



Richard Quasarano  
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February 9, 2023

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

**Re: Minor Project Refinement No. 16 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. 16 (MPR-16) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-16 will authorize the use of a new temporary work area to be utilized as a staging area approximately 450-feet north of the Talega Substation in unincorporated Orange County. The requested additional work area will be approximately 69,696 square feet, or 1.6 acres. Please refer to **Attachment B, MPR-16 Figures** and **Attachment C, MPR-16 Site Photographs** to view the MPR-16 staging area.

Attachment A: SOCRE Minor Project Refinement Form  
Attachment B: MPR-16 Figures  
Attachment C: MPR-16 Site Photographs  
Attachment D: MPR-16 Biological Review

### **Preconstruction Requirements and Permit/Approvals**

Approval of MPR-16 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-16 activities. The Project plans to utilize the existing lease agreement the TL13831 Project has in place with the property owner of the MPR-16 staging area.

### **MPR-16 Request for Approval**

SDG&E respectfully requests approval of MPR-16 to utilize the new temporary work area as a staging area, by February 22, 2023. 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](mailto: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-16 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:** March 23, 2023

**Report No.:** 16

**Date Approved:** TBD

**Approval Agency:** California Public Utilities Commission (CPUC).

**Property Owner(s):** The Minor Project Refinement No. 16 (MPR-16) staging area is located on Rancho Mission Viejo (RMV) LLC property, partially within the San Diego Gas & Electric (SDG&E) right-of-way.

**Location/Milepost:** The MPR-16 staging area is located approximately 450-feet north of the Talega Substation in unincorporated Orange County.

**Land Use/Vegetative Cover:** The 69,696 square-foot or 1.6-acre MPR-16 staging area is located within bare ground and disturbed habitat.

**Sensitive Resources:** The MPR-16 staging area is partially within a cultural environmentally sensitive area (ESA) and 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-16 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-16 staging area is located on private property approximately 450 feet north of the Talega Substation in unincorporated Orange County. The MPR-16 staging area, or Cristianitos South Staging Area, is 1.6 acres (69,696 square-feet).

Use of the Cristianitos South 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 South Staging Area will be used for worker meetings and

materials and equipment storage. The Cristianitos South Staging Area is not anticipated for use as a helicopter fly yard or landing zone.

It should be noted, the Cristianitos South Staging Area 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 as well as stormwater Best Management Practices (BMPs) such as silt fence, and rumble plates. These features will remain in place during the SOCRE Project's use of the Cristianitos South Staging Area, and BMPs will be maintained as needed. Grading is not anticipated to be required for MPR-16 activities. No vegetation removal or ground disturbance would take place in the area surrounding the Cristianitos South Staging Area site.

The Cristianitos South 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. The lease agreement currently in place with SDG&E for the TL13831 Project is anticipated to extend to the SOCRE Project as well. Following the use of the Cristianitos South Staging Area, the site will be stabilized in accordance with the Stormwater Pollution Prevention Plan (SWPPP) and in coordination with the property owner. Please see **Attachment B, MPR-16 Figures** for an overview of the proposed Cristianitos South 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 South Staging Area to complete the Project's transmission line work in the Talega Hub or Talega Corridor. Therefore, the original condition of the Cristianitos South Staging Area was not evaluated in previous reports.

Justification for change: MPR-14 proposed the use of an additional staging area on Cristianitos Road which was approved by the CPUC as a primary staging area and laydown yard. This yard was approved to mitigate the anticipated loss of the lease for the MPR-4 staging areas on Avenida La Pata near transmission pole #25, located on Orange County Waste and Recycling (OCWR) property. However, OCWR has given the Project notice that it will extend the lease for the western yard, although the exact timing is unknown at this time. Since the approval of MPR-14, TL13831 has notified the SOCRE Project that they will need to retain primary use of the MPR-14 staging area (Cristianitos Staging Area) longer than initially anticipated (exact timing unknown). With the delayed access to the MPR-14 staging area, it is anticipated the Project would be left with only the western Avenida La Pata staging area for the time being. This will soon create challenges as poles and corrugated metal pipes (CMPs) will start to be delivered as soon as March 2023, and space will be constricted within the western yard. The MPR-16 Cristianitos South Staging Area will provide the additional space needed for staging and laydown of materials for NTP-7 construction.

The use of the proposed MPR-16 staging area is also expected to reduce the strain of traffic on Avenida La Pata (reduced ingress and egress to La Pata staging areas) and increase safety. The proximity of the MPR-16 staging area to the Talega Hub and Talega Corridor will reduce the overall distance trucks will have to travel with large structures (transmission poles and

CMPs) to reach NTP-7 sites. The Avenida La Pata staging areas are accessed via Avenida La Pata, a 65-mph road. In contrast, the MPR-16 site is located at the terminal end of Avenida Pico on a private road, with minimal traffic. The delivery of large structures will be safer where deliveries can stop in the end of Avenida Pico without the need to divert high-speed traffic.

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 South Staging Area (1.6 acres) would serve as an additional staging area for NTP-7 Project construction. As demonstrated in **Table 1** below, overall temporary disturbance estimated for staging areas in the FEIR would not be increased due to the utilization of the Cristianitos South Staging Area. In addition, as the MPR-16 staging area 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.

**Table 1: SOCRE Project Staging areas<sup>1</sup>**

| Staging area No.          | Staging area Name            | Staging area Location  | Used by the Project | Staging area Size (in acres) |
|---------------------------|------------------------------|--|---------------------|------------------------------|
| <b>Approved in FEIR</b>   |                              |  |                     |                              |
| 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                         |
| <b>Total:</b>             | -                            | -  | -                   | <b>12.2</b>                  |
| <b>Approved in MPRs</b>   |                              |  |                     |                              |
| 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                                      | TBD                 | 2.13                         |
| MPR-16 (Pending Approval) | Cristianitos South           | Approximately 450-feet north of the Talega Substation                                      | Yes                 | 1.6                          |
| <b>Total:</b>             | -                            | -  | -                   | <b>8.42</b>                  |

**Maps & Figures:** Refer to **Attachment B, MPR-16 Figures** (Figure 1), for a map of the proposed Cristianitos South Staging Area location. Refer to **Attachment C, MPR-16 Site Photographs**, for pictures of the current conditions of the Cristianitos South Staging Area.

<sup>1</sup> 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.

Environmental Impact: Utilization of the Cristianitos South 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 South Staging Area during the biological field survey.

Impacts to type of land cover resulting from MPR-16 are estimated in the table below:

| Type of Land Cover | Total Area                            |
|--------------------|---------------------------------------|
| Bare Ground        | 20,909 square feet (0.48 acre)        |
| Disturbed          | 48,787 square feet (1.12 acres)       |
| <b>Total:</b>      | <b>69,696 square feet (1.6 acres)</b> |

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

|   |   |   |   |
|---|---|---|---|
| <b><u>Resources:</u></b>  |   |   |   |
| <b>Biological</b>   | <input type="checkbox"/> No Resources Present | <input checked="" type="checkbox"/> Resources Present | <input type="checkbox"/> N/A, Change would not affect resources |
| <b>Previous Biological Survey Report Reference:</b>   |   |   |   |
| <p>The Cristianitos South Staging Area was not included as part of previous Project-related biological survey reports. A biological field survey of the Cristianitos South Staging Area was performed on January 16, 2023. The Cristianitos South Staging Area has been previously developed as a staging area for TL13831 and has a land cover of bare ground and disturbed. There were no special-status species observed within the Cristianitos South Staging Area or within the 500-foot buffer around the work area (survey area).</p> <p>The Cristianitos South Staging Area is within mapped critical habitat for ARTO and lies north of Cristianitos Creek which is also critical habitat for ARTO. The California Natural Diversity Database (CNDDB) shows ARTO, orange-throated whiptail, and least Bell's vireo (LBVI) have been previously recorded within general polygons that overlap with portions of the MPR-16 staging area and the eastern half of the 500-foot survey buffer. However, there is low potential for LBVI, orange-throated whiptail, and ARTO to occur within the immediate MPR-16 staging area due to the absence of suitable habitat for LBVI and orange-throated whiptail and previous disturbance and compaction of soil for ARTO. Additionally, silt fence has been installed around the perimeter of the MPR-16 staging area by the TL13831 Project, which will remain in place for SOCRE Project use and would deter ARTO and orange-throated whiptail from entering the site. Since the Cristianitos South Staging Area overlaps with mapped 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. In addition, following qualifying rain events a qualified biologist will inspect the ARTO exclusionary fencing and conduct a sweep of the yard. If any burrows are discovered, they shall be hand excavated and the ARTO will be relocated to suitable habitat at least 200 feet away from the MPR-16 staging area. For more detail, please refer to <b>Attachment D, MPR-16 Biological Review</b> and the Vegetation and Wildlife Section below.</p> |   |   |   |

|  |   |   |   |
|--|---|---|---|
| <b>Cultural</b>  | <input type="checkbox"/> No Resources Present | <input checked="" type="checkbox"/> Resources Present | <input type="checkbox"/> N/A, Change would not affect resources |
| <b>Previous Cultural Survey Report Reference:</b>  |   |   |   |
| <p>The Cristianitos South Staging Area was included in the records search for cultural resources within the Project's study area as part of SDG&amp;E's application for a Certificate of Public Convenience and Necessity (CPCN) for the Project and Proponent's Environmental Assessment (PEA). The existing staging area is located within a cultural ESA. The Cristianitos South Staging Area site was not included in previous pedestrian field surveys or survey reports completed for the Project. Cultural monitoring would take place for any ground disturbing activities in native soils, although there is no grading or ground disturbance anticipated to be required.</p> |   |   |   |
| <b>Disturbance Acreage Changes:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  |   |   |   |
| <p>Original disturbance acreage: None. The MPR-16 staging area was not included in the Project's FEIR temporary impact area calculations.</p> <p>New disturbance acreage: 1.6 acres of temporary impact area.</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.  |
|--------------------------------|---------------------------------------|--|
| Geology, Soils, and Seismicity | <input type="checkbox"/> Y            | <p>There is no significant ground disturbance proposed as part of MPR-16 activities. Minor ground disturbance may occur for silt fence or construction fence maintenance. Following the use of the Cristianitos South Staging Area, the site will be stabilized in accordance with the SWPPP and in coordination with the property owner. Accordingly, utilization of the MPR-16 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.</p> |
|                                | <input checked="" type="checkbox"/> N |  |
| Agency Consultation?           | <input type="checkbox"/> Y            | <p>MPR-16 would not require agency consultation relating to geology, soils or seismicity.</p>  |
|                                | <input checked="" type="checkbox"/> N |  |
| Hazardous Materials and Waste  | <input checked="" type="checkbox"/> Y | <p>The utilization of MPR-16 staging area would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8. In addition, the Project would adhere to the requirements in the CPUC-approved Hazardous Materials and Waste Management Plan (HMWMP) and would implement the following APM and MM relating to hazardous materials and waste:</p>  |
|                                | <input type="checkbox"/> N            |  |



|                      |                                       |   |
|----------------------|---------------------------------------|---|
|                      |                                       | <ul style="list-style-type: none"> <li>• APM HAZ-2: Hazardous Materials and Waste Management Plan</li> <li>• MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well</li> </ul>  |
| Agency Consultation? | <input checked="" type="checkbox"/> Y | If needed, a Hazardous Materials Business Plan would be developed and submitted to the California Environmental Reporting System (CERS).  |
|                      | <input type="checkbox"/> N            |   |
| Hydrology            | <input checked="" type="checkbox"/> Y | <p>The Project's Stormwater Pollution Prevention Plan (SWPPP) would be amended to fully cover the MPR-16 site and associated activities and stormwater BMPs would be maintained to prevent sediment runoff. Therefore, there are no jurisdictional or non-jurisdictional drainages that would be impacted by the use of the Cristianitos South Staging Area. Accordingly, utilization of the Cristianitos South Staging Area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality that were assessed in the Project's FEIR, Section 4.9. In addition, the following MM relating to hydrology and water quality would apply to MPR-16, and would be implemented to mitigate for impacts related to hydrology and water quality:</p> <ul style="list-style-type: none"> <li>• MM WQ-1: Pesticide Application</li> </ul>  |
|                      | <input type="checkbox"/> N            |   |
| Agency Consultation? | <input type="checkbox"/> Y            | MPR-16 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 a previously recorded archaeological site and is therefore overlapping with a cultural ESA. Cultural resource monitoring and Native American monitoring will therefore take place during ground disturbing activities in native soils (if any occur). As there is no significant ground disturbance proposed for staging yard activities and monitoring would occur if needed, the use of the MPR-16 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 South Staging Area remain similar to those analyzed in the FEIR (See <b>Attachment B</b> (Figure 2)). All MPR-16 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-16 work activities:</p> <ul style="list-style-type: none"> <li>• APM CUL-1: Worker Training for Cultural Resources</li> </ul> |
|                      | <input type="checkbox"/> N            |   |

|                         |                                       |   |
|-------------------------|---------------------------------------|---|
|                         |                                       | <ul style="list-style-type: none"> <li>• APM CUL-2: Cultural Resource Monitoring</li> <li>• APM CUL-3: Avoid Known Cultural Resources</li> <li>• APM CUL-4: Unanticipated Cultural Finds</li> <li>• APM CUL-5: Curate Cultural Discoveries</li> <li>• APM CUL-6: Archaeological Monitoring Results Report</li> <li>• APM CUL-7: Monitoring by Native Americans</li> <li>• MM CUL-1: Supplemental Worker Training for Cultural Resources</li> <li>• MM CUL-2 Construction Monitoring Plan</li> </ul> <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 and less than 5 feet in depth (fence maintenance).</p>   |
| Agency Consultation?    | <input type="checkbox"/> Y            | MPR-16 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 | <p>The proposed Cristianitos South Staging Area will be accessed by traveling to the eastern end of Avenida Pico and continuing north along the eastern spur of Cristianitos Road to the site. Cristianitos Road is a private road which is not used by the public. Although the addition of a staging area in the location of the Cristianitos South Staging Area was not anticipated in the FEIR. The use of MPR-16 staging area will reduce the strain on traffic at Avenida La Pata and increase safety. The Cristianitos South Staging Area is closer to NTP-7 sites and located at the terminal end of Avenida Pico on a private road with minimal traffic. Large deliveries will travel a shorter overall distance to the project and will not divert high-speed traffic as they would traveling to the Avenida La Pata staging areas. There are no road improvements proposed as part of this MPR-16 request. No helicopter operations are proposed at the MPR-16 staging area.</p> <p>Accordingly, construction activities within and surrounding the MPR-16 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-16 activities. There are no encroachment permits or traffic control plans anticipated to be required for MPR-16 activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-16 activities:</p> |
|                         | <input type="checkbox"/> N            |   |

|                      |                                       |   |
|----------------------|---------------------------------------|---|
|                      |                                       | <ul style="list-style-type: none"> <li>• APM TR-4: Off Peak Deliveries</li> </ul>   |
| Agency Consultation? | <input type="checkbox"/> Y            | MPR-16 would not require agency consultation in relation to Traffic and Circulation.  |
|                      | <input checked="" type="checkbox"/> N |   |
| Air Quality          | <input type="checkbox"/> Y            | <p>The use of the Cristianitos South 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-16 request. The Cristianitos South Staging Area is located approximately 6 miles closer to NTP-7 construction and the Talega Corridor than the Ave La Pata staging yard, and 0.5 mile closer than the Cristianitos Staging Yard approved in MPR-14. Therefore, use of the MPR-16 staging area would reduce the distance of Project-related trips and resulting emissions. As such, 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-16 activities:</p> <ul style="list-style-type: none"> <li>• APM AQ-1: Control Fugitive Dust Emissions</li> <li>• APM AQ-2 Minimize NOx and Particulate Matter (PM) Emissions from Off-Road Diesel-Powered Construction Equipment</li> <li>• MM AQ-1: Oxides of Nitrogen (NOx) Credits</li> </ul> |
|                      | <input checked="" type="checkbox"/> N |   |
| Agency Consultation? | <input type="checkbox"/> Y            | MPR-16 would not require agency consultation relating to air quality.   |
|                      | <input checked="" type="checkbox"/> N |   |

|                              |                                       |   |
|------------------------------|---------------------------------------|---|
| Noise and Vibration          | <input checked="" type="checkbox"/> Y | <p>The Cristianitos South Staging Area is approximately 950 feet from the closest sensitive receptors, a housing subdivision west of the staging area. Staging Area 5 (approved in the FEIR) is approximately 300 feet from the same housing subdivision. Utilizing the Cristianitos South Staging Area as an additional staging area for NTP-7 construction rather than Staging Area 5 will therefore reduce the public's exposure to construction-related noise. In addition, access to the MPR-16 staging area does not require construction vehicles to travel through residential neighborhoods. Accordingly, utilization of the MPR-16 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-16 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-16 work activities:</p> <ul style="list-style-type: none"> <li>• APM NOISE-1: Nighttime and Weekend Activities</li> <li>• MM NV-1: Nighttime and Weekend Construction Noise Controls</li> <li>• MM NV-5: Noise Control Plan</li> </ul> |
|                              | <input type="checkbox"/> N            |   |
| Agency Consultation?         | <input type="checkbox"/> Y            | MPR-16 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-16 staging area. Temporary fencing 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 South 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-16 activities:</p> <ul style="list-style-type: none"> <li>• APM AES-1: Clean Work Areas</li> <li>• APM AES-2: Restoring Disturbed Areas</li> <li>• MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions</li> <li>• MM AES-3: Screen or Effectively Locate Laydown Areas</li> </ul>  |
|                              | <input checked="" type="checkbox"/> N |   |
| Agency Consultation?         | <input type="checkbox"/> Y            | MPR-16 would not require agency consultation relating to visual resources.  |
|                              | <input checked="" type="checkbox"/> N |   |

|                         |                                       |   |
|-------------------------|---------------------------------------|---|
| Vegetation and Wildlife | <input checked="" type="checkbox"/> Y | <p>A biological field survey of the Cristianitos South Staging Area was performed on January 16, 2022. The Cristianitos South Staging Area contains bare ground and disturbed land cover. The Cristianitos South Staging Area overlaps with mapped critical habitat for ARTO and is adjacent to Cristianitos Creek which is also critical habitat for ARTO. However, there is low potential for ARTO to occur within the immediate staging area due to unfavorable soils compacted by disturbance and previous use of the MPR-16 site as a staging area. 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. In addition, the construction entrance will remain closed when staging activities are not taking place and structural BMPs will be in place at the entrance to deter special-status species from entering the yard.</p>  |
|                         | <input type="checkbox"/> N            | <p>Due to the MPR-16 staging area's overlap with mapped critical ARTO habitat and its proximity to the Cristianitos Creek, daily 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 South 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. In addition, following qualifying rain events a qualified biologist will inspect the ARTO exclusionary fencing and conduct a sweep of the yard. If any burrows are discovered, they shall be hand excavated and the ARTO will be relocated to suitable habitat at least 200 feet away from the MPR-16 staging area.</p> <p>In accordance with the SDG&amp;E Subregional NCCP, the Project will inspect materials and equipment where wildlife could hide prior to performing work within the staging area each day. Supplies or equipment that cannot be inspected or from which animals could not be removed shall be capped or otherwise covered at the end of each work day. Old piping or other supplies that have been left open, shall not be capped until inspected and any species found in it is allowed to escape. In addition, no open trenching or excavation is anticipated to occur within the MPR-16 staging area.</p> <p>The CNDDDB records search that was performed for the Cristianitos South Staging Area showed a history of several special-status species documented within large generalized polygons that overlap the 500-foot survey area the and the MPR-16 staging area. The species highlighted by the CNDDDB were ARTO (<i>Bufo californicus</i>), least Bell's vireo (<i>Vireo bellii pusillus</i>), and orange-throated whiptail (<i>Aspidoscelis hyperythra</i>). There were no special-status species observed</p> |

|  |  |  |
|--|--|--|
|  |  | <p>within the Cristianitos South Staging Area or within the 500-foot buffer around the work area (survey area) during the biological survey on January 16, 2023. No suitable LBVI habitat exists within the immediate MPR-16 staging area and the proposed construction staging activities would not be expected to have any impact on LBVI activity in the area. However, in the event an active LBVI nest is discovered near the staging area, the biologist would stop work within the standard buffer of 500 feet and determine if a reduced buffer could be proposed. The reduced buffer would be submitted to CPUC, USFWS and CDFW for their comment prior to implementing the reduced buffer in compliance with Section 6.3.1 of the Nesting Bird Management Plan. For more detail, please refer to <b>Attachment D, MPR-16 Biological Review</b>.</p> <p>Staging area activities are anticipated to begin in the first quarter (Q1) of 2023 which is inside of the nesting season (January 1 – September 15). Therefore, a pre-construction nesting bird survey will be required. Additionally, 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 South 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. Following construction, the Cristianitos South Staging Area site will be restored in accordance with the SWPPP and the NCCP.</p> <p>Therefore, the use of the Cristianitos South 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 South 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-16 work activities:</p> <ul style="list-style-type: none"><li>• MM BR-1: Limit Construction to Designated Areas and Protect Riparian, Aquatic and Wetland Areas.</li><li>• MM BR-2: Biological Monitoring</li><li>• MM BR-3: Preconstruction Surveys.</li><li>• MM BR-4: Limit Removal of Native Vegetation Communities and Trees.</li><li>• MM BR-6: Migratory Birds and Raptors Impact Reduction Measures.</li><li>• MM BR-9: Invasive Plant Control Measures.</li><li>• MM BR-10: Mitigation Plan Development</li></ul> |
|--|--|--|

|                      |                                       |  |
|----------------------|---------------------------------------|--|
| Agency Consultation? | <input type="checkbox"/> Y            | MPR-16 would not require agency consultation relating to vegetation and wildlife.  |
|                      | <input checked="" type="checkbox"/> N |  |
| Wildfire             | <input checked="" type="checkbox"/> Y | <p>The area in which the MPR-16 staging area is located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&amp;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"> <li>• Requirements for equipping diesel and gasoline operated engines with spark arrestors, carrying emergency fire suppression equipment,</li> <li>• Furnishing a water truck on or immediately adjacent to the proposed project work area,</li> <li>• Restricting smoking and vehicle idling,</li> <li>• Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and</li> <li>• Conducting pre-activity tailgate meetings that include fire safety discussions.</li> </ul> <p>All MPR-16 activities would be performed in compliance with the CFPERP and SDG&amp;E's Electric Standard Practice 113.3. Therefore, the proposed MPR-16 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 South 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               |      | Omar Miranda                               |           | <input type="checkbox"/> Reviewed  |
| San Diego Gas and Electric Environmental Project Manager |      | Richard Quasarano                          |           | <input type="checkbox"/> Reviewed  |
| CPUC Project Manager                                     |      | Louis Torres                               |           | <input type="checkbox"/> Approved<br><input checked="" type="checkbox"/> Approved with conditions (see below)<br><input type="checkbox"/> Denied |
| <b>For CPUC Compliance Manager Use Only</b>              |      |  |           |  |
| <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-16 disturbance areas will be limited to the areas shown on the figure titled "SOCRE PROJECT MPR-16 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 first quarter of 2025).
- COA-2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
- COA-3. 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-4. If MPR-16 activities require additional road improvements/design, SDG&E shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval.
- COA-5. Daily pre-construction and post-rain event surveys shall be conducted for special-status species (i.e. ARTO, LBVI) in accordance with MM-BR-3. A CPUC-approved qualified biologist shall also perform spot checks for ARTO during work hours, while the staging area is in use. In accordance with Table 1 of the TL13831 Project's Pre-Activity Survey Report (PSR), the exclusionary fence around the perimeter of the staging area shall be checked daily and repaired as necessary. If an LBVI nest is discovered within a 500-foot buffer of the staging area, work shall stop until it is determined that the buffer can be reduced. In addition, materials where wildlife can hide shall be inspected each day in accordance with the SDG&E Subregional NCCP.
- COA-6. 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-7. The Project Stormwater Pollution and Prevention Plan (SWPPP) shall be updated as necessary to cover the MPR-16 staging 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-8. The work associated with MPR-16 shall occur within approved project workdays and hours. If 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-9. Prior to the start of MPR-16 activities, SDG&E shall ensure that all SOCRE Project personnel have received SEAP training in accordance with the MMCRP to maintain awareness of safety and environmental sensitivities and requirements.
- COA-10. Any anticipated access road closures or partial closures shall be communicated to the public in advance. Signage will remain at worksite entrances notifying the public of possible access restrictions. As always, spotter and qualified safety personnel will be present to manage any ingress or egress of pedestrians through the access road.
- COA-11. All complaints related to MPR-16 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-12. Use of the MPR-16 staging area 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 MMCRP. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.
- COA-13. No grading shall occur as part of the MPR-16 activities. In the event that MPR-16 activities require grading or additional access road improvements/design, or vegetation clearing/grubbing, SDG&E shall meet and consult with appropriate agencies (e.g., CDFW and USFWS) and/or local jurisdictions as needed for approval and notify the CPUC for concurrence.
- COA-14. SDG&E and its contractors shall adhere to (where applicable) the biological constraints outlined in the SDG&E Pre-activity Survey Report for the TL13831 Wood to Steel Project. In addition, SDG&E and its contractors shall adhere to the SOCRE NCCP/HCP Mitigation Plan, Invasive Plant Management Plan, Nesting Bird Management Plan, and the SWPPP. Once the Project has reached the final design, SDG&E shall be responsible for identifying acreage not previously included in the Pre-activity Survey Report (PSR) in accordance with the SOCRE Mitigation Plan as well as removing acreage that was included in the PSR but not disturbed by construction activities.
- COA-15. Prior to the delivery and staging of construction materials in the MPR 16 work areas, a CPUC-approved qualified biological monitor shall conduct a biological clearance sweep to ensure the absence of ARTO. Additionally, qualified biological monitors shall record compliance with work area boundaries and compliance with the avoidance of environmentally sensitive areas (ESAs).
- COA-16. Although no activities requiring ground disturbance or removal of sensitive vegetation are anticipated to occur, if either of these activities were to occur, SDG&E will initiate restoration/revegetation of the area to pre-Project conditions in compliance



with APM AES-2, MM AES-2, and the Project's Stormwater Pollution Prevention Plan immediately following completion of use of the temporary work area.

**Prepared by:** Fernando Guzman, WSP, CPUC Compliance Manager

**Date:** 3/29/2023





**ATTACHMENT B**  
**MPR-16 Figures**

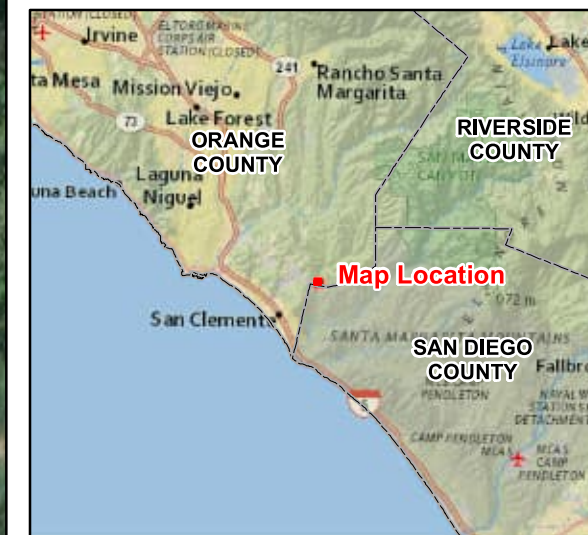
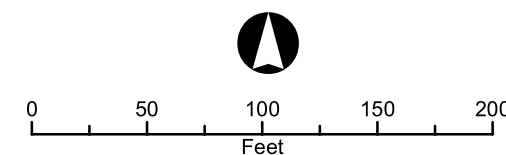
# SOCRE PROJECT

## MPR-16 Figure 1

### Orange County, CA

#### LEGEND

-  Municipal Boundary
- MPR-16 Components**
-  Construction Entrance
-  Access Road
-  Proposed Staging Area



# SOCRE PROJECT

## MPR-16 Figure 2

### Orange County, CA

#### LEGEND

--- Municipal Boundary

#### MPR-16 Components

■ Construction Entrance

— Access Road

▨ Proposed Staging Area

#### Project Components

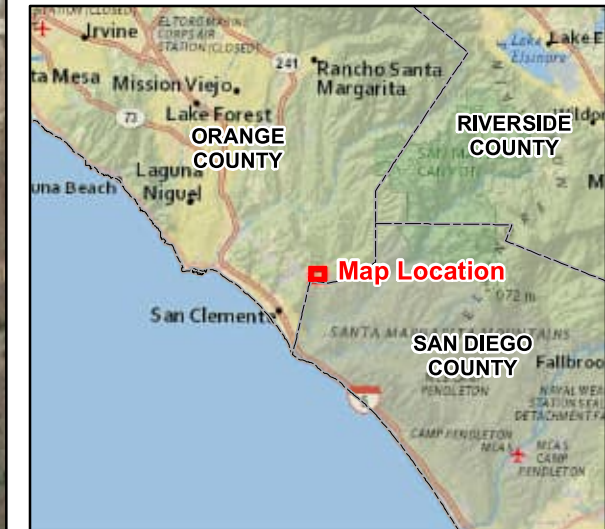
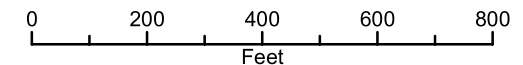
■ Construction Entrance

▨ Staging Area 5

▨ Cristianitos Staging Area



UNINCORPORATED  
ORANGE COUNTY



**ATTACHMENT C**  
**MPR-16 Site Photographs**

**MPR-16 PHOTO LOG**



**Photograph 1:**  
View of the northwest corner of the MPR-16 staging yard construction entrance, gate, and silt fence BMPs. Facing: South



**Photograph 2:**  
View of the MPR-16 Staging Area and the rumble plates at the access entrance. Facing: East

**MPR-16 PHOTO LOG**



**Photograph 3:**

View disturbed habitat within the MPR-16 Staging Area and the staged poles. Facing: West



**Photograph 4:**

View from the outside of the staging on photo take from the private road off the terminal end of Avenida Pico Facing: Northeast

**ATTACHMENT D**  
**MPR-16 Biological Review**



**SAN DIEGO GAS & ELECTRIC COMPANY**

**SOUTH ORANGE COUNTY RELIABILITY  
ENHANCEMENT PROJECT**

**BIOLOGICAL REVIEW FOR  
MINOR PROJECT REFINEMENT No. 16**



PREPARED BY:



February 2023

KPE. 2023. Biological Review for Minor Project Refinement No. 16. January.  
San Diego, CA. Prepared for San Diego Gas & Electric, San Diego, CA.

# Contents

|   | Page      |
|---|-----------|
| <b>1. Introduction .....</b>  | <b>3</b>  |
| <b>2. Methods.....</b>  | <b>3</b>  |
| <b>3. Results .....</b>   | <b>3</b>  |
| 3.1 Vegetation within the MPR-16 Work Area .....                            | 3         |
| 3.1.1 Bare Ground.....  | 3         |
| 3.1.2 Disturbed.....  | 3         |
| 3.2 Other Vegetation in Survey Area .....                                   | 4         |
| 3.2.1 Non-Native Grassland .....  | 4         |
| 3.2.2 Developed .....   | 4         |
| 3.2.3 Coast Live Oak Riparian Forest.....                                   | 4         |
| 3.2.4 Coastal Sage Scrub .....  | 4         |
| 3.2.5 Riparian Scrub .....  | 4         |
| 3.2.6 Riparian Woodland and Forest.....                                     | 3         |
| 3.3 Special-Status Species.....   | 5         |
| <b>4. Applicable Mitigation Measures and Best Management Practices.....</b> | <b>6</b>  |
| <b>5. References .....</b>  | <b>9</b>  |
| <b>Appendix A. Photo Log of Onsite Conditions.....</b>                      | <b>10</b> |
| <b>Appendix B. MPR-16 CNDDDB Results Figure.....</b>                        | <b>13</b> |
| <b>Appendix C. Aquatic Resources Figure.....</b>                            | <b>15</b> |

# Tables

|   | Page |
|---|------|
| Table 1. Vegetation and Land Cover within the MPR-16 Work Area..... | 1    |

# 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.16 (MPR-16) 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-16 for a new staging area (MPR-16 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-16 work area is 450 feet north of the Talega Substation and 150 feet north of the Cristianitos Creek in unincorporated Orange County, just east of the City of San Clemente. The MPR-16 staging area is approximately 1.6 acres. Construction vehicles and equipment would be stored entirely within the MPR-16 staging area. No ground disturbance is anticipated to be required to perform MPR-16 activities. BMPs including silt fence are already installed along the perimeter.

# 2. Methods

A biological field survey was conducted on January 16, 2023 to determine if the MPR-16 work area or the area within 500 feet of the MPR-16 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 (CNDDDB) data were used to assess potential impacts from construction staging associated with this MPR-16 request.

# 3. Results

## 3.1 Vegetation within the MPR-16 Work Area

The following vegetation communities or land cover types were noted within the MPR-16 work area during the biological field survey conducted on January 16, 2023 (Table 1).

**Table 1: Vegetation and Land Cover within the MPR-16 Work Area**

| <b>Vegetation/Land Cover</b> | <b>Total Area (acre)</b> |
|------------------------------|--------------------------|
| Disturbed                    | 1.12                     |
| Bare Ground                  | 0.48                     |
| <b>TOTAL</b>                 | <b>1.6</b>               |

### 3.1.1 Bare Ground

Bare ground is a land cover type that is unpaved but devoid of vegetation. Areas of high traffic within the existing staging yard have already been cleared of vegetation and are being utilized as a staging area by another project.

### **3.1.2 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. Most of the ground cover within the MPR-16 staging yard is disturbed. This area has been used as a staging area for the SDGE TL13831 Project, and the vegetation within the staging area was cleared. Fast growing invasive/non-native weeds have propagated. The dominant species in the survey area are purple vetch (*Vicia benghalensis*), black mustard (*Brassica nigra*), artichoke thistle (*Cynara cardunculus*), Bermuda grass (*Cynodon dactylon*), and a single Peruvian pepper tree (*Schinus molle*).

## **3.2 Other Vegetation in Survey Area**

### **3.2.1 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 south of the MPR-16 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.

### **3.2.2 Developed**

Developed is a land cover type associated with human-constructed land cover types devoid of vegetation. Developed areas within the survey area include the cul-de-sac at the end of Avenida Pico, Cristianitos Road, the paved access roadway and the north end of the Talega Substation.

### **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-16 work area immediately 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-16 activities.

### **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 approximately 100 feet west of the MPR-16 staging area following along the roadside of Avenida Pico and 400 feet southwest along the north-facing slope west of the Talega substation. No direct impact to CSS in this area will occur as a result of MPR-16 activities. Vehicular traffic will use existing access roads to move between the MPR-16 staging area and other Project construction areas, in accordance with MM BR-1.

### **3.2.5 Riparian Scrub**

Riparian scrub occurs in the floodplain of rivers and streams. This vegetation community is found within the survey area directly north of the MPR-16 staging area. The species composition includes

arroyo willow (*Salix lasiolepis*), oak trees and cottonwood (*Populus fremontii*) trees with an understory of mule-fat (*Baccharis salicifolia*), poison oak, and coyote brush (*Baccharis pilularis*). No direct impact to riparian Scrub in this area will occur as a result of MPR-16 activities. Vehicular traffic will use existing access roads to move between the MPR-16 staging area and other Project construction areas, in accordance with MM BR-1.

### 3.2.6 Riparian Woodland and Forest

Riparian forest and woodland both occur along Cristianitos Creek. They share the same species composition and are generally distinguished from each other based on the density of canopy. These habitats are characterized by the presence of many broadleaf deciduous trees such as western sycamore (*Platanus racemosa*) and Fremont's cottonwood, as well as coast live oak and willows (*Salix* sp.). Often with an understory composed of the same species in riparian scrub: mule-fat, poison oak, and stinging nettle (*Urtica dioica*). These habitats are found immediately east of the MPR-16 staging area and continue to the eastern-boundary of the 500-foot survey buffer. No direct impact to riparian woodland and forest in this area will occur as a result of MPR-16 activities. Vehicular traffic will use existing access roads to move between the MPR-16 staging area and other Project construction areas, in accordance with MM BR-1.

## 3.3 Special-Status Species

No special-status species were noted within the MPR-16 staging area during the biological survey conducted on January 16, 2023. Visual and auditory surveying was used to determine the absence of special-status species within the MPR-16 staging area. Please see **Figure 1** for the mapped results of the CNDDDB records search conducted for the MPR-16 staging area.

The CNDDDB showed the orange-throated whiptail (*Aspidoscelis hyperythra*) to be presumed extant over a large, generalized CNDDDB polygon encompassing the majority of the MPR-16 work area, but the January 16 survey of the area was negative for these species within the MPR-16 work area and there is no suitable habitat for these species onsite.

The CNDDDB showed least Bell's vireo "*Vireo bellii pusillus*" (LBVI) to be presumed extant over a large, generalized CNDDDB polygon encompassing the MPR-16 work area and the eastern portion of the 500-foot survey buffer. However, the January 16 survey of the area was negative for this species and no suitable LBVI habitat exists within the immediate MPR-16 staging area. The staging area is currently in use from the SDG&E TL13831 Project and the use of MPR-16 staging area construction staging will have no direct impact on LBVI.

The CNDDDB showed Arroyo toad "*Bufo californicus*" (ARTO) to be presumed extant over a large, generalized CNDDDB polygon encompassing most of the MPR-16 work area and the eastern portion of the 500-foot survey buffer within the riparian woodland and forest. The January 16 survey of the area was negative for this species. 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 MPR-16 staging area overlaps with mapped critical ARTO habitat, but there is no suitable habitat within the immediate MPR-16 staging area due to compaction of the soil from the prior use of this area as a staging yard. While suitable habitat does not exist within the immediate MPR-16 staging area, pre-construction sweeps are recommended due to its proximity to suitable habitat within the Cristianitos Creek east of the staging area. No direct impacts are anticipated as a result of the proposed construction activity.

Indirect impacts on LBVI, 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-16 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: Southeast-facing view of the northwestern construction entrance to MPR-16 staging area.



Photo 2: South-facing view of the disturbed habitat within the staging area, and the south entrance to MPR-16.

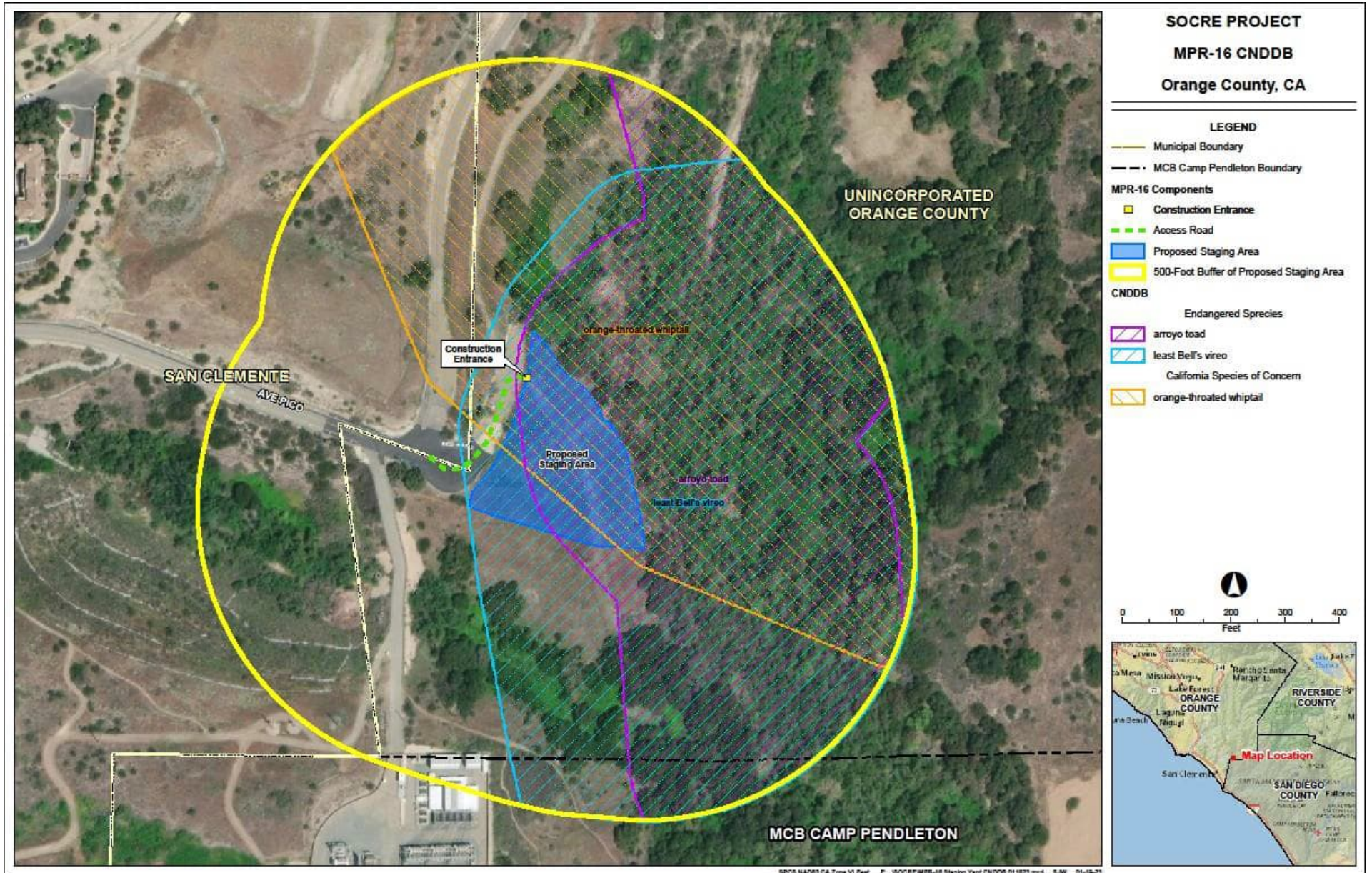


Photo 3: West-facing view of the MPR-16 staging area taken from the eastern perimeter. The single Peruvian pepper tree can be seen between the staged transmission poles.



Photo 4: Southeast-facing view of the disturbed habitat within the MPR-16 staging area, and the riparian woodland and forest in the background.

## Appendix B. MPR-16 CNDDDB Results Figure



## Appendix C. MPR-16 Aquatic Resources Figure



