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October 11, 2022

Louis Torres
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Minor Project Refinement No. 14 for the South Orange County Reliability Enhancement Project.

Mr. Torres:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 14 (MPR-14) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-14 will authorize the use of a new temporary work area to be utilized as a staging area approximately 0.5 mile north of the Talega Substation in unincorporated Orange County. The requested additional work area will be approximately 92,990 square feet, or 2.13 acres. Please refer to **Attachment B, MPR-14 Figures** and **Attachment C, MPR-14 Site Photographs** to view the MPR-14 staging area.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-14 Figures
Attachment C: MPR-14 Site Photographs
Attachment D: MPR-14 Biological Review

Preconstruction Requirements and Permit/Approvals

Approval of MPR-14 will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 04, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction requirements described in NTP-7. No permits are anticipated to be required for MPR-14 activities.

MPR-14 Request for Approval

SDG&E respectfully requests approval of MPR-14 to utilize the new temporary work area as a staging area, by October 18, 2022. The new temporary work area will be used in accordance with conditions outlined in the CPUC's NTP-7 approval letter. Should you have any questions or need

additional information, please do not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Quasarano', with a long horizontal flourish extending to the right.

Richard Quasarano
SOCRE Environmental Project Manager

cc: Kevin Kimball, Ecology and Environment, Inc.
Omar Miranda, SDG&E
Kenda Pollio, KP Environmental

ATTACHMENT A
MPR-14 Form



South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: October 11, 2022

Report No.: 14

Date Approved: October 18, 2022

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 14 (MPR-14) staging area is located on San Diego Gas & Electric (SDG&E) property.

Location/Milepost: The MPR-14 staging area is located approximately 0.5 mile north of the Talega Substation in unincorporated Orange County.

Land Use/Vegetative Cover: The 92,990 square-foot or 2.13-acre MPR-14 staging area is located within bare ground and developed.

Sensitive Resources: The MPR-14 staging area is partially within a cultural environmentally sensitive area (ESA) and adjacent to critical habitat for arroyo toad (ARTO). See resource discussions below.

Modification From:

<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other:		

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-14 for the use of a new staging area in order to facilitate transmission line construction activities within the Talega Hub and Talega Corridor for the South Orange County Reliability Enhancement Project (SOCRE or Project). The MPR-14 staging area is located on SDG&E property approximately 0.5 mile north of the Talega Substation in unincorporated Orange County. The proposed staging area site is the location of the former Cristianitos Substation, which has been decommissioned. The MPR-14 staging area, or Cristianitos Staging Area, is 2.13 acres (92,990 square-feet).

Use of the Cristianitos Staging Area is necessary to complete the remaining transmission line work for the Project in the Talega Hub and Talega Corridor described in Notice to Proceed No. 7 (NTP-7). The Cristianitos Staging Area will be used for worker meetings, staging of

construction trailers, visitor and construction personnel parking, and materials and equipment storage. If needed, the Cristianitos Staging Area would also be used as a helicopter fly yard, where the helicopter would load, unload, land and refuel. Helicopters would be used to string conductor during NTP-7 construction activities (FEIR, Section 2.4.8).

It should be noted, the Cristianitos Staging Area site is currently being used as a staging area by another SDG&E transmission line Project (TL13831). The TL13831 Project will utilize the site as a staging area until the SOCRE Project is ready to mobilize and utilize the site. This may result in some overlap, where both Projects are temporarily utilizing the yard. However, the SOCRE Project is expected to be the primary Project utilizing the yard. If overlap occurs, the SOCRE LEI would coordinate with the TL13831 LEI as needed to ensure the Project would remain in compliance with existing APMs and MMs.

The TL13831 Project has installed security fencing and screening material as well as stormwater Best Management Practices (BMPs) such as silt fence, straw wattle and rumble plates. These features will remain in place during the SOCRE Project's use of the Cristianitos Staging Area, and BMPs will be maintained as needed. Grading is not anticipated to be required for MPR-14 activities. No vegetation removal or ground disturbance would take place in the area surrounding the Cristianitos Staging Area site.

The Cristianitos Staging Area will be utilized for the duration of transmission line work in the Talega Hub and Talega Corridor for the Project, estimated through the end of 2024. Following the use of the Cristianitos Staging Area, the site will be stabilized in accordance with the Stormwater Pollution Prevention Plan (SWPPP). Please see **Attachment B, MPR-14 Figures** for an overview of the proposed Cristianitos Staging Area.

Describe how project refinement deviates from current project. Include photos.

Original Condition: The Project's FEIR did not identify the need for an additional staging area in the location of the proposed Cristianitos Staging Area to complete the Project's transmission line work in the Talega Hub or Talega Corridor. Therefore, the original condition of the Cristianitos Staging Area was not evaluated in previous reports.

Justification for Change: The Cristianitos Staging Area is being proposed in MPR-14 as an alternative to the staging areas that were approved in the Final Environmental Impact Report (FEIR) (Section 2.4.8.1 and Figure 2-1). Staging Area 3 (0.97 acre) and Staging Area 4 (2.59 Acres) could have been utilized for NTP-7 activities due to their proximity to NTP-7 components but are not anticipated to be available for use. Staging Area 5 (1.63 acres) was also approved in the FEIR and included in NTP-7 to be used for construction activities in the Talega Hub and Talega Corridor. However, the lease agreement for use of Staging Area 5 was denied by the property owner. As stated in Section 2.4.2 of the FEIR, Staging Area 5 was added to the Project specifically to account for staging and helicopter operations near the Talega Substation. The Cristianitos Staging Area is in a similar location as Staging Area 5, except further away from residences and located on SDG&E-owned property.

MPR-4 approved the use of two additional staging areas on Avenida La Pata near transmission pole #25, which were approved by the CPUC as fly yards for the Project on September 11, 2020. One of the two staging areas is no longer in use by the Project (eastern yard). The property owner of the yards, Orange County Waste and Recycling (OCWR), has given the Project notice that the lease for the western yard will also most likely be terminated before the end of the Project (exact timing unknown). OCWR needs the properties to be utilized for landfill operation and development. As a result, the Project will need a functional staging area with construction

trailers and space for the materials needed to complete the remaining transmission line construction activities in the Talega Hub and Talega Corridor. This is why the use of the proposed Cristianitos Staging Area is critical to the Project's remaining NTP-7 construction activities.

It is important the Cristianitos Staging Area be approved for use as a helicopter fly yard as the other staging areas approved by the CPUC to be utilized as helicopter fly yards (Staging Areas 2, 5 and the MPR-4 staging areas) are not anticipated to be viable for Project use through the end of the Project. Staging Area 2 (0.94 acre) is not available for lease and is too far from the NTP-7 Project components to be used as a fly yard. As described above, the lease for Staging Area 5 was denied, and the MPR-4 staging areas may not be available to the Project at the time of helicopter use. Not being able to utilize helicopters for overhead wire stringing activities could cause significant delays to the overall construction schedule.

The staging areas in the FEIR that were anticipated for use during construction activities in the Talega Hub and Talega Corridor (Staging Areas 3, 4 and 5) have a combined size of 5.23 acres. It is anticipated that the Cristianitos Staging Area (2.13 acres) would serve as the primary staging area for NTP-7 Project construction. Therefore, overall temporary disturbance estimated for staging areas in the FEIR would not be increased due to the utilization of the Cristianitos Staging Area. In addition, as the MPR-14 site is already being utilized as a staging area by another Project, it is not anticipated there would be any additional impacts as a result of the SOCRE Project using the same site as a staging area.

Please see below for **Table 1** summarizing the Project's staging areas:

Table 1: SOCRE Project Staging Areas¹

Staging Area No.	Staging Area Name	Staging Area Location	Used by the Project	Staging Area Size (in acres)
Approved in FEIR				
1	Juliana	At the eastern terminus of Juliana Farms Road, San Juan Capistrano	No	2.45
2	Prima	At the Prima Deschecha Landfill	No	0.94
3	La Pata	East Side of Avenida La Pata near Vista Hermosa Sports Park, San Clemente	No	0.97
4	Del Cerro	Southwest of the intersection of Calle Del Cerro and Avenida Vista Montana in San Clemente	No	2.59
5	Toll Roads	At the eastern terminus of Corte Cristianitos, San Clemente	No	1.63
6	Vista Montana	Northwest of the intersection of La Pata Avenue and Vista Montana, San Juan Capistrano	No	1.54
7	Alternate Prima Staging Yard	At the Prima Deschecha Landfill	No	2.08
Total:	-	-	-	12.2
Approved in MPRs				
MPR-4	Avenida La Pata	On Avenida La Pata near transmission pole #25 (NTP-6)	Yes	4.69
MPR-14	Cristianitos	Approximately 0.5 mile north of the Talega Substation	Yes	2.13

¹ Although there are no plans to utilize any of the approved staging areas at this time due to various constraints, there is the potential for circumstances to change in which case the CPUC would be notified.

(Pending Approval)				
Total:	-	-	-	6.82

Maps & Figures: Refer to **Attachment B, MPR-14 Figures** (Figure 1), for a map of the proposed Cristianitos Staging Area location. Refer to **Attachment C, MPR-14 Site Photographs**, for pictures of the current conditions of the Cristianitos Staging Area.

Environmental Impact: Utilization of the Cristianitos Staging Area to facilitate NTP-7 construction activities would not substantially increase the severity of any impacts disclosed within the FEIR; would not create a new significant impact, would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require an additional discretionary approval by the CPUC or other agencies. No special-status species were observed within the proposed Cristianitos Staging Area during the biological field survey.

Impacts to type of land cover resulting from MPR-14 are estimated in the table below:

Type of Land Cover	Total Area
Bare Ground	89,250 square feet (2.05 acres)
Developed	3,740 square feet (0.08 acre)
Total:	92,990 square feet (2.13 acres)

Concurrence (if appropriate): Concurrence is not required as the proposed staging areas are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:				
Biological	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources	
Previous Biological Survey Report Reference:				
<p>The Cristianitos Staging Area was not included as part of previous Project-related biological survey reports. A biological field survey of the Cristianitos Staging Area was performed on September 7, 2022. The Cristianitos Staging Area has been developed as a staging area and has a land cover of bare ground and developed. There were no special-status species observed within the Cristianitos Staging Area or within the 500-foot buffer around the work area (survey area). However, a coastal California gnatcatcher (CAGN) was heard calling approximately 150 to 200 feet west of the survey area during the field survey. No suitable CAGN habitat exists within the immediate MPR-14 work area and the proposed construction staging activities would not be expected to have any impact on CAGN activity in the area.</p>				
<p>The Cristianitos Staging Area is adjacent to Cristianitos Creek to the east which is critical habitat for ARTO. ARTO has been documented in the California Natural Diversity Database (CNDDB) approximately 290 feet east of the Cristianitos Staging Area near the coast live oak woodland habitat within the survey area. The Cristianitos staging area site is not designated as critical habitat which is likely due to previous disturbance and compaction within the yard. Silt fence has been installed around the perimeter of the staging area site by the TL13831 Project, which will remain in place for SOCRE Project use and would deter ARTO from entering the site. Due to the proximity of the Cristianitos Staging Area to critical habitat for</p>				

ARTO, pre-construction sweeps will be performed as needed at the direction of the CPUC-approved, qualified biologists in compliance with MM BR-3. For more detail, please refer to **Attachment D, MPR-14 Biological Review** and the Vegetation and Wildlife Section below.

Cultural No Resources Present Resources Present N/A, Change would not affect resources

Previous Cultural Survey Report Reference:

The Cristianitos Staging Area was included in the records search for cultural resources within the Project’s study area as part of SDG&E’s application for a Certificate of Public Convenience and Necessity (CPCN) for the Project and Proponent’s Environmental Assessment (PEA). The proposed staging area is located within 50 feet of a previously recorded archaeological site and is therefore partially within a cultural ESA. The Cristianitos Staging Area site was not included in previous pedestrian field surveys or survey reports completed for the Project. A cultural resources field survey was performed by the Project’s CPUC-approved Qualified Cultural Resources Consultant, Patrick McGinnis (ICF) on August 5, 2022, and was negative for cultural resources. Cultural monitoring would take place for any ground disturbing activities in native soils, although there is no grading or significant ground disturbance anticipated to be required.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None. The MPR-14 staging area was not included in the Project’s FEIR temporary impact area calculations.

New disturbance acreage: 2.13 acres of temporary impact area.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn’t applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input type="checkbox"/> Y	There is no significant ground disturbance proposed as part of MPR-14 activities. Ground disturbance may occur for silt fence or construction fence maintenance. Following the use of the Cristianitos Staging Area, the site will be stabilized in accordance with the SWPPP. Accordingly, utilization of the MPR-14 staging area site would not increase the severity of any previously identified impacts to geology, soils, and seismicity, and would not create any new geological related hazard not previously disclosed in the Project’s FEIR, Section 4.6.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-14 would not require agency consultation relating to geology, soils or seismicity.
	<input checked="" type="checkbox"/> N	
	<input checked="" type="checkbox"/> Y	The MPR-14 staging area site is the location of the now decommissioned SDG&E Cristianitos Substation. As part of

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	<input type="checkbox"/> Y	MPR-14 would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	<p>Review of the Project's previous records search confirmed the proposed staging area site is located within 50 feet of a previously recorded archaeological site and is therefore partially within a cultural ESA. Cultural resource monitoring and Native American monitoring will therefore take place during ground disturbing activities in native soils (if any occur). A field survey was conducted on August 05, 2022, and the survey was negative for cultural resources. As there is no significant ground disturbance proposed for staging yard setup activities and monitoring would occur as described, the use of the MPR-14 staging area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.5. It should be noted, Staging Area 5 (approved in FEIR) was also located within a cultural ESA which supports the conclusion that impacts resulting from the use of the Cristianitos Staging Area remain similar to those analyzed in the FEIR. All MPR-14 activities would adhere to requirements within the CPUC-approved Cultural Resources Construction Monitoring Plan (CRCMP). Although no new or altered APMs or MMs would be required, the following APMs and MMs are applicable and would be implemented for MPR-14 work activities:</p> <ul style="list-style-type: none"> • APM CUL-1: Worker Training for Cultural Resources • APM CUL-2: Cultural Resource Monitoring • APM CUL-3: Avoid Known Cultural Resources • APM CUL-4: Unanticipated Cultural Finds • APM CUL-5: Curate Cultural Discoveries • APM CUL-6: Archaeological Monitoring Results Report • APM CUL-7: Monitoring by Native Americans • MM CUL-1: Supplemental Worker Training for Cultural Resources • MM CUL-2 Construction Monitoring Plan <p>No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to paleontological resources are anticipated to occur as a result of the proposed staging area. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. Paleontological monitoring is not anticipated to be required since the proposed staging area is located on previously disturbed land, and ground-disturbing activities will be minimal</p>
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		and less than 5 feet in depth (post-driven fence and silt fence maintenance).
Agency Consultation?	<input type="checkbox"/> Y	MPR-14 would not require agency or tribal consultation in relation to cultural resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input checked="" type="checkbox"/> Y	The proposed Cristianitos Staging Area will be accessed by traveling to the eastern end of Avenida Pico and continuing north along Cristianitos Road to the site. Cristianitos Road is a private road which is not used by the public. Although the addition of a new staging area in the location of the Cristianitos Staging Area was not anticipated in the FEIR, the proposed staging area location is expected to generate less traffic and public exposure than its alternatives as construction vehicles and equipment will not need to travel through residential neighborhoods in order to access the staging area. There are no road improvements proposed as part of this MPR-14 request.
	<input type="checkbox"/> N	<p>The MPR-14 staging area would also be used as a helicopter fly yard for NTP-7 construction if needed, where helicopters would load, unload, land, and refuel when in use. In accordance with APM TR-6, the Cristianitos Staging Area is located away from residences and other sensitive noise receptors. The nearest sensitive noise receptor is a housing subdivision approximately 1,000 feet southwest of the staging area. This is a greater distance than Staging Area 5, (the staging area approved as a fly yard in the FEIR for the Project) which is approximately 300 feet east of the same housing subdivision (see Attachment B, MPR-14 Figures (Figure 2)). The helicopter landing zone would be an approximately 100-foot by 100-foot area on the west side of the staging area (see Attachment B, MPR-14 Figures (Figure 1)). All helicopter activities would be in compliance with the requirement in APM TR-6 that states Project fly yards would be kept clear of all other construction activity during helicopter operations. In accordance with MM TR-2(a), the Helicopter Safety Plan and initial External-Load Training Program shall be provided to personnel through the Safety and Environmental Awareness Training (SEAP).</p> <p>Accordingly, construction activities within and surrounding the MPR-14 staging area would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's FEIR, Section 4.15. No new or significant increase to previously identified significant impacts would occur as a result of the MPR-14 activities. There are no encroachment permits or traffic control plans anticipated to be</p>




CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<p>required for MPR-14 activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-14 activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries • APM TR-6: Helicopter Use • MM TR-2(a): Helicopter Safety Plan and External-Load Training Program • MM TR-3: Notification and Monitoring of Helicopter Use
Agency Consultation?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>Before the Cristianitos Staging Area is used as a helicopter fly yard, SDG&E will notify the Long Beach Flight Standards District Office in accordance with MM TR-3.</p>
Air Quality	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>The use of the Cristianitos Staging Area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3 as there is no new construction equipment or significantly different activities proposed as part of this MPR-14 request. Although MPR-14 involves the addition of a new staging area, there was a staging area in a similar location analyzed in the Project's FEIR (Staging Area 5) which is not anticipated to be utilized as a staging area for the Project. Therefore, there would not be an increase in emissions associated with the additional staging area beyond what was previously analyzed in the FEIR, Section 4.3. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-14 activities:</p> <ul style="list-style-type: none"> • APM AQ-1: Control Fugitive Dust Emissions • APM AQ-2 Minimize NOx and Particulate Matter (PM) Emissions from Off-Road Diesel-Powered Construction Equipment • MM AQ-1: Oxides of Nitrogen (NOx) Credits
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	<p>MPR-14 would not require agency consultation relating to air quality.</p>

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Noise and Vibration	<input checked="" type="checkbox"/> Y	<p>The Cristianitos Staging Area is approximately 1,000 feet from the closest sensitive receptors, a housing subdivision southwest of the staging area. Staging Area 5 (approved in the FEIR) is approximately 300 feet from the same housing subdivision. Utilizing the Cristianitos Staging Area as the primary staging area for NTP-7 construction and helicopter activities rather than Staging Area 5 will therefore reduce the public's exposure to construction-related noise. Accordingly, utilization of the MPR-14 staging area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's FEIR, Section 4.11. All MPR-14 activities would adhere to the requirements in the CPUC-approved Construction Noise and Vibration Control Plan (CNVCP). No new or altered APMs or MMs would be required, and the following APM and MMs would be implemented for MPR-14 work activities:</p> <ul style="list-style-type: none"> • APM NOISE-1: Nighttime and Weekend Activities • MM NV-1: Nighttime and Weekend Construction Noise Controls • MM NV-5: Noise Control Plan
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-14 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	<p>No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-14 staging area. Temporary fencing and screening material would be maintained in compliance with MM AES-3, and work areas would be kept clean in accordance with APM AES-1. Use of the Cristianitos Staging Area would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-14 activities:</p> <ul style="list-style-type: none"> • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions • MM AES-3: Screen or Effectively Locate Laydown Areas
	<input checked="" type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	<input type="checkbox"/> Y	MPR-14 would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	A biological field survey of the Cristianitos Staging Area was performed on September 7, 2022. The Cristianitos Staging Area contains bare ground and developed land cover. The Cristianitos Staging Area is adjacent to Cristianitos Creek to the east which is critical habitat for ARTO. ARTO has been documented in the CNDDDB approximately 290 feet east of the Cristianitos Staging Area near the coast live oak woodland habitat within the survey area.
	<input type="checkbox"/> N	<p>The Cristianitos staging area site is not designated as critical habitat which is likely due to previous disturbance and compaction within the yard. Silt fence has been installed around the perimeter of the staging area site by the TL13831 Project, which will remain in place for SOCRE Project use and would deter ARTO from entering the site. Due to the proximity of the Cristianitos Staging Area to critical habitat for ARTO, pre-construction sweeps will be performed as needed at the direction of the CPUC-approved, qualified biologists in compliance with MM BR-3. Although night work is not currently anticipated within the Cristianitos Staging Area, there is potential for outage-driven, critical path activities to be required during nighttime. In this case, lighting would be shielded away from Cristianitos Creek in compliance with MM BR-1 to prevent impacts to aquatic wildlife.</p> <p>The CNDDDB records search that was performed for the Cristianitos Staging Area showed a history of several special-status species occurring within the 500-foot survey area around the staging area site such as; California monarch (<i>Danaus plexippus</i>), orange-throated whiptail (<i>Aspidoscelis hyperythrus</i>), Coast horned lizard (<i>Phrynosoma blainvillii</i>), coastal cactus wren (<i>Campylorhynchus brunneicapillus</i>), ARTO (<i>Bufo californicus</i>) and CAGN (<i>Polioptila californica californica</i>). There were no special-status species observed within the Cristianitos Staging Area or within the 500-foot buffer around the work area (survey area). A CAGN was heard calling approximately 150 to 200 feet west of the survey area during the field survey. No suitable CAGN habitat exists within the immediate MPR-14 staging area and the proposed construction staging activities would not be expected to have any impact on CAGN activity in the area. For more detail, please refer to Attachment D, MPR-14 Biological Review.</p>

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		<p>Staging area activities are anticipated to begin in the fourth quarter (Q4) of 2022 which is outside of the nesting season (January 1 – September 15). Therefore, a pre-construction nesting bird survey is not anticipated to be required. However, if the staging area becomes inactive for 10 or more days during the nesting season, a nesting bird survey will be performed by a CPUC-approved avian biologist prior to the restart of staging area activities per the Project's Nesting Bird Management Plan.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the Cristianitos Staging Area, any indirect impacts that may occur to sensitive species in the vicinity of the work area will be mitigated in accordance with the MMs listed below. If the proposed staging area is used as a helicopter fly yard, vertical buffers will be established as needed in accordance with MM BR-6. Following construction, the Cristianitos Staging Area site will be restored in accordance with the SWPPP and the NCCP.</p> <p>As shown in Attachment B, Staging Area 5 (approved in FEIR) is located in a similar environmental setting as the proposed Cristianitos Staging Area and would have resulted in similar impacts. Therefore, the use of the Cristianitos Staging Area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. This is further supported by the fact that the Cristianitos Staging Area is already being utilized as a staging area by the TL13831 Project. No new or altered APMs or MMs would be required. The following MMs would be implemented for MPR-14 work activities:</p> <ul style="list-style-type: none"> • MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic and Wetland Areas. • MM BR-2: Biological Monitoring • MM BR-3: Preconstruction Surveys. • MM BR-4: Limit Removal of Native Vegetation Communities and Trees. • MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. • MM BR-9: Invasive Plant Control Measures. • MM BR-10: Mitigation Plan Development
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-14 would not require agency consultation relating to vegetation and wildlife.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Wildfire	<input checked="" type="checkbox"/> Y	<p>The area in which the MPR-14 staging area is located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention and Emergency Response Plan (CFPERP) requirements including but not limited to;</p> <ul style="list-style-type: none"> • Requirements for equipping diesel and gasoline operated engines with spark arrestors, carrying emergency fire suppression equipment, • Furnishing a water truck on or immediately adjacent to the proposed project work area, • Restricting smoking and vehicle idling, • Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and • Conducting pre-activity tailgate meetings that include fire safety discussions. <p>All MPR-14 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-14 staging area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts related to fires and wildfires that were analyzed in the FEIR, Section 4.8.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input checked="" type="checkbox"/> Y	SDG&E will coordinate with local emergency response agencies such as fire departments and police during NTP-7 construction, including the use of the Cristianitos Staging Area. Emergency access will be maintained throughout construction.
	<input type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	10/24 /2022	Omar Miranda		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	10/20 /2022	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	10/19 /2022	Louis Torres		<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied

X *Louis Torres*

Louis Torres
Manager

For CPUC Compliance Manager Use Only

<input checked="" type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> Beyond Authority
---	--	---

Conditions of Approval or Reason for Denial:

COA-1. The extent of the MPR-14 staging areas will be limited to the areas shown on the figure titled "SOCRE PROJECT MPR-14 Figure 1" and will be used for project construction staging and related activities only during the period of project construction and restoration (anticipated to be approximately through the end of 2024).

COA-2. In the event that facilities store hazardous materials in excess of 55 gallons (liquid), 500 pounds (solid), or 200 cubic feet (gas), SDG&E shall develop a Hazardous Materials Management Plan (HMBP) for construction and submit the HMBP to the Certified Unified Program Agency (CUPA) and/or the California Environmental Reporting System (CERS) as required. Additionally, a copy of the HMBP shall be provided to the CPUC.

COA-3. Prior to the start of helicopter use associated with NTP-7 construction activities, SDG&E shall verify that the SOCRE Project Helicopter Safety Plan (i.e., Project Aviation Operations Plan) has been updated as necessary to ensure safety and compliance with FAA, federal, state, and local regulations. In the event that the SOCRE Project Helicopter Safety Plan is amended, a copy shall be provided to the CPUC. Additionally, all helicopter activities will be in compliance with APM TRA-6 to ensure that the Cristianitos Staging Area will be kept clear of all other construction activity during helicopter operations.

COA-4 Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.

COA-5. All activities (e.g., stabilizing construction entrance/ ground surface, fence repair, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where applicable.

COA-6. In the event that MPR-14 activities require additional road improvements/design, or vegetation clearing/grubbing, SDG&E shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.

COA-7. SDG&E shall ensure that construction equipment at the proposed staging areas will have adequate and properly placed secondary containment to avoid and minimize potential leaks or spills.

COA-8. The Project Stormwater Pollution and Prevention Plan (SWPPP) shall be updated as necessary to cover MPR-14 work area and activities. The Qualified SWPPP Developer (QSD) must prepare and certify each SWPPP amendment and a copy of the revised SWPPP shall be provided to the CPUC.

COA-9. Given that potential overlap use of the MPR-14 staging area may occur with the TL13831 Project, the SOCRE LEI will coordinate with the TL13831 LEI as needed to ensure the Project would remain in compliance with existing SOCRE applicant proposed measures (APMs) and mitigation measures (MMs), including ensuring that any track-out from the Cristianitos staging area that occurs while SOCRE is utilizing the yard (whether it is Project-related or not) is prevented to the extent practicable and properly cleaned. Additionally, each Project will designate specific areas for equipment and materials storage to promote environmental oversight.

COA-10. The work associated with MPR-14 shall occur within approved project workdays and hours. In the event that staging area use necessitates work outside of the hours permitted under local noise ordinances, SDG&E shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.

COA-11. Prior to the start of MPR-14 activities, SDG&E shall ensure that the SOCRE Project Safety and Environmental Awareness Program (SEAP) is updated as necessary to include the California species of concern (e.g., coastal horned lizard, orange-throated whiptail, monarch, etc.), endangered species (e.g., arroyo toad), and critical habitat, as identified in the figure titled "SOCRE PROJECT MPR-14 CNDDDB Results". Additionally, prior to the start of MPR-14 activities, SDG&E shall ensure that all SOCRE Project personnel have received SEAP training in accordance with the MMCRP. In the event that SOCRE Project personnel working at the staging area have already completed SEAP training, SDG&E shall verify that a revised SEAP training refresher is provided to all SOCRE personnel working at the MPR-14 staging area in order to maintain awareness of safety and environmental sensitivities and requirements.

COA-12. All complaints related to MPR-14 activities received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibrations, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.

COA-13. Use of the MPR-14 staging areas will adhere to all applicable conditions of approval identified for approved project NTPs and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.

COA-14. SDG&E shall notify CPUC after completing MPR-14 associated activities including use of staging area access roads and temporary work areas, and provide photos of the restored additional work disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SDG&E shall notify CPUC for evaluation and approval.

Prepared by: Fernando Guzman, WSP, CPUC
Compliance Manager

Date: October 17, 2022








ATTACHMENT B
MPR-14 Figures

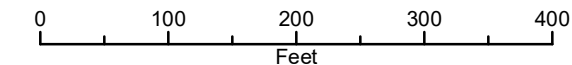
SOCRE PROJECT

MPR-14 Figure 1

Orange County, CA

LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
- MPR-14 Components**
-  Construction Entrance
-  Helicopter Landing Zone
-  Proposed Staging Area










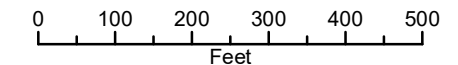
SOCRE PROJECT

MPR-14 Figure 2

Orange County, CA

LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  Staging Area 5
- MPR-14 Components**
-  Construction Entrance
-  Proposed Staging Area



ATTACHMENT C
MPR-14 Site Photographs

MPR-14 PHOTO LOG

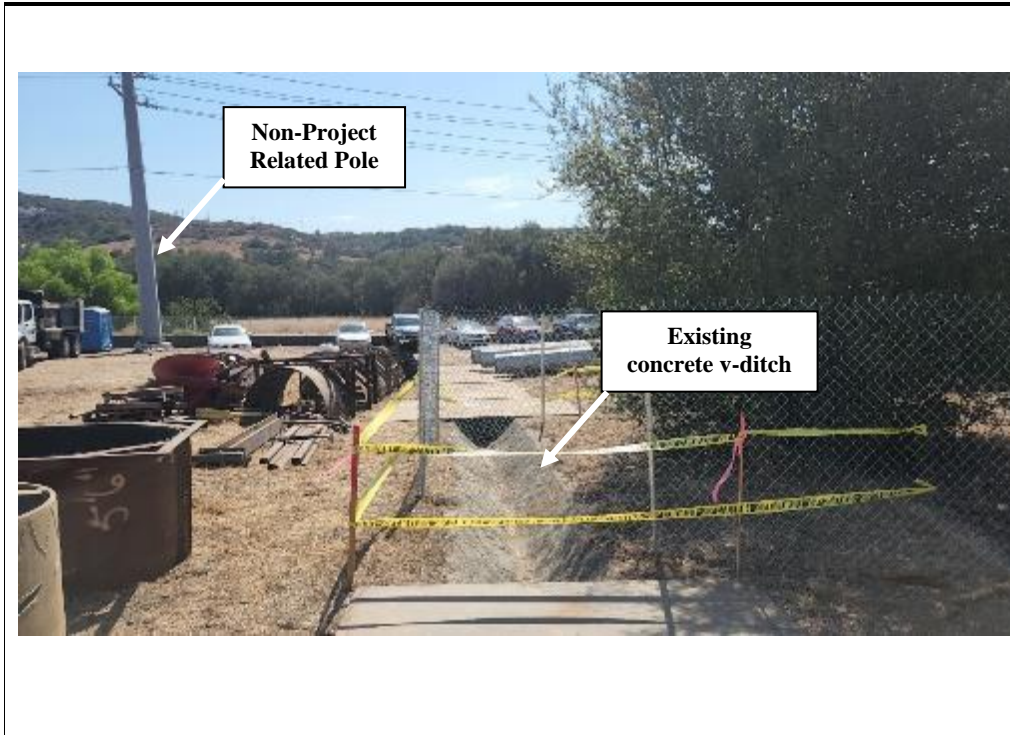


Photograph 1:
View of the northeast corner of the Cristianitos Staging Area and northeast construction entrance. Facing: Southwest



Photograph 2:
View of the Cristianitos Staging Area and the decommissioned substation. Facing: East

MPR-14 PHOTO LOG



Photograph 4:

View of the Cristianitos Staging Area location facing east toward Cristianitos Road. The existing concrete v-ditch within the staging area site is being protected by steel plates. Facing: East



Photograph 5:

View of the northwest corner of the Cristianitos Staging Area location with the former site of the decommissioned Cristianitos Substation shown. Facing: Northeast

MPR-14 PHOTO LOG



Photograph 6:

View of the concrete drainage running through the MPR-14 staging area location facing southeast toward Cristianitos Road. The concrete drainage is covered by steel plates for the current staging yard use. Facing: Southeast

ATTACHMENT D
MPR-14 Biological Review

SAN DIEGO GAS & ELECTRIC COMPANY

**SOUTH ORANGE COUNTY RELIABILITY
ENHANCEMENT PROJECT**

**BIOLOGICAL REVIEW FOR
MINOR PROJECT REFINEMENT No. 14**



PREPARED BY:



September 2022

ICF. 2019. Biological Review for Minor Project Refinement No. 14. July. San Diego, CA. Prepared for San Diego Gas & Electric, San Diego, CA.

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Acronyms and Abbreviations

APM	Applicant Proposed Measure
BMP	Best Management Practices
CAGN	California gnatcatcher
CNDDB	California Natural Diversity Database
CPUC	California Public Utilities Commission
FEIR	Final Environmental Impact Report
kV	Kilovolt
MPR	Minor Project Refinement
MM	Mitigation Measure
SDG&E	San Diego Gas & Electric Company
SOCRE	South Orange County Reliability Enhancement

1. Introduction

This biological review was prepared to document the biological conditions of the Minor Project Refinement No.14 (MPR-14) identified for the San Diego Gas & Electric Company’s (SDG&E) South Orange County Reliability Enhancement (SOCRE) Project (Project).

SDG&E is requesting approval of MPR-14 for a new staging area (MPR-14 work area) to facilitate remaining transmission line construction activities in the Talega Hub and Talega Corridor approved in Notice to Proceed No. 7 (NTP-7). The MPR-14 work area is adjacent to Cristianitos Road in unincorporated Orange County, just east of the City of San Clemente. The MPR-14 staging area is approximately 2.13 acres. Construction vehicles and equipment would be stored entirely within the MPR-14 staging area. Minimal ground disturbance will be required to perform MPR-14 activities (BMPs, fence maintenance, vegetation maintenance).

2. Methods

A biological field survey was conducted on September 7, 2022 to determine if the MPR-14 work area or the area within 500 feet of the MPR-14 work area (survey area) provides habitat for special-status species. While onsite, the biologist recorded vegetation and scanned for special-status species and nesting birds within the survey area. Binoculars were used to assess vegetation and habitat potential within restricted areas and privately-owned properties within the survey area. These results along with California Natural Diversity Database (CNDDB) data were used to assess potential impacts from construction staging associated with this MPR-14 request.

3. Results

3.1 Vegetation within the MPR-14 Work Area

The following vegetation communities or land cover types were noted within the MPR-14 work area during the biological field survey conducted on September, 7, 2022 (Table 1).

Table 1: Vegetation and Land Cover within the MPR-14 Work Area

Vegetation/Land Cover	Total Area (acre)
Bare Ground	2.05
Developed	0.08
TOTAL	2.13

3.1.1 Developed

Developed is a land cover type associated with human-constructed land cover types devoid of vegetation. Developed areas within the survey area include Cristianitos Road, the paved roadway to enter the MPR-14 staging area, and the decommissioned substation within the MPR-14 staging area.

3.1.2 Bare Ground

Bare ground is a land cover type that is unpaved but devoid of vegetation. Much of the proposed work area site has already been cleared of vegetation and is being utilized as a staging area by another project.

3.2 Other Vegetation in Survey Area

3.2.1 Disturbed

Disturbed habitat is composed primarily of non-native and/or invasive grasses and forbaceous species, but it is dependent on types and frequencies of disturbances, soil types, microclimate variables, available seed sources and other factors. The disturbed habitat is present throughout the overland travel area, as well as the borders of the paved road intersecting the MPR-14 work area and Cristianitos Road.

3.2.2 Non-Native Grassland

Non-native grassland consists of vegetation composed of predominantly non-native, annual grasses and forbaceous species. Non-native grassland is found in patches to the east and northeast of the MPR-14 staging area within the 500-foot buffer. The dominant species in the survey area are great brome (*Bromus diandrus*), red brome (*Bromus rubens*), wild oat (*Avena fatua*), and black mustard (*Brassica nigra*).

3.2.3 Coast Live Oak Riparian Forest

Coast Live Oak Riparian Forest is a plant community that occurs near streams with a dense tree canopy dominated by coast live oak (*Quercus agrifolia*), often containing an understory of poison oak (*Toxicodendron diversilobum*), wild cucumber (*Marah macrocarpa*), and annual grasses. The vegetation community is found outside of the MPR-14 work area approximately 150 feet to the east and continues along the eastern perimeter of the 500-foot buffer. No direct impacts to the coast live oak riparian forest will occur as a result of MPR-14 activities. There is an invasive understory of great brome, red brome, and wild oat within the area.

3.2.4 Coastal Sage Scrub

Coastal sage scrub (CSS) is composed of drought-deciduous, soft-woody subshrubs found primarily near the coast on foothill slopes at low elevations. It is found immediately west of the MPR-14 staging area, approximately 250 feet northwest, and approximately 20 feet south. No direct impacts to the CSS in this area will occur as a result of MPR-14 activities. Vehicular traffic will use existing access roads to move between the MPR-14 staging area and other Project construction areas, in accordance with MM BR-1.

3.2.5 Coastal Sage Scrub/Chaparral Mix

CSS/chap mix consists of low-growing, drought-deciduous shrubs in coastal lowlands. This vegetation community is found within the survey area approximately 100 feet north of the MPR-14 staging area. A single scrub oak is located within the MPR-14 staging area, however it has been

sectioned off and no impacts are anticipated to the shrub. No direct impacts to the CSS/chap mix in this area will occur as a result of MPR-14 work activities.

3.3 Special-Status Species

No special-status species were noted within the MPR-14 staging area. Visual and auditory surveying was used to determine the absence of special-status species within the MPR-14 staging area. Please see **Figure 1** for the mapped results of the CNDDDB records search conducted for the MPR-14 staging area.

The CNDDDB showed the California monarch (*Danaus plexippus*) overwintering population, along with the orange-throated whiptail (*Aspidoscelis hyperythra*) to be presumed extant over a large, generalized CNDDDB polygon encompassing the entirety of the MPR-14 work area, but the September 7 survey of the area was negative for these species within the MPR-14 work area and there is no suitable habitat for these species onsite.

Coast horned lizard (*Phrynosoma blainvillii*) and coastal cactus wren (*Campylorhynchus brunneicapillus*) were documented in the CNDDDB approximately 100 feet north of the MPR-14 work area. No suitable habitat exists within the MPR-14 work area for these species due to previous disturbance and compaction of soil, as well as the absence of adequate vegetation cover of prickly pear cactus (*Opuntia* sp.) and cholla (*Cylindropuntia* sp.). Proposed construction will have no direct impact on these species.

Many-stemmed dudleya (*Dudleya multicaulis*) was documented in the CNDDDB approximately 400 feet north, and approximately 500 feet northwest of the staging area site, on the northern and northwestern perimeter of the 500-foot buffer within dense stands of CSS/chap mix. This species was not observed during the biological survey and was not recorded in the immediate MPR-14 work area. Due to the distance of previous recordings of this species from the MPR-14 work area and dense vegetative canopy cover, no direct impacts are anticipated as a result of construction activity.

Intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) has been documented in the CNDDDB approximately 470 feet northwest of the MPR-14 work area on the northwestern perimeter of the 500-foot buffer. This species was not observed during the biological survey and was not recorded in the immediate MPR-14 work area. Due to the distance of previous recordings of this species from the MPR-14 work area and dense vegetative canopy cover, no direct impacts are anticipated as a result of construction activity.

Arroyo toad (ARTO) was documented in the CNDDDB approximately 290 feet east of the MPR-14 work area near the coast live oak riparian woodland on the eastern perimeter of the 500-foot buffer. The site has been developed as a staging area for another Project, and silt fencing has been installed around the perimeter, which will remain in place for the SOCRE Project as well. The Cristianitos staging area site is not designated as critical habitat and it may be due to previous disturbance and compaction within the yard. However, it is directly adjacent to critical habitat and pre-construction sweeps are recommended. No direct impacts are anticipated as a result of the proposed construction activity.

One coastal California gnatcatcher (CAGN) (*Polioptila californica californica*) was heard calling approximately 150 to 200 feet west of the survey area. No suitable CAGN habitat exists within the immediate MPR-14 work area and the proposed construction staging will have no direct impact on CAGN.

Indirect impacts on CAGN, ARTO, and other special-status species will be minimized or avoided by implementation of SDG&E's Operational Protocols under the SDG&E Subregional Habitat Conservation Plan / Natural Community Conservation Plan (HCP/NCCP) as well as mitigation measures from the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) within the Final Environmental Impact Report (FEIR; CPUC 2016), summarized in Section 4, below.

4. Applicable Mitigation Measures and Best Management Practices

The following represent all applicable Mitigation Measures (MM) from the FEIR as well as best management practices (BMPs) that would apply to construction activities proposed in this MPR-14 request.

MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic, and Wetland Areas. In all project locations, vehicular traffic (including movement of all equipment) will be restricted to established construction areas indicated by flagging and signage. California Public Utilities Commission (CPUC) notification and approval will be required for any additional disturbance areas already identified and evaluated for the project pursuant to CEQA. As feasible, the applicant shall use disturbed or low habitat value areas before using undisturbed or higher quality habitat areas, as determined by a qualified biologist. Prior to ground disturbing activities, sensitive resources, such as waterbodies, oak trees, special status plant populations, and natural communities, will be clearly marked and avoided.

All aquatic features, including vegetated washes, creeks, drainages (ephemeral and perennial), and riparian areas, will be spanned by the 230-kV transmission and 12-kV distribution line where possible. If construction will occur within 200 feet of an aquatic feature, biological monitors will establish and maintain a minimum exclusionary buffer of 50 feet from the delineated extent of all jurisdictional wetland features. If the applicant cannot maintain the 50-foot exclusionary buffer, the applicant will submit best management practices (BMPs) to the CPUC for review and approval prior to construction. In addition, if the applicant is unable to maintain the 50-foot buffer, the applicant shall consult with USACE and CDFW regarding potential impacts to streams or wetlands.

MM BR-2: Biological Monitoring. CPUC-approved, qualified biological monitors will be present during construction and restoration activities in areas where sensitive resources identified by a CPUC-approved biologist may be impacted by construction of the project. Biological monitors will be assigned to the project in areas of sensitive biological resources. The monitors will be responsible for ensuring that impacts on special status species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities will need to be restricted in order to protect native plants and wildlife or special status species. Those restricted areas will be monitored to ensure their protection during construction. The applicant shall submit the biological monitors' daily monitoring reports and monthly biological monitoring reports to the CPUC, CDFW, and USFWS.

MM BR-3: Preconstruction Surveys

- a. Preconstruction surveys will be conducted by CPUC-approved, qualified biologists according to standardized methods. Surveys will encompass all construction areas. Existing baseline vegetation data will be used during post-construction restoration efforts, as outlined in Section 7 of the SDG&E Subregional NCCP/HCP. Preconstruction surveys will take place for each discrete work area within 14 days of the start of ground disturbance, or if work has lapsed for longer than 14 days.
- b. Additionally, a CPUC-approved, qualified biologist will conduct preconstruction clearance sweeps for special status species at all access, staging, and work areas where suitable habitat is present within approximately 24 hours of construction and restoration activities each day.
- c. In addition to these preconstruction surveys, a CPUC-approved biologist will conduct protocol-level surveys for coastal California gnatcatcher and least Bell's Vireo along the proposed 12-kV distribution line where surveys have not yet taken place. A CPUC-approved biologist will also perform protocol-level southwestern willow flycatcher and rare plant surveys throughout the entire project area, where suitable habitat exists.

If a special status species is found at any time, the CPUC will be notified within 48 hours, and the CPUC will determine the need for additional consultation with the appropriate resource agency or agencies.

MM BR-4: Limit Removal of Native Vegetation Communities and Trees. The removal of native vegetation and trees will be limited to the minimum practicable area required for construction of the project. To the extent feasible, grading, grubbing, graveling, or paving will only occur for permanent project components. Temporary staging areas will be used in such a way that it facilitates post-construction restoration, per Section 7 of the SDG&E Subregional NCCP/HCP. Drive-and-crush methods will be employed, with the exception of those areas where this method is not feasible for temporary staging areas for safety reasons and placement of temporary structures, such as construction trailers and drop tanks.

MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. The applicant will develop a Nesting Bird Management Plan in consultation with the USFWS, CDFW, and CPUC that outlines protective measures and BMPs that will be employed to prevent disturbance to active nests of both special status and Migratory Bird Treaty Act (MBTA) protected bird species with the potential to occur in the project area. The Nesting Bird Management Plan will include the following components:

- Appropriate survey timing, extents, and methods, including dates of local breeding season when surveys must take place; monitoring and reporting protocol; protocol for determining whether a nest is active; and protocol for documenting, reporting, and protecting active nests within construction and restoration areas will be included in the Nesting Bird Management Plan. If preconstruction survey protocols exist for a special status avian species with a potential to be impacted by the project, the plan will outline the implementation of these protocols. The survey area will include the construction area, plus an additional distance large enough to accommodate the protective buffer of MBTA-protected bird species likely to occur in proximity to the construction area. The plan will also specify approved nest deterrent methods, inactive nest management, and state that project-related nest failures will be reported to the USFWS and CDFW.
- Appropriate and effective buffer distances, including horizontal buffers from nests, horizontal buffers from territories, if appropriate, and vertical buffers for helicopters will be included. Buffers

will not be based on generalized assumptions regarding all nesting birds, but will be specific to the site and species/guild and account for specific stage of nesting cycle and construction work type. During construction and restoration, a CPUC-approved avian biologist will implement the appropriate buffer distance in accordance with the plan, and a process for a reduction from the plan's nesting buffer distances will be specified. Buffer reductions for special status species and raptors shall be determined upon consultation with USFWS, CDFW, and the CPUC. Buffer reductions for common species must be approved by the CPUC-approved avian biologist and USFWS, CDFW, and CPUC will be notified.

- Vertical buffers would be based on anticipated effects of rotor wash and noise for each class of helicopter (i.e. Light Duty, Medium Duty, and Heavy Duty). Surveys and monitoring of the active buffer areas will be completed by a CPUC-approved biologist before, during, and after helicopter use in the vicinity of active buffers and reported to the CPUC.
- The Nesting Bird Management Plan will include the minimum requirements to become a CPUC-approved avian biologist and biological monitor for nesting birds, including education, experience in conducting biological surveys, and experience with specific birds in the project area.
- The CPUC-approved biological monitor will halt work if it is determined that active nesting will be disturbed by construction or restoration activities until further direction or approval to work is obtained from the CPUC and/or appropriate wildlife agencies.

The Nesting Bird Management Plan will be submitted to the USFWS, CDFW, and CPUC for review and comment no more than six months prior to the start of construction, with the intent that the plan will be finalized no more than two months prior to the start of construction. The final plan will be implemented during construction and restoration activities. A Nesting Tracker will be maintained and updated weekly during the nesting bird season, and will be submitted to USFWS, CDFW, and CPUC on a monthly basis. This Nesting Tracker will contain data such as species, location, buffer, monitor name, and status of the nest.

MM BR-9: Invasive Plant Control Measures. The applicant will use standard BMPs to avoid the introduction and spread of controllable invasive plant species such as tamarisk (*Tamarix* sp.) and giant reed (*Arundo donax*) during construction of the project. Proper handling during construction will include the following:

- All vehicles and equipment will be cleaned prior to arrival at the work site.
- Crews, with construction inspector oversight, will ensure that vehicles and equipment are free of soil and debris capable of transporting noxious weed seeds, roots, or rhizomes before the vehicles and equipment are allowed use of access roads.

Best Management Practices. The following best management practices (BMPs) will be implemented.

- Pursuant to the NCCP Operational Protocols, hydrologic impacts will be minimized through the use of state-of-the-art technical design and construction techniques to minimize ponding and avoid offsite erosion siltation.
- Perimeter sediment and runoff control BMPs will be installed to prevent runoff.

- During work activities, all trucks, tools, and equipment will be kept on existing access roads or cleared areas.
- Waste management and materials controls will be implemented, including covering and properly disposing of trash and using secondary containment for any staged equipment.
- Daily spot checks will be conducted by a biological monitor or the Lead Environmental Inspector to document compliance with these BMPs.

5. References

California Public Utilities Commission. 2016. *South Orange County Reliability Enhancement Project Final Environmental Impact Report*. April

Appendix A. Photo Log of Onsite Conditions



Photo 1: Northwest view of the southern construction entrance MPR-14 staging area.



Photo 2: Southwest view of the only vegetation, a scrub oak (*Quercus berberidifolia*), in the middle of the MPR-14 staging area.



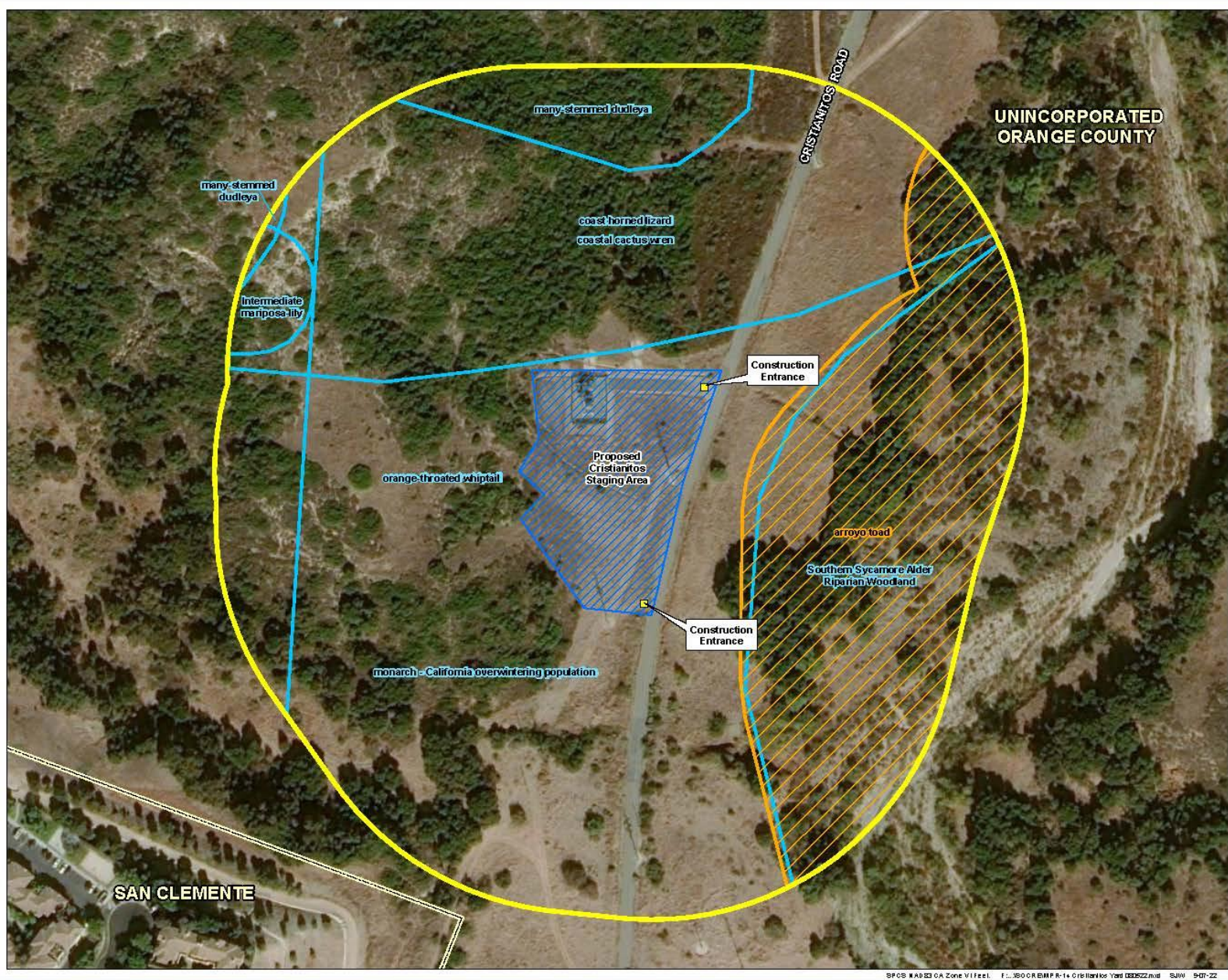
Photo 3: North facing view of the MPR-14 staging area taken from the southern perimeter.



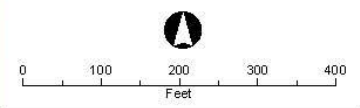
Photo 4: Northwestern-view of bare ground MPR-14 staging area.

Appendix B. MPR-14 CNDDDB Results Figure

SOCRE PROJECT
MPR-14 CNDBB Results
Orange County, CA



- LEGEND**
- Interstate
 - State Highway
 - County Boundary
 - Municipal Boundary
- MPR-14 Components**
- Construction Entrance
 - Proposed Staging Area
- CNDBB**
- Endangered Species
 - California Species of Concern
 - 500-Foot Buffer of Proposed Staging Area



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