

Environmental Minor Project Refinement Form



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

Date Approval Required: 12/6/2019 **Variance Request No.:** 32

Date Submitted: 11/14/2019 **Locations:** New work areas West of 4S60; Southwest of GS-4X50-4X51; East and west of GS-4X48-4X50; West of GS-4X46-4X47; West of 4X44; East and West of GP-4X43-W; East of PP#123298; West of 4X38; East and west of 4X29; Southwest intersection corner of Mountain Avenue and Cedar Road (City of Banning); East of 4X04-3-SE; East of 6N26; South of 6S15; (see *Description of Change and Justification* section below and figures attached).

Landowners and Associated Parcel Numbers:

<u>Proposed Work Area</u>	<u>Property Owner</u>	<u>Assessor's Parcel Number</u>
<u>GS-4-3S01-4S60-1-MPR-32</u>	<u>Fairway Canyon Community Association</u>	<u>413-710-061</u>
	<u>Rivers & Lands Conservancy</u>	<u>413-460-043</u>
<u>GS-4-4X50-4X51-MPR-32</u>	<u>San Gorgonio Land</u>	<u>413-290-059</u>
<u>GS-4-4X48-4X50-1-MPR-32</u>	<u>San Gorgonio Land</u>	<u>413-290-035</u>
<u>GS-4-4X48-4X50-2-MPR-32</u>	<u>San Gorgonio Land</u>	<u>413-290-059</u>
	<u>HPH Homebuilders 2000</u>	<u>413-920-044</u>
<u>GS-4-4X48-4X50-3-MPR-32</u>	<u>San Gorgonio Land</u>	<u>413-290-035</u>
<u>GS-4-4X46-4X47-1-MPR-32</u>	<u>Walter Dopek</u>	<u>009-706-820</u>
	<u>Mary Chavez</u>	<u>009-707-258</u>
<u>WSS-4-4X44-2-MPR-32</u>	<u>Michael A. Adler</u>	<u>400-010-010</u>
<u>WSS-4-4X44-1-MPR-32</u>	<u>Colorado River Mobile Homes</u>	<u>400-010-012</u>
		<u>400-010-011</u>
<u>GS-4-W-4X43-3-MPR-32</u>	<u>City of Beaumont</u>	<u>400-150-003</u>
<u>GS-4-E-4X42-MPR-32</u>	<u>Robert D. Knox</u>	<u>400-230-041</u>
	<u>Solera Oak Valley Greens Assn.</u>	<u>400-220-001</u>
	<u>Solera at Oak Valley Greens Assn.</u>	<u>400-220-002</u>
		<u>400-230-069</u>
<u>GS-4-4X41-4X42-1-MPR-32</u>	<u>Solera Oak Valley Greens Assn.</u>	<u>400-220-001</u>
	<u>Solera at Oak Valley Greens Assn.</u>	<u>400-220-002</u>
		<u>400-230-069</u>
	<u>Pulte Home Corporation</u>	<u>400-230-068</u>
<u>GS-4-4X41-4X42-2-MPR-32</u>	<u>Solera Oak Valley Greens Assn.</u>	<u>400-220-001</u>
	<u>Solera at Oak Valley Greens Assn.</u>	<u>400-220-002</u>
		<u>400-230-067</u>
<u>GS-4-W-4X38-1-MPR-32</u>	<u>Solera Oak Valley Greens Assn.</u>	<u>400-220-005</u>
	<u>Solera at Oak Valley Greens Assn.</u>	<u>400-220-012</u>
<u>GS-4-W-4X38-2-MPR-32</u>	<u>Solera Oak Valley Greens Assn.</u>	<u>400-220-005</u>

	<u>Solera at Oak Valley Greens Assn.</u>	<u>400-220-012</u>
	<u>Gerald L. Erickson</u>	<u>400-330-012</u>
<u>GS-4-4X29-4X30-MPR-32</u>	<u>City of Beaumont</u>	<u>404-230-002</u>
<u>WSS-4-4X29-MPR-32</u>	<u>Familian Investment Group</u>	<u>404-260-002</u>
	<u>H T. Weeda</u>	<u>404-260-006</u>
	<u>City of Beaumont</u>	<u>404-230-002</u>
<u>WS-6-CedarRd-MPR-32</u>	<u>City of Banning</u>	<u>APN Not Available</u>
<u>WA-4-4X04-3-SE-MPR-32</u>	<u>American Lifetime Homes Number One</u>	<u>535-080-018</u>
<u>WSS-6-6N25-MPR-32</u>	<u>HH Management LLC</u>	<u>516-030-014</u>
	<u>John A. Meyers</u>	<u>516-120-003</u>
		<u>516-120-004</u>
<u>WA-6-6S15-MPR-32</u>	<u>Southern California Edison Company</u>	<u>668-211-017</u>

Current Vegetative Cover/Land Use: Developed/Disturbed; Grassland Forbland; Agriculture; Chaparral; Desert Scrub

Existing Sensitive Resource? NO YES Specify: Coastal CAGN Suitable Habitat; SKR Suitable Habitat; DETO Modeled habitat; Coachella Valley Jerusalem Cricket Modeled Habitat; Coachella Valley Milk-Vetch Modeled Habitat; Chaparral San Verbena Occupied 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: _____

GS-4-3S01-4S60-1-MPR-32: Expansion of GS-3S01-4S60-1 East of San Timoteo Canyon Road and West of 4S60

A new temporary work area adjacent to the east side of San Timoteo Canyon Road and east of GS-3S01-4S60-1 is required 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, Page 1.

The new work area consists of approximately 0.23-acre of developed/disturbed land (0.04 acre) and grassland forbland (.19 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X50-4X51-MPR-32: Expansion of GS-4X50-4X51 East of Palmer Avenue and West of M27-T1

A new temporary work area adjacent to the east side of Palmer Avenue, east of GS-4X50-4X51, and west of Supersite M27-T1 is required to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 1, Page 2.

The new work area consists of approximately 0.31-acres of developed/disturbed land (.29 acre) and chaparral (.02 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X48-4X50-1-MPR-32, GS-4-4X48-4X50-2-MPR-32, GS-4-4X48-4X50-3-MPR-32: Guard Structures on the East and West sides of Cherry Valley Blvd and on the east and west sides of GS-4X48-4X50

Three new temporary work areas are required along the east and west sides of Cherry Valley Boulevard , on either side of GS-4-4X48-4X50 to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 1, Page 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 0.93 acres of developed/disturbed (.34 acre) and grassland/forland (.59 acre). The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X46-4X47-1-MPR-32: Expansion of GS-4X46-4X47-1 West of Plantation Drive

A new temporary work area along the west side of Plantation Drive within the SCE transmission right-of-way is required to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 1, Page 4.

The new work area consists of approximately 0.17-acre of developed/disturbed land (.06 acre) and agricultural (.11 acre). The land is privately owned and located within the SCE transmission line right-of-way.

WSS-4-4X44-2-MPR-32: Expansion of Supersite M25-T4 for Wire Stringing Activities West of 4X44

A new temporary work area is required east of I-10 and west of Supersite 4X44 to facilitate wire stringing activities associated with the tower site, as shown on Figure 1, Page 5. The new work area will be lightly graded to level the existing terrain.

The total temporary disturbance area associated with the new work area consists of approximately 0.41 acres of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

WSS-4-4X44-1-MPR-32, GS-4-W-4X43-3-MPR-32: Expansion of Supersites 4X44-1 and GP-4X43-W for Wire Stringing Activities at 4X43 and 4X44

Two new temporary work areas are required east of I-10 and Supersite 4X44-1 and west of Supersite GP-4X43-W to facilitate wire stringing activities associated with tower sites 4X43 and 4X44, as shown on Figure 1, Page 6. The new work areas will not require site preparation for use.

The total temporary disturbance space associated with the new work areas consists of approximately 2.94 acres of developed/disturbed land. One work area is privately owned and the other is owned by the City of Beaumont, and are located within the SCE transmission line right-of-way.

GS-4-E-4X42-MPR-32, GS-4-4X41-4X42-1-MPR-32, GS-4-4XX41-4X42-2-MPR-32: Guard Structures between 4X41 and 4X42

Three new temporary work areas are required east of Supersite 4X42 and west of Supersite 4X41 to facilitate wire stringing activities associated with tower sites 4X41 and 4X42, as shown on Figure 1, Page 7. The new work areas may require light grading to level out the areas in preparation for use.

The total temporary disturbance area associated with the new work areas consists of approximately 0.93 acres of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-W-4X38-1-MPR-32, GS-4-W-4X38-2-MPR-32: Expansion of Supersite 4X38 for Wire Stringing Activities

Two new temporary work areas are required along the east side of Fairway Drive to facilitate wire stringing activities associated with tower site 4X38, as shown on Figure 1, Page 8. The new work areas will require minimal site preparation for use.

The total temporary disturbance area associated with the new work areas consists of approximately 0.29 acre of developed/disturbed land. The land is privately owned and located within the SCE transmission line right-of-way.

GS-4-4X29-4X30-MPR-32, WSS-4-4X29-MPR-32: Expansion of GS-4-4X29-4X30 and WSS-4X27-4X29

Two new temporary work areas are required east of GS-4-4X29-4X30 and west of WSS-4X27-4X29 to facilitate wire stringing and wreck-out activities associated with tower sites 4X27, 4X29, and 4X30, as shown on Figure 1, Page 9. The new work areas will require minimal site preparation for use.

The total temporary disturbance area associated with the new work areas consists of approximately 3.38 acres of developed/disturbed land (.43 acre) and grassland/forland (2.95 acres). The work areas are both privately and publicly owned by the City of Beaumont and located within the transmission line right-of-way.

WS-6-CedarRd-MPR-32: Existing water source west of Mountain Avenue

Rubber tired water trucks will park on the shoulder of the existing/public road adjacent to the existing water source location (i.e., hydrant) shown on Figure 1, Page 10. 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 location. No impacts to

regulated trees, jurisdictional waters, biological, or cultural resources are anticipated for use of the water source. Clearance surveys will be conducted prior to use.

The potable hydrant is supplied by the City of Banning Public Works Department and is located on the southwest corner of the intersection of Mountain Avenue and Cedar Drive (33°56'11.45"N , -116°55'14.57"W) in the City of Banning, as shown on Figure 1, Page 10.

The total temporary disturbance area associated with the new work area consists of approximately .02-acre of previously developed/disturbed land, owned by the City of Banning in the public ROW.

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.

WA-4-4X04-3-SE-MPR-32: Expansion of Supersite 4X04-3-SE

Supersite 4X04-3-SE requires expansion to the east to create a turnaround area for vehicles and equipment traveling along the access road, as shown on Figure 1, Page 11. The new work area will require minimal site preparation for use.

The total temporary disturbance area associated with the new work areas consists of approximately 0.03 acre of developed/disturbed land (.01 acre) and chaparral (.02 acre). The land is privately owned and located within the SCE transmission line right-of-way.

WSS-6-6N25-MPR-32: Expansion of Supersite 6N26

A 1.72-acre temporary work area expansion immediately east of SWA-6-6N26, is required to provide adequate work space for material and equipment staging during tower construction, wire stringing, and wire wreck-out activities, as shown on Figure 1, Page 12. 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 1.72-acre of previously disturbed/developed (.18-acre) and Desert Scrub (1.54-acre) vegetated land. The land is privately owned and located within the SCE transmission line right-of-way.

WA-6-6S15-MPR-32: Expansion of Supersite 6S15

Supersite 6S15 requires expansion to the south to provide adequate work space for material and equipment staging during removal of an existing guy anchor located outside of the currently approved work area, as shown on Figure 1, Page 13. The new work area will require minimal ground disturbance in preparation for use.

The total temporary disturbance area associated with the new work area consists of approximately 0.03-acre of desert scrub. The land is privately owned and located within the SCE transmission line right-of-way.

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: 000132, 000079, 000042, 000175, 000176, 000178, 000190, 000146, 000195, and 000147. No previous surveys were conducted at the proposed WS-6-CedarRd-MPR-32 hydrant.

Desert Tortoise (DETO) – The new work areas in Segment 6 (WSS-6-6N25-MPR-32, WA-6-6S15-MPR-32) are located within desert tortoise modeled habitat, as shown in Figure 1, Pages 12-13. No definitive signs of DETO were observed during the 2011 and 2012 protocol desert tortoise surveys, during the currently active preconstruction surveys, or during daily sweeps and monitoring, although desert tortoises are present in other portions of the project area. With implementation of the desert tortoise mitigation measures and permit conditions, however, no direct impacts to DETO are anticipated. To minimize temporal habitat loss, a portion of approved work area that was determined to no longer be necessary for construction will be removed from the project data and avoided (Figure 1, Page 12).

The other new work areas are not located within the current known range of the DETO; therefore, no impacts to DETO are anticipated at those locations.

Special-status Terrestrial Herpetofauna – No special-status terrestrial herpetofauna have been observed within the new work areas during prior project-related surveys. However, many species have the potential to occur throughout the project area. For instance, an orange-throated whiptail was observed within the 4X51 work area on the west side of Palmer Avenue (Species Event 000059), as shown on Figure 1, Page 2. 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 significant impacts to special-status terrestrial herpetofauna are anticipated.

Burrowing Owl – Burrowing owl habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the project area.

Two burrowing owls (FRED Species Events 000201, 000322) were observed on June 1, 2019 and October 9, 2019 approximately 800 feet southwest and 550 northeast, respectively, of WA-6-6S15-MPR-32 and an active BUOW burrow (FRED Nest Event 000302; FRED Species Event 000212) is located approximately 900 feet northeast of WA-6-6S15-MPR-32. The burrow was originally identified during Segment 6 preconstruction surveys conducted on March 19, 2019. Considering the distances from the new work area, no impacts are anticipated.

Active burrowing 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 12-13, observations of special-status bird species (e.g., Loggerhead Shrike) 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 are anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the NBMP.

Listed Riparian Birds – Historically occupied habitat for the least Bell's vireo (LBVI) and suitable habitat for the Southwestern willow flycatcher (SWFL) is mapped within the vicinity of GS-4-3S01-4S60-1-MPR-32, as shown on Figure 1, Page 1.

Suitable habitat for riparian birds (LBVI/SWFL) is located adjacent to WA-4-4X04-3-SE-MPR-32 (near supersites 4X04-SE-1 and 4X04-3-SE), as shown on Figure 1, Page 11. After several consecutive years of protocol surveys, however, no LBVI or SWFL nests or territories have been observed.

Additionally, areas previously mapped as suitable habitat for the riparian birds is located in the vicinity of GS-4-4x48-4x50-1-MPR-32 and GS-4-4x48-4x50-3-MPR-32, as shown on Figure 1, Page 3. No LBVI or territorial SWFL were detected in this habitat stand during 2018 or 2019 protocol surveys, or during preconstruction surveys of the areas. Furthermore, during a recent habitat assessment update, a LBVI/SWFL qualified biologist determined that the areas are no longer suitable (report forthcoming).

If active LBVI or SWFL nests are identified during future preconstruction surveys or within 500 feet of construction activities, avoidance buffers will be established and the nest will be monitored according to MM WIL-1c and, since these locations are within the WR-MSHCP, the *Determination of Biologically Equivalent or Superior Preservation for Riverine/Riparian Areas, Vernal Pools, and Associated Species*. With implementation of these avoidance and minimization 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 Segment 6 work areas. Therefore, no impacts are anticipated.

Coastal California Gnatcatcher – The proposed GS-4-4X50-4X51-MPR-32 (opposite side of Palmer Avenue from 4X51) is located within 500 feet of suitable CAGN habitat (Figure 1, page 2). In the history (2014-2018) of protocol surveys conducted for the project in this area, there have been no detections of CAGN. Results were negative during the May 7-9, 2018 preconstruction survey (000041).

Suitable habitat for coastal California gnatcatcher (CAGN) overlaps GS-4-4X41-4X42-1-MPR-32 and a new work area, as shown in Figure 1, Page 7. In the history (2014-2018) of protocol surveys conducted for the project in this area, there have been no detections of CAGN. No CAGN were observed in this area during the June 3, 2019 preconstruction survey (000175).

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 2 and 4 work areas. Based on habitat assessments, limited suitable nesting habitat for golden eagles was identified within 2 miles of the new Segment 6N25 work area. 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 approximately 55 feet east of the proposed GS-4-3S01-4S60-1-MPR-32, as shown in Figure 1, Page 1. Work areas east of 4X50 (see Figure 1, Page 3) and west of 4X44 (See Figure 1, Page 5) are also located in the vicinity of mapped suitable habitat for SKR, however only GS-4-4X48-4X50-2-MPR-32, and 4-4X48-4X50-3-MPR-3232 intersect mapped suitable habitat, as shown on Figure 1, Page 3. Work areas GS-4-4X29-4X30-MPR-32 and WSS-4-4X29-MPR-32 are also located within mapped suitable habitat for SKR, as shown on Figure 1, Page 9.

A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within suitable habitat areas in the project area. 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.

The other new work areas outside of Segment 4 are not located within suitable habitat for the species; therefore, no impacts are anticipated.

Special-status Bats – A potential roost site (FRED_Habitat_000043) was identified approximately 9 feet northeast of GS-4-3S01-4S60-1, as shown on Figure 1, Page 1. No bats were detected during emergence surveys at FRED_Habitat_000043; however, the adjacent field to the east of this habitat feature serves as an important forage site for a high diversity of bats. Construction has been using the access road for ingress/egress near the new work area and no daytime emergence/abandonment or other unusual behavior has been observed at this potential roost location in response to construction activities (ingress/egress).

Previously mapped suitable bat habitat is located approximately 25 feet west of towers 4N44 and 4S44 (Figure 1, page 5). However, a bat assessment conducted by bat approved biologist Ed West (MOU bat specialist) on May 9, 2018 indicates that no suitable bat habitat exists within the survey area.

Bat surveys conducted by Ed West and Chris Taylor (agency-approved bat biologist) in 2018 indicate that large cottonwood and sycamore trees associated with the golf course between supersites 4X37 and PP123305 (FRED Habitat Events 000002, 000034, and 000005) serve as bat roosting sites for species including Yuma myotis (FRED Species Event 000035), as shown in Figure 1, page 8. FRED Habitat Events 000002 and 000034 have 165-foot buffers that intersect supersite PP123305, but do not intersect the new work areas, which do not include suitable bat habitat.

ESA buffers have been established around all potential roost sites. These buffers do not intersect the new work areas. 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. However, if any of these species are found, potential impacts will be addressed according to the Small Mammals Avoidance and Minimization Plan.

No proposed work areas intersect occupied Los Angeles pocket mouse (LAPM) habitats in the WR-MSHCP.

Little pocket mouse subspecies (i.e., Palm Springs pocket mouse [PSPM] and LAPM) occupied habitat is widespread throughout Segment 6. Occurrences of San Diego pocket mice have been documented within Supersites WSS-4X27-4X29 and 4X27 (Figure 1, page 9). San Diego pocket mice were previously observed at two locations approximately 150 feet west of WA-4-4X04-3-SE-MPR-32.

Five desert woodrat middens were previously observed within supersite SWA-6-6S15-MPR-29 (FRED Habitat Events 000388—000392), as shown in Figure 1, Page 13. Desert woodrat middens have also been observed throughout the vicinity (FRED Habitat Events 000054-000055, 000058, 000060, 000110-000113, 000115-000116, 000172-000173, 000202-000203, 000263, 000279-000280, 000290, 000309, 000317-000322, 000339, 000354, 000356, 000369, 000371, 000382-000387). Sixteen active woodrat middens were observed within 10 feet of access roads and within supersites during the last preconstruction survey (FRED Habitat Events 000608-000624). A 10-foot no-entry buffer was established around each midden using ESA signs. If construction determines avoidance of a buffer is not possible, a qualified biologist will relocate the midden in accordance with the Special Status Small Mammal Avoidance and Minimization Plan.

Potential impacts 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 –Yucaipa onions and Plummer’s mariposa lilies were observed in the vicinity of proposed GS-4-4X50-4X51-MPR-32, as shown on Figure 1, page 2. However, no special-status plants were observed within the work area itself, and due to the high levels of disturbance and compaction along the roadside, no impacts to these plant species are anticipated. Should they occur in the future, the Yucaipa onion will be addressed in accordance with the Narrow Endemic/Criteria Area Plant DBESP and the Plummer's mariposa lily, which is a CRPR 4 plant and adequately conserved in the MSHCP, will be avoided to the extent feasible.

Coachella Valley milk-vetch (*Astragalus lentiginosus* var. *coachellae*; FE, CRPR 1B.2) modeled habitat overlaps supersites 6S26 and associated access roads between the supersites, as shown on Figure 1, page 12. However, no milk-vetch plants have been detected after many years of focused surveys. Therefore, no impacts are anticipated. If milk-vetch plants are discovered in the future, they will be addressed in accordance with the Biological Opinion and/or via the CV-MSHCP, in coordination with the CVCC and USFWS.

Chaparral sand verbena (*Abronia villosa* var. *aurita*; CRPR 1B.1) occupied habitat intersects WSS-6-6N25-MPR-32 and associated access roads between the supersites, as shown on Figure 1, Page 12. 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. 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. Occupied habitat will continue to be avoided to the extent feasible. With implementation of these avoidance strategies and based on current levels of disturbance, the project is not expected to impact greater than 10 percent of the local occurrences.

In addition to avoidance, drive and crush methods will be used to the extent possible for temporary work areas. If grading of temporary work areas is required, topsoil salvage will occur. Seed was also collected from these populations in 2019 and will be planted during the restoration phase of the project. 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. As described above under “desert tortoise,” a portion of approved work area that was determined to no longer be necessary for construction will be removed from the project data and avoided, as shown on Figure 1, Page 12. While no *Abronia* plants have been observed in this area, it is within 200 feet of occupied habitat and therefore, may support

the species in the future. These methods for addressing unavoidable impacts to special-status plants are consistent with the Special-status Plant Salvage and Relocation Plan.

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.

Regulated Trees – No tree trimming or tree removal is required for construction activities within the new work areas. One Englemann Oak (*Quercus engelmannii*; CRPR 4.2) was observed between towers 4N48 and 4N49 approximately 710 feet from the new work area. The oak will not be impacted by construction.

Coachella Valley Jerusalem Cricket – In addition to desert tortoise modeled habitat and chaparral sand verbena occupied habitat, WSS-6-6N25-MPR-32 is located in Coachella Valley Jerusalem cricket modeled habitat, as shown on Figure 1, Page 12. Many of the work areas along this sub-segment have been staked with a 3-foot offset from the approved work limits, which will serve to minimize impacts. The permanent work areas in this area have been graded, but drive and crush methods will be used to the extent feasible for temporary work areas such as WSS-6-6N25-MPR-32 to minimize habitat loss. If grading of temporary work areas is necessary, soil salvage will occur. Upon completion of construction, temporary work areas will be restored in accordance with the HRRP. In addition, to minimize temporal habitat loss, a portion of approved work area in cricket and tortoise habitat that was determined to no longer be necessary for construction will be removed from the project data and avoided (Figure 1, Page 12).

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 in-between GS-4-3S01-4S60-1 and GS-4-3S01-4S60-1-MPR-32, as shown on Figure 1, Page 1. A second non-wetland jurisdictional feature is located south of GS-4-4X46-4X47-1-MPR-32, as shown on Figure 1, Page 4. A third non-wetland jurisdictional feature is located between the new work areas between 4X42 and 4X41, as shown on Figure 1, Page 7. A fourth non-wetland water feature is located south of WA-4-4X04-3-SE-MPR-32, as shown on Figure 1, Page 11. 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

With the exception of WS-6-CedarRd-MPR-32, 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. Prepared by Southern California Edison.*

WS-6-CedarRd-MPR-32 has been covered within a new record search conducted for this MPR. The record search and survey results for WS-6-CedarRd-MPR-32 were negative for cultural resources. *Mclean, Roderic, Natalie Brodie, Jacqueline Hall, Shannon Carmack, Phil Fulton, Ingri Quon, Erin Martinelli, Richard Erickson, and Jay Michalsky. 2013. Cultural Resources Assessment and Class III Inventory Volume I. West of Devers Project San Bernardino and Riverside Counties, California. Prepared for Southern California Edison. Prepared by LSA Associates.*

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. Prepared by Southern California Edison.

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 an area of unknown PFYC U paleontological sensitivity and will be monitored by a qualified paleontological monitor on a part-time basis:

- WSS-6-6N25-MPR-32 (Figure 1, Page 12)

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:

- GS-4-3S01-4S60-1-MPR-32 (Figure 1, Page 1)
- GS-4-4X50-4X51-MPR-32 (Figure 1, Page 2)
- Portions of GS-4-4X48-4X50-1-MPR-32 (Figure 1, Page 3)
- Portions of GS-4-4X48-4X50-2-MPR-32 (Figure 1, Page 3)
- Portions of GS-4-E-4X42-MPR-32 (Figure 1, Page 7)
- GS-4-4X29-4X30-MPR-32 (Figure 1, Page 9)
- WSS-4-4X29-MPR-32 (Figure 1, Page 9)
- WA-4-4X04-3-SE-MPR-32 (Figure 1, Page 11)
- WA-6-6S-15-MPR-32 (Figure 1, Page 13)
- WS-6-CedarRd-MPR-32 (Figure 1, Page 10)

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:

- Portions of GS-4-4X48-4X50-1-MPR-32 (Figure 1, Page 3)
- Portions of GS-4-4X48-4X50-2-MPR-32 (Figure 1, Page 3)
- GS-4-4X48-4X50-3-MPR-32 (Figure 1, Page 3)
- GS4-4X46-4X47-1-MPR-32 (Figure 1, Page 4)
- WSS-4-4X44-2-MPR-32 (Figure 1, Page 5)
- WSS-4-4X44-1-MPR-32 (Figure 1, Page 6)
- GS-4-W-4X43-3-MPR-32 (Figure 1, Page 6)
- Portions of GS-4-E-4X42-MPR-32 (Figure 1, Page 7)
- GS-4-4X41-4X42-1-MPR-32 (Figure 1, Page 7)
- GS-4-4X41-4X42-2-MPR-32 (Figure 1, Page 7)
- GS-4-W-4X38-1-MPR-32 (Figure 1, Page 8)
- GS-4-W-4X38-2-MPR-32 (Figure 1, Page 8)

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 000132, 000079, 000042, 000175, 000176, 000178, 000190, 000146, 000195 and 000147.

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.

With the exception of WS-6-CedarRd-MPR-32, 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.

WS-6-CedarRd-MPR-32 has been covered within a new record search conducted for this MPR. The record search and survey results for WS-6-CedarRd-MPR-32 were negative for cultural resources. Mclean, Roderic, Natalie Brodie, Jacqueline Hall, Shannon Carmack, Phil Fulton, Inqri Quon, Erin Martinelli, Richard Erickson, and Jay Michalsky. 2013. Cultural Resources Assessment and Class III Inventory Volume I. West of Devers Project San Bernardino and Riverside Counties, California. Prepared for Southern California Edison. Prepared by LSA Associates.

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. Prepared by Southern California Edison.

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

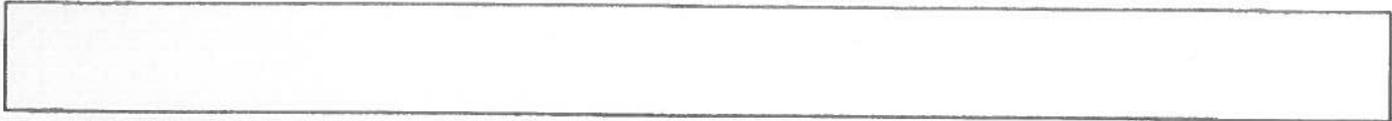
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|---|--|--|
| <input type="checkbox"/> AIR QUALITY | <input type="checkbox"/> LAND USE | <input type="checkbox"/> TRAFFIC |
| <input type="checkbox"/> BIOLOGICAL RESOURCES | <input type="checkbox"/> NOISE | <input type="checkbox"/> VISUAL |
| <input 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.)

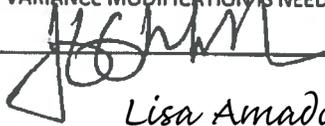
1. Will modification involve substantial changes that will require major changes to the CEQA document?
 YES NO
 2. Will modification result in new significant environmental effects or a substantial increase in the severity of previously identified impacts?
 YES NO
 3. Additional agency notifications 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.)

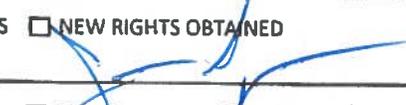
 X Chief Construction Inspector or Foreman: VARIANCE MODIFICATIONS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION

Name: Jeff Miller Signature:  Date: 11/15/2019

Environmental Inspector: FIELD REVIEW COMPLETE

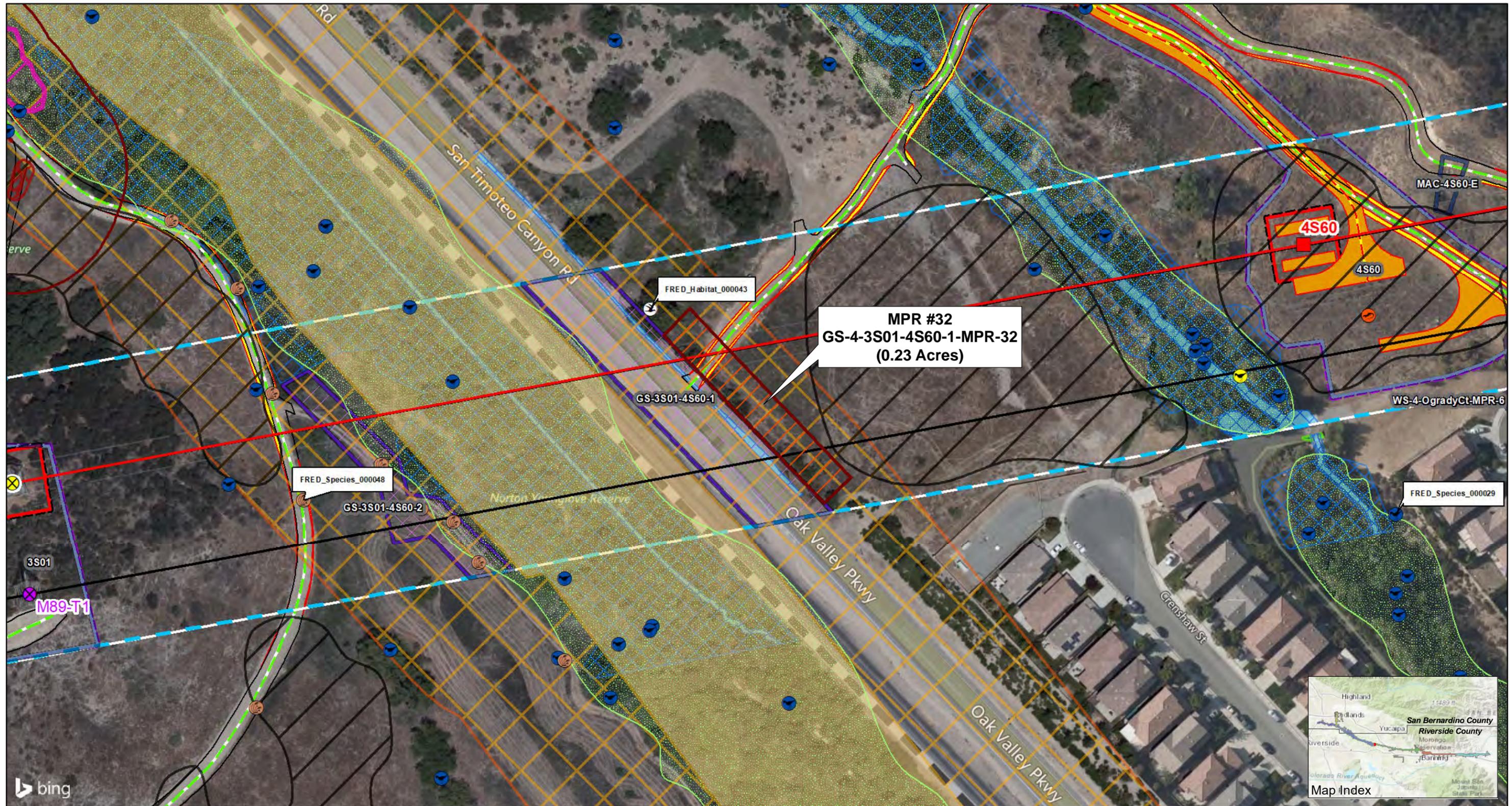
Name: Lisa Amador Signature: *Lisa Amador* Date: 11/15/2019

 X Land Agent: CONSISTENT WITH EXISTING RIGHTS NEW RIGHTS OBTAINED

Name: James Spence Signature:  Date: 11/15/2019

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

Name: Sylvia Granados Signature: *Sylvia Granados* Date: 11/15/2019



LEGEND		Major Trans Line		Civil Access Road		Guard Pole		Orange-Throated Whiptail		Stephens' Kangaroo Rat Suitable Habitat		Wetland Waters	
	MPR #32 Proposed Work Area		Proposed		Existing Road Edge		Guard Pole		Orange-Throated Whiptail		Stephens' Kangaroo Rat Suitable Habitat		CDFW Jurisdiction
	Supersite Boundary		Existing		Designed Road Boundary		O&M Tower		Smooth Tarplant		Bat Suitable Habitat		USACE/RWQCB Jurisdiction
	Proposed	Civil Access Roads Lines			Potential Road Widening		Structure Work Area		Smooth Tarplant Occupied Habitat		Bat Suitable Habitat 165ft Buffer		USACE/RWQCB Jurisdiction
	Modify		New Access Road		Existing ROW		Potential Bat Habitat		Los Angeles Pocket Mouse Suitable Habitat		CDFW Jurisdiction		USACE/RWQCB Jurisdiction
	Remove		Existing Access Road		Construction Areas		Least Bell's Vireo		LBVI Occupied/SWFL Suitable Habitat		USACE/RWQCB Jurisdiction		
					General Disturbance Area		Smooth Tarplant						
							Yellow Warbler						

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FIGURE 1
Page 1 of 13

Southern California Edison
West of Devers Upgrade Project
GS-4-3S01-4S60-1-MPR-32
MPR #32

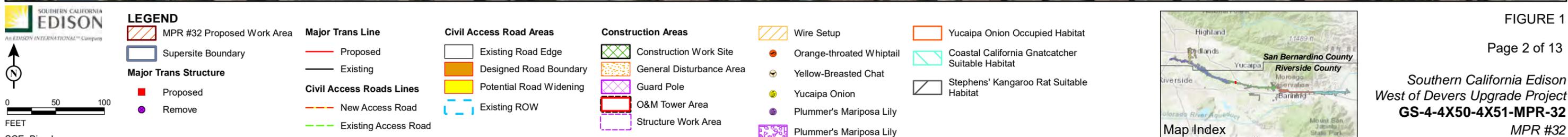
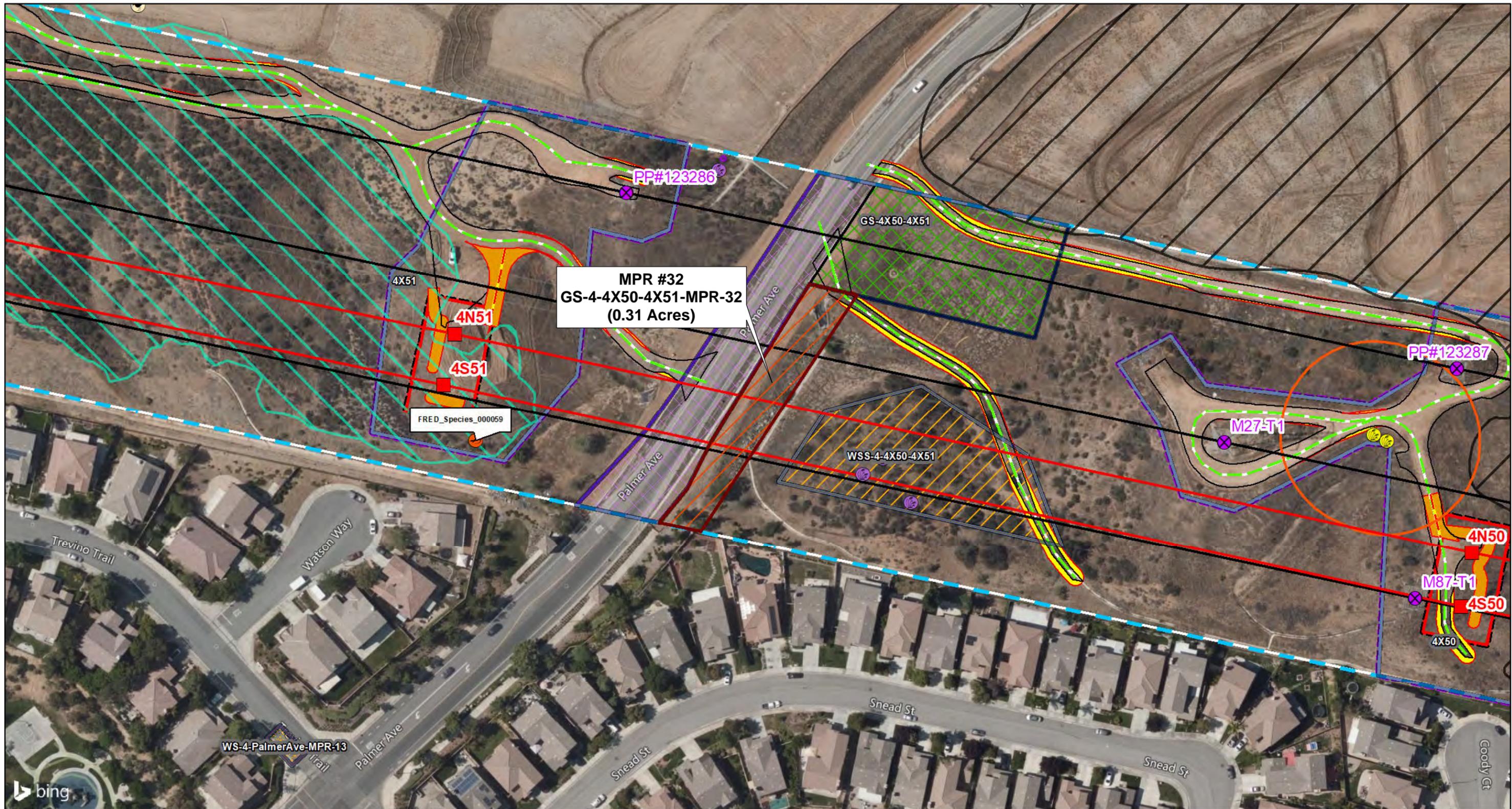
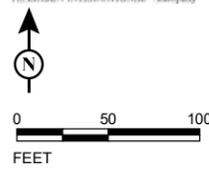
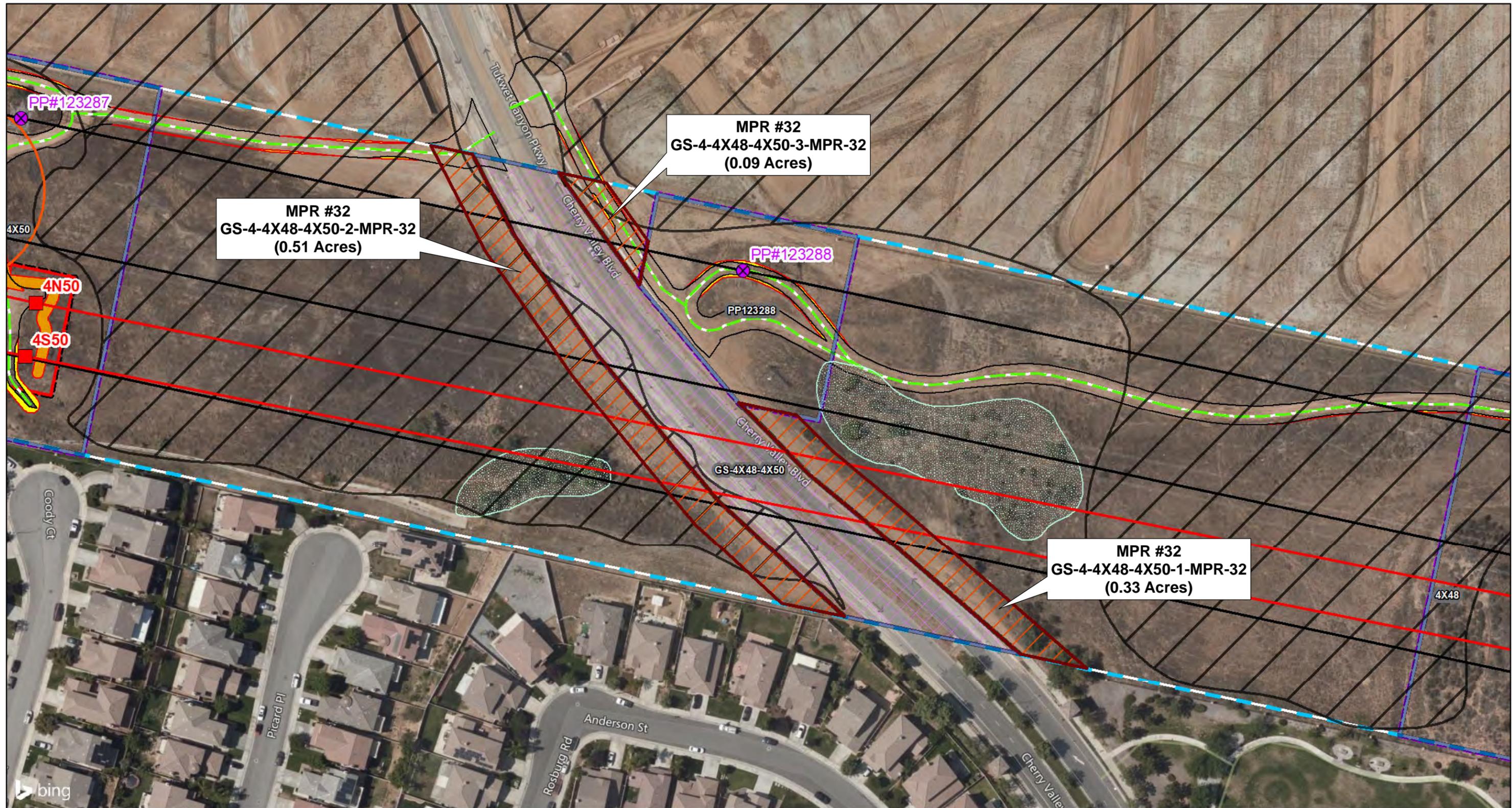


FIGURE 1
 Page 2 of 13

Southern California Edison
 West of Devers Upgrade Project
GS-4-4X50-4X51-MPR-32
 MPR #32



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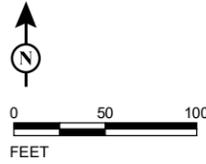
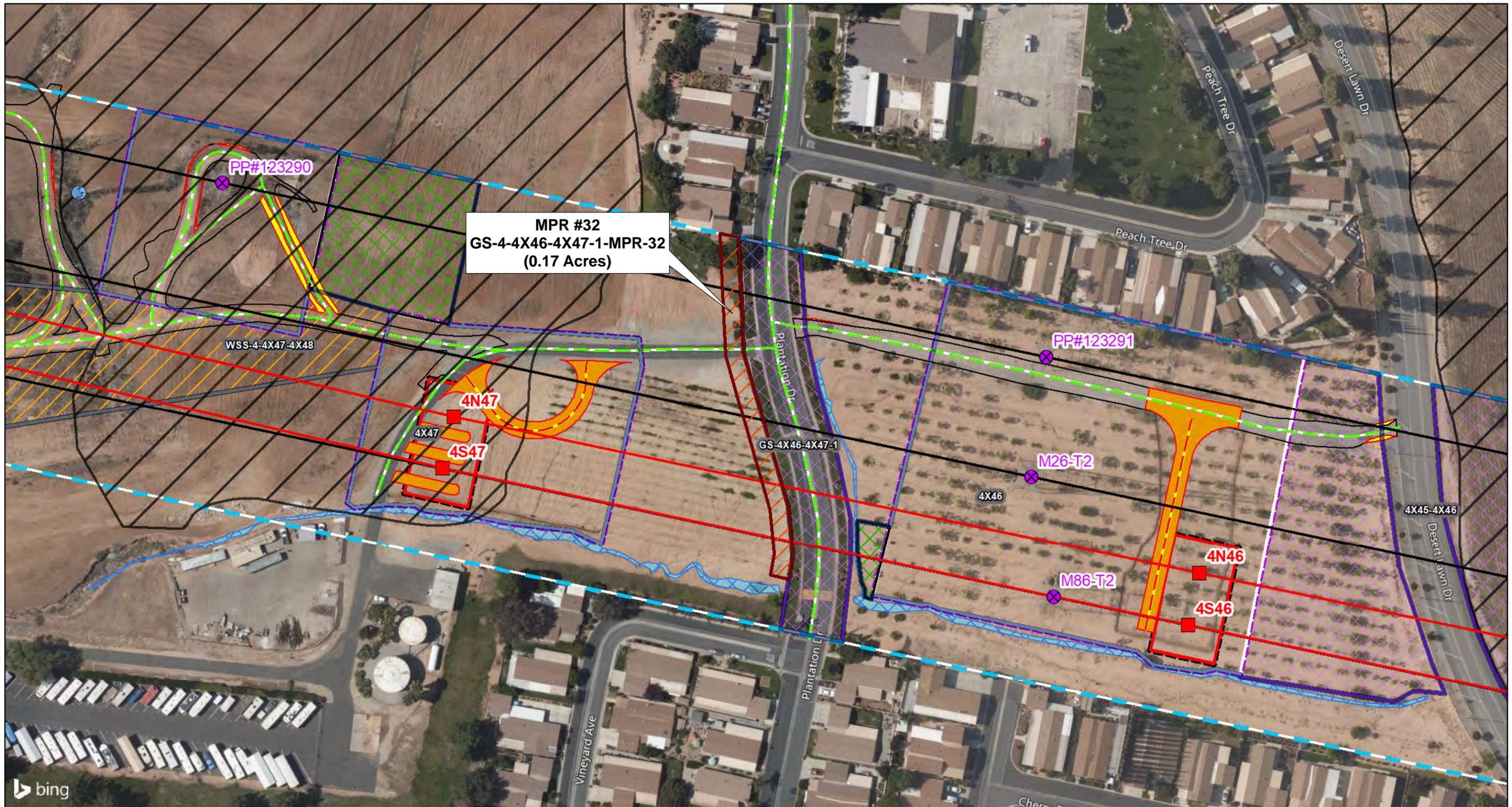
LEGEND

- | | | | | |
|------------------------------|---------------------------------|--------------------------------|--------------------------------|--|
| MPR #32 Proposed Work Area | Major Trans Line | Civil Access Road Areas | Construction Areas | Stephens' Kangaroo Rat Suitable Habitat |
| Supersite Boundary | Proposed | Existing Road Edge | Guard Pole | Riparian Bird (LBVI/SWFL) Unsuitable Habitat |
| Major Trans Structure | Existing | Designed Road Boundary | O&M Tower Area | |
| Proposed | Civil Access Roads Lines | Potential Road Widening | Structure Work Area | |
| Remove | Existing Access Road | Existing ROW | Yucaipa Onion Occupied Habitat | |



Note: Sandy, friable soils in the area pictured provide suitable habitat for the Palm Springs pocket mouse.

FIGURE 1



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LEGEND

- MPR #32 Proposed Work Area
- Supersite Boundary
- Major Trans Structure**
- Proposed
- Remove

- Major Trans Line**
- Proposed
- Existing
- Civil Access Roads Lines**
- New Access Road
- Existing Access Road

- Civil Access Road Areas**
- Existing Road Edge
- Designed Road Boundary
- Potential Road Widening
- Existing ROW

- Construction Areas**
- Construction Work Site
- Guard Pole
- O&M Tower Area
- Structure Work Area
- Wire Setup

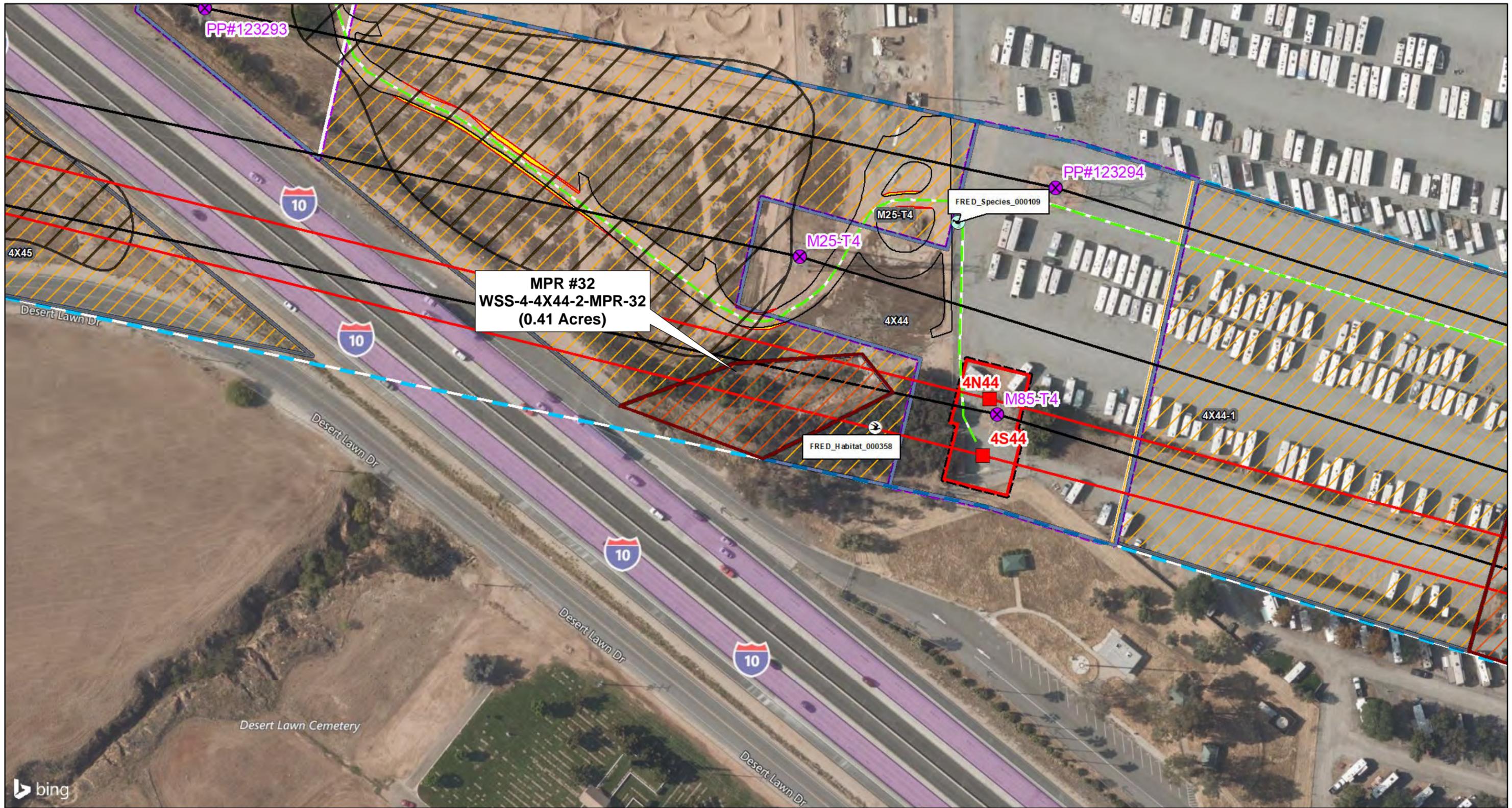
- Engelmann Oak
- Stephens' Kangaroo Rat Suitable Habitat
- Non-wetland Waters**
- CDFW Jurisdiction
- USACE/RWQCB Jurisdiction



FIGURE 1
Page 4 of 13

Southern California Edison
West of Devers Upgrade Project
GS-4-4X46-4X47-1-MPR-32
MPR #32





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LEGEND	
	MPR #32 Proposed Work Area
	Supersite Boundary
Major Trans Structure	
	Proposed
	Remove
Major Trans Line	
	Proposed
	Existing
Civil Access Roads Lines	
	Existing Access Road
Civil Access Road Areas	
	Existing Road Edge
	Potential Road Widening
	Existing ROW
Construction Areas	
	O&M Tower Area
	Structure Work Area
	Wire Setup
	Potential Bat Habitat
	Merlin
	Stephens' Kangaroo Rat Suitable Habitat



FIGURE 1
Page 5 of 13

Southern California Edison
West of Devers Upgrade Project
WSS-4-4X44-2-MPR-32
MPR #32

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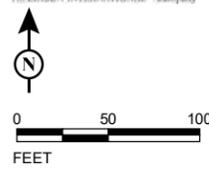
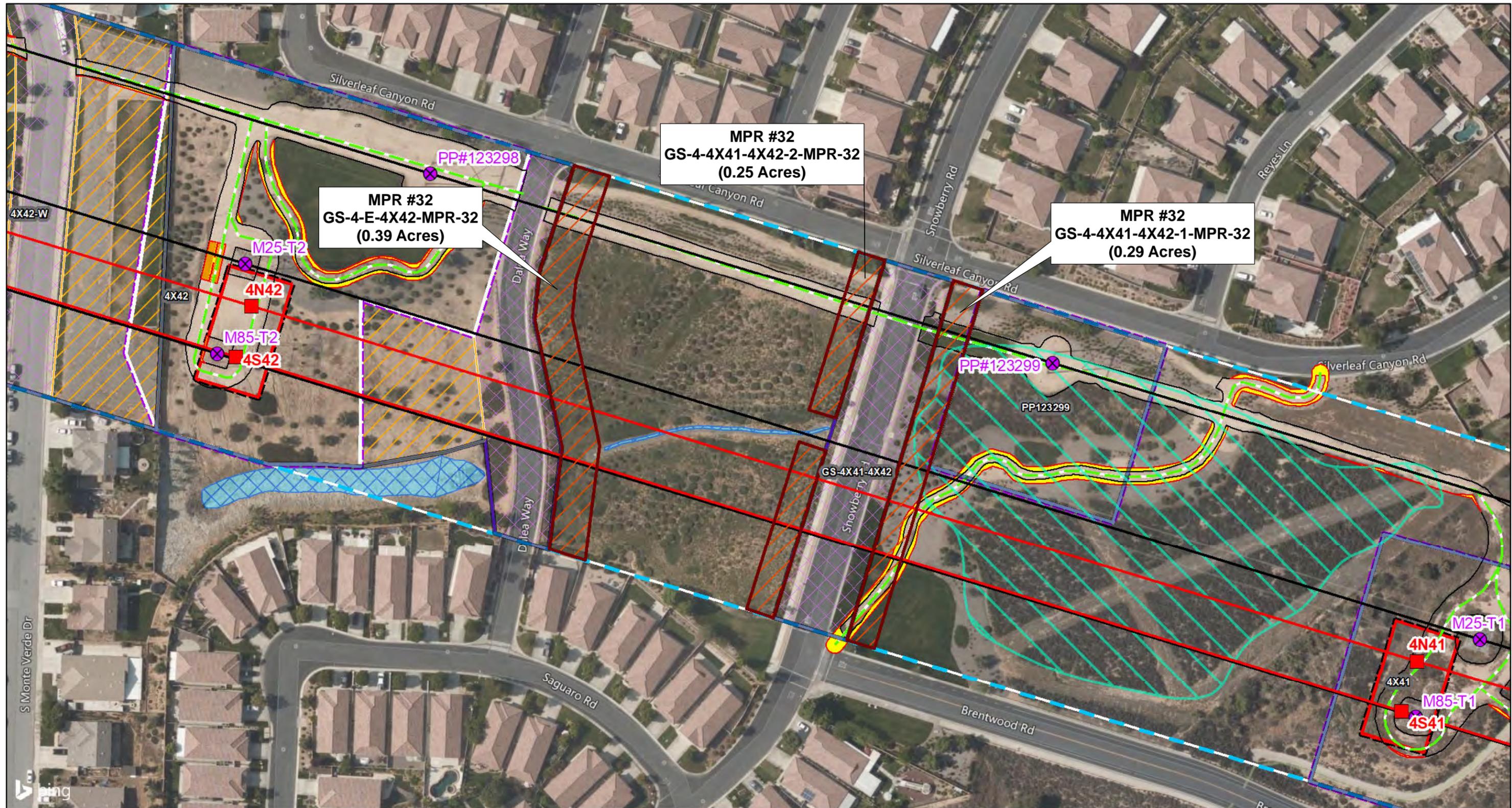
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LEGEND	
	MPR #32 Proposed Work Area
	Supersite Boundary
Major Trans Structure	
	Proposed
	Remove
Major Trans Line	
	Proposed
	Existing
Civil Access Roads Lines	
	Existing Access Road
Civil Access Road Areas	
	Existing Road Edge
	Potential Road Widening
	Existing ROW
Construction Areas	
	Construction Work Site
	General Disturbance Area
	Guard Pole
	O&M Tower Area
	Structure Work Area
	Wire Setup



FIGURE 1
Page 6 of 13
Southern California Edison
West of Devers Upgrade Project
WSS-4-4X44-1-MPR-32
& GS-4-W-4X43-3-MPR-32
MPR #32



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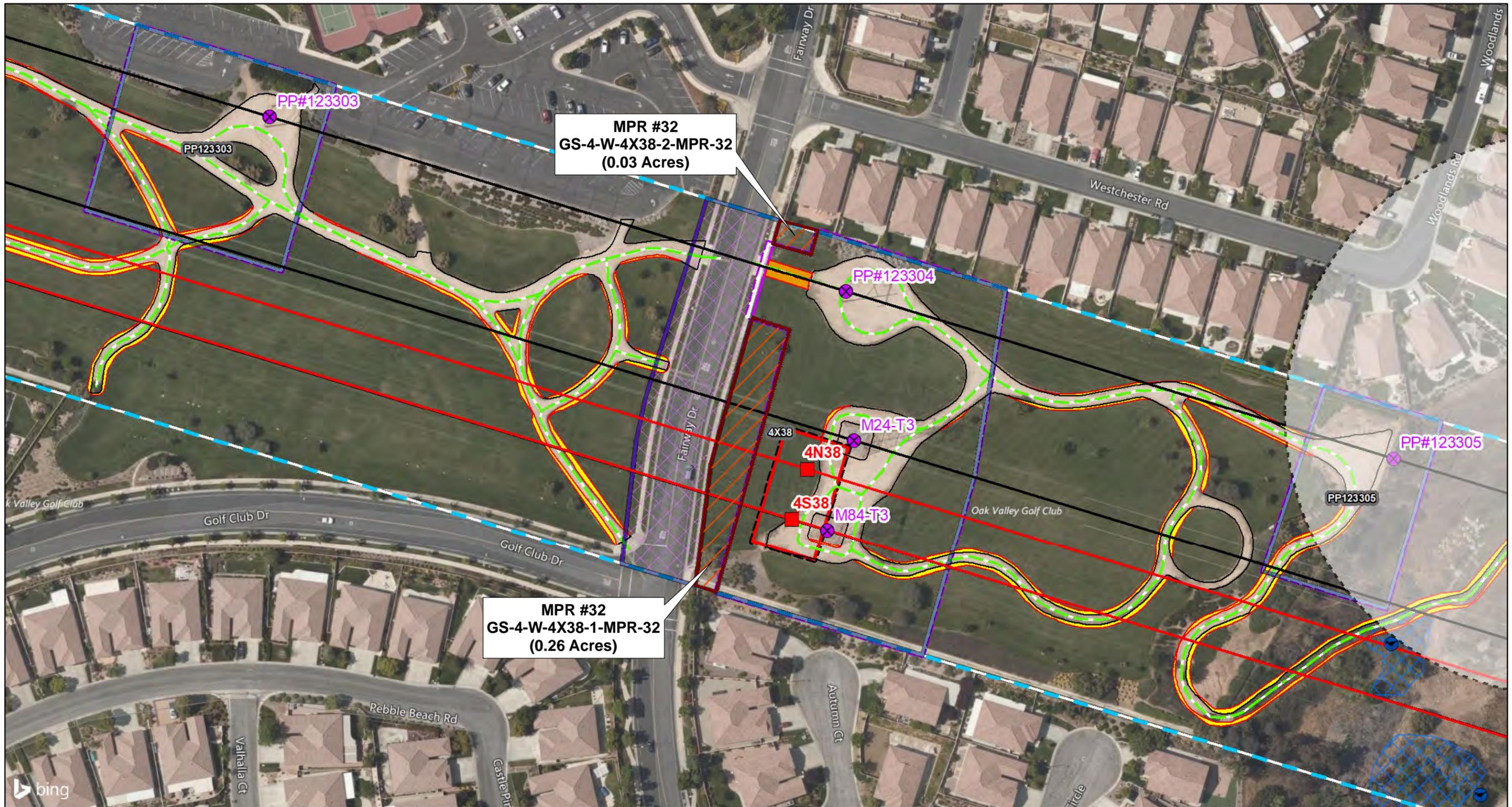
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LEGEND

- | | | | | |
|---|--|---|--|--|
| <ul style="list-style-type: none"> MPR #32 Proposed Work Area Supersite Boundary <p>Major Trans Structure</p> <ul style="list-style-type: none"> Proposed Remove | <p>Major Trans Line</p> <ul style="list-style-type: none"> Proposed Existing <p>Civil Access Roads Lines</p> <ul style="list-style-type: none"> New Access Road Existing Access Road | <p>Civil Access Road Areas</p> <ul style="list-style-type: none"> Existing Road Edge Designed Road Boundary Potential Road Widening Existing ROW | <p>Construction Areas</p> <ul style="list-style-type: none"> Guard Pole O&M Tower Area Structure Work Area Wire Setup | <ul style="list-style-type: none"> Coastal California Gnatcatcher Suitable Habitat CDFW Jurisdiction USACE/RWQCB Jurisdiction <p>Non-wetland Waters</p> |
|---|--|---|--|--|



FIGURE 1



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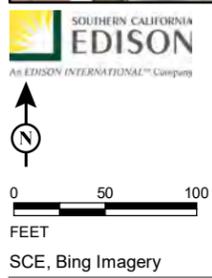
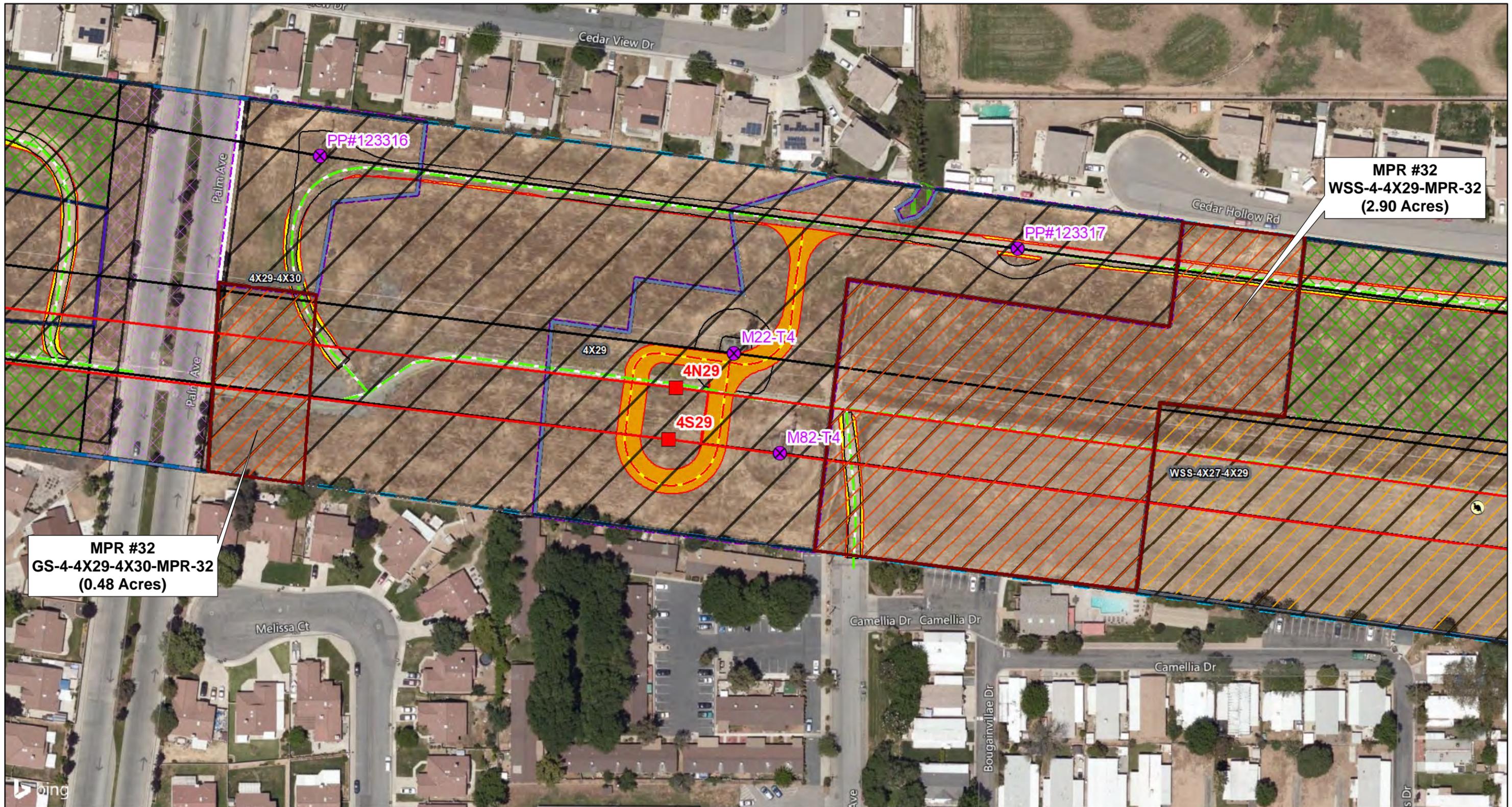
LEGEND		Major Trans Line		Civil Access Road Areas		Construction Areas		Non-wetland Waters	
	MPR #32 Proposed Work Area		Proposed		Existing Road Edge		Guard Pole		CDFW Jurisdiction
	Supersite Boundary		Existing		Designed Road Boundary		O&M Tower Area		
	Proposed		Existing		Potential Road Widening		Structure Work Area		
	Remove		New Access Road		Existing ROW		Yuma Myotis (300ft Buffer)		
			Existing Access Road				Least Bell's Vireo		



FIGURE 1
Page 8 of 13

Southern California Edison
West of Devers Upgrade Project
GS-4-W-4X38-MPR-32
MPR #32

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LEGEND

- MPR #32 Proposed Work Area
- Supersite Boundary
- Major Trans Structure**
- Proposed
- Remove

- Major Trans Line**
- Proposed
- Existing
- Civil Access Roads Lines**
- New Access Road
- Existing Access Road

- Civil Access Road Areas**
- Existing Road Edge
- Designed Road Boundary
- Potential Road Widening
- Existing ROW

- Construction Areas**
- Construction Work Site
- Guard Pole
- O&M Tower Area
- Structure Work Area
- Wire Setup

- San Diego Pocket Mouse
- Stephens' Kangaroo Rat Suitable Habitat
- Wetland Waters**
- RWQCB Jurisdiction



FIGURE 1
Page 9 of 13
Southern California Edison
West of Devers Upgrade Project
GS-4-4X29-4X30-MPR-32
& WSS-4-4X29-MPR-32
MPR #32



LEGEND

- MPR #32 Proposed Water Source
- MPR #32 Proposed Work Area

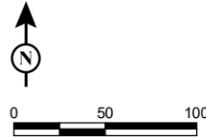
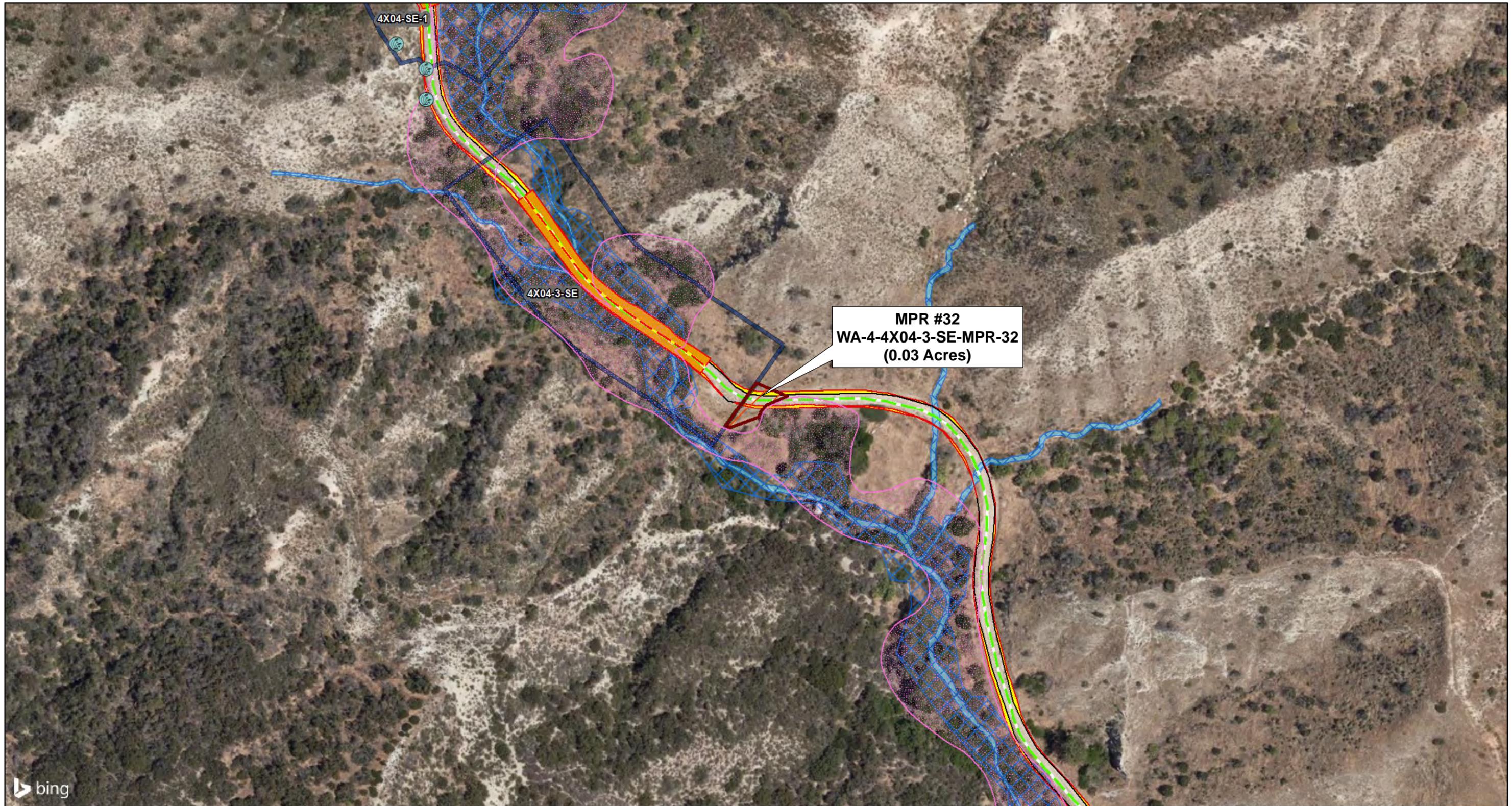
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FIGURE 1
Page 10 of 13

Southern California Edison
West of Devers Upgrade Project
WS-6-CedarRd-MPR-32
MPR #32



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LEGEND

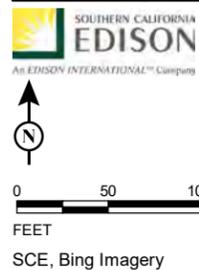
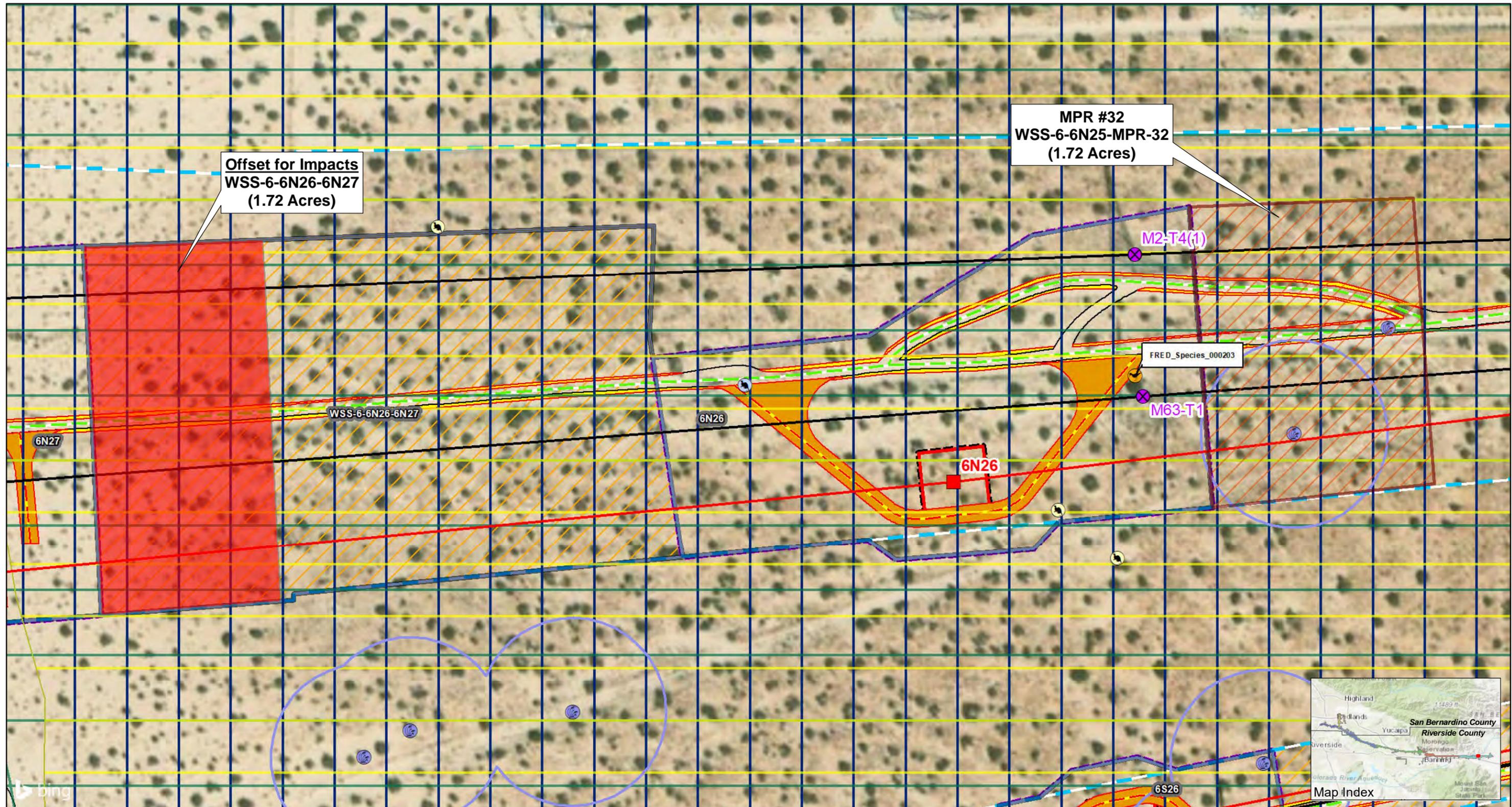
- | | | |
|---------------------------------|--------------------------------|--|
| MPR #32 Proposed Work Area | Civil Access Road Areas | Riparian Bird (LBVI/SWFL) Suitable Habitat |
| Supersite Boundary | Existing Road Edge | Non-wetland Waters |
| Civil Access Roads Lines | Designed Road Boundary | CDFW Jurisdiction |
| New Access Road | Potential Road Widening | USACE/RWQCB Jurisdiction |
| Existing Access Road | Mariposa Lily | |



FIGURE 1
Page 11 of 13

Southern California Edison
West of Devers Upgrade Project
WA-4-4X04-3-SE-MPR-32
MPR #32





LEGEND

- MPR #32 Proposed Work Area
- MPR #32 Proposed Give Back
- Supersite Boundary
- Major Trans Structure**
- Proposed
- Remove

- Major Trans Line**
- Proposed
- Existing
- Civil Access Roads Lines**
- New Access Road
- Existing Access Road

- Civil Access Road Areas**
- Existing Road Edge
- Designed Road Boundary
- Potential Road Widening
- Existing ROW

- Construction Areas**
- O&M Tower Area
- Structure Work Area
- Wire Setup
- American Badger
- Burrowing Owl

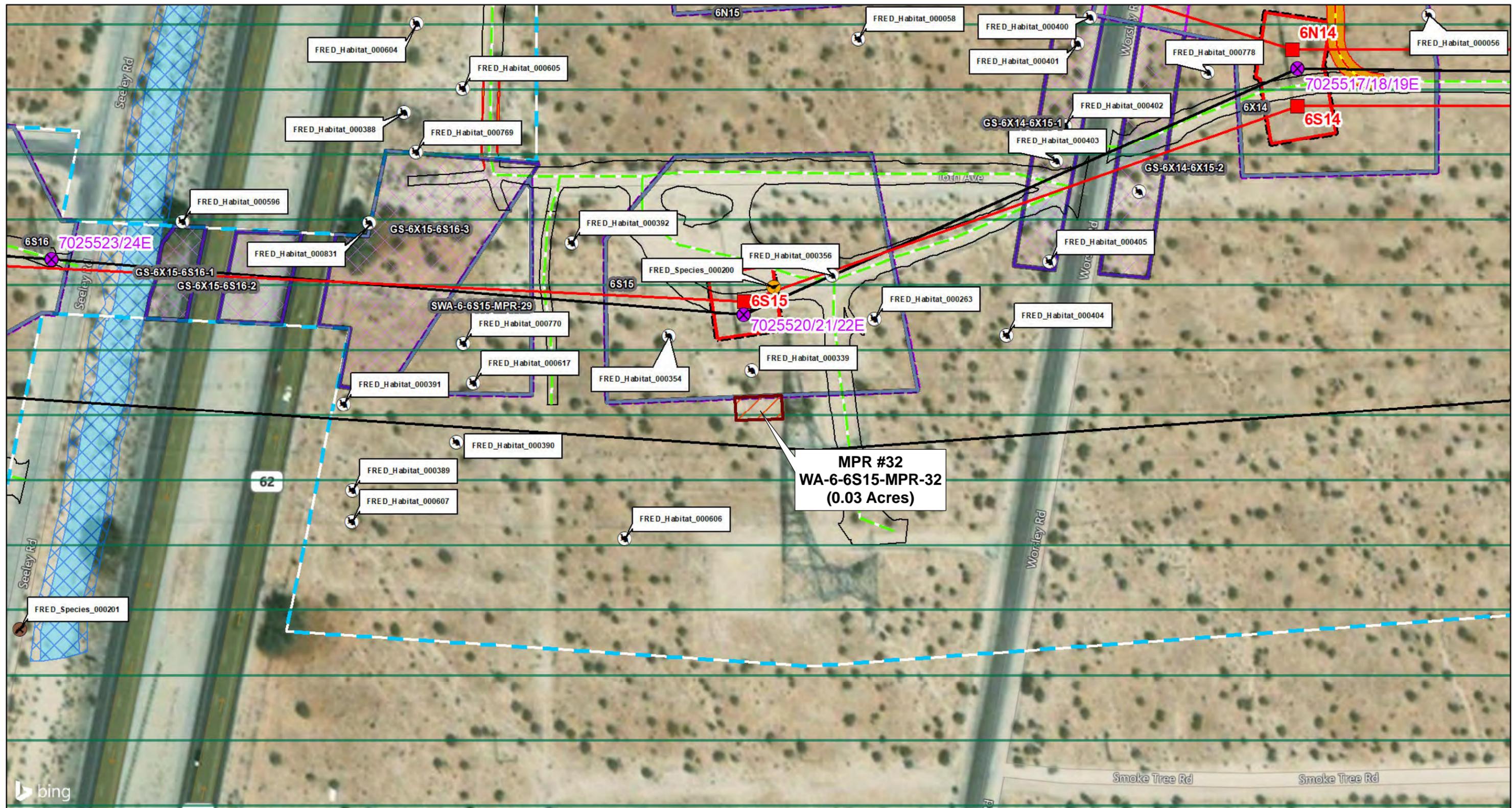
- Loggerhead Shrike
- San Diego Pocket Mouse
- Chaparral Sand Verbena
- Chaparral Sand Verbena Occupied Habitat

- Coachella Valley Milk-Vetch Modeled Habitat
- Desert Tortoise Modeled Habitat
- Coachella Valley Jerusalem Cricket Modeled Habitat

Note: Sandy, friable soils in the area pictured provide suitable habitat for the Palm Springs pocket mouse.



FIGURE 1



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LEGEND

- | | | | | |
|---|--|---|--|--|
| <ul style="list-style-type: none"> MPR #32 Proposed Work Area Supersite Boundary <p>Major Trans Structure</p> <ul style="list-style-type: none"> ■ Proposed ● Remove | <p>Major Trans Line</p> <ul style="list-style-type: none"> — Proposed — Existing <p>Civil Access Roads Lines</p> <ul style="list-style-type: none"> — New Access Road — Existing Access Road | <p>Civil Access Road Areas</p> <ul style="list-style-type: none"> Existing Road Edge Designed Road Boundary Potential Road Widening Existing ROW | <p>Construction Areas</p> <ul style="list-style-type: none"> Guard Pole O&M Tower Area Structure Work Area ● Desert Woodrat (10ft Buffer) ● Burrowing Owl | <ul style="list-style-type: none"> ● Loggerhead Shrike Desert Tortoise Modeled Habitat <p>Non-wetland Waters</p> <ul style="list-style-type: none"> CDFW Jurisdiction USACE/RWQCB Jurisdiction |
|---|--|---|--|--|

Note: Sandy, friable soils in the area pictured provide suitable habitat for the Palm Springs pocket mouse.



FIGURE 1
Page 13 of 13

Southern California Edison
West of Devers Upgrade Project
WA-6-6S15-MPR-32
MPR #32