**Environmental Minor Project Refinement Form**

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

Date Approval Required: April 12, 2021  
Variance Request No.: 46

Date Submitted: April 5, 2021  
Location: Supersite 3X64 in Loma Linda; Supersite 3X37 in Redlands; Supersite 3S02 in Calimesa; west side of Bluff Street in Banning; south side of Oak Valley Parkway in Beaumont; Supersite 2N32 in Colton.

Landowners and Associated Parcel Numbers:

<table>
<thead>
<tr>
<th>Proposed MPR Area</th>
<th>Property Owner</th>
<th>Assessor’s Parcel Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAC-3-3X64-3-MPR-46 - (Figure 1, page 1)</td>
<td>City of Loma Linda</td>
<td>0294-011-30</td>
</tr>
<tr>
<td>MAC-3-3X37-2-MPR-46 - (Figure 1, page 2)</td>
<td>Moonlight Farms, Inc.</td>
<td>473-030-015</td>
</tr>
<tr>
<td>MAC-3-3S02-2-MPR-46 - (Figure 1, page 3)</td>
<td>Riverside County Regional Park &amp; Open Spaces</td>
<td>413-180-010</td>
</tr>
<tr>
<td>SWA-4-PP123353-4-MPR-46 - (Figure 1, page 4)</td>
<td>City of Banning</td>
<td>531-110-012</td>
</tr>
<tr>
<td>SWA-4-PP123353-5-MPR-46 - (Figure 1, page 4)</td>
<td>City of Banning</td>
<td>531-110-005</td>
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<tr>
<td>SWA-OakValleyParkwayTelecom-MPR-46 - (Figure 1, page 5)</td>
<td>City of Beaumont</td>
<td>Public ROW</td>
</tr>
<tr>
<td>Supersite 2N32 - (Figure 1, page 6)</td>
<td>Greater Faith Ministries</td>
<td>0276-382-14</td>
</tr>
</tbody>
</table>

Current Vegetative Cover/Land Use: Developed/Disturbed, Chaparral, Grassland Forbland

Existing Sensitive Resource?  **NO**  **YES**  Specify: Mapped CAGN Suitable Habitat, Mapped LAPM 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

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**Description of Change and Justification**  (Attach additional sheets if needed.)

Attachments:
- CONSTRUCTION DRAWING
- ADDITIONAL ENVIRONMENTAL ANALYSIS
- CORRESPONDENCE
- OTHER: MODIFICATION TO NTP #4 PROJECT DESCRIPTION

**MAC-3-3X64-3-MPR-46 - (Figure 1, page 1)**

A new McCarthy Drain is required along the west access road south of the tower pad for 3S64 to better capture and divert surface flow from the access road to uplands on the north side of the road, as shown in Figure 1, page 2. The new McCarthy Drain will be located within the previously approved work area associated with Supersite 3X64.

The new McCarthy Drain will consist of a 0.003-acre increase in permanent impacts within the previously approved temporary work area, located on public property within the SCE ROW utility corridor.

**MAC-3-3X37-2-MPR-46 - (Figure 1, page 2)**
A new McCarthy Drain is required along the south access road east of the tower pad for 3S37 to better capture and divert surface flow from the access road to uplands on the east side of the road, as shown in Figure 1, page 3. The new McCarthy Drain will be located within the previously approved work area associated with Supersite 3X37.

The new McCarthy Drain will consist of a 0.003-acre increase in permanent impacts within the previously approved temporary work area, located on private property within the SCE ROW utility corridor.

MAC-3-3S02-2-MPR-46 - (Figure 1, page 3)

A new McCarthy Drain is required along the access road east of tower pad 3S02 to better capture and divert surface flow from the access road to uplands on the west side of the road, as shown in Figure 1, page 4. The new McCarthy Drain will be located within the previously approved work area associated with Supersite 3S02. In addition, rip rap will be installed on the developed utility road to minimize erosion, within the previously approved work area.

The new McCarthy Drain will consist of a 0.003-acre increase in permanent impacts within the previously approved temporary work area, located on public property within the SCE ROW utility corridor.

SWA-4-PP123353-4-MPR-46 and WA-4-PP123353-5-MPR-46 - (Figure 1, page 4)

A new temporary 0.14-acre work area west of Supersite PP123353 is required to safely stage material and equipment during wire wreck-out activities associated with PP#123353. A new temporary 0.07-acre work area southeast side of Supersite PP123353 is required to safely stage material and equipment during wire wreck-out activities associated with PP#123353. Both temporary work areas are shown on Figure 1, Page 4.

The new temporary work areas will result in approximately 0.21-acre of temporarily impacted public property owned by the City of Banning and consisting of 0.20-acre of grassland/forbland and 0.01-acre of developed disturbed land.

SWA-OakValleyParkwayTelecom-MPR-46 - (Figure 1, page 5)

A new temporary 0.33-acre work area on the south side of Oak Valley Parkway is required to safely stage material and equipment during telecommunication work activities associated with the three distribution poles shown on Figure 1, page 5.

The new temporary work area will result in approximately 0.33-acre of temporarily impacted public property owned by the City of Beaumont consisting entirely of developed/disturbed land on the road shoulder.

Supersite 2N32 - (Figure 1, page 6)

Mitigation Measure (MM) VR-3a states: Where construction would unavoidably create land scars or retaining walls visible from sensitive public viewing locations (as defined in Table D.18.11), disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.

The Soldier Pile and Hilfiker retaining walls shown on Figure 1, page 6 and in the photograph below, are visible from South Mount Vernon Avenue in the City of Colton, and as such were designed to be constructed and treated with a Natina finish, in accordance with MM VR-3a above. After the walls were constructed, they were repeatedly vandalized with graffiti and the City of Colton subsequently painted over the graffiti, as is standard practice throughout the city. Tagging of walls is common in this vicinity and is expected to continue over time. The intent of MM VR-3a, to reduce the visual contrast created by the walls through the use of a one-time application of Natina treatment, cannot be served under these circumstances, and for that reason, SCE requests an exemption from the MM VR-3a wall treatment requirement for these two walls.
Environmental Analysis

No additional 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 of publicly available data and relevant project data was conducted to determine the potential for special-status species to occur in the new work areas. The MPR 46 work areas were included within the study area for previous biological surveys (e.g., habitat assessments, protocol, and focused surveys).

The MPR 46 work areas were also covered during the following project preconstruction surveys:

| MAC-3-3X64-3-MPR-46 - (Figure 1, page 1) | FRED Preconstruction Survey ID #000060 |
| MAC-3-3X37-2-MPR-46 - (Figure 1, page 2) | FRED Preconstruction Survey ID #000055 |
| MAC-3-3S02-2-MPR-46 - (Figure 1, page 3) | FRED Preconstruction Survey ID #000078 |
| SWA-4-PP123353-4-MPR-46 and SWA-4-PP123353-5-MPR-46 (Figure 1, page 4) | FRED Preconstruction Survey ID #000192 |
| SWA-OakValleyParkwayTelecom-MPR-46 - (Figure 1, page 5) | FRED Preconstruction Survey ID #000006 |
| Supersite 2N32 - (Figure 1, page 6) - (Figure 1, page 6) | FRED Preconstruction Survey ID #000064 |

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 throughout the ROW. As shown on Figure 1, pages 1 and 2 observations of special-status bird species (Cooper's Hawk, Least Bell's Vireo, and Southern California Rufous-crowned Sparrow) have been made in the vicinity of the new work areas. However, the observations were ephemeral and are not associated with active nests.
Preconstruction surveys, including surveys for nesting birds will be conducted during the avian breeding season (Jan 1 – Aug 31) prior to the initiation of construction in the new work area. 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**

The new work area and new project components are not located within 500-feet of listed riparian bird habitat. With implementation of nesting bird surveys during nesting season and project mitigation measures, no impacts are anticipated.

**Coastal California Gnatcatcher**

WA-4-PP123353-5-MPR-46 is located approximately 360-feet north of mapped suitable Habitat for Coastal California gnatcatcher (CAGN) as shown on Figure 1, page 4.

Protocol surveys in this area occurred in March, April and May of 2018. No CAGN were observed within this area during 2018 protocol surveys. Furthermore, no CAGN were detected within CAGN habitat during the July 2019 survey. Due to a history of subsequently negative CAGN survey results in the area, no impacts to CAGN are anticipated and the Project area is considered unoccupied by CAGN at this time. If active CAGN nests or breeding territories are identified later within 500 feet of construction activities, avoidance buffers will be established and the nests will be monitored in accordance with the Wildlife Noise Monitoring Plan.

No suitable habitat for CAGN occurs within 500 feet of the other new work areas. Therefore, no impacts are anticipated with implementation of preconstruction surveys and mitigation measures.

**Stephens' Kangaroo Rat**

Areas of suitable habitat for Stephens' kangaroo rat (SKR) are mapped to the north of MAC-3-3X64-3-MPR-46 (Figure 1, page 1), west of MAC-3-3X37-2-MPR-46 (Figure 1, page 2), and east and west of MAC-3-3S02-2-MPR-46 (Figure 1, page 3), but do not intersect the respective work areas. A habitat assessment, pedestrian surveys, and trapping surveys were conducted in Segment 3 during the last trapping season in 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. With implementation of mitigation measures, preconstruction surveys, clearance sweeps, and biological monitoring during construction, no impacts to SKR are anticipated.

The other new work areas are not located within the range of the species, therefore 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, however Ringtail and Palm Springs round-tailed ground squirrel are not expected.

Los Angeles Pocket Mouse Suitable Habitat is located approximately 75-feet east of SWA-4-PP123353-5-MPR-46, across Bluff Street. However, the new work areas do not intersect LAPM habitat. A habitat assessment, pedestrian surveys, and several consecutive years of trapping surveys have been conducted within the LAPM suitable habitat areas of the Project. No LAPM were captured during trapping. Based on a lack of historic data, habitat conditions, and negative results over several years of surveys, LAPM are not expected in the project area. With implementation of mitigation measures and biological monitoring during construction, no impacts to LAPM are anticipated. If the species is found, potential impacts will be addressed in accordance with the Small Mammals Avoidance and Minimization Plan.

The other new work locations do not intersect mapped suitable habitat for special-status mammal habitat. If any of these species are found, potential impacts will be addressed according to the small mammals avoidance and minimization plan.

**Special-status Bats**

No suitable bat roosting habitat or buffers occur within the proposed work location, therefore, no impacts to special-status bats are anticipated.

**Special-status Plants**

Yucaipa onion (Allium marvini; CRPR 1B.2) occupied habitat is located more than 400-feet west of SWA-4-PP123353-4-MPR-46 (Figure 1, page 4). Seed collection for Yucaipa onion was conducted in 2018 in accordance with the Special-status...
Plant Salvage and Relocation Plan to address impacts to these populations of Yucaipa onion. The proximity of this area from the new work areas poses no threat to the plants.

The other proposed work areas do not intersect special-status plant habitat and no observations of special-status plants have been observed in the proposed work locations over several years of surveys, therefore no impacts to special-status plants are anticipated. If special-status plants are later identified during clearance sweeps/survey/monitoring, they will be avoided to the extent feasible. Unavoidable impacts will be addressed in accordance with the Special-status Plant Salvage and Relocation Plan.

**Burrowing Owl**

Burrowing owl habitat is widespread in the project area. Burrowing owls only have a moderate potential to occur within 500 feet of the proposed work areas. No owl buffers currently intersect the work areas. Active 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 mitigation measures, including appropriate avoidance buffers and biological monitoring during construction, no impacts to burrowing owls are anticipated.

**Desert Tortoise**

The proposed work areas are not located within the range of desert tortoise, therefore, no impacts to DETO 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 areas. Protocol aerial surveys conducted for the project in 2019 also showed no golden eagle nests within 2 miles of the new work areas. 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 terrestrial herpetofauna have been observed within the new work areas during project related surveys. However, a Red Diamond Rattlesnake (FRED Species Event 000131) was observed approximately 650 feet east of MAC-3-3X64-3-MPR-46 (Figure 1, page 1). Red Diamond Rattlesnakes (FRED Species Events 000126, 000518) have also been observed approximately 300 feet south of MAC-3-3X37-2-MPR-46 (Figure 1, page 2). With biological monitoring and implementation of project mitigation measures, no impacts are anticipated.

**Jurisdictional Waters**

The MPR 46 work areas do not intersect jurisdictional waters. Therefore, no additional non-permitted impacts to jurisdictional features are anticipated.

**Cultural Resources**

The proposed work areas and project components are located within the WOD APE and were covered within the record search data that was conducted 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

Below are the proposed components of MPR 43, with associated PFYC class:

<table>
<thead>
<tr>
<th>Component</th>
<th>PFYC Class</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAC-3-3X64-3-MPR-46</td>
<td>Very High PFYC Class 5</td>
</tr>
<tr>
<td>MAC-3-3X37-2-MPR-46</td>
<td>Very High PFYC Class 5</td>
</tr>
<tr>
<td>MAC-3-3502-2-MPR-46</td>
<td>Very High PFYC Class 5</td>
</tr>
<tr>
<td>SWA-4-PP123353-4-MPR-46 and SWA-4-PP123353-5-MPR-46</td>
<td>Low PFYC Class 2</td>
</tr>
<tr>
<td>SWA-OakValleyParkwayTelecom-MPR-46</td>
<td>Moderate PFYC Class 3</td>
</tr>
<tr>
<td>Supersite 2N32</td>
<td>Low PFYC Class 2</td>
</tr>
</tbody>
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Resources:

Biological: NO SENSITIVE RESOURCES PRESENT ☐ SENSITIVE RESOURCES PRESENT ☐ N/A
New Survey Report Attached: YES ☐ NO
If No, Previous Biological Survey Reference: The proposed components of MPR 46 and the associated preconstruction biological surveys are listed in the table within the Biological Resources section.

Cultural: ☐ NO RESOURCES PRESENT ☐ RESOURCES PRESENT WITH PROJECT APE: YES ☐ NO
If in APE, Previous Cultural Survey Reference:
The proposed MPR 46 components 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. 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 ☐ LAND USE ☐ TRAFFIC
☐ BIOLOGICAL RESOURCES ☐ NOISE ☐ VISUAL
☐ CONTAMINATED SOILS ☐ PALEO RESOURCES ☐ WATER RESOURCES
☐ CULTURAL RESOURCES ☐ SOCIOECONOMIC ☐ WETLANDS
☐ HAZARDOUS MATERIALS ☐ 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 MODIFICATION IS NEEDED FOR SAFE AND EFFICIENT CONSTRUCTION
Name: Jeff Miller                      Signature: [Signature]                      Date: 4/5/2021

Environmental Inspector: □ FIELD REVIEW COMPLETE
Name: Lisa Amador                      Signature: Lisa Amador                      Date: 4/5/2021

☐ X Land Agent: □ CONSISTENT WITH EXISTING RIGHTS □ NEW RIGHTS OBTAINED
Name: James Spence                      Signature: JS                      Date: 4/5/2021

☐ X Environmental Compliance Lead: □ APPROVED □ APPROVED WITH CONDITIONS (SEE CONDITIONS ABOVE) □ DENIED
Name: Sylvia Granados                      Signature: Sylvia Granados                      Date: 4/5/2021
Proposed Work Areas

Southern California Edison
West of Devers Upgrade Project

FIGURE 1

Proposed Rip Rap

Proposed MAC-3-3502-2-MPR-46
0.003 Acre
FIGURE 1

Southern California Edison
West of Devers Upgrade Project
Proposed Work Areas
MPR #46

LEGEND

- MPR #46 Work Area
- Construction Areas
- General Disturbance Area

Map Index

San Bernardino County
Riverside County

Proposed Work Area
SWA-OakValleyParkwayTelecom-MPR-46
0.33 Acre

FIGURE 1
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Southern California Edison
West of Devers Upgrade Project
Proposed Work Areas
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