Project Name: West of Devers Upgrade Project

Date Approval Required: 3/2/2020
Variance Request No.: 34

Date Submitted: 2/19/2020

Locations: New work areas West of 3X50; East of 4X16; East of 4X34; East of 4X27; East of 4X08; South of 1X25; and North of Matich Material Yard (see Description of Change and Justification section below and figures attached).

Landowners and Associated Parcel Numbers:

<table>
<thead>
<tr>
<th>Proposed Work Area</th>
<th>Property Owner</th>
<th>Assessor's Parcel Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>WSS-3-3X50-MPR-34</td>
<td>San Bernardino County</td>
<td>N/A</td>
</tr>
</tbody>
</table>
| WSS-4-4X15-4X16-MPR-34     | Banning, Bilberry Pardee Homes | 535-020-029
|                            |                 | 531-080-014             |
| WA-4-4X34-MPR-34           | Saab, Helou     | 404-190-007             |
|                            | Bianchi Prop, LTD | 404-140-001            |
| WA-4-4X27-4X26-MPR-34      |                 | 408-090-045             |
| WSS-4-4X08-MPR-34          | Loma Linda University | 535-060-002            |
| WSS-1-1X25-MPR-34          | City of Redlands | 0167-511-11            |
| Matich Yard North Access Road | Matich Corp     | 534-242-001            |

Current Vegetative Cover/Land Use: Developed/Disturbed; Grassland Forbland; Coastal Sage Scrub

Existing Sensitive Resource? YES Specify: SKR Suitable Habitat

Modifying (check as many as apply):

- MITIGATION MEASURE
- Plan/Procedure
- Specification
- Drawing
- Permit Condition
- Other

Specify Source (e.g., Mitigation Measure B.5): NTP #4 Work Areas/Conditions

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

Attachments:

- Construction Drawing
- Additional Environmental Analysis
- Correspondence
- Other

WSS-3-3X50-MPR-34: Expansion of Supersite PP123237

A new temporary 0.30-acre work area adjacent to the south side of Supersite PP123237 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 3X50 and 3X51, as shown on Figure 1, Page 1.

The new work area consists of approximately 0.11-acre of developed/disturbed land, 0.15-acre grassland forbland, and 0.04-acre coastal sage scrub. The land is publicly owned and located within the SCE transmission line right-of-way.

WSS-4-4X15-4X16-MPR-34: Expansion of Supersite 4X15

A new temporary 2.18-acre work area adjacent to the west side of Supersite 4X15 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X15 and 4X16, as shown on Figure 1, Page 2.
The new work area consists of approximately 0.30-acre developed/disturbed land and 1.88-acre grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

**WA-4-4X34-MPR-34: Expansion of Supersite PP123311**

A new temporary 0.09-acre work area is required along the northeast side of Supersite PP123311 to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X32 and PP123310, as shown on Figure 1, Page 3.

The total temporary disturbance area associated with the new work area consists of approximately 0.03 acre of developed/disturbed land and 0.06 acre of grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

**WA-4-4X27-4X26-MPR-34: Expansion of Supersites 4X27-4X26**

A new temporary 0.13-acre work area is required south of Supersite 4X27-4X26 to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with Supersites 4X26 and 4X27, as shown on Figure 1, Page 4.

The total temporary disturbance space associated with the new work area consists of approximately 0.13-acre of developed/disturbed land. The work area is located within the SCE transmission line right-of-way.

**WSS-4-4X08-MPR-34: Expansion of Supersite 4X08**

A 0.92-acre temporary work area expansion immediately east of Supersite 4X08 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with the adjacent supersites, as shown on Figure 1, Page 5. The new work area will require light grading to level out the areas in preparation for use.

The total temporary disturbance area associated with the expanded work area is approximately 0.92-acre of grassland/forbland. The land is privately owned and located within the SCE transmission line right-of-way.

**WSS-1-1X25-MPR-34: Work Area south of Supersite 1X25**

A 0.56-acre temporary work area south of Supersite 1X25 is required to provide adequate work space for material and equipment staging during construction, including wire stringing and wire wreck-out activities associated with the adjacent supersites, as shown on Figure 1, Page 6. The new work area will require non-native tree removal in preparation for use.

The total temporary disturbance area associated with the expanded work area is approximately 0.56-acre of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

**Matich Yard: North Access Road**

The access road on the north side of the Matich Material Yard is required to provide ingress/egress to and from the north entrance gate, as shown on Figure 1, page 7.

**Environmental Analysis**

No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated during the use of the new work areas.

**Biological Resources**

A desktop analysis was conducted for the new work areas using aerial imagery, publicly available data, and project biological data. The new work areas were covered during previous surveys, including FRED Preconstruction Survey IDs: 000121, 000186, 000177, 000178, 000189, 000068, and 000039.

**Desert Tortoise (DETO)** – The new work areas are not located within the known range of this species; therefore, no impacts to DETO are anticipated at these locations.

**Special-status Terrestrial Herpetofauna** – No special-status terrestrial herpetofauna have been observed within the new work areas during project-related surveys. However, many species have the potential to occur throughout the project.
area. For instance, a red diamond rattlesnake was observed approximately 600-feet west of WSS-4-4X08-MPR-34 during surveys conducted to support licensing, permitting, and preconstruction planning efforts for the project (Figure 1, Page 5). A preconstruction survey for each new work area will be conducted prior to use. With implementation of the mitigation measures and biological monitoring during construction, no significant impacts to special-status terrestrial herpetofauna are anticipated.

**Burrowing Owl** – Burrowing owl (BUOW) habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the project area. BUOW have been previously observed within Supersite 4X16, approximately 250-feet southwest of WSS-4-4X15-4X16-MPR-34 (Figure 1, page 2) as well as approximately 650 feet northeast of WA-4-4X27-4X26-MPR-34 (Figure 1, page 4). However, no burrows or sign have been observed near the new work areas.

Active owl burrows observed during preconstruction surveys and during construction will be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of the mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to burrowing owls are anticipated.

**Nesting Birds** – Suitable substrates for nesting birds protected by the California Fish and Game Code and Migratory Bird Treaty Act, 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 at this time. 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 in each area. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan. With implementation of the NBMP, no impacts are anticipated.

As shown on Figure 1, Pages 2, 5, and 7, observations of special-status bird species (e.g., Ferruginous Hawk; Osprey; Cooper’s Hawk) have been made in the vicinity of the new work areas. However, the observations were ephemeral and are not associated with active nests. Therefore, no impacts area anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the NBMP.

**Listed Riparian Birds** – No suitable habitat for riparian birds (least Bell's vireo [LBVI]/Southwestern willow flycatcher [SWFL]) occurs within 500 feet of the new work areas. Therefore, no impacts are anticipated.

**Coastal California Gnatcatcher** – Coastal California Gnatcatcher Suitable Habitat (CAGN) is mapped within 650-feet east of WSS-4-4X15-4X16-MPR-34 (Figure 1, Page 2) and within 250-feet southwest of WA-4-4X34-MPR-34 (Figure 1, page 3). In the history (2014-2018) of protocol surveys conducted for the project in this area, there have been no detections of CAGN. Results were also negative during June and July 2019 preconstruction surveys (FRED IDs 000177 and 000186).

Preconstruction surveys, including surveys for nesting birds, will be conducted in the new work areas during the avian breeding season (Jan 1 – Aug 31). With monitoring and implementation of mitigation measures, no impacts to CAGN are anticipated.

**Golden Eagle** – Based on habitat assessments and protocol surveys conducted for the project, no suitable nesting habitat for golden eagles is located within 2 miles of the new Segment 3 and 4 work areas. Protocol aerial surveys conducted for the project in 2019 showed no golden eagle nests within 2 miles of the project ROW. With monitoring and implementation of mitigation measures, no impacts are anticipated.

**Stephens’ Kangaroo Rat** – Areas of suitable habitat for Stephens’ kangaroo rat (SKR) are mapped within the WSS-3-3X50-MPR-34, WSS-4-4X15-4X16-MPR-34, and WA-4-4X34-MPR-34 work areas (Figure 1, pages 1, 2, and 3).

A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas of the Project. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected. Therefore, no impacts are anticipated.
To minimize temporal habitat loss, a portion of previously approved work area in San Bernardino County, which was determined to no longer be necessary for construction, will be removed from the project data and avoided to offset mapped habitat impacts to WSS-3-3X50-MPR-34 (Figure 1, Page 1). Proposed work areas WSS-4-4X15-4X16-MPR-34 and WA-4-4X34-MPR-34 are located within the WR-MSHCP, where SKR are a covered species.

The other proposed work areas are not located within suitable habitat for the species; therefore, no impacts to SKR are anticipated.

**Special-status Bats** – No suitable bat roosting habitat or buffers occur within the new work areas; therefore, no impacts to special-status bats 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 anticipated to occur in the new work areas. However, if any of these species are found, potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan.

A Los Angeles pocket mouse (LAPM) species event (FRED_000260) was observed approximately 580-feet southwest of WA-4-4X34-MPR-34 in August 2019. LAPM are a covered species in the WR-MSHCP. Occurrences of San Diego pocket mice were also documented approximately 670-feet southwest of WA-4-4X34-MPR-34 in August 2019 (Figure 1, page 3).

Historical occurrences of San Diego pocket mice have also been documented approximately 730-feet west of WA-4-4X27-4X26-MPR-34, however the work area is asphalt paved and therefore not suitable habitat for the species (Figure 1, page 4).

Little Pocket Mouse habitat is widespread to the east of the Matich Yard in Segment 5. The Matich Yard and new access road to the north in Segment 4, are isolated from native habitats and do not include suitable habitats supporting the species (Figure 1, page 7).

Potential impacts to these species will be addressed according to the Small Mammals Avoidance and Minimization Plan. With implementation of the plan, no significant impacts are anticipated.

**Special-status Plants** – Plummer’s mariposa lily (Calochortus plummerae; CRPR 4.2) plants have been historically identified within approximately 380-feet east of WSS-4-4X08-MPR-34 (Figure 1, page 5), however no special-status plants were documented within the new work area. The previously documented Plummer’s mariposa lily locations were revisited but no individuals were observed during recent preconstruction surveys. If special-status plants are later identified during clearance sweeps/monitoring, they 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.

**Regulated Trees** – No tree trimming or tree removal is required for construction activities within the new work areas. Therefore, no impacts are anticipated.

**Jurisdictional Waters**

Wetland and non-wetland jurisdictional features are located throughout the project area. No jurisdictional features intersect the new work areas. One non-wetland jurisdictional feature is located along the west side of WSS-4-4X15-4X16-MPR-34, as shown on Figure 1, Page 2. ESA signs will be established at the edges of work areas and BMPs will be established in accordance with the SWPPP. No impacts to jurisdictional features are expected to result from use of the new work areas.

**Cultural Resources**

The new work areas 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
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 proposed work areas listed below are located in areas of low PFYC 2 paleontological sensitivity, therefore, the sites may initially be spot checked by a qualified paleontological monitor to confirm the PFYC 2 classification, if grading or excavation is required:

- WSS-4-4X15-4X16-MPR-34
- WA-4-4X27-4X26-MPR-34
- WSS-1-1X25-MPR-34
- Matich Yard North Access Road

The proposed work areas listed below are located in areas of moderate (PFYC 3) paleontological sensitivity and require full time monitoring during ground-disturbing construction activities, if grading is required:

- WSS-3-3X50-MPR-34
- WA-4-4X34-MPR-34
- WSS-4-4X08-MPR-34

No proposed work areas are located in an area of very high (PFYC 5) paleontological sensitivity.

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 work in each new work area. The new work areas were covered in FRED Preconstruction Survey IDs 000121, 000186, 000177, 000178, 000189, 000068, and 000039.

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 new work areas 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 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.

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
☐ CONTAMINATED SOILS  ☐ PALEO RESOURCES  ☐ WATER RESOURCES
☐ CULTURAL RESOURCES  ☐ SOCIOECONOMIC  ☐ WETLANDS
☐ HAZARDOUS MATERIALS  ☐ STORM WATER (SWPPP)

NA

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.)

☐ Chief Construction Inspector or Foreman:  ☐ VARIANCE MODIFICATIONS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION
Name: Jeff Miller  Signature:  Date: 2/19/2019

☐ Environmental Inspector:  ☐ FIELD REVIEW COMPLETE
Name: Lisa Amador  Signature:  Date: 2/19/2019

☐ Land Agent:  ☐ CONSISTENT WITH EXISTING RIGHTS  ☐ NEW RIGHTS OBTAINED
Name: James Spence  Signature:  Date: 2/19/2019

☐ Environmental Compliance Lead:  ☐ APPROVED  ☐ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE)  ☐ DENIED
Name: Sylvia Granados  Signature:  Date: 2/19/2019

Sylvia Granados
Lisa Amador
Jim Spence
FIGURE 1

LEGEND

- Proposed Work Area
- Major Trans Line
  - Proposed
  - Existing
- Major Trans Structure
  - Proposed
  - Removed
- Civil Access Roads Lines
  - New Access Road
  - Existing Access Road
- Construction Areas
  - Proposed Work Area
  - Structure Work Area
- Non-wetland Waters
  - CDFW Jurisdiction
  - USACE/RWQCB Jurisdiction

SCE, ESRI World Imagery

Southern California Edison
West of Devers Upgrade Project
WSS-3-3X50-MPR-34
MPR #34

SKR Offset Work Area
(0.30 Acres)

WSS-3-3X50-MPR-34
(0.30 Acres)
FIGURE 1

Southern California Edison
West of Devers Upgrade Project
WSS-4-4X15-4X16-MPR-34
MPR #34

Map Index

San Bernardino County
Riverside County

LEGEND

Proposed Work Area
Proposed
Existing

Major Trans Structure
Proposed
Existing

Civil Access Roads Lines
New Access Road
Existing Access Road

Construction Areas
DAM Tower Area
Structure Work Area
Wire Setup
Burrowing Owl
Ferruginous Hawk

USACE/RWQCB Jurisdiction
CDFW Jurisdiction

WSS-4-4X15-4X16-MPR-34 (2.18 Acres)

FIGURE 1

Southern California Edison
West of Devers Upgrade Project
WSS-4-4X15-4X16-MPR-34
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Map Index

San Bernardino County
Riverside County

LEGEND

Proposed Work Area
Proposed
Existing

Major Trans Structure
Proposed
Existing

Civil Access Roads Lines
New Access Road
Existing Access Road

Construction Areas
DAM Tower Area
Structure Work Area
Wire Setup
Burrowing Owl
Ferruginous Hawk

USACE/RWQCB Jurisdiction
CDFW Jurisdiction

WSS-4-4X15-4X16-MPR-34 (2.18 Acres)
FIGURE 1

LEGEND

- Proposed Work Area
- Proposed Major Trans Line
- Existing Major Trans Line
- Proposed Civil Access Roads Lines
- Existing Civil Access Roads Lines
- Proposed Construction Areas
- Existing Construction Areas
- Proposed Non-wetland Waters

- Super-site Boundary
- Major Trans Structure
- Road Edge
- Trans Boundary
- Potential Road Widening
- Designed ROAD Boundary
- Existing ROW
- New Access Road
- Existing Access Road
- Non-wetland Waters
- CDFW Jurisdiction
- USACE/RWQCB Jurisdiction

- Red Diamond Rattlesnake
- Plummer's Mariposa Lily
- Osprey
- Burrowing Owl
- Plummer's Mariposa Lily
- Non-wetland Waters

WSS-4-4X08-MPR-34
(0.92 Acres)

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