

Environmental Minor Project Refinement Form



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

Date Approval Required: 7/3/2019 Variance Request No.: 29

Date Submitted: 6/27/2019 Location: East of 6S39; West and East of 6S34 and 6S35, respectively; East and West of 6S26; West of 6X24; East of 6S21; East of GS-6X15-6S16-4; north and east of El Casco Substation (see Description of Change and Justification section below and figures attached).

Landowner: Richard Norton, Mike Breckenridge, Benneva Burns, Carrie Griffen, and Select Ventures, Inc.; Manuel Ramirez, Hsiu Chu Tseng, Donald Lowe, Bessie Chen Tse and John Meyers; Bureau of Land Management; Wind Energy Partnership; Southern California Edison; Riverside County Regional Park & Open Space District

Landowner Parcel Numbers: 517-221-003, 517-221-012, 517-221-014, 517-221-002; 516-060-017, 516-060-020, 516-060-006, 516-060-017, 516-060-020; 516-120-003, 516-120-002, 516-120-004, 516-120-005; 516-120-060; 668-150-004; 668-190-005; 413-180-008, 413-180-010

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

Existing Sensitive Resource? NO ☒ YES Specify: DETO; Desert woodrat; Chaparral sand verbena Habitats

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: _____

Expansion area east of 6S39

Supersite 6S39 will be expanded to the east within the SCE transmission line corridor, to provide adequate work space for material and equipment staging during tower construction, wire stringing activities, and wire wreck-out, as shown on Figure 1.

The new work area consists of approximately 0.59-acres of developed/disturbed land. The land is privately-owned and is located within the SCE transmission line right-of-way in Whitewater, Riverside County.

6S34 and 6S35 Wire Stringing Sites

Two new temporary work areas are required west and east of Supersites 6S34 and 6S35, respectively, to facilitate wire stringing activities associated with the tower sites, as shown in Figure 2. The new work areas will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work areas consists of approximately 2.27 acres of developed/disturbed (.39 acre) and desert scrub (1.87 acre). The land is privately owned and is located within the existing SCE transmission line right-of-way in Whitewater, Riverside County.

6S26 Wire Stringing Sites

Two new temporary work areas are required east and west of Supersite 6S26 to facilitate wire stringing activities associated with the tower site, as shown in Figure 3. The new work areas will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work areas consists of approximately 1.79 acres of developed/disturbed land (0.29 acre) and desert scrub (0.15 acres). The land is privately owned and is located within the existing SCE transmission line right-of-way in the City of Cabazon.

Expansion area west of 6X24

Supersite 6X24 will be expanded to the west within the SCE transmission line corridor, to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 4.

The new work area consists of approximately 0.47-acres of developed/disturbed land (0.16 acre) and desert scrub (0.31 acre). The land is owned by the Bureau of Land Management but is located within the SCE transmission line right-of-way in Cabazon, Riverside County.

Work area east of 6S21

A new work area is required east of 6S21, within the SCE transmission line corridor, to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 5.

The new work area consists of approximately 0.23-acre of developed/disturbed land (0.05 acre) and desert scrub (0.18 acre). The land is privately owned and is located within the SCE transmission line right-of-way in Cabazon, Riverside County.

Expansion area east of GS-6X15-6S16-4 (west of 6S15)

Supersite GS-6X15-6S16-4 will be expanded to the east within the SCE transmission line corridor, to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, associated with 6S15, as shown on Figure 6.

The new work area consists of approximately 0.41-acres of desert scrub. The land is owned by Southern California Edison in Cabazon, Riverside County.

New Telecom Work Areas outside El Casco Substation

Two new work areas are required north and east of El Casco Substation to facilitate telecommunication tie-ins from structures 3N02 and 4N64 into the El Casco Substation, as shown on Figure 7. The new work areas will receive drive and crush impacts and the installation of two new telecom manholes.

The new work areas consist of approximately 1.27 acre of previously developed/disturbed land (0.95 acre) and coastal sage (0.32 acre), 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 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 000171, 000167, 000147, 000146, 000145, 00014, and 000067:

Desert Tortoise (DETO) – The new work areas west and east of 6S34 and 6S35 (Figure 2), east and west of 6S26 (Figure 3), west of 6X24 (Figure 4), east of 6S21 (Figure 5), and east of GS-6X15-6S16-4 (Figure 6) are all located within desert tortoise modeled habitat.

No definitive signs of DETO were observed during the 2011 and 2012 protocol desert tortoise surveys of the area or during the active preconstruction surveys. With clearance surveys and monitoring, no impacts to DETO are anticipated.

The other new work areas (Figures 1 and 7) are not located within the range of the DETO; therefore, no impacts to DETO are anticipated at those locations.

Special-status Terrestrial Herpetofauna – One red diamond rattlesnake occurrence was recorded approximately 260 feet southwest of the new work area associated with tower 3N02. No special-status terrestrial herpetofauna were observed

within the new work areas. However, many species have the potential to occur throughout the project area. Therefore, 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. Burrowing owl and a burrow with whitewash and pellets were previously observed approximately 290 feet southwest of supersite 6S35 (Figure 2). Active burrowing owl burrows will be mitigated for in accordance with the Burrowing Owl Management and Passive Relocation Plan.

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.

Listed Riparian Birds – Suitable habitat for riparian bird (least Bell's vireo [LBVI] or Southwestern willow flycatchers [SWFL]) breeding associated with San Timoteo Creek is located adjacent to the eastern edge of the new work areas for tower 4N64 and the telecom manhole. LBVI are known to occur in the riparian habitats associated with San Timoteo Creek and several LBVI nests were identified within the survey area this breeding season. Multiple least Bell's vireo observations have been made in the vicinity of the work area (FRED Species Events 000013, 000014, 000015, 000016, 000038 and 000054). LBVI/SWFL biologists John Green and/or Steve Myers conducted 6 rounds of protocol surveys in suitable riparian bird habitat within 500 feet of construction between April 13, 2018 and June 14, 2018 in the survey area. No currently active LBVI nest buffers are located within the new work areas. The breeding season for this species is trending toward completion. No new nests are anticipated. With implementation of the mitigation measures and biological monitoring during construction, no impacts to listed riparian birds are anticipated.

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

Stephens' Kangaroo Rat – Mapped suitable habitat for Stephens' kangaroo rat (SKR) is located adjacent to both sides of the El Casco access road and approximately 200 feet west of the work area associated with tower 3N02. A habitat assessment, pedestrian surveys, and trapping surveys were conducted as recent as last trapping season 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.

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

Special-status Bats – Areas of suitable bat habitat were previously mapped along the Project. Yuma myotis, big brown bat, silver-haired bat, hoary bat, California myotis and canyon bat have all been documented by Dr. Ed West (bat specialist) as using the riparian area associated with San Timoteo Creek north of the work area and access road as a daytime roost site (Habitat Event 000031). Additionally, a large eucalyptus stand south of the El Casco access road has been identified as a potential daytime and/or maternal roost site (Habitat Event 000012). Buffers established around the potential roost sites, which do not intersect the work areas; therefore, no impacts to special-status bats are anticipated.

Dr. Ed West (Lead, MOU Bat Specialist) and Chris Taylor (agency-approved Qualified Bat Biologist) conducted an emergence survey along the riparian corridor north of the El Casco access road on the evening of 8/8/18. Based on results of this survey, it was determined that both silver-haired bats (*Lasionycteris noctivagans*) and big brown bats (*Eptesicus fuscus*) are currently using this stand of trees as a roost. A 165-foot buffer has been established around the suitable roost features within this corridor. The access road to 4N64 passes through the buffer established for Habitat Event 000031. However, Ed West evaluated the potential risk and determined that ingress/egress of construction vehicles and equipment is unlikely to result in adverse impacts to the roosting bats. Signage indicating no stopping, idling, or loitering has been established in the field and construction personnel have been instructed to respect those instructions and to avoid using horns or making other loud noises within the buffers. With implementation of the mitigation measures and biological monitoring during construction, no impacts to special-status bats are anticipated.

No suitable bat roosting habitat or buffers occur within the other 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. Little pocket mouse (including Los Angeles pocket mouse [LAPM] and Palm Springs pocket mouse [PSPM] subspecies) occupied habitat is widespread throughout Segment 6. San Diego pocket mouse have been observed in Segment 6, approximately 400-feet north of the new work areas shown in Figure 3.

Desert woodrat midden has been identified near the new work areas shown in: Figures 1 (south of tower site 6S39), Figure 2 (6S34, T238, and south of 6S35), Figure 5 (6N21 and to the east), and Figure 6 (6N15, 6S15, 6S16). San Diego desert woodrat midden has been identified near the new work areas shown in Figure 6 (6N15, 6S15, 6S16). A 10-foot no-entry buffer was established around the midden using ESA signs and will also be implemented if other midden are found in the new work areas. If construction determines avoidance of these buffers is not possible, a qualified biologist will relocate the midden in accordance with the Special Status Small Mammal Avoidance and Minimization Plan. With monitoring no impacts are expected.

There is mapped suitable habitat for the Los Angeles Pocket Mouse (LAPM) located approximately 50 feet east of the new work areas at El Casco Substation. No suitable habitat for LAPM is located within the new work areas; therefore, no impacts to LAPM will occur.

Special-status Plants – Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae* [CVMV]; FE, CRPR 1B.2) modeled habitat overlaps the new work areas shown on Figures 2, 3, and 4. Previous comprehensive surveys have been negative for the species. If milk-vetch plants are identified during future surveys or clearance sweeps/monitoring, ESA buffers will be established and the special-status plants will be avoided to the extent feasible. Unavoidable impacts will be addressed in coordination with the USFWS.

Chaparral sand verbena (*Abronia villosa* var. *aurita*; CRPR 1B.1) occupied habitat overlaps the new work areas as shown in Figures 3 and 5 and exists within 230 feet of the new work area shown in Figure 4. Individual chaparral sand verbena plants have also been identified within 6S26 and the new work area east of 6S21, and 320 feet north east of the new work area adjacent to 6S24. The boundaries of the occupied habitat were staked with ESA signs along the access roads. If additional special-status plants are later 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. Many of the work areas along this segment have been staked with a 3-foot offset from the approved work limits, which will serve to minimize impacts to occupied habitat. Seed was collected from these populations in 2019 and will be planted during the restoration phase of the project.

Smooth tarplant (*Centromadia pungens* ssp. *laevis*; CRPR 1B.1, WR-MSHCP Criteria Area Plant Species) occurs throughout the habitat immediately north of the El Casco paved access road. Plants have not been previously identified within the new work areas; therefore, no impacts to smooth tarplant are anticipated. Current polygons accurately delineate the locations of these plants where they occur. ESA signs have been established in the field. With implementation of the mitigation measures and biological monitoring during construction, no impacts to special-status plants are anticipated.

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

Jurisdictional Waters – Wetland and non-wetland jurisdictional features are located throughout the project area. No jurisdictional features intersect the new work areas, although a jurisdictional feature exists immediately west of the new work area shown in Figure 2. BMPs will be implemented in accordance with the Project SWPPP. A preconstruction survey of the work areas will be conducted prior to use. Therefore, no unpermitted impacts to jurisdictional waters are anticipated.

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 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 new work areas east of 6S39 (Figure 1); west and east of 6S34 and 6S35, respectively (Figure 2); east of 6S21 (Figure 5); east of GS-6X15-6S16-4 (Figure 6), and adjacent to El Casco Substation (Figure 7) 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.

The new work areas east and west of 6S26 (Figure 3) and west of 6X24 (Figure 4) are in areas of unknown PFYC U paleontological sensitivity) and will be monitored by a qualified paleontological monitor on a part-time basis.

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 000171, 000167, 000171, 000147, 000146, 000145, 000143, 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 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 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

☐ LAND USE

☐ NOISE

☐ TRAFFIC

☐ VISUAL

- ☐ CONTAMINATED SOILS
- ☐ CULTURAL RESOURCES
- ☐ HAZARDOUS MATERIALS

- ☐ PALEO RESOURCES
- ☐ SOCIOECONOMIC
- ☐ STORM WATER (SWPPP)

- ☐ WATER RESOURCES
- ☐ WETLANDS

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.)

 X Chief Construction Inspector or Foreman: ☒ VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION
Name: Jeff Miller Signature:  Date: 6/27/2019

Environmental Inspector: ☒ FIELD REVIEW COMPLETE
Name: Lisa Amador Signature:  Date: 6/27/2019

 X Land Agent: ☒ CONSISTENT WITH EXISTING RIGHTS ☐ NEW RIGHTS OBTAINED
Name: James Spence Signature:  Date: 6/27/2019

 X Environmental Compliance Lead: ☒ APPROVED ☐ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) ☐ DENIED
Name: Sylvia Granados Signature:  Date: 6/27/2019

MPR 23

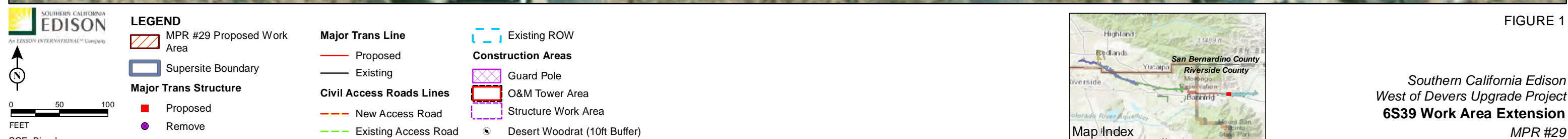
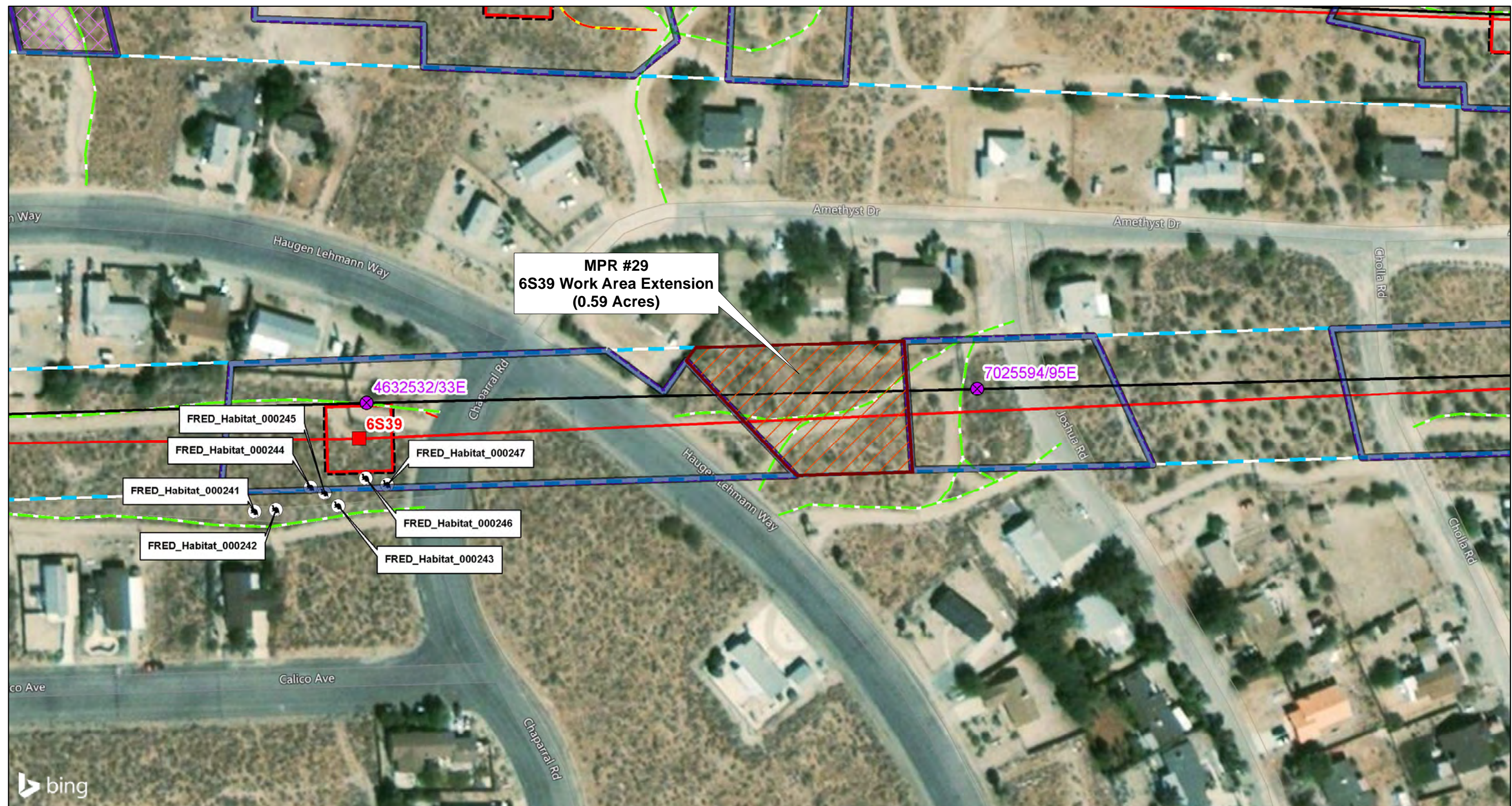
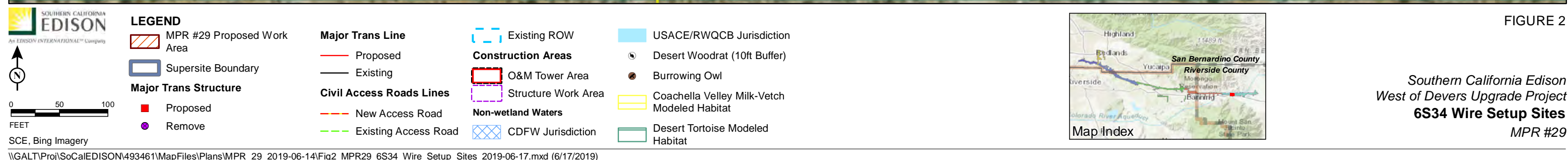
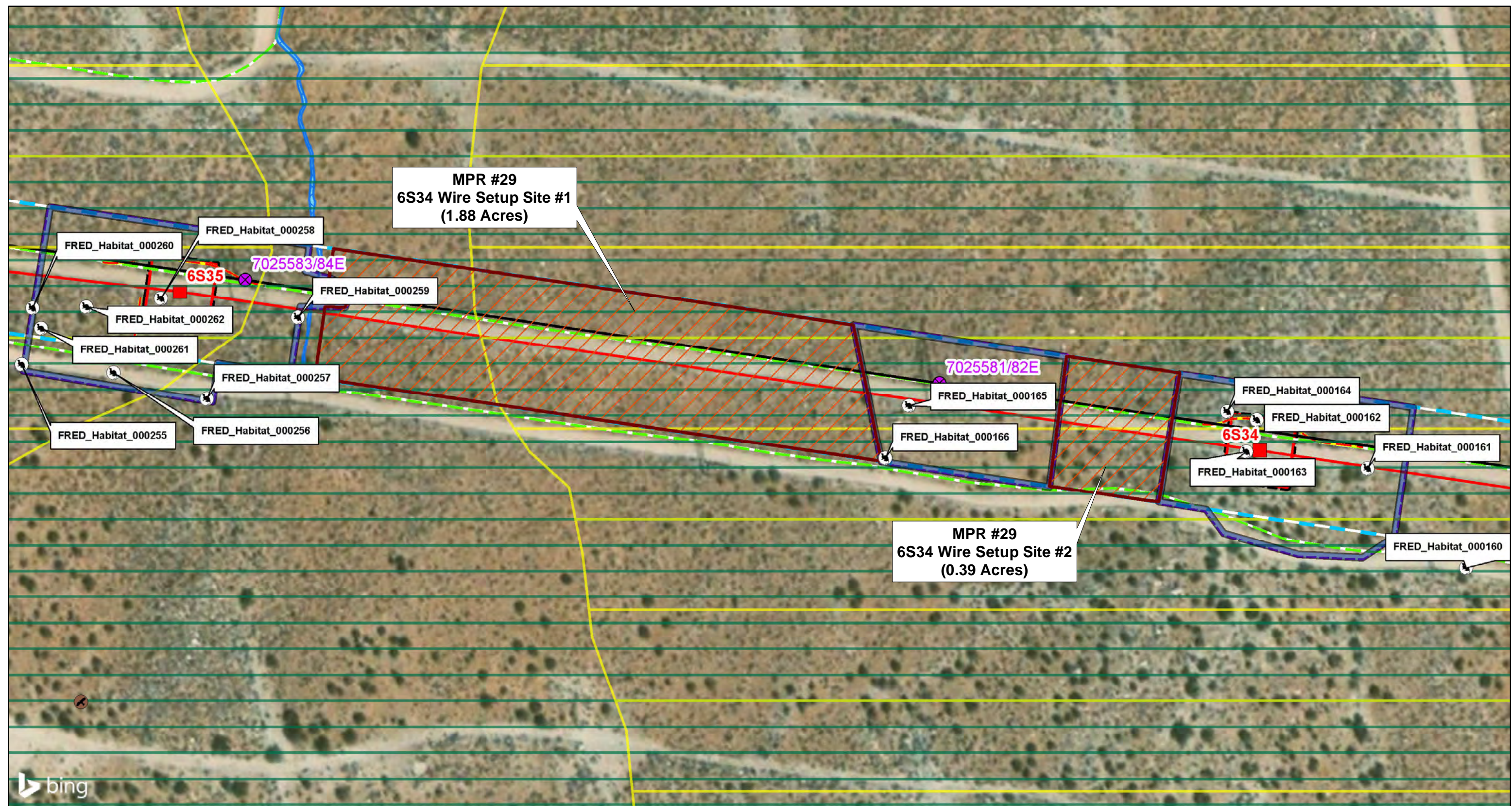
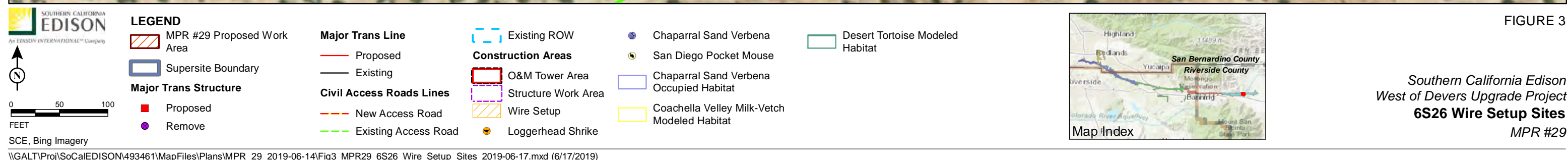
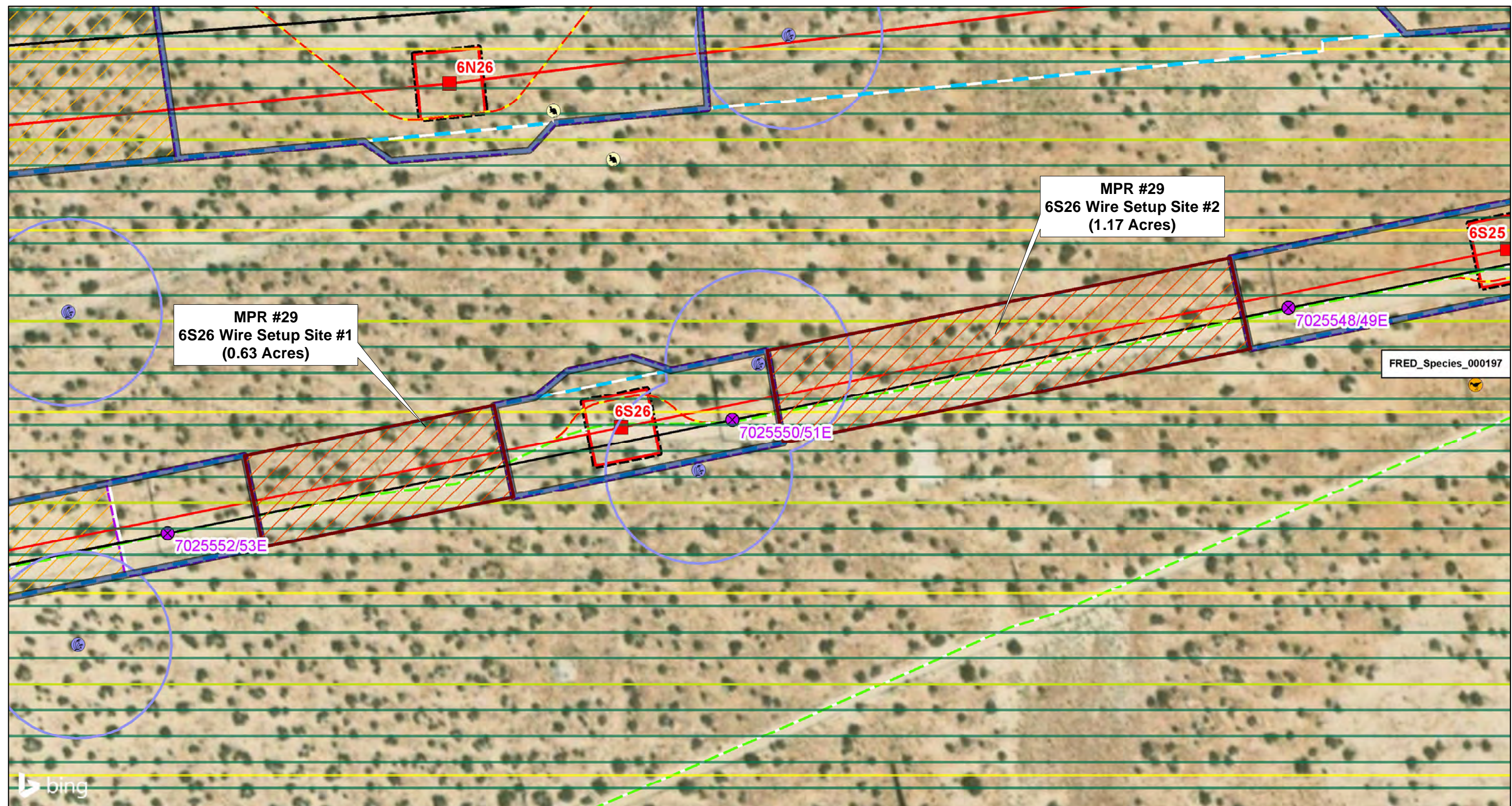


FIGURE 1

Southern California Edison
West of Devers Upgrade Project
6S39 Work Area Extension
MPR #29





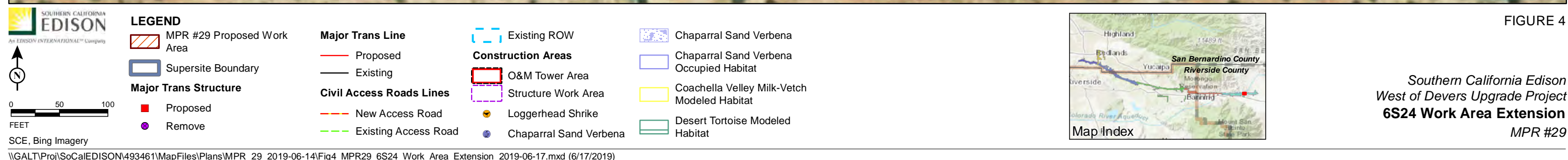
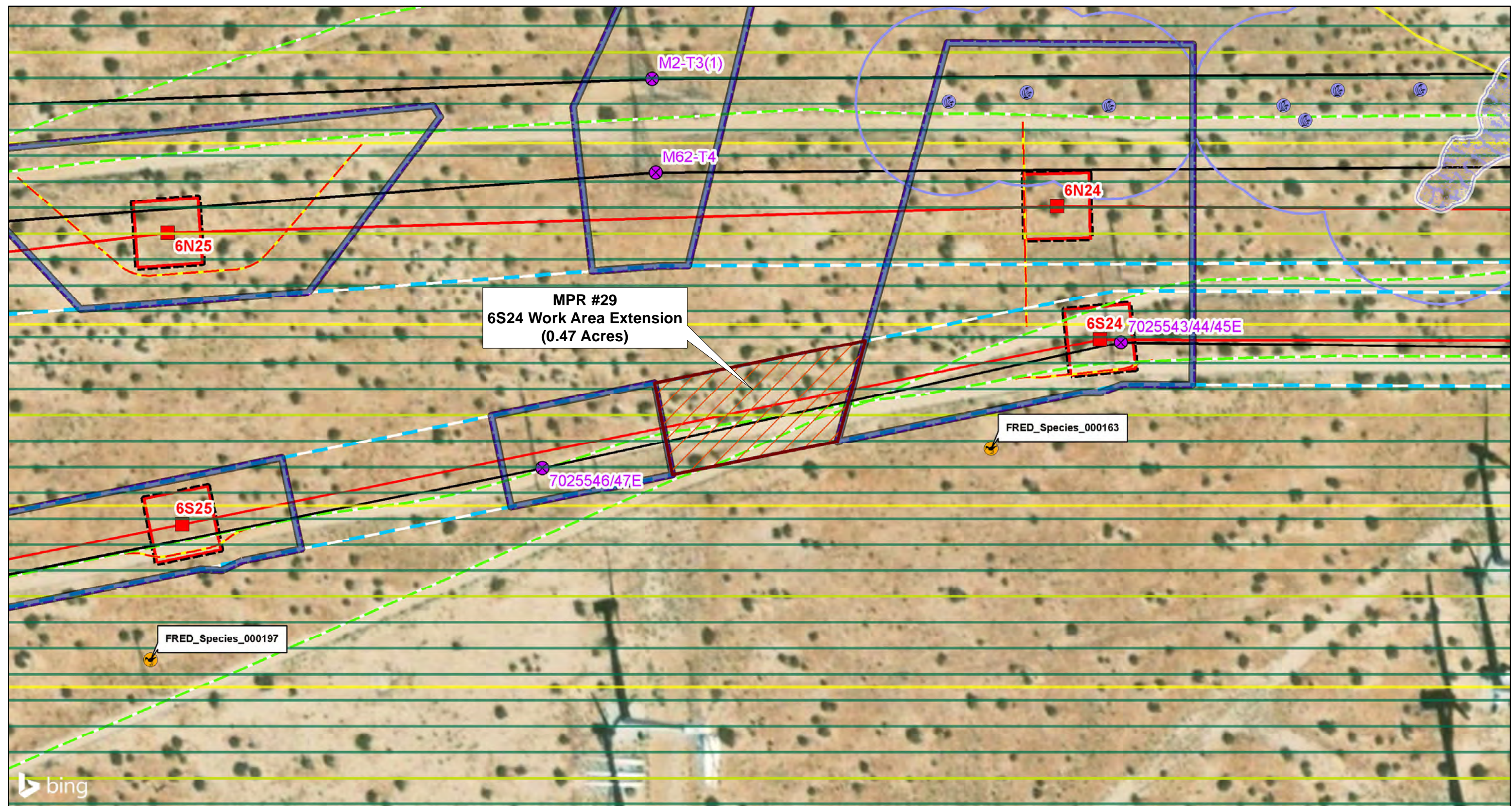


FIGURE 4

Southern California Edison
West of Devers Upgrade Project
6S24 Work Area Extension
MPR #29

JACOBS

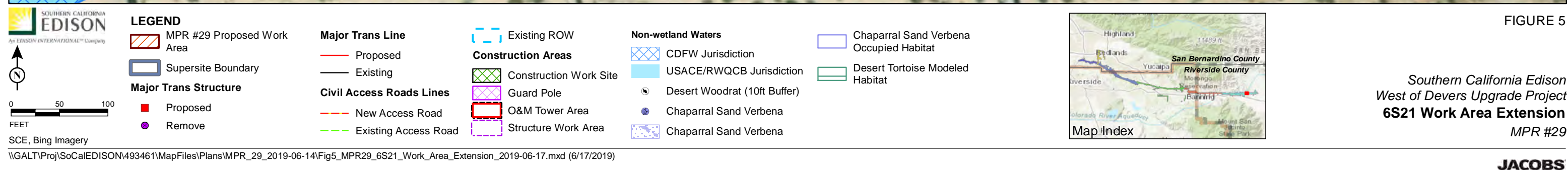
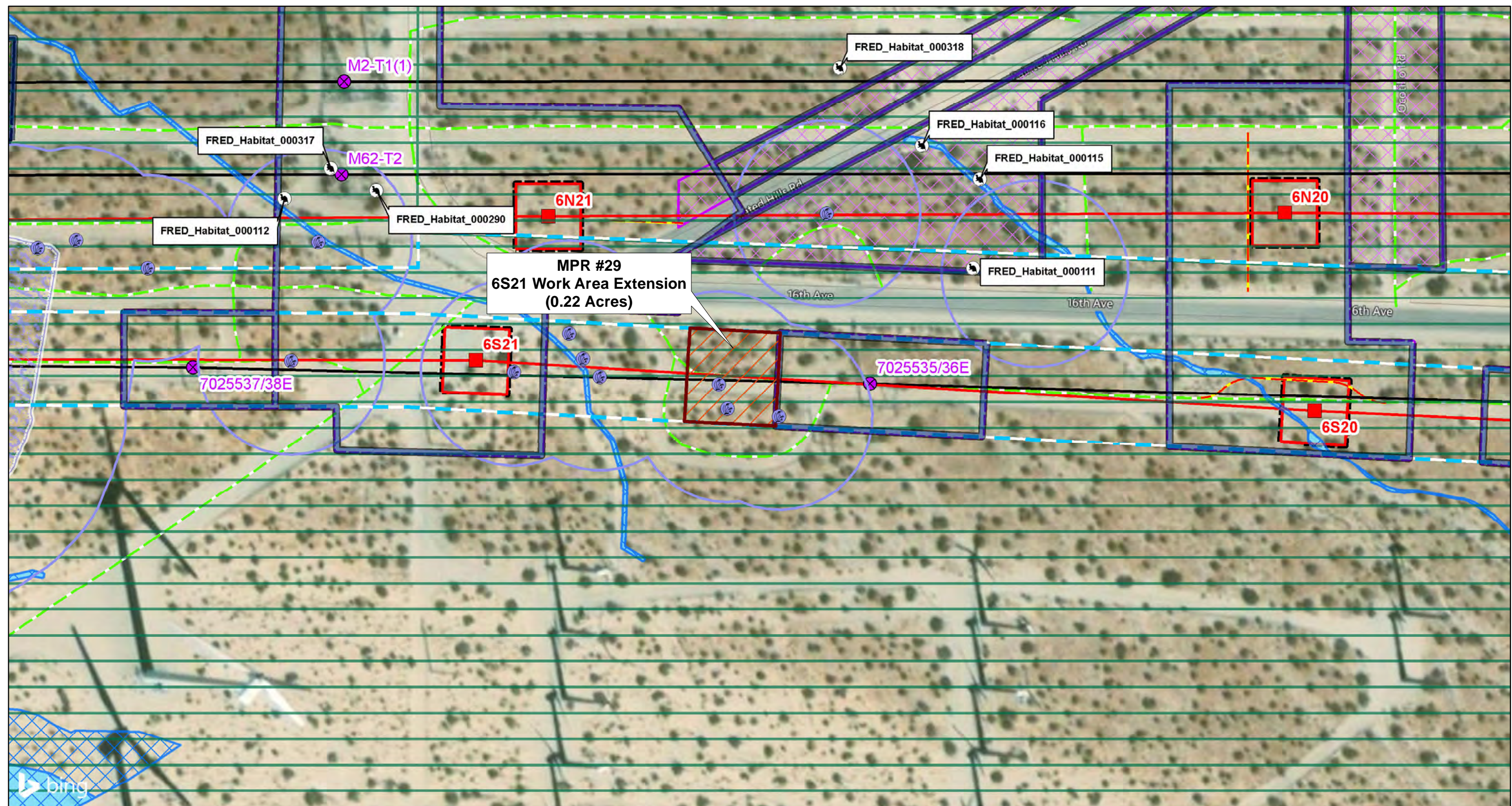


FIGURE 5

Southern California Edison
West of Devers Upgrade Project
6S21 Work Area Extension
MPR #29

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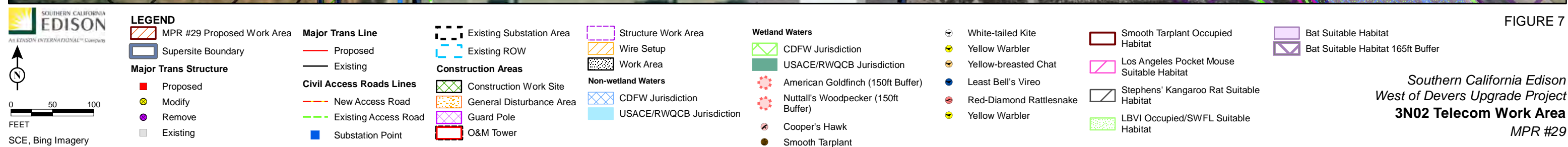
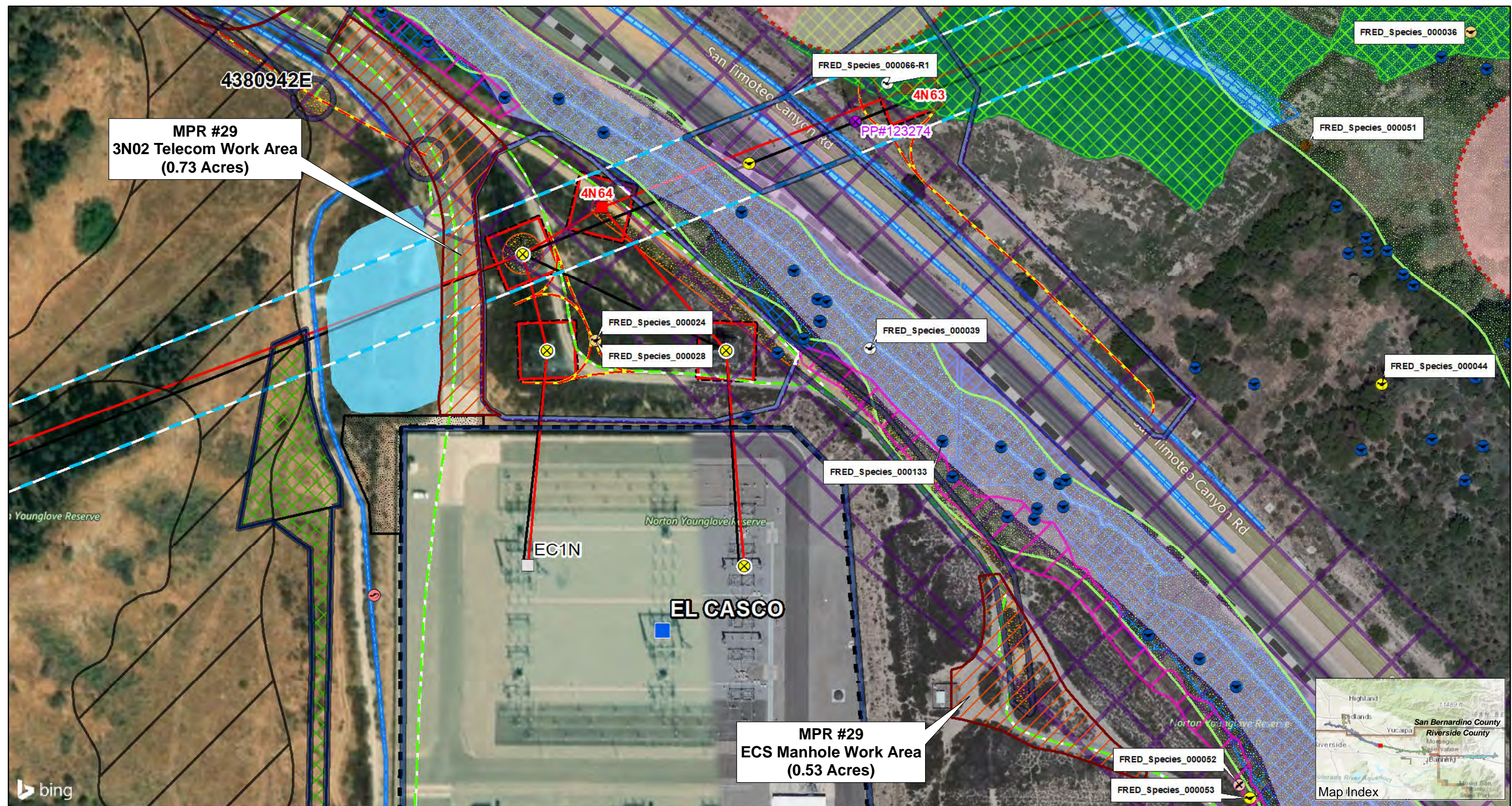


FIGURE 7