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May 23, 2023

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

Re: Minor Project Refinement No. 19 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. 19 (MPR-19) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-19 will authorize the use of a new temporary work area to be utilized as a staging area approximately 300-feet east of the Rancho Mission Viejo Substation in unincorporated Orange County. The requested additional work area will be approximately 28,990 square feet, or 0.67 acre. Please refer to **Attachment B, MPR-19 Figures** and **Attachment C, MPR-19 Site Photographs** to view the MPR-19 staging area.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-19 Figures
Attachment C: MPR-19 Site Photographs
Attachment D: MPR-19 Biological Review

Preconstruction Requirements and Permit/Approvals

Approval of MPR-19 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-19 activities. The Project plans to utilize the existing lease agreement the TL13831 Project has in place with the property owner of the MPR-19 staging area.

MPR-19 Request for Approval

SDG&E respectfully requests approval of MPR-19 to utilize the new temporary work area as a staging area, by May 31, 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 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, WSP
Fernando Guzman, WSP
Omar Miranda, SDG&E

ATTACHMENT A
MPR-19 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, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: May 23, 2023

Report No.: 19

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 19 (MPR-19) staging area is located on Rancho Mission Viejo (RMV) property.

Location/Milepost: The MPR-19 staging area is located approximately 300 feet (0.06 mile) east of the Rancho Mission Viejo Substation in unincorporated Orange County.

Land Use/Vegetative Cover: The 28,990 sq. ft. (0.67 acre) MPR-19 staging area is located within bare ground and disturbed.

Sensitive Resources: The MPR-19 staging area is within an area of high paleontological potential. 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-19 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-19 staging area is located approximately 300 feet (0.06 mile) east of the existing Rancho Mission Viejo Substation. The MPR-19 staging area, or Cow Camp Staging Area, is 0.67 acre (28,990 square-feet) and is separated from the Rancho Mission Viejo Substation by Cow Camp Road.

Use of the Cow Camp 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 Cow Camp Staging Area will be used for worker meetings, staging of construction trailers, visitor and construction personnel parking, and materials and equipment storage.

It should be noted, the Cow Camp Staging Area site was previously used as a staging area by another SDG&E transmission line Project (TL13831). The TL13831 Project is no longer utilizing the site so no overlap is anticipated between Projects. Security fencing has already been installed around the perimeter of the proposed staging area as well as stormwater Best Management Practices (BMPs) such as straw wattle, gravel bags, flat plates, and rumble plates at the entrance. These features will remain in place during the SOCRE Project's use of the Cow Camp Staging Area, and BMPs will be maintained as needed. Grading is not anticipated to be required for MPR-19 activities. No vegetation removal or ground disturbance would take place in the area surrounding the Cow Camp Staging Area site.

The Cow Camp 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 Cow Camp Staging Area, the site will be stabilized in accordance with the Stormwater Pollution Prevention Plan (SWPPP). Please see **Attachment B, MPR-19 Figures** for an overview of the proposed Cow Camp 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 Cow Camp Staging Area to complete the Project's transmission line work in the Talega Hub or Talega Corridor. Therefore, the original condition of the Cow Camp Staging Area was not evaluated in previous reports.

Justification for Change: The Cow Camp Staging Area is being proposed in MPR-19 as an alternative to the staging areas that were approved in the Project's FEIR (Section 2.4.8.1 and Figure 2-1) and the La Pata staging areas approved in MPR-4. The storage area immediately west of the Rancho Mission Viejo Substation is an approved staging area and fly yard in the FEIR but was not included in NTP-7 as it was not anticipated to be required for Project use. The Cow Camp Staging Area is being proposed for use instead since SDG&E has an existing lease agreement in place with the property owner, whereas there is not a current lease agreement for the FEIR-approved staging area. The lease for the Cow Camp Staging Area expires in June 2023 when it will transition to a month-to-month lease. In addition, the FEIR-approved staging area to the west of the Rancho Mission Viejo Substation is not as large, developed, or as safely accessible as the Cow Camp Staging Area, although it is in a similar location.

MPR-4 approved the use of two additional staging areas (eastern yard and western yard) on Avenida La Pata near transmission pole #25. The entire eastern yard, and a large portion of the western yard will no longer be in use by the Project. 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 be terminated June 20, 2023. 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 Cow Camp Staging Area is critical to the Project's remaining NTP-7 construction activities.

MPR-14 and MPR-16 approved the use of the Cristianitos Staging Area and the Cristianitos South Staging Area, respectively. The Cristianitos Staging Area approved in MPR-14 does not have adequate or reliable cellular service to uphold critical communication among Project personnel and is therefore no longer anticipated for Project use. The Cristianitos South Staging Area approved in MPR-16 is currently in use by the Project. However, the Cristianitos South

Staging Area is not large enough to accommodate both parking for Project personnel and storage for construction equipment that will be demobilized from the eastern and western yards located on Avenida La Pata. The Cow Camp Staging Area provides an easily accessible area with reliable cellular coverage and a large enough space to accommodate the spillover of parking and equipment storage occurring as a result of the La Pata eastern and western yard demobilization.

It is anticipated that the Cow Camp Staging Area (0.67 acre) would serve as a primary staging area for NTP-7 Project construction along with the Cristianitos South Staging Area (1.6 acres). As shown in Table 1 below, overall temporary disturbance estimated for staging areas in the FEIR would not be increased due to the utilization of the Cow Camp Staging Area. In addition, as the MPR-19 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 Areas

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	Yes	4.69
MPR-14	Cristianitos Staging Area	Approximately 0.5 mile north of the Talega Substation	No	2.13
MPR-16	Cristianitos South Staging Area	Approximately 450 feet north of the Talega Substation	Yes	1.60
MPR-19 (Pending Approval)	Cow Camp Staging Area	Approximately 300 feet east of the Rancho Mission Viejo Substation	Yes	0.67
Total:	-	-	-	9.09

Maps & Figures: Refer to **Attachment B, MPR-19 Figures**, for a map of the proposed Cow Camp Staging Area location. Refer to **Attachment C, MPR-19 Site Photographs**, for pictures of the current conditions of the Cow Camp Staging Area.

Environmental Impact: Utilization of the Cow Camp 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 Cow Camp Staging Area during the biological field survey.

Impacts to type of land cover resulting from MPR-19 are estimated in the table below:

Type of Land Cover	Total Area
Bare Ground	27,540 square feet (0.63 acre)
Disturbed	1,450 square feet (0.04 acre)
Total:	28,990 square feet (0.67 acre)

Concurrence (if appropriate): Concurrence is not required for use of the Cow Camp Staging Area. As described above, SDG&E has a current lease agreement in place with the property owner (Rancho Mission Viejo, LLC).

<u>Resources:</u>			
Biological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference:			
<p>The Cow Camp Staging Area was not included as part of previous Project-related biological survey reports. A biological field survey of the Cow Camp Staging Area was performed on May 18, 2023. The Cow Camp Staging Area has been developed as a staging area and has a land cover of bare ground and disturbed. There were no special-status species observed within the Cow Camp Staging Area or within the 500-foot buffer around the work area (survey area). No suitable habitat for special-status species exists within the immediate MPR-19 staging area and the proposed construction staging activities would not be expected to have any impact on special-status species activity in the area.</p> <p>According to the California Natural Diversity Database (CNDDDB), there have been previous observations of coastal California gnatcatcher (CAGN) and coastal cactus wren (CACW) within 500 feet of the Cow Camp Staging Area (likely before the area was as developed as it is currently). As such, pre-construction sweeps and nesting bird surveys will be performed during the avian breeding season (January 1-September 15) in compliance with MM BR-3 and the Nesting Bird Management Plan (NBMP). For more detail, please refer to Attachment D, MPR-19 Biological Review and the Vegetation and Wildlife Section below.</p>			

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

Previous Cultural Survey Report Reference:
 The Cow Camp Staging Area site was not included in previous pedestrian field surveys or survey reports completed for the Project. A cultural resources records search was performed by the Project's CPUC-approved Qualified Cultural Resources Consultant, Patrick McGinnis (ICF) on May 19, 2023, and was negative for known cultural resources.

The Cow Camp Staging Area is located approximately 1,400 feet (0.27 mile) north of the confluence between San Juan Creek and riparian woodland and is therefore within an area of high paleontological potential. No ground disturbance is anticipated for MPR-19 activities, thus, no paleontological or cultural monitoring would be required. Should ground disturbance be required at any time within the Cow Camp Staging Area, paleontological, Native American, and cultural monitoring would be required.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None. The MPR-19 staging area was not included in the Project's FEIR temporary impact area calculations. The size of the FEIR-approved staging area west of the Rancho Mission Viejo Substation was not included in the FEIR.

New disturbance acreage: 28,990 sq. ft. (0.67 acre) 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-19 activities. Ground disturbance may occur for construction fence maintenance. Following the use of the Cow Camp Staging Area, the site will be stabilized in accordance with the SWPPP. Accordingly, utilization of the MPR-19 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-19 would not require agency consultation relating to geology, soils or seismicity.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input checked="" type="checkbox"/> Y	SDG&E and its contractors would comply with applicable rules and regulations pertaining to hazardous materials to minimize the risk of a significant hazard from material transport, use, storage, and disposal. A Hazardous Material Business Plan (HMBP) would be prepared that provides information regarding the location, type, quantity, and health risks of hazardous materials and/or waste if applicable thresholds are met in accordance with the Hazardous Materials and Waste Management Plan (HMWMP). The utilization of the MPR-19
	<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.
		<p>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. It should also be noted, as stated in Section 2.4.8.1 of the FEIR the area west of the Rancho Mission Viejo Substation is an approved staging area and fly yard, and the proposed Cow Camp Staging Area is in a similar location.</p> <p>The Project would adhere to the requirements in the CPUC-approved HMWMP and would implement the following APM and MM relating to hazardous materials and waste:</p> <ul style="list-style-type: none"> • APM HAZ-2: Hazardous Materials and Waste Management Plan • MM HAZ-5: Discovery of an Unrecorded Oil or Gas Well
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>There is an existing non-jurisdictional storm drain located underneath the construction entrance at the southwestern corner of the MPR-19 staging area. This area has been previously protected by the TL13831 Project through the installation of steel flat plates, straw wattle, and gravel bags throughout the entire perimeter of the yard and through the entrance. These BMPs would be maintained throughout the course of staging area operations. Additionally, existing non-jurisdictional concrete v-ditch drainages are located immediately outside the eastern perimeter of the proposed staging area site. The Project's SWPPP would be amended to fully cover the MPR-19 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 Cow Camp Staging Area. Accordingly, utilization of the Cow Camp 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-19, and would be implemented to mitigate for impacts related to hydrology and water quality:</p> <ul style="list-style-type: none"> • MM WQ-1: Pesticide Application
	<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.
Agency Consultation?	<input type="checkbox"/> Y	MPR-19 would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	<p>A desktop review was conducted on May 19, 2023, and was negative for cultural resources but confirmed high paleontological potential for prehistoric resources within the area due to the presence of San Juan Creek located 0.27 mile south of the Cow Camp Staging Area. Therefore, paleontological, Native American and cultural resource monitoring will take place during ground disturbing activities in native soils (if any occur). As there is no significant ground disturbance proposed for staging yard setup activities and monitoring would occur as described, the use of the MPR-19 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. All MPR-19 activities would adhere to requirements within the CPUC-approved Cultural Resources Construction Monitoring Plan (CRCMP) and Paleontological Monitoring and Treatment Plan (PMTP). Although no new or altered APMs or MMs would be required, the following APMs and MMs are applicable and would be implemented for MPR-19 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 • MM CUL-3: Qualified Cultural Resources Consultants • MM CUL-5: Native American Consultation and Participation Planning
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-19 would not require agency or tribal consultation in relation to cultural or paleontological resources.
	<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.
Traffic and Circulation	<input checked="" type="checkbox"/> Y	The proposed Cow Camp Staging Area will be accessed by traveling east along Cow Camp Road from Antonio Parkway to the site. The Rancho Mission Viejo Substation and associated FEIR-approved staging area are located approximately 300 feet west from the Cow Camp Staging Area across Cow Camp Road. The proposed staging area location is expected to reduce public exposure compared to its alternatives as it is located in a mostly undeveloped area, approximately 0.25 mile from the nearest residences. There are no road improvements proposed as part of this MPR-19 request.
	<input type="checkbox"/> N	Accordingly, construction activities within and surrounding the MPR-19 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-19 activities. There are no encroachment permits or traffic control plans anticipated to be required for MPR-19 activities. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-19 activities: <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
Agency Consultation?	<input type="checkbox"/> Y	MPR-19 would not require agency consultation in relation to Traffic and Circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input checked="" type="checkbox"/> Y	The use of the Cow Camp 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-19 request. Although MPR-19 involves the addition of a new staging area, there was an approved staging area in a similar location to the west of the Rancho Mission Viejo Substation analyzed in the Project's FEIR which is not anticipated to be utilized as a staging area for the Project. In addition, the Cristianitos South Staging Area and a portion of the western La Pata Staging Area will continue to be utilized by the Project which will reduce the overall number of construction-related trips to and from the Cow Camp Staging Area. Therefore, it is not anticipated there will 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-19 activities:
	<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.
		<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	MPR-19 would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	<p>The Cow Camp Staging Area is approximately 1,200 feet from the closest sensitive receptors, a housing subdivision west of the staging area. Access to the MPR-19 staging area does not require construction vehicles to travel through residential neighborhoods, and is therefore not anticipated to expose the public to construction-related noise. In addition, the Cow Camp Staging Area is located in a mostly undeveloped area. Accordingly, utilization of the MPR-19 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-19 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-19 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 checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-19 would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-19 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 Cow Camp 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

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.
	<input checked="" type="checkbox"/> N	<p>required, and the following APMs and MMs would be implemented for MPR-19 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
Agency Consultation?	<input type="checkbox"/> Y	MPR-19 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 Cow Camp Staging Area was performed on May 18, 2023. The Cow Camp Staging Area contains bare ground and disturbed land cover.</p>
	<input type="checkbox"/> N	<p>The CNDDDB records search that was performed for the Cow Camp Staging Area showed a history of special-status species occurring within the 500-foot survey area around the staging area site such as; CAGN (<i>Polioptila californica californica</i>), coastal cactus wren (<i>Campylorhynchus brunneicapillus</i>), pallid bat (<i>Antrozous pallidus</i>) and California satintail (<i>Imperata brevifolia</i>). There were no special-status species observed within the Cow Camp Staging Area or within the 500-foot buffer around the work area (survey area) during the biological field survey. No suitable habitat for special-status species exists within the immediate MPR-19 staging area and the proposed construction staging activities would not be expected to have any impact on special-status species activity in the area. For more detail, please refer to Attachment D, MPR-19 Biological Review.</p> <p>Staging area activities are anticipated to begin in the second quarter (Q2) of 2023 which is inside of the nesting season (January 1 – September 15). Therefore, a pre-construction nesting bird survey will be required prior to mobilization. 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 NBMP. Additionally, pre-construction sweeps will be performed as needed at the direction of CPUC-approved, qualified biologists in compliance with MM BR-3.</p> <p>Fencing has been installed around the perimeter of the staging area site by the TL13831 Project, which will remain in place for</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>SOCRE Project use and would deter species from entering the site.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the Cow Camp 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 Cow Camp Staging Area site will be restored in accordance with the SWPPP and the NCCP.</p> <p>Therefore, the use of the Cow Camp 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 Cow Camp 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-19 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-19 would not require agency consultation relating to vegetation and wildlife.
Wildfire	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<p>The area in which the MPR-19 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,

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.
		<ul style="list-style-type: none"> • 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-19 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-19 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>
Agency Consultation?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	SDG&E will coordinate with local emergency response agencies such as fire departments and police during NTP-7 construction, including the use of the Cow Camp Staging Area. Emergency access will be maintained throughout construction.

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 <input type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> Beyond Authority		

<p>Conditions of Approval or Reason for Denial:</p>
<p>Prepared by: Fernando Guzman, WSP, CPUC Compliance Manager Date:</p>








ATTACHMENT B
MPR-19 Figures

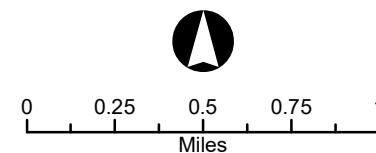
SOCRE PROJECT

MPR-19 Figure 1

Orange County, CA

LEGEND

-  Interstate
 -  State Highway
 -  County Boundary
 -  MCB Camp Pendleton Boundary
 -  Municipal Boundary
 -  Talega Substation
- MPR-19 Component**
-  New Cow Camp Staging Area





SOCRE PROJECT

MPR-19 Figure 2

Orange County, CA

LEGEND

MPR-19 Components

-  Construction Entrance
-  New Cow Camp Staging Area



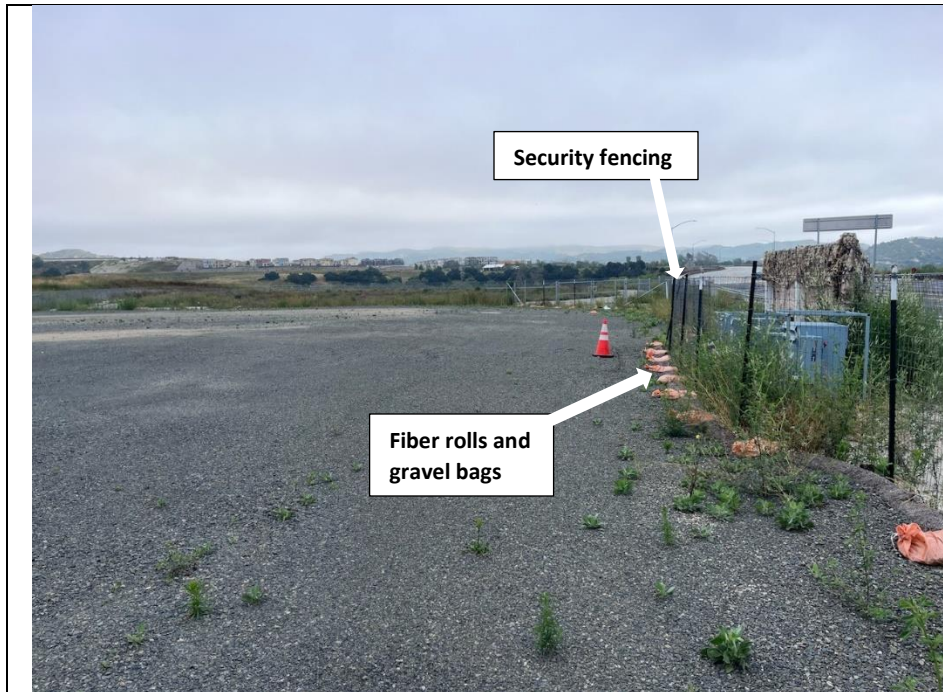
ATTACHMENT C
MPR-19 Site Photographs

SOCRE South Orange County Reliability Enhancement Project

MPR-19 PHOTO LOG



Photograph 1:
View of the southwest corner and construction entrance of the Cow Camp Staging Area with previously placed Best Management Practices (BMPs) including rumble plates and flat plates that will be maintained throughout the course of the Project. Facing: Southwest.



Photograph 2:
View of Cow Camp Staging Area from construction entrance. The perimeter of the staging area contains security fencing and staked fiber rolls with gravel bags. Facing: East.



Photograph 3:
View from southeast corner of the Cow Camp Staging Area. Ground cover consists of 95% bare ground and 5% disturbed vegetation. Facing: Northwest.



Rancho Mission Viejo Substation

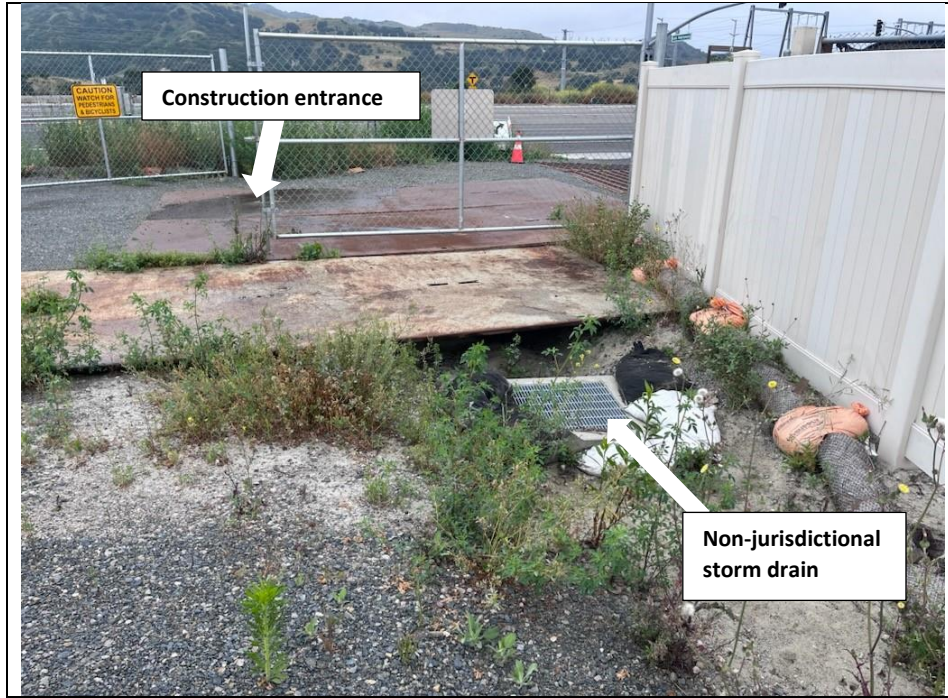
Photograph 4:
View from the northeast corner of the Cow Camp Staging Area. The FEIR-approved Rancho Mission Viejo Substation is located across Cow Camp Road approximately 300 feet west and is visible from the staging area. Facing: Southwest.



Photograph 5:
View from the northwest corner of the Cow Camp Staging Area.
Facing: Southeast.



Photograph 6:
View of fiber rolls and gravel bags secured along perimeter fencing.
Facing: Southwest.



Photograph 7:
View of the storm drain beneath the construction entrance. The non-jurisdictional drain has been previously protected with BMPs including steel flat plates, fiber rolls, and gravel bags that will continue to be maintained throughout the course of staging area operations. Facing: South.

ATTACHMENT D
MPR-19 Biological Review

SAN DIEGO GAS & ELECTRIC COMPANY

**SOUTH ORANGE COUNTY RELIABILITY
ENHANCEMENT PROJECT**

**BIOLOGICAL REVIEW FOR
MINOR PROJECT REFINEMENT No. 19**



PREPARED BY:



May 2023

KPE. 2023. Biological Review for Minor Project Refinement No. 19 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
CNDDDB	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.19 (MPR-19) 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-19 for a new staging area (MPR-19 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-19 work area is adjacent to Cow Camp Road Road in unincorporated Orange County. The MPR-19 staging area is approximately 0.67 acre and is located approximately 300 feet east of the Rancho Mission Viejo Substation. Construction vehicles and equipment would be stored within the MPR-19 staging area. No ground disturbance is anticipated for performance of MPR-19 activities.

2. Methods

A biological field survey was conducted on May 18, 2023 to determine if the MPR-19 work area or the area within 500 feet of the MPR-19 work area (survey area) provides habitat for special- status species. While onsite, the biologist recorded vegetation and surveyed 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-19 request.

3. Results

3.1 Vegetation within the MPR-19 Work Area

The following vegetation communities or land cover types were noted within the MPR-19 work area during the biological field survey conducted on May 18, 2023 (Table 1).

Table 1: Vegetation and Land Cover within the MPR-19 Work Area

Vegetation/Land Cover	Total Area (acre)
Bare Ground	0.63
Disturbed	0.04
TOTAL	0.67

3.1.1 Bare Ground

Bare ground is a land cover type that is unpaved but devoid of vegetation. The proposed work area site has already been cleared of vegetation and has been used as a staging area by another project, TL 13831.

3.1.2 Disturbed

Disturbed habitat is composed primarily of non-native and/or invasive grasses and forbaceous species, but is dependent on types and frequencies of disturbances, soil types, microclimate variables, available seed sources and other factors. Disturbed habitat is present within the perimeter of the MPR-19 work area, as well as the borders of the existing MPR-19 work area fence and Cow Camp Road.

3.2 Other Vegetation in Survey Area

3.2.1 Developed

Developed is a land cover type associated with human constructed land cover types devoid of vegetation. Developed areas within the survey area include Cow Camp Road, Los Patrones Parkway, and the Rancho Mission Viejo Substation.

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-19 staging area within the 500-foot buffer. The dominant species in the survey area consist of wild oat (*Avena* sp.), mustard species (*Bromus* sp.), and brome grasses (*Bromus* sp.).

3.2.3 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 400 feet northwest of the MPR-19 staging area. No direct impacts to the CSS in this area will occur as a result of MPR-19 activities. Vehicular traffic will use Cow Camp Road to access the MPR-19 staging area through a gated entrance.

3.2.4 Riparian Woodland

Riparian Woodland is a plant community that occurs along permanent standing, running, and/or subterranean waters at the coastline, valleys, and foothills. The northern boundary of the riparian woodland is found approximately 430 feet southeast of the MPR-19 work area, with San Juan Creek located to the southwest of MPR-19 work area.

3.3 Special-Status Species

No special-status species were noted within the MPR-19 staging area. Visual and auditory surveying were used to determine the absence of special-status species within the MPR-19 staging area. Please see **Figure 1** for the mapped results of the CNDDDB records search conducted for the MPR-19 staging area.

The CNDDDB showed coastal California gnatcatcher (CAGN) (*Polioptila californica californica*) to be historically present directly to the northwest of the MPR-19 work area and approximately 350 feet northeast of the MPR-19 work area. Suitable CAGN habitat does not exist within the MPR-19 work area but exists within the 500-foot survey area in the coastal sage scrub to the northwest. This species was not observed during the biological survey. The proposed construction staging area is not anticipated to have any direct impacts on CAGN due to the absence of suitable habitat.

Coastal cactus wren (*Campylorhynchus brunneicapillus*) was documented in the CNDDDB approximately 60 feet southwest of the MPR-19 work area. No suitable habitat exists within the MPR-19 work area for this species due to previous disturbance and compaction of soil, as well as development and the absence of thorny shrubs and cactus.

California satintail (*Imperata brevifolia*) has been documented in the CNDDDB outside of the MPR-19 work area approximately 60 feet southwest within the 500-foot buffer. This species was not observed during the biological survey and was not recorded in the immediate MPR-19 work area.

The pallid bat (*Antrozous pallidus*) was documented within the CNDDDB outside of the MPR-19 work area approximately 60 feet southwest within the 500-foot buffer. The Cow Camp bridge that runs approximately 0.5 mile southeast from the MPR-19 work area, as well as the water present within San Juan Creek, provide suitable roosting habitat for this species. This species was not observed during the biological survey and proposed construction will have no direct impact on this species due to the absence of habitat within the proposed MPR-19 staging area.

Indirect impacts on CAGN 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-19 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.

Straw wattle lining the perimeter of the MPR-19 work area and storm drain inlet protection have previously been installed by Project TL13831 and will be maintained upon mobilization of the SOCRE Project.

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: North-facing view of the MPR-19 staging area taken from the southern perimeter.



Photo 2: West-facing view of the MPR-19 staging area from the southeastern corner.



Photo 3: Northeastern-facing view of the MPR-19 staging area taken from the southwestern corner.



Photo 4: North-facing view of the MPR-19 staging area taken from the southeastern corner.

Appendix B. MPR-19 CNDDB Results Figure

