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

Date Approval Required: 10/19/2020
Variance Request No.: 41

Date Submitted: 10/14/2020
Locations: Supersite 3X64 in Loma Linda, San Bernardino County (see Description of Change and Justification section below and figures attached).

Landowners and Associated Parcel Numbers:

<table>
<thead>
<tr>
<th>Proposed Work Area</th>
<th>Property Owner</th>
<th>Assessor’s Parcel Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supersite 3X64 (Figure 1, page 1)</td>
<td>CITY OF LOMA LINDA</td>
<td>0294-011-30</td>
</tr>
</tbody>
</table>

Current Vegetative Cover/Land Use: Developed/Disturbed

Existing Sensitive Resource? ■ NO  YES Specify:

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:

McCarthy Drain Installations in Supersite 3X64 (Figure 1, page 1)

The location of MAC-3-3X64-1 has been redesigned and relocated to the east, as shown in Figure 1, page 1, to better capture and divert rain flow off the tower pad and discharge flows downstream to uplands. The relocation of the McCarthy drain will not result in additional project impacts, because the original McCarthy drain location will not be constructed, and will therefore offset disturbance impacts for the relocation. In addition, a new McCarthy drain, MAC-3-3X64-2-MPR-41, and drain/dissipator feature, MAC-3-3X64-3-MPR-41, are required to properly discharge flows from Supersite 3X64, as shown in Figure 1, page 1.

The new McCarthy drain/dissipator locations are located within the SCE transmission line right-of-way, in an approved and active supersite (3X64) in the City of Loma Linda, and will result in a net increase in permanent impacts of approximately 0.0018-acre of developed/disturbed land.

Environmental Analysis

No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated during the installation of the mac drains/dissipator features in Supersite 3X64.

Biological Resources

A desktop analysis of the previously approved work area was conducted using aerial imagery, publicly available data, and project biological data. Supersite 3X64 was covered during previous surveys, including FRED Preconstruction Survey ID 000060.

Desert Tortoise (DETO) – The work area is not located within the range of desert tortoise, therefore no impacts to DETO are anticipated.
Special-status Terrestrial Herpetofauna – No special-status terrestrial herpetofauna have been observed within the work area during project-related surveys. However, many species have the potential to occur throughout the project area. For instance, a Red Diamond Rattlesnake (Crotalus ruber) was observed approximately 415-feet east of MAC-3-3X64-2-MPR-41 in August 2018 (FRED Species Event FRED_000058), as shown in Figure 1, page 1. A clearance sweep of the active work area will be conducted prior to construction in the supersite. With implementation of mitigation measures and biological monitoring during construction, no significant impacts to special-status terrestrial herpetofauna are anticipated.

Burrowing Owl – Burrowing owl (BUOW) habitat in the form of annual and perennial grasslands and scrublands characterized by low-growing vegetation is present throughout the project area. No occupied burrows or associated buffers intersect the proposed work areas.

Active owl burrows observed during clearance sweeps and during construction will be mitigated in accordance with the Burrowing Owl Management and Passive Relocation Plan. With implementation of 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. The work area does not currently intersect nesting bird buffers. As shown on Figure 1, page 1 an observation of a special-status bird species (Cooper's Hawk) was made in the vicinity of the work area, however, the observation was ephemeral and not associated with an active nest.

Preconstruction nesting bird surveys during the avian breeding season (Jan 1 – Aug 31) will be conducted prior to the initiation of construction in the work areas. If active nests are identified, avoidance buffers will be established in accordance with the Nesting Bird Management Plan. With implementation of mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to nesting birds are anticipated.

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

Coastal California Gnatcatcher [CAGN] – No suitable habitat for CAGN occurs within 500 feet of the work area. 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 work area. Protocol aerial surveys conducted for the project in 2019 also showed no golden eagle nests within 2 miles of the work area. Therefore, no impacts are anticipated.

Stephens' Kangaroo Rat (SKR) – The work area does not intersect mapped SKR habitat, however suitable SKR habitat is mapped approximately 40-feet north of MAC-3-3X64-1-MPR-41 (see Figure 1, page 1). A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within the SKR suitable habitat areas of the Project. No Stephens' kangaroo rat were captured during trapping. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, SKR are not expected in the project area. With implementation of mitigation measures and biological monitoring during construction, no impacts to SKR are anticipated.

Special-status Bats – No suitable bat roosting habitat or buffers occur within the work area; therefore, no impacts to special-status bats are anticipated.

Special-status Small Mammals – Special-status small mammals such as the pallid San Diego pocket mouse, northwestern San Diego pocket mouse, American badger, desert kit fox, San Diego desert woodrat, and/or San Diego black-tailed jackrabbit can occur in many parts of the project area, however Ringtail and Palm Springs round-tailed ground squirrel are not anticipated to occur within the project area.

No special-status small mammals have been observed within the work area. With implementation of the mitigation measures, biological monitoring during construction, and the Small Mammals Avoidance and Minimization Plan, no impacts to special-status small mammals are anticipated.
**Special-status Plants** – No sign of special-status plants have been observed in the vicinity of the work area during prior surveys of the area or construction in the active supersite. If special-status plants are later identified during clearance sweeps/monitoring, they will be avoided to the extent feasible.

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

**Jurisdictional Waters**

Wetland and non-wetland jurisdictional features are located throughout the project area. No jurisdictional features intersect the new project features at 3X64. ESA signs will be established at the edges of jurisdictional waters located outside the features and BMPs will be implemented in accordance with the SWPPP. No negative impacts to jurisdictional features are expected to result from use of the work area.

**Cultural Resources**

The work area was covered within the record search that was conducted during previous WOD surveys and studies. The record search and survey results for the work 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. 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

Supersite 3X64 is located within an area of very high PFYC 5 paleontological sensitivity, therefore, the site requires full-time qualified paleontological construction monitoring if grading is required.

**Resources:**

Biological:  ■ NO SENSITIVE RESOURCES PRESENT  □ SENSITIVE RESOURCES PRESENT  □ N/A

New Survey Report Attached:  YES  ■ NO

If No, Previous Biological Survey Reference: A clearance sweep will be conducted prior to initiating work in the work area. The work area is currently active and was covered during FRED Preconstruction Survey ID 000060.

**Cultural:**  ■ NO RESOURCES PRESENT  □ RESOURCES PRESENT WITH PROJECT APE:  □ YES  ■ NO
If in APE, Previous Cultural Survey Reference:
If not in APE, attach new survey report.
The work area was covered within the record search data that was conducted during previous WOD surveys and studies.
The record search and survey results for the work area were negative for cultural resources. Williams, Audry. 2016.

**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
- ☐ SOCIAL/ECONOMIC
- ☐ STORM WATER (SWPPP)
- ☐ TRAFFIC
- ☐ VISUAL
- ☐ 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.)

- ☑ Chief Construction Inspector or Foreman:  ■ VARIANCE MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION
  Name: Jeff Miller  Signature: JM  Date: 10/14/2020
  Environmental Inspector:  ■ FIELD REVIEW COMPLETE
  Name: Lisa Amador  Signature: Lisa Amador  Date: 10/14/2020

- ☑ Land Agent:  ■ CONSISTENT WITH EXISTING RIGHTS  ☐ NEW RIGHTS OBTAINED
  Name: James Spence  Signature: JS  Date: 10/14/2020

- ☑ Environmental Compliance Lead:  ■ APPROVED  ☐ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE)  ☑ DENIED
  Name: Sylvia Granados  Signature: Sylvia Granados  Date: 10/14/2020
Southern California Edison
West of Devers Upgrade Project
Proposed Mac Drains
MPR #41

**FIGURE 1**

Legend:
- MPR #41 Proposed Mac Drains
- Stephens' Kangaroo Rat Suitable Habitat
- FRED Species Event
- Cooper's Hawk
- Red Diamond Rattlesnake
- Non-wetland Waters
- SCE, ESRI World Imagery

Proposed Mac Drains:
- MAC-3-3X64-1-MPR-41
  - 0.002 Acre
- MAC-3-3X64-2-MPR-41
  - 0.002 Acre
- MAC-3-3X64-3-MPR-41
  - 0.0008 Acre

Old Mac Drains:
- MAC-3-3X64-1
  - 0.003 Acre

Proposed Civil Drainage Areas:
- Permanent, New, Gabion
- Temporary, New, Gabion
- Proposed Civil Drainage Area
  - Single

Civil Access Roads:
- New Access Road
- Existing Access Road
- Designed Road Boundary
- Potential Road Widening

Existing ROW:
- USACE/RWQCB Jurisdiction
- CDFW Jurisdiction

Construction Areas:
- USACE/RWQCB Jurisdiction
- CDFW Jurisdiction

Civil Disturbance Areas:
- Temporary, Civil Work Limits

FRED Species Event:
- Cooper's Hawk
- Red Diamond Rattlesnake

San Bernardino County
Riverside County