

# Environmental Minor Project Refinement Form



Project Name: West of Devers Upgrade Project Request Prepared By: Sylvia Granados

Date Approval Required: 12/17/2018 Variance Request No.: 23

Date Submitted: 12/11/2018 Location: Parking lot north of 2N32 in Colton, San Bernardino County; 3X29-WSS in Redlands, Riverside County; M37-T3-CP east of Refuse Road, in Redlands, San Bernardino County; 3X08-CP and 3X09-CP in Calimesa, Riverside County; GS-3-3X59 and GS-3-3X59E south of Cypress Way in Redlands, San Bernardino County; GS-3-3X55-3X53 on the east side of Refuse Road in Redlands, San Bernardino County; GS-3-3X35-3X33 west of Redlands Blvd in Redlands, Riverside County; GS-3-3X27 and GS-3-3X27E in Redlands, Riverside County.

Landowners: AP-Colton LLC, Nguyen, Vinh T; West Coast League; County of San Bernardino; Riverside County Regional Parks and Open Space; Susan Reid, Nareman Abujudeh; Peggy Ann Christian; Larry Sungki Min, John W Jeffries

Landowner Parcel Numbers: 0276-361-80, 0276-361-79; 473-070-019, 473-070-029; 0294-061-01; 413-140-008; 0294-031-34, 0294-031-29; 473-070-010; 473-080-005, 413-390-014

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

Existing Sensitive Resource? NO ☒ YES Specify: Mapped SKR suitable habitat; CAGN and bat suitable habitat adjacent

Modifying (check as many as apply):  
☐ MITIGATION MEASURE ☐ PLAN/PROCEDURE ☐ SPECIFICATION  
☒ DRAWING ☐ PERMIT CONDITION ☐ OTHER

Specify Source (e.g., Mitigation Measure B.5): Modification to NTP #4 Mapping

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

Attachments:

☒ CONSTRUCTION DRAWING ☐ ADDITIONAL ENVIRONMENTAL ANALYSIS ☐ CORRESPONDENCE ☐ OTHER: \_\_\_\_\_

### **2N32-Parking Lot Work Area**

A .32-acre work area is required north of Supersite 2N32 and west of 2N31 for material and equipment staging/storage, to facilitate construction activities at the adjacent supersites, as shown in Figure 1.

The total temporary work area associated with the new work area consists of approximately .32 acres of privately owned, developed/disturbed asphalt commercial parking lot in Colton, San Bernardino County.

### **3X29-WSS Wire Stringing Site**

An additional 4.2-acre work area is required to support wire stringing activities associated with Supersites 3X29 and 3X31, as shown in Figure 2.

The total temporary work area associated with the new wire stringing set-up area consists of approximately 4.2 acres of privately owned, grassland/forbland in Redlands, Riverside County.

### **M37-T3-CP Wreck-out Work Area**

An additional .03-acre work area is required to support wreck-out activities associated with Supersite M37-T3 east of Refuse Road, as shown in Figure 3.

The total temporary work area associated with the expanded work area consists of approximately .03 acre of publicly owned developed/disturbed land in Redlands, San Bernardino County.

### **3X08-CP-N and 3X08-CP-S Wreck-out Work Area**

An additional .02-acre of work areas is required to support wreck-out activities associated with Supersite 3X08, as shown in Figure 4.

The total temporary work area associated with the expanded work area consists of approximately .02 acre of publicly owned land including grassland/forbland (.01 acre) and coastal sage scrub (.01 acre) in Calimesa, Riverside County.

### **Guard Structures GS-3-3X59 and GS-3-3X59E**

An additional .17-acre work area is required on the south side of Cypress Way and an additional .28-acre work area is required to the south, for the installation of guard structures required to facilitate wire stringing activities associated with Supersites 3X57 and 3X59, as shown in Figure 5.

The total temporary work areas associated with the new guard structure work areas consists of approximately .45 acre of privately owned developed/disturbed land in San Bernardino County.

### **Guard Structure GS-3-3X55-3X53 Location Adjustment**

The approved guard structure work area at Refuse Road requires adjustment slightly to the east to facilitate wire stringing activities associated with Supersites 3X55 and 3X53, as shown in Figure 3.

The total additional temporary work space associated with the expanded guard structure work area consists of approximately .1 acre of publicly owned land including coastal sage scrub (.07 acre), developed/disturbed (.02) and grassland/forbland (.01 acre) in San Bernardino County.

### **Guard Structure GS-3-3X35-3X33 Location Adjustment**

The approved guard structure work area at Redlands Blvd requires adjustment slightly to the west to facilitate wire stringing activities associated with Supersites 3X35 and 3X33, as shown in Figure 6.

The total additional temporary work space associated with the expanded guard structure work area consists of approximately .20 acre of publicly owned grassland forbland in Riverside County.

### **Guard Structures GS-3-3X27 and GS-3-3X27E**

An additional .11-acre work area is required on the west side of 3X27 and a .15-acre work area is required on the east side of 3X27, for the installation of guard structures to facilitate wire stringing activities associated with Supersite 3X27, as shown in Figure 7.

The total temporary work areas associated with the new guard structure work areas consists of approximately .26 acre of privately owned developed/disturbed (.17 acre) and coastal sage scrub (.09) in Riverside County.

### **Biological Resources**

A desktop analysis of publicly available data and relevant project data was conducted to determine the potential for special-status species to occur in the new work areas. Since included in early iterations of project design, these new work locations were included in the study area for previous habitat assessments and protocol surveys, as well as recent preconstruction surveys.

#### **In all of the new work areas analyzed in this MPR:**

Burrowing Owl – Burrowing owls only have a moderate potential to occur within 500 feet of the work areas. No burrowing owl or burrowing owl sign were observed within the new work areas during previous surveys. However, preconstruction clearance surveys and sweeps will be conducted prior to the start of construction activities.

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

Nesting Birds – Suitable substrates for nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, including trees, shrubs, man-made structures, and the ground surface, are located within the new work areas and the vicinity. Nesting bird surveys will be conducted prior to construction in the new work areas during nesting bird season (January 1 through August 31).

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.

Regulated Trees – No tree trimming, or tree removal is currently required for construction activities in the work area. Should trimming or removal become necessary, relevant permits will be acquired from the local jurisdictions.

### **2N32-Parking Lot Work Area – Figure 1**

The new work area was covered within active preconstruction FRED Survey ID 000064:

Jurisdictional Waters – No jurisdictional features intersect the new work area. Therefore, no impacts are anticipated.

Special-status Plants – The paved work area is isolated from native habitats and does not include habitats supporting special-status plants. Therefore, no impacts are anticipated.

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 area. Therefore, no impacts are anticipated.

Stephens' Kangaroo Rat – No suitable habitat for Stephens' kangaroo rat occurs within 100 feet of the new work area. Therefore, no impacts are anticipated.

Special-status Bats – No suitable bat roosts occur within 300 feet of the new work area. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – Mapped coastal California gnatcatcher critical habitat is located within the work area of tower 2N32 but it does not intersect the paved parking lot work area to the north. No suitable breeding habitat is located within 500 feet of the work area. Therefore, no impacts are anticipated.

Special-status Terrestrial Herpetofauna – No suitable habitat for special-status herpetofauna occurs within the work area. Therefore, no impacts are anticipated.

Special-status Small Mammals – The paved parking lot is not suitable habitat for small mammals. Therefore, no impacts are anticipated.

### **3X29-WSS Wire Stringing Site - Figure 2**

The new work area was covered within active preconstruction FRED Survey ID 000046:

Jurisdictional Waters – The work area does not intersect jurisdictional waters. One non-wetland feature is located along the access road to the east of the new work area. Impacts to the jurisdictional feature will be avoided during use of the new work area.

Special-status Plants – A Paniculate tarplant (*Deinandra paniculate*; CRPR 4.2) plant was identified along the existing access road 230 feet north of towers 3N29/3S29 during 2017 focused plant surveys. Plummer's mariposa lily (*Calochortus plummerae*; CRPR 4.2) plants were identified along the existing access road between towers 3S28 and 3N29/3S29. The plants will be avoided to the extent feasible. Because these are CRPR 4 ranked species and not species subject to a Determination of Biologically Equivalent or Superior Preservation (DBESP) in the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP), no mitigation is required if impacts occur. No special-status plants were observed within the new work area during the preconstruction survey. No impacts are anticipated.

Listed Riparian Birds – No suitable riparian bird habitat exists within 500 feet of the new work area. Therefore, no impacts are anticipated.

Stephens' Kangaroo Rat – The new work area is located within mapped suitable habitat for SKR. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 during the 2018 trapping season, and several years before. Habitat quality is generally poor in the project area and the project area is distant from extant populations. No SKR have been identified in the project area. SKR is a covered species under the WR-MSHCP. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected in the new work area. Therefore, no impacts are anticipated.

Special-status Bats – During bat habitat assessments conducted on May 14, 2018 and emergence surveys conducted on June 13, 2018 by Ed West (permitted bat biologist), no suitable bat roosts occur within 300-feet of the new work area.

Coastal California Gnatcatcher – No suitable breeding habitat is mapped within 500-feet of the new work area. Therefore, no impacts are anticipated.

Special-status Terrestrial Herpetofauna – No special-status herpetofauna were observed during the previous surveys of the new work site. The nearest observation of a special-status terrestrial was an orange-throated whiptail located

approximately 131 feet west of the access road between 3N24/3S24 and 3N25/3S25, on June 4, 2018. Preconstruction clearance sweeps will be conducted prior to the start of construction.

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, and/or black-tailed jackrabbit can occur in many parts of the project area, however no sign of the subject small mammal species was observed during previous surveys of the new work site. Ringtail and Palm Springs round-tailed ground squirrel are not expected due to the work area being located outside of the range and/or habitat for these species. If any of these species are found, potential impacts will be addressed according to the Special-status Small Mammals Avoidance and Minimization Plan. There is no mapped suitable habitat for the Los Angeles Pocket Mouse (LAPM) within the work area.

### **M37-T3-CP Supersite Expansion for Wreck-out Activities – Figure 3**

The new work area was covered within active preconstruction FRED Survey ID 000057:

Riparian Birds - A small patch of suitable habitat for riparian birds (LBVI/SWFL) is mapped approximately 90 feet north of the new work areas. Protocol surveys were conducted in 2016, 2017, and 2018. No Southwestern Willow Flycatcher were confirmed during previous surveys of the area. However, LBVI were observed defending a territory and, presumably, a nest in 2018. If work occurs during the breeding season, buffers will be established in accordance with the Biological Opinion and Incidental Take Permit. Buffer reductions, if needed, will be coordinated with the USFWS and CDFW.

Coastal California Gnatcatcher - Suitable habitat for coastal California gnatcatcher is mapped southwest of the new work area. Protocol surveys for CAGN were conducted in 2016, 2017, and 2018. No CAGN were detected in Segment 3. No impacts to CAGN are expected a result of construction in the new work area.

Stephen's Kangaroo Rat – The new work area is not located within suitable SKR habitat. Therefore, no impacts are anticipated.

Special-status Bats – Ed West (bat specialist), Chris Taylor, and Rebecca John conducted an emergence survey on July 25, 2018 focusing on the trees associated with a water feature approximately 100 ft northwest of PP#123234, 150 feet northwest of M37-T3, and 275 ft northwest of M97-T3. Silver-haired bats and big brown bats were documented as using these trees as a daytime and potential maternal roost site. Several other bat species including canyon bat and western yellow bat were observed and recorded using the vegetated area and vicinity as a forage site. Silver-haired bats and big brown bats are non-special-status; thus the current 165 feet buffer will remain in place. The buffer limits were staked with ESA signs in the field. The new work areas are located outside of the bat buffer.

Special-status Plants - No special-status plants were observed within the new work areas. Therefore, no impacts are anticipated.

Special-status Small Mammals - No sign of the subject small mammal species were observed in the new work areas. Therefore, no impacts are anticipated.

Special-status Herpetofauna - No special-status herpetofauna were observed during the previous survey of the areas. Therefore, no impacts are anticipated.

### **3X08-CP-N and 3X08-CP-S Expansion Areas for Wreck-out Activities – Figure 4**

The new work areas were covered within active preconstruction FRED Survey ID 000076:

Listed Riparian Birds – No suitable habitat for the listed riparian birds (LBVI/SWFL) is located within 500 feet of the work areas. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – No suitable breeding habitat is located within 500 feet of the work areas. Therefore, no impacts are anticipated.

Stephens' Kangaroo Rat – The new work areas are not located within 100 feet of suitable SKR habitat. Therefore, no impacts are anticipated. No sign of SKR was observed within the work areas. 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 potential bat roost sites were observed within 300 feet of 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, and/or black-tailed jackrabbit can occur in many parts of the project area, however no sign of the subject small mammal species was observed during previous surveys of the new



work site. Ringtail and Palm Springs round-tailed ground squirrel are not expected due to the work areas being located outside of the range and/or habitat for these species. If any of these species are found, potential impacts will be addressed according to the Special-status Small Mammals Avoidance and Minimization Plan. No special-status small mammals were observed within the work areas. Therefore, no impacts are anticipated.

Special-status Herpetofauna – No special-status herpetofauna were observed within the work areas. Therefore, no impacts are anticipated.

Special-status Plants – A historic Plummer's mariposa lily (*Calochortus plummerae*; CRPR 4) point was located along the access road between 3X08 and 3X10 and was revisited during the preconstruction survey. The location likely still supports the species; however, none were visible at the time of the survey. The Plummer's mariposa lily was initially observed along the side of the access road and is not located within any planned disturbance area, therefore, the plant location will be avoided. No other special-status plants were observed during the preconstruction survey. Because these are CRPR 4 ranked species and not species subject to a Determination of Biologically Equivalent or Superior Preservation (DBESP) in the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP), no further action is required.

Jurisdictional Waters – No jurisdictional waters intersect the new work areas.

#### **Guard Structures GS-3-3X59 and GS-3-3X59E – Figure 5**

The new work areas were covered within active preconstruction FRED Survey ID 00085:

Special-status Terrestrial Herpetofauna – No special-status herpetofauna have been previously observed within the work areas. Therefore, no impacts are anticipated.

Listed Riparian Birds – No suitable habitat for riparian birds (LBVI/SWFL) is mapped within the work areas. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – No suitable habitat for CAGN is located within 500 feet of the new work areas. Therefore, no impacts are anticipated.

Stephens' Kangaroo Rat – Suitable habitat for Stephens' kangaroo rat (SKR) is mapped to the north of Cypress Way for the majority of the GS-3-3X59 work area, however the west end of the work area is located within mapped SKR habitat. The portion of the work area extending into mapped habitat is only required for the removal of the most western circuit, therefore the guard structure will not be erected in that portion of the work area until the circuit is removed, after which the guard structure will be removed. The removal of the other two existing circuits and stringing of the two new circuits will not require a work area inside the mapped habitat. Unused portions of approved wire stringing sites WSS-3X59-1 and WSS-3X59-2, also located in mapped suitable SKR habitat, will offset the new GS-3-3X59 impact area in mapped habitat.

Trapping surveys were conducted in 2016, 2017, and 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. Therefore, no impacts are anticipated.

Special-status Bats – No potential bat roosting sites have been identified within the work areas during Segment 3 bat habitat assessments conducted by Ed West (MOU Bat Specialist) in July 2018. No suitable bat roosts exist in the work areas.

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, and/or black-tailed jackrabbit can occur in many parts of the project area. Ringtail and Palm Springs round-tailed ground squirrel are not expected due to the work areas being located outside the range and/or habitat for the species. The work area is 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. Historic San Diego pocket mouse occurrences are located approximately 245 feet northeast of 3X59 and 305 feet northeast of 3X59. If any of these species are found, potential impacts will be addressed according to the small mammals avoidance and minimization plan.

Special-status Plants – No special-status plants have been previously documented within the work areas. Therefore, no impacts are anticipated.

Jurisdictional Waters – One non-wetland ephemeral jurisdictional feature is located outside the work areas on the north side of Cypress way. The feature does not intersect the work areas and will be protected during ground disturbing activities.

#### **Guard Structure GS-3-3X53-3X55 Adjustment – Figure 3**

The new work area was covered within active preconstruction FRED Survey ID 00112 and Survey ID 000118 conducted on December 4, 2018:

Special-status Terrestrial Herpetofauna – A historic western spadefoot toad (*Spea hammondi*) occurrence is located approximately 160 feet west of the adjusted work area, however no special-status herpetofauna were observed within the adjusted work area during the previous surveys. Therefore, no impacts are anticipated.

Listed Riparian Birds – A small patch of suitable habitat for riparian birds (LBVI/SFWL) is mapped southeast of Refuse Road. No impacts to riparian birds are expected as a result of construction in the adjusted work area on the opposite side of the road.

Coastal California Gnatcatcher – Suitable habitat for coastal California gnatcatcher is mapped southeast of the new work area, within 500 feet. Focused surveys for CAGN were conducted in March and April 2018. No CAGN were detected in Segment 3. No impacts to CAGN are expected a result of construction in the adjusted work area.

Stephens' Kangaroo Rat – Suitable habitat for Stephens' kangaroo rat is mapped outside the adjusted work area on the opposite side of Refuse Road. Trapping surveys were conducted in Segment 3 in 2016, 2017, and 2018. No SKR were captured. No sign of SKR was observed during pedestrian surveys. 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.

Special-status Bats – Approximately 230 feet east of the new work area, a cluster of trees associated with a water feature within the San Bernardino County Landfill was identified as potentially suitable for roosting bats during a bat habitat assessment conducted in May 2018 (See FRED Habitat Event 000006). Emergence surveys were conducted in July 2018 and determined the presence of roosting silver-haired bats (*Lasionycteris noctivagans*) and big brown bats (*Eptesicus fuscus*). Both species are non-special status, therefore a 165-ft buffer has been established in FRED and in the field. This buffer does not intersect with the work limits, therefore no impacts to bats are expected. Additional emergence surveys will be conducted during the breeding season (March 1 to July 31) within 14 days prior to the start of construction to determine whether species composition has changed. The buffer radius may change prior to the commencement of work in the event that a special-status species takes residence or if bats no longer inhabit this roost feature at that time.

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, 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, due to the new work locations being located outside the range and/or habitat for the species. The work area is 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 area. A historic San Diego pocket mouse occurrence is located approximately 475 feet west of the new work area, however no special-status small mammals were observed within the adjusted work area during previous surveys. Potential impacts will be addressed according to the Special-status Small Mammals Avoidance and Minimization Plan.

Special-status Plants – No special-status plants have been previously documented within the work area. Therefore, no impacts are anticipated.

Jurisdictional Waters – The adjusted work site does not intersect jurisdictional waters. Therefore, no impacts are anticipated.

#### **Guard Structure GS-3-3X35-3X33 Adjustment on Redlands Blvd - Figure 6**

The new work area was covered within preconstruction FRED Survey ID 00117 conducted on December 3, 2018:

Special-status Terrestrial Herpetofauna – No special-status herpetofauna have been previously observed within the work area. Therefore, no impacts are anticipated.

Listed Riparian Birds – No suitable habitat for riparian birds (LBVI/SWFL) occurs within 500 feet the work area. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – No suitable habitat for coastal California gnatcatcher occurs within 500' of the work area. Therefore, no impacts area anticipated.

Stephens' Kangaroo Rat – Suitable habitat for Stephens' kangaroo rat (SKR) is mapped in the adjusted work area. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected. SKR is a covered species in the WR-MSHCP.

Special-status Bats – No suitable bat roosts exist in the adjusted work area or within 300 feet. Therefore, no impacts area 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, due to the work areas being located outside the range/habitat for the species. The work area is outside the known range of the Palm Springs pocket mouse. No mapped suitable habitat for the Los Angeles Pocket Mouse (LAPM) occurs within the adjusted work area. However, if any of these species are found, potential impacts will be addressed according to the Special-status Small Mammals Avoidance and Minimization Plan.

Special-status Plants – No special-status plants have been previously documented within the work area. Therefore, no impacts are anticipated.

Jurisdictional Waters – One non-wetland water feature is located along Redlands Boulevard east of supersite GS-3X33-3X35 and west of supersite 3X33-3X35-2. This water feature does not intersect the work area for these supersites; therefore, impacts are not anticipated.

#### **Guard Structures GS-3-3X27 and GS-3-3X27E – Figure 7**

The new work areas were covered within active preconstruction FRED Survey ID 000046:

Jurisdictional Waters – No jurisdictional waters intersect the new work areas. Therefore, no impacts are anticipated.

Special-status Plants – No special-status plants have been previously documented within the work areas. Therefore, no impacts are anticipated

Listed Riparian Birds – No suitable habitat is located within 500 feet of the work areas. Therefore, no impacts area anticipated.

Stephens' Kangaroo Rat – The new work areas are located at least 420 feet east of mapped suitable habitat for SKR. Therefore, no impacts are anticipated.

Special-status Bats – No suitable bat roosts exists within 300 feet 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 *West of Devers: Cultural Resources Assessment and Class III Inventory* (LSA, 2013) and *Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Project* (ASM, 2015). The record search and survey results for the area were negative for cultural resources.

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#### **Resources:**

Biological      ☐ NO SENSITIVE RESOURCES PRESENT    ☒ SENSITIVE RESOURCES PRESENT    ☐ N/A

New Survey Report Attached:    YES ☒ NO

If No, Previous Biological Survey Reference: The new work areas were covered within active FRED Survey Report IDs 000046, 000057, 000064, 000076, 000085, 000112, 000117, and 000118.

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**Cultural:**    ☒ NO RESOURCES PRESENT    ☐ RESOURCES PRESENT WITH PROJECT APE: ☐ YES    ☒ NO

#### **If in APE, Previous Cultural Survey Reference:**

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. *West of Devers: Cultural Resources Assessment and Class III Inventory* (LSA, 2013) and *Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Project* (ASM, 2015).

If not in APE, cite new survey report:

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

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> AIR QUALITY          | <input type="checkbox"/> LAND USE            | <input type="checkbox"/> TRAFFIC         |
| <input type="checkbox"/> BIOLOGICAL RESOURCES | <input type="checkbox"/> NOISE               | <input type="checkbox"/> VISUAL          |
| <input type="checkbox"/> CONTAMINATED SOILS   | <input type="checkbox"/> PALEO RESOURCES     | <input type="checkbox"/> WATER RESOURCES |
| <input type="checkbox"/> CULTURAL RESOURCES   | <input type="checkbox"/> SOCIOECONOMIC       | <input type="checkbox"/> WETLANDS        |
| <input type="checkbox"/> HAZARDOUS MATERIALS  | <input type="checkbox"/> 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 MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION

Name: Jeff Miller Signature: [Signature] Date: 12/11/2018

Environmental Inspector: ☒ FIELD REVIEW COMPLETE

Name: Lisa Amador Signature: [Signature] Date: 12/11/2018

☒ Land Agent: ☒ CONSISTENT WITH EXISTING RIGHTS ☐ NEW RIGHTS OBTAINED

Name: James Spence Signature: [Signature] Date: 12/11/2018

☒ Environmental Compliance Lead: ☒ APPROVED ☐ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) ☐ DENIED

Name: Sylvia Granados Signature: [Signature] Date: 12/11/2018



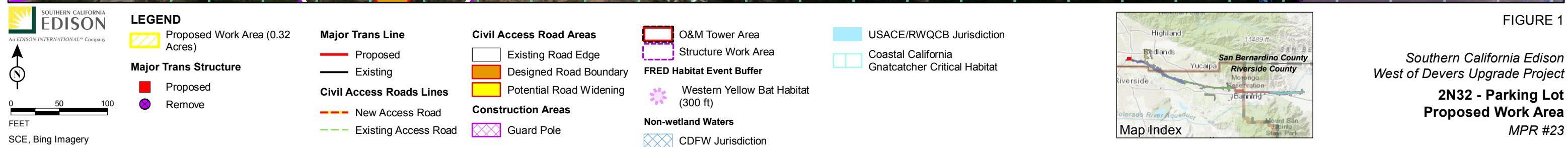
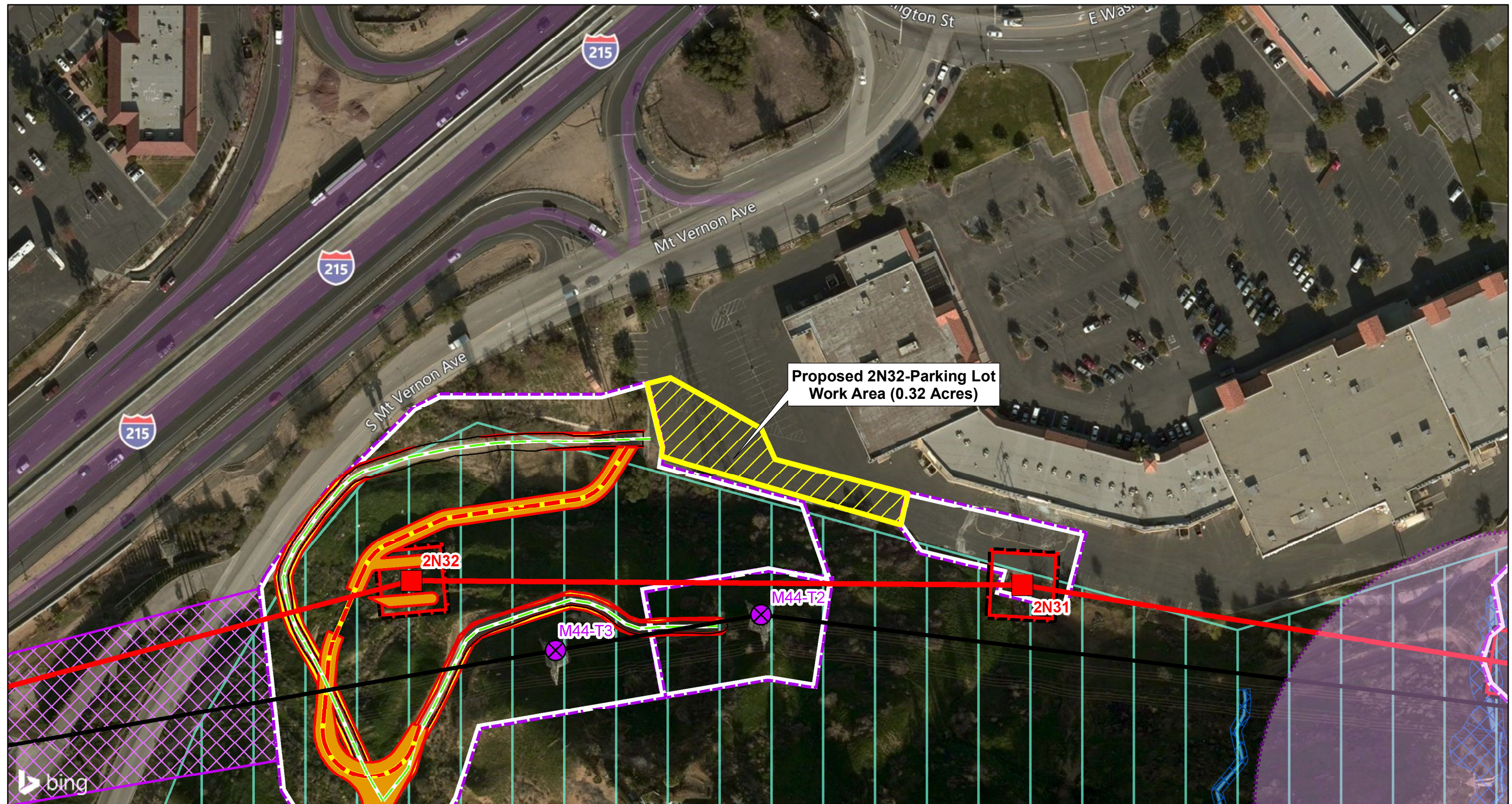


FIGURE 1

Southern California Edison  
West of Devers Upgrade Project  
**2N32 - Parking Lot  
Proposed Work Area**  
MPR #23



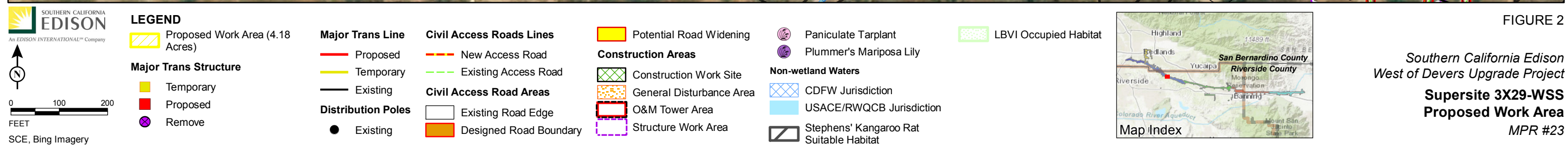
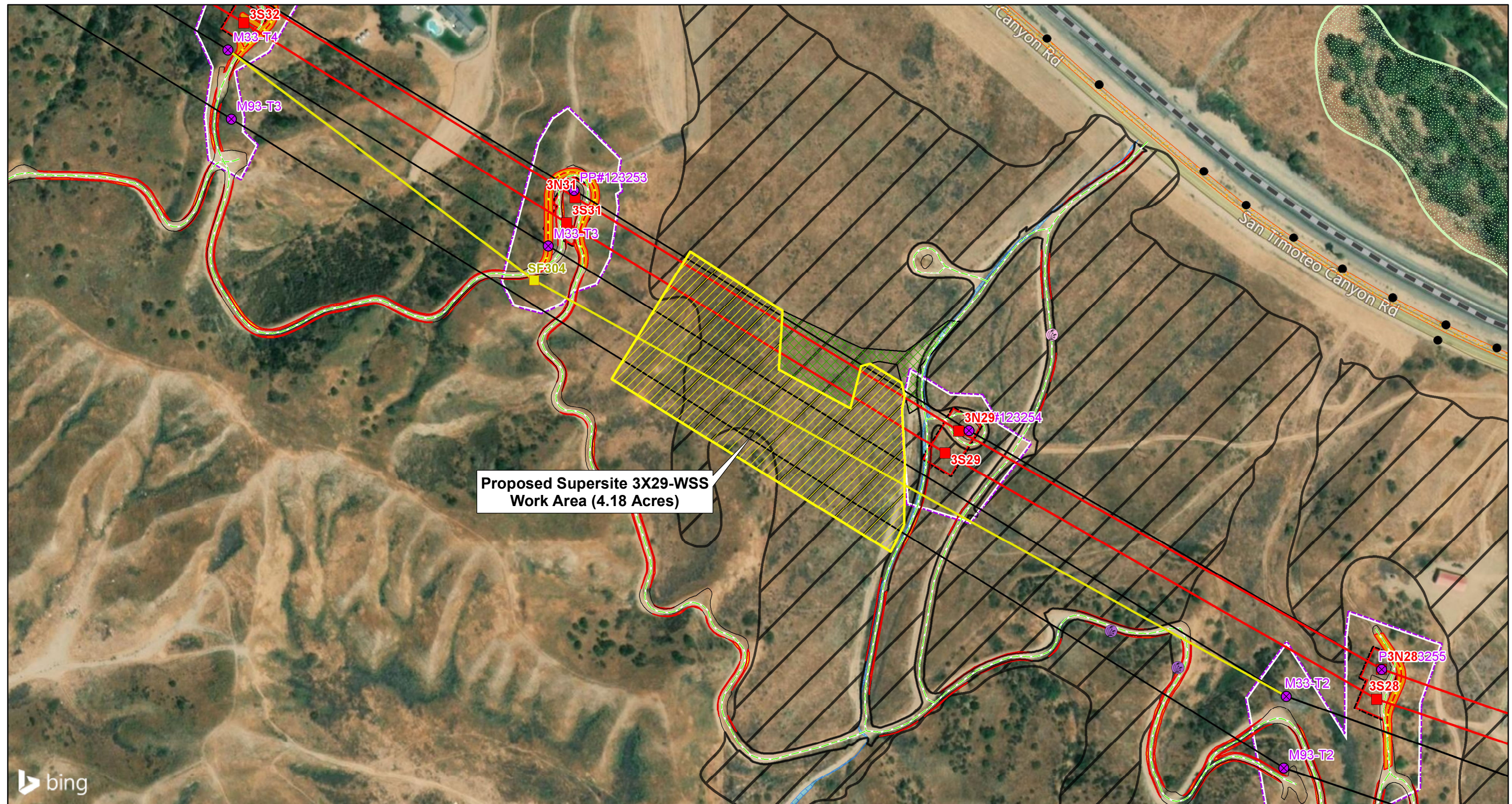
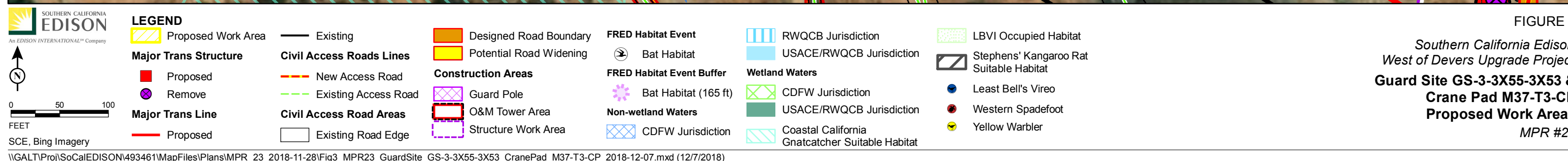
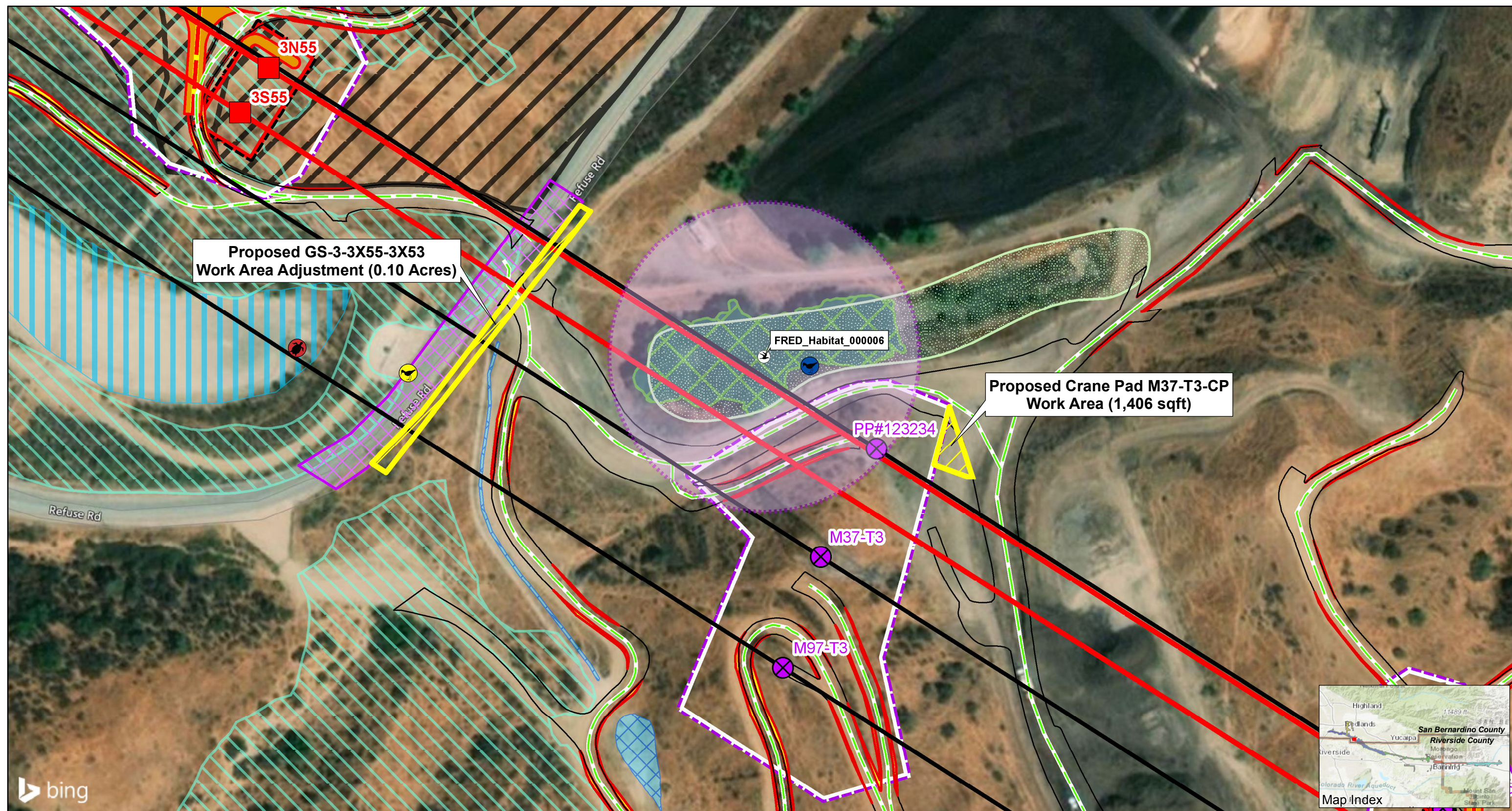


FIGURE 2

Southern California Edison  
West of Devers Upgrade Project  
**Supersite 3X29-WSS  
Proposed Work Area**  
MPR #23





**FIGURE 3**

*Southern California Edison*

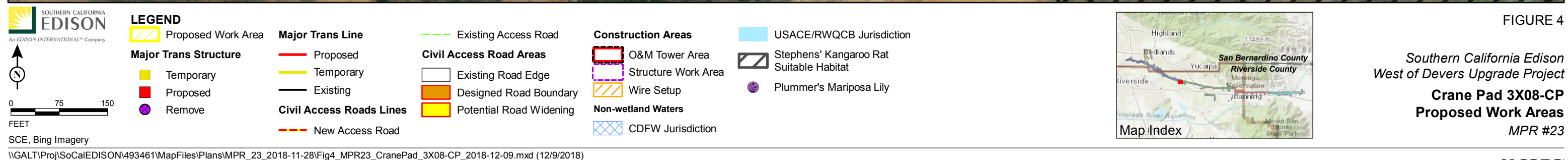
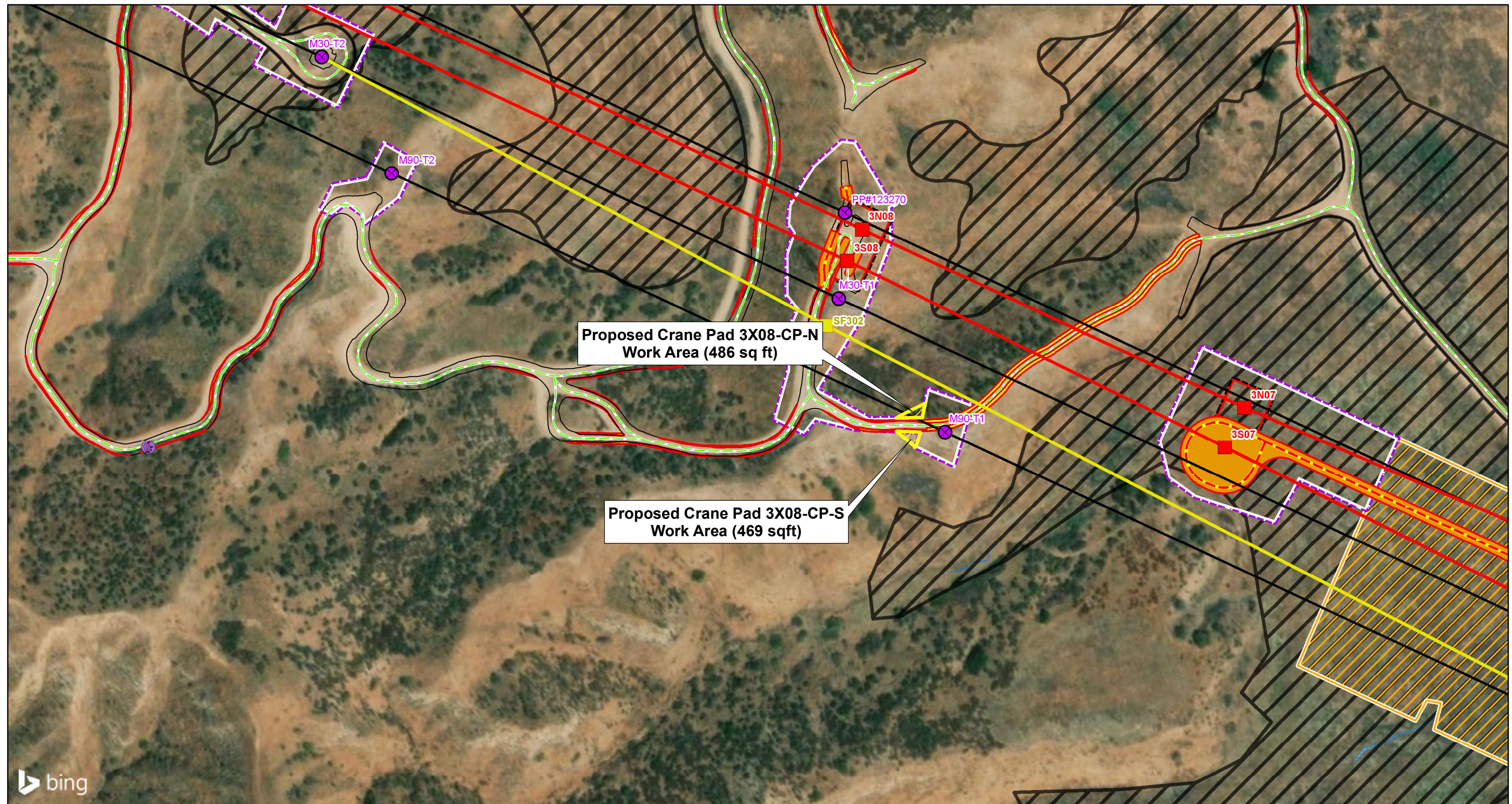
*West of Devers Upgrade Project*

**Guard Site GS-3-3X55-3X53 & Crane Pad M37-T3-CP**

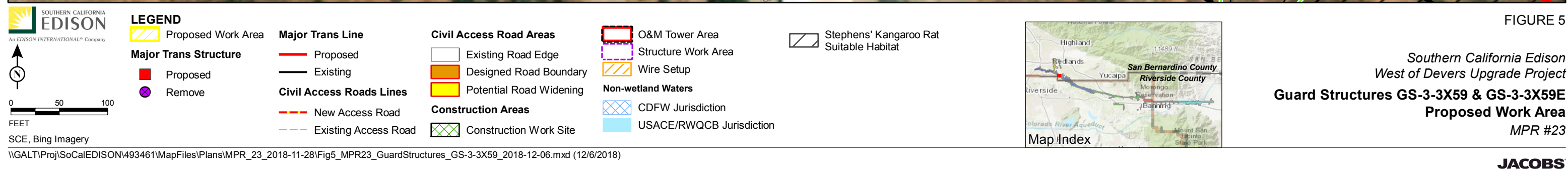
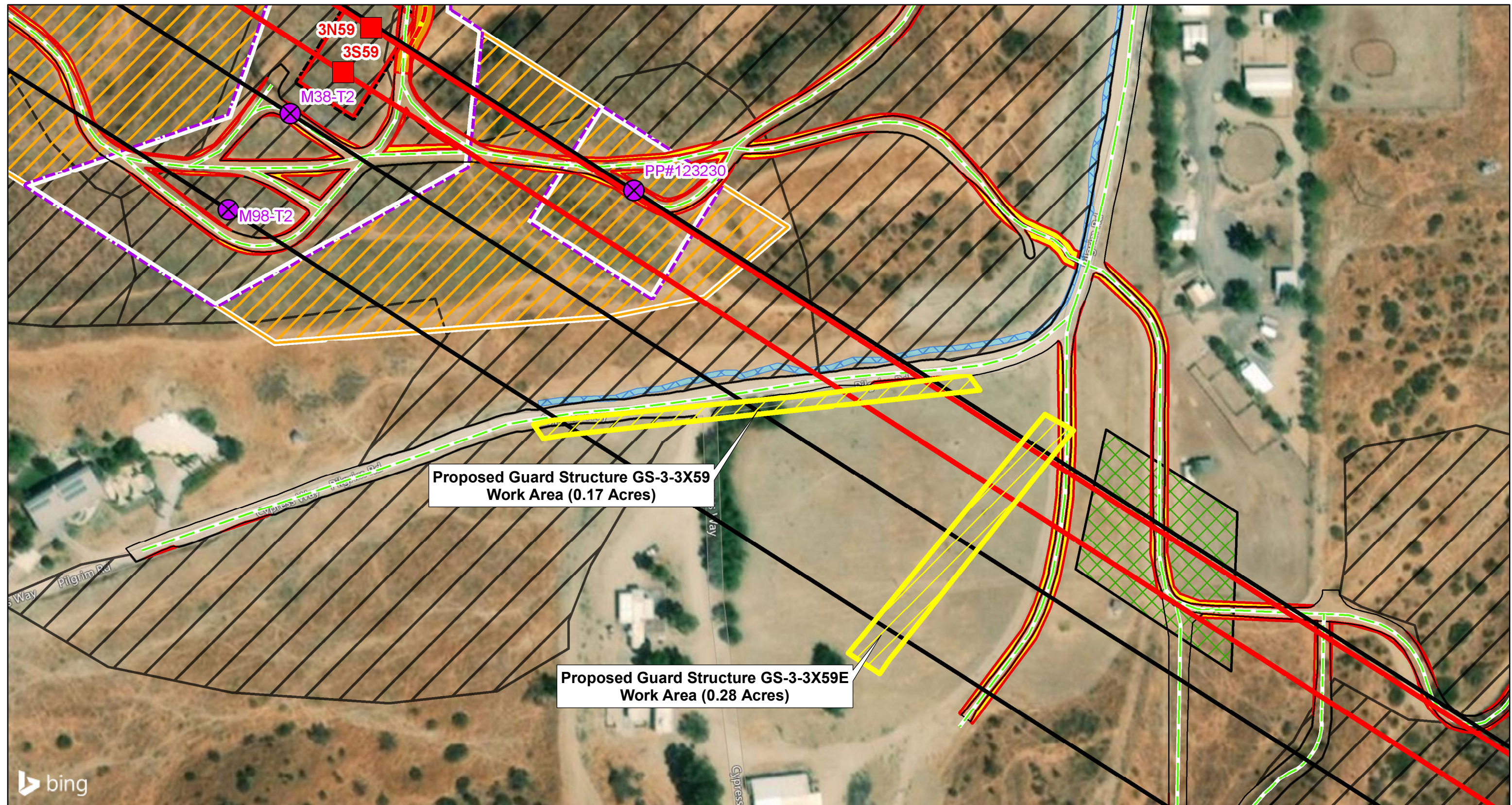
**Proposed Work Areas**

**MPR #23**











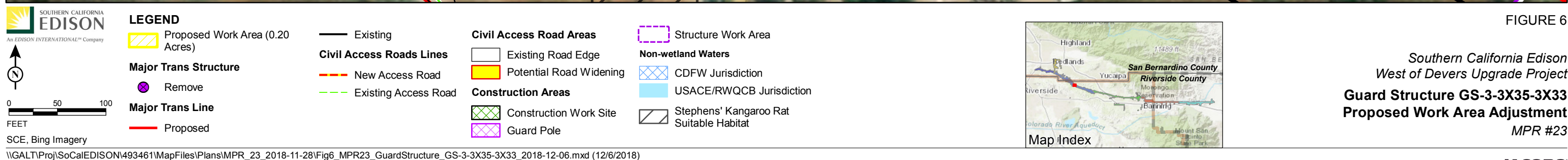
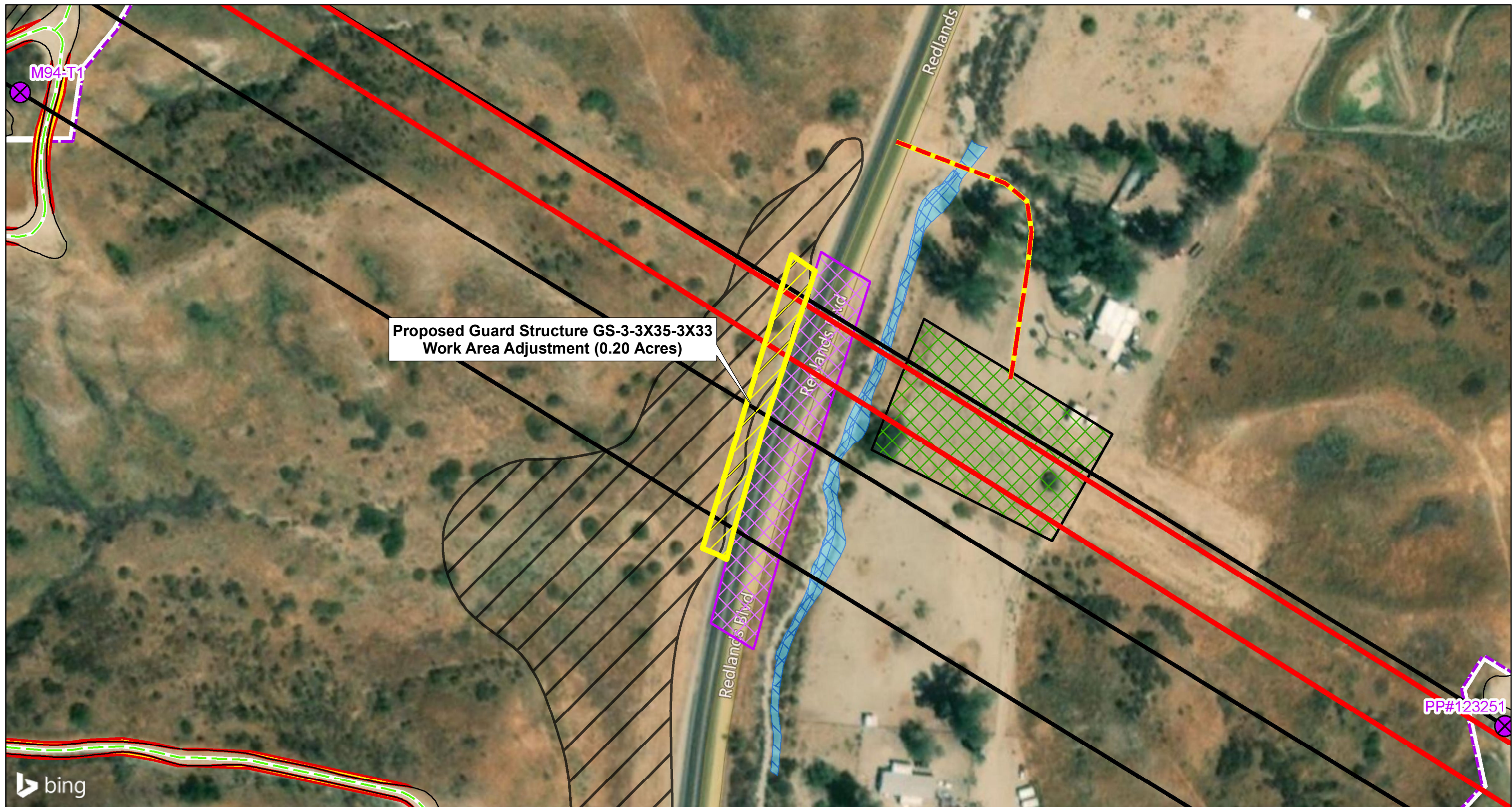


FIGURE 6

*Southern California Edison*  
*West of Devers Upgrade Project*

**Guard Structure GS-3-3X35-3X33**  
**Proposed Work Area Adjustment**  
MPR #23

**JACOBS**



