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

Date Approval Required: 4/5/2019  
Variance Request No.: 26

Date Submitted: 4/2/2019  
Location: Existing water hydrants in Segment 6; Prado Lane access road to Segment 2 ROW (see Description of Change and Justification section below and figures attached).

Landowner: SCE; Carmen Cervantes  
Landowner Parcel Number: 668-080-045, 668-100-005, 282-331-46, 282-331-47

Current Vegetative Cover/Land Use: Developed/Disturbed, Desert Scrub

Existing Sensitive Resource?  
NO  ■ YES  Specify: DETO Modeled Habitat in Segment 6; SWFL/LBVI Suitable Habitat adjacent in Segment 2

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: ____________________________

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Proposed Project Water Sources

Rubber tired water trucks will park on the shoulders of existing/public roads adjacent to the two (2) existing water source locations (i.e., hydrants) shown on Figure 1, pages 1 and 2. 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. No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated for use of the water sources described below:

**Hydrant #1** – Potable hydrant supplied by the Mission Springs Water District, located on the west side of Vernon Road, north of 16th Avenue (33°55’59.30”N, 116°36’11.14”W) in unincorporated Riverside County, shown on Figure 1, page 1.

The total temporary disturbance area associated with the new work area consists of approximately .01-acre of previously disturbed land and .01-acre of desert scrub, owned by Southern California Edison.

**Hydrant #2** – Potable hydrant supplied by the Mission Springs Water District, located on the west side of Diablo Road, near the western entrance to Devers Substation (33°56’15.18”N, 116°34’49.73”W) in unincorporated Riverside County, shown on Figure 1, page 2.

The total temporary disturbance area associated with the new work area is approximately .02 acre of previously disturbed land, owned by Southern California Edison.

All Water Districts/Agencies listed in the FEIR were contacted to determine the availability of non-potable water. Only the City of Redlands provides non-potable water service within the Project Area, however Redlands’ recycled water hydrants are located within the northern portion of Segment 1, where it is not economically or environmentally feasible to haul recycled water to other areas of the West of Devers Project.

Expanded Work Area Off Prado Lane

A .10-acre temporary work area located on vacant, previously disturbed land, west of Prado Park (APNs 282-331-46, 282-331-47) and south of Prado Lane, is required to facilitate construction access into the Segment 2 right-of-way, in the City of Colton. The additional work area will be used to safely mobilize and demobilize construction material, equipment,
Biological Resources

Proposed Project Water Sources

The new water sources are existing hydrants, located within existing disturbed or developed areas. Water trucks will be parked immediately adjacent to the water hydrants, and workers will fill the tanks using equipped hoses and on-board pumps. No additional ground disturbance (i.e., site preparation) will occur. The water sources are located adjacent to habitats that may support special-status plants and wildlife. Because no ground-disturbance will occur and water trucks will be positioned on paved/disturbed surfaces, 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 of short duration and similar to baseline conditions (e.g., public traffic, residences).

A desktop analysis was conducted for each water source using aerial imagery and project biological data. Hydrant 1 was covered in FRED Survey ID 000144 and hydrant 2 was covered in FRED Survey ID 000083:

Desert Tortoise – Based on project survey data, desert tortoises have a low probability of occurring in these locations. No desert tortoise or sign were observed within the survey areas. A preconstruction survey for each hydrant will be conducted immediately prior to use. With implementation of the mitigation measures and permit conditions, no impacts are anticipated.

Special-status Terrestrial Herpetofauna – No special-status terrestrial herpetofauna were observed within the survey areas. A preconstruction survey for each hydrant will be conducted prior to use. With implementation of the mitigation measures, no impacts are anticipated.

Burrowing Owl – No burrowing owls or burrows were observed within the survey areas. However, burrowing owls are known to occur in the vicinity. If active burrows are identified later, within 300 feet of construction activities, potential impacts will be addressed according to the Burrowing Owl Management and Passive Relocation Plan. A preconstruction survey for each hydrant will be conducted prior to use. With implementation of the mitigation measures, no impacts are anticipated.

Nesting Birds – A non-coastal Cactus Wren (Campylorhynchus brunneicapillus) nest is located approximately 530 feet northwest of hydrant 1 (FRED Nest Event 00212). A second CAWR nest is located approximately 530 feet southeast of hydrant 1 (FRED Nest Event 00214). See Figure 1, page 1. Hydrant 1 and the access road to it are located outside both of the 300-foot buffers for each nest. Preconstruction surveys, including surveys for nesting birds during the avian breeding season (Jan 1 – Aug 31) will be conducted prior to use of the water sources and periodic sweeps will be conducted during the avian breeding season. 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.

Special-status Small Mammals – No special-status mammals were observed in the survey areas. However, suitable and occupied habitats for the Palm Springs Pocket Mouse occur throughout Segment 6. The project has been designed to minimize impacts to the extent feasible. Potential impacts will be addressed in accordance with the Special-status Small Mammals Avoidance and Minimization Plan. A preconstruction survey for each hydrant will be conducted prior to use.

Special-status Plants – No special-status plants were observed within the survey 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 hydrant will be conducted prior to use.

Regulated Trees – No regulated trees were observed in the survey area. No tree trimming or tree removal of regulated trees are required for hydrant use.
Jurisdictional Waters – The hydrant work areas do not intersect jurisdictional water features. No grading signs are established where jurisdictional features intersect with access roads shown on Figure 1, pages 1 and 2. The water source locations are situated such that the proposed activities would be conducted from existing disturbed/developed areas. Impacts to jurisdictional features will be avoided during project activities.

Proposed Expanded Work Area

A desktop analysis was conducted for the expanded work area shown in Figure 1, page 3, using aerial imagery and project biological data. The expanded wok area was covered in active FRED Survey ID 000110:

Jurisdictional Waters – The new work area does not intersect any jurisdictional water features. One non-wetland feature is located approximately 25 feet south of the new work area and a wetland water feature is located approximately 60 feet south of the new work area. ESA and no grading signs are established at the limits of the jurisdictional features shown on Figure 1, page 3. The new work area is situated such that the proposed activities would be conducted from existing disturbed/developed areas. Impacts to jurisdictional features will be avoided during project activities.

Burrowing Owl – Burrowing owl habitat is widespread in the project area. Burrowing owls only have a moderate potential to occur within 500 feet of the new work area. A preconstruction sweep of the new work area will be conducted prior to construction. With implementation of the mitigation measures, 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, can be found throughout the project area. A preconstruction sweep of the new work area will be conducted prior to construction. Bird nests, if found, would be addressed in accordance with the Nesting Bird Management Plan.

Listed Riparian Birds – Suitable habitat for LBVI and SWFL was mapped within 20 feet east of the new work area in Prado Park and within 30 feet southwest of the new work area. No SWFL or LBVI have been detected in these habitat patches during multiple years of protocol surveys. In addition, qualified biologists have observed declining habitat quality over the years, such that it is now estimated that the species are unlikely to occur in these particular habitat patches. The proposed work area would not result in direct impacts to habitat. A preconstruction survey of the new work area will be conducted prior to construction.

Coastal California Gnatcatcher – Coastal California gnatcatcher critical habitat is mapped within 60-feet south of the new work area; However, no suitable habitat is located within 500 feet of the new work area. The land cover types comprising the proposed work area are not primary constituent elements of gnatcatcher critical habitat and no CAGNs are expected to occur.

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 survey area. No impacts are anticipated.

Stephens’ Kangaroo Rat – No suitable habitat for Stephens’ kangaroo rat occurs within the new work area vicinity. No impacts are anticipated.

Desert Tortoise – The new work area is not located within the range of the species. No impacts are anticipated.

Special-status Herpetofauna – The new work area does not include habitat supporting special-status herpetofauna. No impacts are anticipated.

Special-status Bats – No suitable bat roosting sites occur within the new work area. No impacts are anticipated.

Special-status Small Mammals – The survey area does not include habitat supporting special-status mammals. No impacts are anticipated.

Special-status Plants – No special-status plants were observed within the survey area. No impacts are anticipated.

Regulated Trees – No tree trimming or tree removal is required for construction activities in the new work area.

Cultural Resources
The proposed water sources are existing hydrants located within existing disturbed and/or developed areas. Only occasional short-term filling of a water truck will occur at each location. Water trucks will park on paved or unpaved roadway areas immediately adjacent to the water sources using rubber-tired water trucks, and fill using equipped hoses and on-board pumps. Paved and unpaved access roads will be used to access the existing hydrants. No ground disturbance will occur. No impacts to cultural resources are required during water truck filling.

The hydrants and expanded work area south of Prado Lane 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.

### Resources:

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<tr>
<th>Biological</th>
<th>NO SENSITIVE RESOURCES PRESENT</th>
<th>SENSITIVE RESOURCES PRESENT</th>
<th>N/A</th>
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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 were covered in FRED Survey Report ID 000144 and 000083. The new work area off Prado Lane was covered in FRED Survey Report ID 000110.*

<table>
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<th>Cultural</th>
<th>NO RESOURCES PRESENT</th>
<th>RESOURCES PRESENT WITH PROJECT APE:  <strong>YES</strong>  <strong>NO</strong></th>
</tr>
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<tbody>
<tr>
<td></td>
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<td>(PAVED/GRAVEL AREA AND NO GROUND DISTURBANCE)</td>
</tr>
</tbody>
</table>

If in APE, Previous Cultural Survey Reference:

If not in APE, attach new survey report.

The new hydrants and expanded work area south of Prado Lane 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**
- **BIOLOGICAL RESOURCES**
- **CONTAMINATED SOILS**
- **CULTURAL RESOURCES**
- **HAZARDOUS MATERIALS**
- **LAND USE**
- **NOISE**
- **PALEO RESOURCES**
- **SOCIOECONOMIC**
- **STORM WATER (SWPPP)**
- **TRAFFIC**
- **VISUAL**
- **WATER RESOURCES**
- **WETLANDS**

### 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: [Signature]          Date: 4/1/2019

Environmental Inspector:  ■ FIELD REVIEW COMPLETE
Name: Lisa Amador          Signature: [Signature]          Date: 4/1/2019

X Land Agent:  ■ CONSISTENT WITH EXISTING RIGHTS  □ NEW RIGHTS OBTAINED
Name: James Spence          Signature: [Signature]          Date: 4/1/2019

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

Southern California Edison
West of Devers Upgrade Project
Segment 6 Water Sources & Fence Work Area

**LEGEND**

- Proposed Potable Water Hydrant
- Proposed Work Area
- Existing Substation Area
- Existing ROW
- Non-wetland Waters
  - CDPW Jurisdiction
  - USACE/RWQCB Jurisdiction
  - Desert Tortoise Modeled Habitat

Map Index

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FIGURE 1

Southern California Edison
West of Devers Upgrade Project
Segment 6 Water Sources & Fence Work Area

LEGEND

Proposed Work Area
Major Trans Structure
- Proposed
- Existing

Civil Access Roads
- Proposed
- Existing

Civil Access Roads Lines
- New Access Road
- Existing Access Road

Construction Areas
- Construction Work Site
- O&M Tower Area
- Structure Work Area

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

Wetland Waters
- USACE/RWQCB Jurisdiction
- CDFW Jurisdiction
- Gnatcatcher Critical Habitat

Proposed Fence Work Area (0.11 Acres)