 2,295 ft	Not expected	The project is on the low valley floor and lacks the narrowly reported elevation and habitat combination for this taxon.
<i>Astragalus sabulorum</i> gravel milk-vetch	CRPR 2B.2	Desert dunes, Mojavean desert scrub, Sonoran desert scrub; Flats, Gravelly (sometimes), Roadsides, Sandy (usually), Washes Blooming: Feb-Jun Elevation: -195 to 3,050 ft	Low to Moderate	Potential is limited to loose sandy flats, washes, or roadside habitat that has not been paved, cultivated, or compacted.
<i>Chorizanthe leptotheca</i> Peninsular spineflower	CRPR 4.2	Chaparral, Coastal scrub, Lower montane coniferous forest; Granitic Blooming: May-Aug Elevation: 985 to 6,235 ft	Not expected	Granitic chaparral and montane habitat are absent from the project corridor.
<i>Ditaxis claryana</i> glandular ditaxis	CRPR 2B.2	Mojavean desert scrub, Sonoran desert scrub; Sandy Blooming: Oct-Mar Elevation: 0 to 1,525 ft	Low	Most of the corridor is modified; localized sandy desert habitat may remain.
<i>Ditaxis serrata</i> var. <i>californica</i> California ditaxis	CRPR 3.2	Sonoran desert scrub Blooming: Mar-Dec Elevation: 100 to 3,280 ft	Low	Potential is limited to remnant Sonoran desert scrub in otherwise developed and agricultural surroundings.
<i>Horsfordia alata</i> pink velvet-mallow	CRPR 4.3	Sonoran desert scrub (rocky) Blooming: Feb-Dec Elevation: 330 to 1,640 ft	Not expected	Rocky Sonoran desert scrub is not characteristic of the mapped valley-floor corridor.
<i>Horsfordia newberryi</i> Newberry's velvet-mallow	CRPR 4.3	Sonoran desert scrub (rocky) Blooming: Feb-Dec Elevation: 10 to 2,625 ft	Not expected	Rocky Sonoran desert scrub is not characteristic of the mapped valley-floor corridor.
<i>Johnstonella costata</i> ribbed cryptantha	CRPR 4.3	Desert dunes, Mojavean desert scrub, Sonoran desert scrub; Sandy Blooming: Feb-May Elevation: -195 to 1,640 ft	Low to Moderate	Potential is limited to remaining loose sandy habitat.
<i>Johnstonella holoptera</i> winged cryptantha	CRPR 4.3	Mojavean desert scrub, Sonoran desert scrub Blooming: Mar-Apr Elevation: 330 to 5,545 ft	Low	Potential is limited to remnant desert scrub; the corridor is substantially modified.
<i>Juncus acutus</i> ssp. <i>leopoldii</i> southwestern spiny rush	CRPR 4.2	Coastal dunes (mesic), Coastal scrub, Marshes and swamps (coastal salt), Meadows and seeps (alkaline seeps) Blooming: (Mar)May-Jun Elevation: 10 to 2,955 ft	Low	Potential is limited to alkaline seeps, marsh edges, or other mesic features; no broad suitable habitat is mapped.
<i>Marina orcuttii</i> var. <i>orcuttii</i> California marina	CRPR 1B.3	Chaparral, Pinyon and juniper woodland, Sonoran desert scrub; Rocky Blooming: May-Oct Elevation: 3,445 to 3,805 ft	Not expected	The reported rocky and higher-elevation habitat is absent from the project corridor.

Species	Status	Habitat, blooming period, and elevation	Potential	Basis
Matelea parvifolia spear-leaf matelea	CRPR 2B.3	Mojavean desert scrub, Sonoran desert scrub; Rocky Blooming: Mar-May(Jul) Elevation: 1,445 to 3,595 ft	Not expected	Rocky desert habitat and the reported elevation range are not characteristic of the project corridor.
Nemacaulis denudata var. gracilis slender cottonheads	CRPR 2B.2	Coastal dunes, Desert dunes, Sonoran desert scrub Blooming: (Mar)Apr-May Elevation: -165 to 1,310 ft	Low to Moderate	Potential is limited to remnant dune or sandy desert habitat.
Pseudorontium cyathiferum Deep Canyon snapdragon	CRPR 2B.3	Sonoran desert scrub (rocky) Blooming: Feb-Apr Elevation: 0 to 2,625 ft	Low	Potential is limited to remnant rocky desert scrub, which is uncommon within the BSA.
Selaginella eremophila desert spike-moss	CRPR 2B.2	Chaparral, Sonoran desert scrub (gravelly, rocky) Blooming: (May)Jun(Jul) Elevation: 655 to 4,250 ft	Not expected	Gravelly or rocky scrub habitat is not characteristic of the mapped project corridor.
Stemodia durantifolia purple stemodia	CRPR 2B.1	Sonoran desert scrub (often mesic, sandy) Blooming: (Jan)Apr-Dec Elevation: 590 to 985 ft	Low	Potential is limited to mesic sandy Sonoran desert scrub near drains or irrigated margins.
Stuckenia striata broadleaf pondweed	CRPR 2B.3	Marshes and swamps Blooming: (Jun)Jul-Aug Elevation: -230 to 7,005 ft	Low	Potential is limited to ponds, drainage canals, or other aquatic features; it is not expected in upland pole work areas.

Appendix B. Special-Status Wildlife Species Evaluation

Special-status wildlife identified through the CNDDDB, RareFind, and IPaC review were evaluated using habitat, species ecology, current land use, mapped soils and vegetation, regional occurrences, and the location of the Project within an existing utility corridor.

Species	Status	Habitat and regional records	Potential	Basis
Athene cunicularia burrowing owl	CESA Candidate Endangered; CDFW SSC: Species of Special Concern	Coastal prairie; Coastal scrub; Great Basin grassland; Great Basin scrub; Mojavean desert scrub; Sonoran desert scrub; Valley & foothill grassland Records: 6	Moderate	Agricultural land, pasture, open disturbed areas, road shoulders, canal banks, and suitable burrows may occur.
Buteo regalis ferruginous hawk	CDFW Watch List: Watch List	Great Basin grassland; Great Basin scrub; Pinon & juniper woodlands; Valley & foothill grassland Records: 1	Low	Open agricultural areas may provide seasonal foraging habitat, but nesting habitat is not expected.
Chaetodipus fallax pallidus pallid San Diego pocket mouse	Special-status	Desert wash; Pinon & juniper woodlands; Sonoran desert scrub Records: 1	Low	Potential is limited to remnant desert wash or scrub habitat in a fragmented corridor.
Crotalus ruber red-diamond rattlesnake	CDFW SSC: Species of Special Concern	Chaparral; Mojavean desert scrub; Sonoran desert scrub Records: 1	Low	Suitable natural desert scrub is limited and fragmented.
Cyprinodon macularius desert pupfish	FESA Endangered; CESA Endangered	Aquatic; Artificial flowing waters; Artificial standing waters; Colorado River basin flowing waters; Colorado River basin standing waters Records: 1	Low	Potential is restricted to suitable aquatic features and does not extend to dry upland pole sites.
Dinacoma caseyi Casey's June beetle	FESA Endangered	Desert wash; Mojavean desert scrub Records: 1	Not expected	The species has highly restricted known habitat, and suitable habitat is not indicated within the BSA.
Eumops perotis californicus western mastiff bat	CDFW SSC: Species of Special Concern	Chaparral; Cismontane woodland; Coastal scrub; Valley & foothill grassland Records: 1	Low to Moderate	Foraging may occur; roosting suitability depends on mature trees or structures at individual work areas.
Euparagia unidentata Algodones euparagia	Special-status	Desert dunes Records: 1	Low	Potential is limited to suitable dune habitat, which is localized and highly modified near the alignment.
Falco mexicanus prairie falcon	CDFW Watch List: Watch List	Great Basin grassland; Great Basin scrub; Mojavean desert scrub; Sonoran desert scrub; Valley & foothill grassland Records: 2	Low	Transient foraging is possible; cliff or rocky nesting habitat is absent.
Lasiurus xanthinus western yellow bat	CDFW SSC: Species of Special Concern	Desert wash Records: 6	Moderate	Palms and landscaped or riparian settings may provide roosting and foraging habitat.
Macrobaenetes valgum Coachella giant sand treader cricket	Special-status	Desert dunes Records: 3	Low to Moderate	Potential is limited to remaining loose dune sand.
Nyctinomops femorosaccus pocketed free-tailed bat	CDFW SSC: Species of Special Concern	Joshua tree woodland; Pinon & juniper woodlands; Riparian scrub; Sonoran desert scrub Records: 1	Low	Foraging is possible, but suitable roosting habitat is not confirmed.
Oliarces clara cheeseweed owlfly (cheeseweed moth lacewing)	Special-status	Sonoran desert scrub Records: 1	Low	Potential is limited to remnant Sonoran desert scrub.
Perognathus longimembris bangsi Palm Springs pocket mouse	CDFW SSC: Species of Special Concern	Desert wash; Sonoran desert scrub Records: 2	Low to Moderate	Potential is limited to unpaved sandy desert or wash habitat.
Phrynosoma mcallii flat-tailed horned lizard	CDFW SSC: Species of Special Concern	Desert dunes; Mojavean desert scrub; Sonoran desert scrub Records: 6	Low to Moderate	Potential is limited to unpaved sandy desert habitat; urban, cultivated, and landscaped segments are unsuitable.

Species	Status	Habitat and regional records	Potential	Basis
<i>Poliophtila melanura</i> black-tailed gnatcatcher	CDFW Watch List: Watch List	Mojavean desert scrub; Sonoran desert scrub Records: 6	Low	Limited native desert scrub occurs in the developed corridor.
<i>Pyrocephalus rubinus</i> vermillion flycatcher	CDFW SSC: Species of Special Concern	Marsh & swamp; Riparian forest; Riparian scrub; Riparian woodland; Wetland Records: 2	Moderate	Golf courses, irrigated open space, ponds, palms, and riparian landscaping may provide habitat.
<i>Taxidea taxus</i> American badger	CDFW SSC: Species of Special Concern	Broad habitat generalist; locally relevant types include desert scrub, dunes and washes, riparian habitats, thorn woodland, and grassland. See RareFind export. Records: 1	Low	Open parcels and agricultural land may provide transient habitat, but the corridor is fragmented by development and roads.
<i>Toxostoma lecontei</i> Le Conte's thrasher	CESA Candidate Threatened; CDFW SSC: Species of Special Concern	Desert wash; Mojavean desert scrub; Sonoran desert scrub Records: 2	Low	Desert wash and scrub habitat are limited and fragmented.
<i>Uma inornata</i> Coachella Valley fringe-toed lizard	FESA Threatened; CESA Endangered	Desert dunes; Desert wash Records: 37	Low to Moderate	Mapped sandy soils and regional dune habitat occur, but most of the corridor is modified or compacted.
<i>Xerospermophilus tereticaudus</i> chlorus Palm Springs round-tailed ground squirrel	CDFW SSC: Species of Special Concern	Chenopod scrub; Sonoran desert scrub Records: 4	Low to Moderate	Potential exists in chenopod scrub or unpaved Sonoran desert habitat.
<i>Ovis canadensis nelsoni</i> Peninsular bighorn sheep	FESA Endangered	See USFWS species account Records: IPaC	Not expected	The project is in a developed valley-floor setting without mountain slope or escape terrain.
<i>Vireo bellii pusillus</i> Least Bell's vireo	FESA Endangered	See USFWS species account Records: IPaC	Low	Potential is limited to dense suitable riparian vegetation near aquatic features.
<i>Gopherus agassizii</i> Desert tortoise	FESA Threatened	See USFWS species account Records: IPaC	Low to Not expected	Most of the corridor is developed, agricultural, or landscaped; natural desert habitat is limited.
<i>Danaus plexippus</i> Monarch butterfly	FESA Proposed Threatened	See USFWS species account Records: IPaC	Low, transient	Transient use depends on milkweed or flowering nectar plants in landscaped or open areas.