Project Name: West of Devers Upgrade Project

Request Prepared By: Sylvia Granados

Date Approval Required: 11/12/2020

Variance Request No.: 42

Date Submitted: 11/11/2020

Location: Approximately 150 feet west of 3S03 in Riverside County

Landowners: Riverside County Regional Park & Open Space District

Landowner Parcel Number: 413-180-008

Current Vegetative Cover/Land Use: Grassland forbland

Existing Sensitive Resource?  NO  ■ YES  Specify: Mapped SKR Suitable 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 - Transmission

GS-3-3S03-MPR-42

A new temporary 0.16-acre work area located approximately 150-feet west of 3S03 is required to safely stage material and equipment associated with wire stringing and wreck-out activities. A mobile guard structure will be mobilized to the area to protect the existing distribution lines in the event of a wire drop during helicopter activities. The new work area will be accessed from the existing access road to the north, as shown on Figure 1. No equipment or materials will be staged outside of the transmission right-of-way.

The new work area is publicly owned and consists of approximately 0.16-acres of grassland/forbland located in Riverside County.

Environmental Analysis

No impacts to regulated trees, jurisdictional waters, biological, or cultural resources are anticipated during the use of the new work area.

Biological Resources

A desktop analysis of publicly available data and relevant project data was conducted to determine the potential for special-status species to occur in the new work area. The new work area was included in the study area for previous biological surveys (e.g., habitat assessments and focused surveys). In addition, the new work area and access road were covered within active preconstruction FRED Survey ID 000077 and a preconstruction survey of the area conducted on 11/10/2020, in preparation for this MPR (FRED Survey ID 000241).

Nesting Birds – Suitable substrates for nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code, including transmission structures, trees, shrubs, and the ground surface, are located within the vicinity. With implementation of project mitigation measures, preconstruction clearance sweeps, and nesting bird surveys conducted during nesting bird season (January 1 through August 31), no impacts to nesting birds are anticipated. If active nests are discovered in the future, impacts will be mitigated in accordance with the WOD Nesting Bird Management Plan.

Listed Riparian Birds – Suitable habitat for riparian birds (least Bell's vireo [LBVI]/Southwestern willow flycatcher [SWFL]) occurs east of El Casco Substation. No impacts to this habitat will occur as a result of construction activities in the new...
work area, located more than 1,500 feet to the west. With implementation of project mitigation measures, preconstruction clearance sweeps, and nesting bird survey conducted during nesting bird season (January 1 through August 31), no impacts to listed riparian birds are anticipated.

Coastal California Gnatcatcher – No suitable habitat for Coastal California Gnatcatcher occurs within the vicinity of the new work area. No impacts to CAGN are expected.

Stephens’ Kangaroo Rat – Areas of suitable habitat for Stephens’ kangaroo rat (SKR) are mapped within the new work area. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 during 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. Additionally, the new work area is located within the WR-MSHCP, where SKR are a covered species.

To minimize temporal habitat loss, a portion of previously approved work area WSS-3-3S02-3S03, which was determined to no longer be necessary for construction, will be removed from the Project data and avoided to offset mapped habitat impacts to GS-3-3S03-MPR-42.

With implementation of project mitigation measures and preconstruction clearance sweeps, no impacts to SKR are anticipated.

Special-status Small Mammals – Special-status small mammals such as the pallid San Diego pocket mouse, northwestern San Diego pocket mouse, American badger, desert kit fox, and/or black-tailed jackrabbit can occur in many parts of the project area. Ringtail and Palm Springs round-tailed ground squirrel are not expected. The new work area is also outside the known range of the Palm Springs pocket mouse. Mapped suitable habitat for the Los Angeles Pocket Mouse (LAPM) is located northeast of El Casco Substation, well outside the vicinity of the new work area. Although no impacts to special-status mammals are expected, if any of these species are found, potential impacts will be addressed in accordance with the WOD Small Mammals Avoidance and Minimization Plan.

Special-status Bats – Potential roosting sites for bats are located east of El Casco Substation, well outside the vicinity of the new work area. With implementation of project mitigation measures, no impacts to special-status bats are anticipated.

Special-status Plants – Smooth tarplant (Centromadia pungens ssp. laevis; CRPR 1B.1, WR-MSHCP Criteria Area Plant Species) occurs throughout the habitat immediately northeast of the El Casco Substation, well outside the vicinity of the new work area. Special-status plants have not been previously identified within the new work area; therefore, no impacts are anticipated. If special-status plants are later identified during clearance sweeps/monitoring, they 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 and/or WR-MSHCP DBESP for Narrow Endemic and Criteria Area plants.

Burrowing Owl – Burrowing owl habitat is widespread in the project area. Burrowing owls have a moderate potential to occur within 500 feet of the new work area, however no burrows have been observed within the vicinity of the new work area, therefore, no impacts are anticipated. If active burrows are identified later within 300 feet of construction activities, potential impacts will be addressed according to the Western Riverside County MSHCP DBESP for the Burrowing Owl.

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

Regulated Trees – No tree trimming or tree removal is required for the proposed activities.

Special-status Terrestrial Herpetofauna – No special-status herpetofauna were observed within the vicinity of the new work area during previous preconstruction surveys. No impacts to special status herpetofauna are expected as a result of use of the new work area.

Jurisdictional Waters

The new work area does not intersect jurisdictional waters however a non-wetland jurisdictional feature is located in the northeast corner of the survey area. This feature does not intersect any work areas or access roads; therefore, no impacts are anticipated.

Cultural Resources

The new work area is located within the WOD APE and was covered within the record search data that was compiled during previous WOD surveys and studies; West of Devers: Cultural Resources Assessment and Class III Inventory (LSA, 2013) and Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural
Resources with Southern California Edison Company's West of Devers Project (ASM, 2015). The record search and survey results for the area were negative for cultural resources.

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 area is located in an area of low (PFYC 2) paleontological sensitivity and no excavation is anticipated. Therefore, no paleontological monitoring will be required.

Resources:

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

New Survey Report Attached:  YES  □ NO

If No, Previous Biological Survey Reference: The new work area was covered within active FRED Survey ID 000777 and FRED Survey ID 000241.

**Cultural**: ■ NO RESOURCES PRESENT  □ RESOURCES PRESENT WITH PROJECT APE:  □ YES  □ NO

If in APE, Previous Cultural Survey Reference:

The new work area is located within the WOD APE and was covered within the record search data that was compiled during previous WOD surveys and studies. The record search and survey results for the area were negative for cultural resources. West of Devers: Cultural Resources Assessment and Class III Inventory (LSA, 2013) and Area of Potential Effects for the Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company’s West of Devers Project (ASM, 2015).

If not in APE, cite new survey report:

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  □ 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:  JM  Date: 11/11/2020

Environmental Inspector:  [ ] FIELD REVIEW COMPLETE
Name: Lisa Amador  Signature:  Lisa Amador  Date: 11/11/2020

[X] Land Agent:  [ ] CONSISTENT WITH EXISTING RIGHTS  [ ] NEW RIGHTS OBTAINED
Name: James Spence  Signature:  JS  Date: 11/11/2020

[X] Environmental Compliance Lead:  [ ] APPROVED  [ ] APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE)  [ ] DENIED
Name: Sylvia Granados  Signature:  Sylvia Granados  Date: 11/11/2020
FIGURE 1

Southern California Edison
West of Devers Upgrade Project
Proposed Guard Structure
MPR #42

LEGEND

MPR #42 Area
MPR #42 Proposed Access Road
Proposed Offset Area
Proposed Civil Access Road
Proposed Civil Access Road Areas
Proposed Guard Structure
Proposed GS-3-3S03-MPR-42
0.16 Acre

Major Trans Structure

- Proposed
- Remove

Major Trans Line

- Proposed
- Existing

Civil Access Roads

- New Access Road
- Existing Access Road

Civil Access Road Areas

- Existing Substation Area
- Existing ROW Construction Areas
- Construction Work Site
- General Disturbance Area
- Temporary, Civil Work Limits

Structure Work Area

- Structure Work Area
- Wire Setup
- Civil Disturbance Area
- Guard Pole
- O&M Tower Area

Non-wetland Waters

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

San Bernardino County
Riverside County

Map Index

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