Description of Change and Justification (Attach additional sheets if needed.)

Attachments:
- CONSTRUCTION DRAWING  ADDITIONAL ENVIRONMENTAL ANALYSIS  CORRESPONDENCE  OTHER:

New Water Sources in Segment 1

Rubber tired water trucks will park on existing public roads shoulders adjacent to two (2) existing municipal water source locations, shown on Figure 1, page 1. Only occasional short-term filling of water trucks will occur, while allowing access to local land uses. No ground disturbance will occur at the water source locations described below:

**Hydrant #1** – Potable water hydrant supplied by the City of Loma Linda, located on the north side of Business Center Drive, adjacent to the SCE corridor (34°03'55.45"N, 117°14'21.65"W), shown on Figure 1, page 1.

The new work area consists of approximately .03-acre of previously developed/disturbed public right-of-way in the City of Loma Linda.

**Hydrant #2** – As an alternative to Hydrant #1, the potable water hydrant supplied by the City of Loma Linda, located on the southwest corner of Business Center Drive and Enterprise Drive (34°03'54.82"N, 117°14'16.15"W), shown on Figure 1, page 1 may be utilized.

The new work area consists of approximately .02-acre of previously developed/disturbed public right-of-way in the City of Loma Linda.

All Water Districts/Agencies listed in the FEIR were contacted to determine the availability of non-potable water. Only the City of Redlands currently provides non-potable water service within the Project Area, however the City does not provide recycled water for use outside the City boundaries.

Water Tank Installation in Segment 2

A .33-acre temporary work area located on vacant land at the east end of Prado Lane in the City of Loma Linda (APNs 0284-161-49, 0284-161-50) is required to install and operate a water holding tank for Segment 2 construction, utilizing an adjacent previously approved water source. At the Prado Lane water source, approved in MPR #6, a steel encased 3-inch fire hose will be temporarily installed above ground, from the approved hydrant to a portable water tank located in the approximate location shown on Figure 1, page 2. The site will be grubbed and lightly graded prior to the installation of the tank to provide a level surface.
The total temporary disturbance area associated with the work area consists of approximately .01-acre of developed/disturbed land and .32-acre grassland/forbland, owned by the City of Colton and Leo R. Beus.

El Casco Substation Helicopter Hook-Up Area in Segment 3

A .22-acre temporary work area located on previously developed/disturbed land on the northwest exterior perimeter of the El Casco Substation (APNs 413-180-009 and 413-180-010) is required to complete the OPGW installation from 3N02 to 3N25, during the Move 3, California Independent System Operator’s allowable outage period, ending May 8, 2019. During this activity, a helicopter will enter the new work area from the southwest to minimize encroachment into an existing LBVI nest buffer. Workers on the ground will affix the rope to a hook on the helicopter. The helicopter will then proceed with threading the rope through the structures associated with the move until rope is threaded through structure 3N25. The helicopter will remain approximately 100 feet above the ground for approximately 1-2 minutes before departing the work area.

The new work area shown on Figure 1, page 3 consists of approximately .22-acre of previously developed/disturbed land, owned by the Riverside County Regional Park & Open Space District.

Environmental Analysis

No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated during the use of the water sources and new work areas described below:

Proposed Project Water Sources – Figure 1, page 1

The two new water sources are existing hydrants, located within existing developed/disturbed areas. Water trucks will park immediately adjacent to the water hydrants, and workers will fill the truck tanks using equipped hoses and on-board pumps. No additional ground disturbance (i.e., site preparation) will occur at these locations. The Segment 1 hydrants are located in an urbanized industrial area, not likely to be affected by use of the hydrants. Because no ground-disturbance will occur and water trucks will be positioned on paved/disturbed surfaces occasionally for short durations of time, no impacts to special-status terrestrial wildlife (e.g., burrowing small mammals) or special-status plants are anticipated. In addition, the act of filling water trucks will be similar to baseline conditions in both locations (e.g., public traffic, busy freeways and highways, and train travel). Preconstruction surveys for each water source will be conducted prior to initiation of use.

Water Tank Installation – Figure 1, page 2

The Prado Lane water source is unique in that above ground piping will be installed to convey water from the approved water hydrant to an above ground holding tank adjacent to the approved access road. To mitigate potential impacts, the above ground piping from the hydrant to the tank will be encased in a steel sleeve to prevent puncture and control potential drips. Secondary containment will be placed under the hydraulic motor that is used to raise and lower the tank. Wire-backed silt fence will be installed around the western and southern perimeter of the site in compliance with the SWPPP. The pull cord on the tower will be locked out nightly and will be removed over weekends and holidays. A preconstruction survey of the work area will be conducted prior to initiation of use.

El Casco Helicopter Hook-up Area – Figure 1, page 3

The helicopter hook-up area is adjacent to an active 500-kV substation, with baseline conditions including frequent bursts of noise from the adjacent train track, passing cars and truck traffic on San Timoteo Canyon Road, aircraft, and other ambient noise. Despite the baseline conditions, LBVI Nest Event 000305 exists within the riparian canopy to the east of the substation, which provides a natural acoustic barrier. The standard OPGW helicopter stringing approach has been adjusted to further minimize impacts from helicopter activity to the nest. The helicopter will be restricted to an area outside of the 500-foot nest buffer to the extent possible, but it may encroach to within approximately 400 feet of the nest, by utilizing less impactful construction methods closer to the nest. Specifically, workers will use cranes and manpower to hand pull the sock-line through structure 3N02. The helicopter will then be used to pull the sock line from this location west. This approach will minimize use of the helicopter within the buffer. The WR-MSHCP DBESP for riparian and riverine resources will be implemented including full-time noise and nest monitoring by an agency approved LBVI biologist during all work activities.

Biological Resources
A desktop analysis was conducted for the two new water sources, water tank site, and helicopter hook-up area using aerial imagery and project biological data. The new work areas were covered during previous surveys, including Preconstruction Survey FRED IDs 000068, 00126 (resurveyed 4/23/2019), 000077, 000031, and 000067:

**Desert Tortoise** – The new work areas are not located within the range of the species, therefore no impacts to the species are anticipated.

**Special-status Terrestrial Herpetofauna** – A Red-diamond Rattlesnake was observed south of the El Casco Substation helicopter hook-up area, however no other special-status terrestrial herpetofauna were observed within the new work area areas. A preconstruction survey for each work area will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no impacts to Special-status Terrestrial Herpetofauna are anticipated.

**Burrowing Owl** – Burrowing owl habitat is widespread in the project area. Although burrowing owls are not anticipated to occur within the work areas, active burrowing owl burrows, if found later, will be mitigated for in accordance with the WOD Burrowing Owl Management and Passive Relocation Plan, if encountered.

**Nesting Birds** – Suitable substrates for nesting birds protected by the California Fish and Game Code, including trees, shrubs, man-made structures, and the ground surface, can be found throughout the project area. No active nest buffers intersect the work areas (except the LBVI discussed below), however one active Cassin’s Kingbird (FRED Nest 000279) exists approximately 500-feet southeast of the Prado Lane Water Source, well outside the 150-foot nest buffer for this species and one Common Raven nest buffer is located more than 500-feet southwest of the new water tank site in Segment 2. Preconstruction surveys, including surveys for nesting birds during the avian breeding season (Jan 1 – Aug 31) will be conducted prior to the initiation of construction use at each hydrant/work. If additional active nests are identified during construction activities, avoidance buffers will be established in accordance with the WOD Nesting Bird Management Plan. With implementation of the NBMP, no impacts are anticipated.

**Listed Riparian Birds** – No suitable habitat for riparian birds (least Bell's vireo [LBVI]/Southwestern willow flycatcher [SWFL]) occurs within the work areas, except at the El Casco Substation helicopter site. The proposed site is needed to facilitate OPGW installation through structure 3N02, which is currently encompassed by a 500-foot avoidance buffer associated with LBVI Nest Event 000305. To minimize impacts, Barnard has proposed conducting manual sock line pulling (i.e., utilizing cranes to access the structure and people power to pull the sock line) within the buffer. After the sock line is manually pulled through 3N02, it will be hooked up to the helicopter for the remainder of the pull. The proposed work area would serve as a hook-up area on the edge of the nest buffer. The nest is located approximately 440 feet northwest of the helicopter work area, approximately 200-feet from the nearest ground-based construction, and adjacent to the access route into the 3N02 site. No direct impacts to riparian habitat will occur. The majority of the ground-based activities will be limited to the large approved work area associated with 3N02 and adjacent structures. Only foot traffic will occur within the helicopter area; no ground disturbance. The helicopter will not land in the work area. Rather, it will hover in position for 1-2 minute.

Activities will be well-planned ahead of execution to minimize the duration of work to the extent feasible. No stopping, idling, or loitering will be allowed along access roads in the vicinity of the work. The LBVI monitor will assist with mobilization, encouraging workers to proceed quickly and quietly into the site, parking the greatest distance possible from the nest. The agency-approved LBVI biologist will be present at all times during the proposed activities and hold a pre-flight meeting with the crew, including the helicopter pilot to explain the wildlife agency approved buffer entry exclusion conditions and describe the necessary precautions to avoid impacts to LBVI. As per typical protocol, the pilot will load the on-board GPS with the horizontal and vertical nest buffers to facilitate avoidance while in the air.

While spikes in noise generation may occur during helicopter use and other construction activities, at the distances from the nest, noise levels from the proposed activities are not expected to exceed the established thresholds. RCA, USFWS, and CDFW agreed that the activities may proceed provided the avoidance measures in the Determination of Biologically Equivalent or Superior Preservation, including noise monitoring, are implemented. The DBESP measures are consistent with MM WIL-2c.
**Coastal California Gnatcatcher** – The Prado Lane water tank installation is located within mapped USFWS-designated Coastal California gnatcatcher (CAGN) critical habitat and within 500-feet of mapped suitable CAGN habitat. Focused surveys for CAGN were conducted in March and April 2018. No CAGN were detected in Segment 2. The land cover types comprising the proposed work area are not comprised of primary constituent elements of gnatcatcher critical habitat and no CAGNs are expected to occur. Preconstruction surveys, including surveys for nesting birds, will be conducted during the avian breeding season (Jan 1 – Aug 31) and prior to the initiation of construction use at each hydrant/work area. Daily sweeps will be conducted prior to construction during the avian breeding season. Based on this process and previous surveys, the Project area in San Bernardino County is considered unoccupied by CAGN at this time. No impacts are anticipated.

**Golden Eagle** – Based on aerial habitat assessments and protocol surveys conducted for the project, no suitable nesting habitat for golden eagles is located within 2 miles of the work areas. Therefore, no impacts are anticipated.

**Stephens’ Kangaroo Rat** – Areas of suitable habitat for Stephens’ kangaroo rat (SKR) are mapped west of the El Casco Substation helicopter work area. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 in 2018. No SKR were captured. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected.

**Special-status Bats** – No suitable bat roosting habitat or buffers occur within the work areas; therefore, no impacts are anticipated.

**Special-status Small Mammals** – Special-status small mammals such as the pallid San Diego pocket mouse, northwestern San Diego pocket mouse, American badger, desert kit fox, San Diego desert woodrat, and/or San Diego black-tailed jackrabbit can occur in many parts of the project area. Ringtail and Palm Springs round-tailed ground squirrel are not expected. However, if any of these species are found, potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan. The work areas are located outside the known range of the Palm Springs pocket mouse. No mapped suitable habitat for the Los Angeles pocket mouse (LAPM) occurs within the work areas. No impacts to special-status small mammals are anticipated.

**Special-status Plants** – No special-status plants were observed within the work areas. If special-status plants are identified during clearance sweeps/monitoring, ESA buffers will be established and special-status plants will be avoided to the extent feasible. Unavoidable impacts to special-status plants will be addressed in accordance with the Special-status Plant Salvage and Relocation Plan. A preconstruction survey for each work area will be conducted prior to use.

**Regulated Trees** – No tree trimming, or tree removal is required for construction activities within the work areas.

**Jurisdictional Waters** – One concrete lined jurisdictional channel is located along the exterior western perimeter of the El Casco Substation helicopter hook-up area but does not intersect the work area. No ground disturbance will occur in the work area and the concrete channel will be protected in place during helicopter related activities. The new work area is situated such that the proposed activities would be conducted from existing disturbed/developed areas.

Wetland and non-wetland jurisdictional features are located south and east of the new water tank site but do not intersect the new work area. No impacts to the jurisdictional features will occur during the use of the area, as BMPs will be implemented along the perimeter of the work area and routine SWPPP inspections will be conducted to ensure they are maintained in accordance with the SWPPP. A preconstruction survey of the work area will be conducted prior to use. Therefore, no impacts to jurisdictional waters are anticipated.

**Cultural Resources**

The hydrants, water tank site, and helicopter work area are located within the WOD APE and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey results for the new work areas were negative for cultural resources. Williams, Audry. 2016. Cultural Resources Management Plan for Southern California Edison Company’s West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California.
Paleontological Resources

The WOD Paleontological Resources Mitigation and Monitoring Plan (PRMMP) requires full-time, qualified paleontological construction monitoring in areas determined to have moderate (PFYC 3) to very high (PFYC 5) sensitivity. Sediments of unknown (PFYC U) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis and geologic units with very low (PFYC 1) or low (PFYC 2) sensitivity may be spot checked to confirm paleontological sensitivity.

Per the PRMMP, the types of construction activities that require monitoring or spot-checking include:

- Grading
- Drilling (if drill bit is greater than two feet in diameter)
- Excavation for retaining walls
- Excavation of construction areas

Types of construction activities that will not require monitoring or spot-checking, regardless of paleontological sensitivity include:

- Small diameter drill holes (less than two feet in diameter)
- Pile driving
- Project activities that do not involve ground disturbance

The Segment 2 portable water tank site is located in an area determined to have low PFYC 2 paleontological sensitivity, therefore the site may initially be spot checked during grading to confirm the PFYC 2 classification. The proposed water sources are existing hydrants located within existing developed areas. Only occasional short-term filling of water trucks will occur at each location. Water trucks will park on paved roadway areas immediately adjacent to the water sources using rubber-tired water trucks, and fill using equipped hoses and on-board pumps. Paved roads will be used to access the existing hydrants. No ground disturbance will occur as a result, therefore no impacts to paleontological resources are anticipated during water truck filling, and no paleontological monitoring is required. Likewise, no grading, drilling greater than 2-feet diameter, or excavation will be required for the use of the helicopter hook-up area. Therefore, no impacts to Paleontological resources are anticipated in the new work areas.

Resources:

Biological: NO SENSITIVE RESOURCES PRESENT ■ SENSITIVE RESOURCES PRESENT □ N/A

New Survey Report Attached: YES ■ NO

If No, Previous Biological Survey Reference: A preconstruction survey will be conducted prior to initiating use at each new water source. The existing water sources, the water tank site, and helicopter hook-up area were covered in Preconstruction Survey FRED IDs 000068, 000126 (resurveyed 4/23/2019), 000077, 000031, and 000067.

Cultural: ■ NO RESOURCES PRESENT □ RESOURCES PRESENT WITH PROJECT APE: □ YES ■ NO

(PAVED/GRAVEL AREA AND NO GROUND DISTURBANCE)

If in APE, Previous Cultural Survey Reference:

If not in APE, attach new survey report.

The existing water sources, water tank site, and helicopter hook-up area are located within the WOD APE and were covered within the record search data that was conducted during previous WOD surveys and studies. The record search and survey results for the area were negative for cultural resources. Williams, Audry. 2016. Cultural Resources Management Plan for Southern California Edison Company’s West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties, California.

Other Potential Impacts: (Check any potential changes to permitted impacts and provide details below. Attach additional sheets if needed.)

☐ AIR QUALITY ☐ LAND USE ☐ TRAFFIC
☐ BIOLOGICAL RESOURCES ☐ NOISE ☐ VISUAL
CEQA and Permitting: (Provide details for any “Yes” answer and attach additional information if needed.)

1. Will modification involve substantial changes that will require major changes to the CEQA document?
   - [ ] YES  [ ] NO

2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?
   - [ ] YES  [ ] NO

3. Additional agency notifications and/or permit modifications required?  [ ] YES  [ ] NO

Conditions of Approval or Reasons for Denial: (Attach additional information if needed.)

 Required Signatures: (Attached email approvals may be used in lieu of signatures.)

  X  Chief Construction Inspector or Foreman:  ■ VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION  
Name: Jeff Miller  Signature:  
Date: 4/29/2019

Environmental Inspector:  ■ FIELD REVIEW COMPLETE  
Name: Lisa Amador  Signature:  
Date: 4/29/2019

 X  Land Agent:  ■ CONSISTENT WITH EXISTING RIGHTS  ■ NEW RIGHTS OBTAINED  
Name: James Spence  Signature:  
Date: 4/29/2019

 X  Environmental Compliance Lead:  ■ APPROVED  ■ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE)  ■ DENIED  
Name: Sylvia Granados  Signature:  
Date: 4/29/2019
FIGURE 1

Southern California Edison
West of Devers Upgrade Project
Segment 1 Water Sources
MPR #27

LEGEND

- Proposed Potable Water Hydrant
- Proposed Work Area
- Major Trans Structure
  - Proposed
  - Existing
  - Remove
- Subtransmission Poles
  - Proposed
  - Existing, OH
  - Remove, OH
- Civil Access Roads Lines
  - Proposed
  - Existing
  - Remove
- Major Trans Line
  - Proposed
  - Existing
  - Remove
- Major Trans Structure
  - Proposed
  - Existing
  - Remove

Existing ROW
Construction Areas

- Work Area
  - Non-wetland Waters
  - Wetland
- CDFW Jurisdiction
- USACE/RWQCB Jurisdiction

Proposed Potable Water Hydrant
Business Center Dr & SCE Corridor
(1,174 sq ft)

Proposed Potable Water Hydrant
Business Center Dr & Enterprise Dr
(997 sq ft)
FIGURE 3

Southern California Edison
West of Devers Upgrade Project
Proposed Work Outside El Casco Substation
MPR #27

LEGEND

Major Trans Line
- Proposed
- Pending
- Existing

Construction Areas
- Construction Work Site
- Drainage Ditch
- General Disturbance Area
- Guard Pole
- O&M Tower
- Structure Work Area
- Wire Setup

Civil Access Roads
- Existing Access Road
- Designed Road Boundary
- Potential Road Widening
- Existing Substation Area
- Existing ROW

Civil Access Roads Lines
- New Access Road

Proposed Work Area
- Designed

Non-wetland Waters
- CDFW Jurisdiction
- USACE/RWQCB Jurisdiction

Wetland Waters
- CDFW Jurisdiction
- USACE/RWQCB Jurisdiction

FRED Active Nest Event
- Least Bell's Vireo
- Least Bell's Vireo (500ft Buffer)
- Red Diamond Rattlesnake
- Smooth Tarplant Occupied Habitat
- Bat Suitable Habitat
- Bat Suitable Habitat 150ft Buffer

FRED Active Nest Buffer

Listed/Threatened Habitat
- LBVI Occupied/SWFL Suitable Habitat
- Bat Suitable Habitat
- Bat Suitable Habitat 150ft Buffer
- Los Angeles Pocket Mouse Suitable Habitat
- Stephens' Kangaroo Rat Suitable Habitat
- LHI Occupied/SWFL Suitable Habitat

SCE, ESRI Imagery

3N01
4N63
4N64
PACE2327
PF-12327
EC1N
EC7N
3N02
3N03

Helicopter Hookup (9,686 sq ft)