



Richard Quasarano
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June 26, 2023

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

Re: Minor Project Refinement No. 20 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. 20 (MPR-20) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-20 will authorize the use of a temporary laydown area contiguous with a previously approved Project location that is located south of Avenida Pico in Orange County. The proposed temporary work area would be used for the laydown of transmission structure Z223146 during removal-from-service procedures. The requested additional work area will be approximately 5,130 square feet, or 0.12 acre. Please refer to **Attachment B, MPR-20 Figure** and **Attachment C, MPR-20 Site Photographs** to view the MPR-20 work area.

Attachment A: SOCRE Minor Project Refinement Form
Attachment B: MPR-20 Figure
Attachment C: MPR-20 Site Photographs

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 4, 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 required for activities that will be performed within the MPR-20 work area.

MPR-20 Request for Approval

SDG&E respectfully requests approval of MPR-20 to utilize a new work area to facilitate removal of Z223146 from service, by July 10, 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.

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-20 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: June 26, 2023

Report No.: 20

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 20 (MPR-20) temporary work area is located directly adjacent to the SDG&E right-of-way (ROW) on private property owned by Talega Associates, LLC.

Location/Milepost: The MPR-20 temporary work area is located south of Avenida Pico and west of the Talega Substation in Orange County.

Land Use/Vegetative Cover: The 5,130 sq. ft. (0.12 acre) proposed MPR-20 temporary work area is located within low-quality coastal sage scrub (CSS).

Sensitive Resources: The MPR-20 work area is located in an area with high paleontological potential as well as low-quality CSS. See resource discussions below.

**Modification
From:**

Permit

Plan/Procedure

Specification

Drawing

Mitigation
Measure

Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-20 for the use of a new temporary work area for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area is located immediately east of the approved Location 9A work area, as shown in **Attachment B, MPR-20 Figure**. Location 9A was previously approved in Notice to Proceed No. 7 (NTP-7). The new MPR-20 work area will total approximately 5,130 square feet (0.12 acre).

The MPR-20 temporary work area will be utilized as a temporary laydown area for sections of lattice tower during the removal of Z223146 as part of NTP-7 transmission line construction activities. The remove-from-service (RFS) structure will be accessed from the west via the existing access road,

and the crane required for structure dismantlement will be staged on the eastern end of the maintenance pad for Location 9A. The cut sections of the lattice tower will be hauled away by a trailer as described in Section 2.4.5.4 of the Final Environmental Impact Report (FEIR). The vegetation within the work area will be left in place and drive and crush methods will be employed. A water truck will be utilized to dampen the area prior to drive and crush to mitigate fire risk. Plywood may also be placed on top of the vegetation within the work area to accommodate the sections of lattice tower within the MPR-20 work area while preserving the vegetation underneath.

Following the use of the MPR-20 temporary work area, the site will be restored and revegetated in compliance with APM AES-2, MM AES-2, the Stormwater Pollution Prevention Plan (SWPPP), the Project's Mitigation Plan and in coordination with the property owners.

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

Original Condition: The MPR-20 temporary work area was not included in the approved Project. However, the work area is located immediately adjacent to Project components and within the geographic study area of the FEIR, and therefore has been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need for the additional MPR-20 work area to safely facilitate the removal of Z322146 from service. The existing maintenance pad for Location 9A is unable to accommodate the temporary laydown of the lattice tower due to the proximity of energized lines, newly set poles, and minimum approach distance (MAD) precautions required within the work area. The crane will occupy approximately 40 ft. x 40 ft. of the available space on the eastern end of the maintenance pad for Location 9A, in addition to the flatbed truck required for hauling the sections of tower away staged behind the crane on the eastern access road. Therefore, the substantial size of the cut sections of lattice tower cannot be supported within the constraints of the existing work area while all other necessary pieces of equipment for its removal are present. Therefore, MPR-20 is proposing the use of the additional temporary work area and associated land disturbance that was not originally included in NTP-7, but is necessary to construct the Project as described in Section 2.3.3.1 of the FEIR.

Maps & Figures: Refer to **Attachment B, MPR-20 Figure**, for a map of the proposed MPR-20 temporary work area location. Refer to **Attachment C, MPR-20 Site Photographs**, for pictures of the current conditions within the MPR-20 temporary work area.

Environmental Impact: Utilization of the MPR-20 temporary work area would not change the nature or increase the severity of any impacts disclosed within the FEIR; 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 new permits or new regulatory approval. The MPR-20 temporary work area is approximately 5,130 square feet combined (0.12 acre) and is located within low-quality CSS habitat following significant rainfall in the preceding months. There is no ground disturbance proposed in MPR-20. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): The property owner, Talega Associates, LLC, was notified and provided concurrence for SDG&E's use of the proposed MPR-20 work area. The MPR-20 requested work area is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:

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

Previous Biological Survey Report Reference:

Biological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E’s application for a Certificate of Public Necessity (CPCN) for the SOCRE Project and Proponent’s Environmental Assessment (PEA). Biological Resources were also discussed within the CPUC-conducted CEQA review process. A biological survey was performed on June 9, 2023 in which the qualified biologist verified that the overall condition of the MPR-20 work area was consistent with the results provided in previous biological studies in that it was described as disturbed habitat. The proposed temporary work area was previously disturbed by past construction use (non-Project related) evidenced by the presence of old fiber rolls around the perimeter of the proposed work area, as well as signs of prior mowing. However, the MPR-20 work area has since experienced overgrowth of native species which develop quickly in disturbed soils likely as a result of significant rainfall within the preceding months. Therefore, it is now considered low-quality CSS. The MPR-20 temporary work area is dominated by coastal goldenbush (*Isocoma menziesii*), California sagebrush (*Artemisia californica*), Italian rye grass (*Lolium multiflorum*), Maltese star-thistle (*Centaurea melitensis*), and brome (*Bromus* sp.), with occurrences of lemonade berry (*Rhus integrifolia*) and black mustard (*Brassica nigra*).

No ground disturbance is anticipated for MPR-20 activities. The vegetation within the work area will be left in place and drive and crush methods will be employed. Plywood may also be placed on top of the vegetation within the work area if needed. Plywood would be implemented in a manner that prevents wildlife entrapment. Pre-construction nesting bird surveys will be conducted by an Avian Biologist no more than 7 days prior to the start of activities in the MPR-20 work area during the nesting season (January 1 – September 15) per the Nesting Bird Management Plan (NBMP). Additionally, in compliance with MM BR-3, a pre-construction clearance sweep for sensitive species will be conducted prior to construction activities within the MPR-20 work area.

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

Previous Cultural Survey Report Reference:

Cultural and paleontological resources within the Project’s study area (including the MPR-20 work area) were studied, reviewed, and documented as part of SDG&E’s application for a CPCN for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project’s FEIR, Section 4.5). Additionally, a cultural resources records search was performed by the Project’s CPUC-approved Qualified Cultural Resources Consultant, Patrick McGinnis (ICF) on June 15, 2023. An Environmentally Sensitive Area (ESA) was identified within 100 feet of the proposed MPR-20 work area. As there is no vegetation trimming or ground disturbance proposed in MPR-20, cultural monitoring is not anticipated to be required.

Although the MPR-20 work area is located within an area with high paleontological potential, no ground disturbance is anticipated within the temporary work area. Therefore, no paleontological monitoring would be required.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: The MPR-20 temporary work area was not anticipated to be required for Project construction.

New disturbance acreage: Approximately 5,130 sq. ft. (0.12 acre) of temporary disturbance.

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	The activities within the proposed MPR-20 temporary work area would not result in a new significant impact or a substantial increase in the severity of any previously identified significant impacts to geology, soils, or seismicity. Activities do not involve the installation of any new facilities, performance of any new activities, nor ground disturbance. Accordingly, utilization of the new temporary work area 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	The proposed MPR-20 temporary work area would not require agency consultation relating to geology, soils, or seismicity.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	MPR-20 does not involve the installation of any new facilities nor performance of any new activities. Accordingly, utilization of the new temporary work 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology	<input type="checkbox"/> Y	There are no jurisdictional or non-jurisdictional drainages that would be affected by the use of the MPR-20 work area, as the nearest jurisdictional drainage is located 300 feet southeast near the previously approved Location 4B work area. Stormwater Best Management Practices (BMPs) would be installed and maintained along the perimeter of the proposed work area to prevent potential sediment runoff throughout the course of construction. MPR-20 activities would therefore not impede or redirect flood flow, alter the existing drainage pattern of the area, or otherwise result in hydrology and water quality that would be different from the impacts addressed in the Project's FEIR, Section 4.9.
	<input checked="" type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input checked="" type="checkbox"/> Y	<p>No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to cultural resources are anticipated to occur as a result of the MPR-20 temporary work area. A cultural resources records search was performed by the Project's Qualified Cultural Resources Consultant on June 15, 2023 which determined there is one cultural ESA within 100 feet of the MPR-20 work area. As there is no excavation or ground disturbing activities anticipated, cultural monitoring is not expected to be required. Impacts would remain similar to those disclosed within the Project's FEIR, Section 4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-20 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 <p>No new significant impacts or a substantial increase in the severity of any previously identified impacts to paleontological resources are anticipated to occur as a result of the proposed new temporary work areas. The MPR-20 work area is located in an area with high paleontological potential that requires adaptive monitoring for ground disturbing activities per the Paleontological Monitoring and Treatment Plan (PMTP). There are no ground disturbing activities proposed within the MPR-20 work area, therefore, paleontological monitoring will not be required. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5.</p>
	<input type="checkbox"/> N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Agency Consultation?	<input type="checkbox"/> Y	Use of the proposed MPR-20 temporary work area would not require agency or tribal consultation in relation to cultural or paleontological resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	<p>The MPR-20 temporary work 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. The maintenance pad and access road adjacent to the proposed MPR-20 temporary work area are already used for utility ROW access. Utilization of the proposed MPR-20 work area would not affect ingress and egress of traffic, except to improve flow by temporarily staging transmission equipment out of the way of the existing access road and maintenance pad and allowing construction vehicles to work more efficiently with the available space provided by the utility ROW. There would be no additional construction activities, crews or change in equipment utilized for MPR-20 that would not already be accounted for in NTP-7. There are no traffic control permits required for the use of the MPR-20 work area, nor is it located adjacent to any public roads. Accordingly, traffic and circulation impacts resulting from the use of the MPR-20 work area would be similar to those disclosed in the FEIR, Section 4.15. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-20 work activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries <p>Additionally, any anticipated road closures or partial closures will be communicated to the public in advance. Signage is currently placed at worksite entrances notifying the public of possible access restrictions. As always, a spotter and qualified safety personnel will be present to manage any ingress or egress of pedestrians through the access road.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	The use of the MPR-20 temporary work 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 are no new activities, schedule extensions, or equipment proposed as part of this MPR-20 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area would not require agency consultation relating to air quality.
	<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.
Noise and Vibration	<input type="checkbox"/> Y	Utilization of the new MPR-20 temporary work 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, as there are no new activities proposed as part of this MPR-20 request. Also, the MPR-20 work area is not in the vicinity of any sensitive receptors. Therefore, utilization of the MPR-20 temporary work 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.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area 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-20 work area. The proposed work area is immediately adjacent to an existing utility access road that does not contain any aesthetic resources. The area would be stabilized and restored in accordance with the SWPPP and APM AES-2 following construction. The work area also cannot be readily viewed from any public viewpoints. Therefore, use of the MPR-20 work 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 APM would be implemented for MPR-20 work activities: <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 Area to Pre-Project Conditions
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed MPR-20 temporary work area would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	The use of the new MPR-20 temporary work area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed work area occurs within low-quality CSS dominated by coastal goldenbush, California sagebrush,

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 type="checkbox"/> N	<p>Italian rye grass, Maltese star-thistle, and brome, with occurrences of lemonade berry and black mustard.</p> <p>The vegetation within the work area includes non-native, invasive species and does not contain any sensitive botanical species. However, native plant species are present throughout the proposed work area. The vegetation within the work area will be left in place and drive and crush methods will be employed. Plywood may also be placed on top of the vegetation within the work area to accommodate the sections of lattice tower within the MPR-20 work area while preserving the vegetation underneath. Pre-construction nesting bird surveys will be conducted by an Avian Biologist no more than 7 days prior to the start of MPR-20 activities during the nesting season (January 1 – September 15) per the NBMP. Additionally, in compliance with MM BR-3, a pre-construction clearance sweep for sensitive species will be conducted prior to construction activities within the MPR-20 work area. Biological monitoring will take place as needed for activities within the MPR-20 work area to ensure that impacts on native vegetation will be limited to the fullest extent possible.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-20 temporary work area, any indirect impacts that may occur to sensitive species in the vicinity of the work areas will be mitigated in accordance with the MMs listed below:</p> <ul style="list-style-type: none"> • MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area. • 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-8: Western Burrowing Owl Impacts Reduction Measures • MM BR-9: Invasive Plant Control Measures.
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Use of the proposed MPR-20 temporary work area would not require agency consultation relating to vegetation and wildlife.
Wildfire	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	The area in which the proposed MPR-20 temporary work area is located within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its contractors will conduct all activities in

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>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, • Carrying emergency fire suppression equipment, • Furnishing a water truck on or immediately adjacent to the work area, • Restricting smoking and vehicle idling, • Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and • Conducting pre-activity tailgate meetings that include fire safety discussions. <p>All MPR-20 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. A fire spotter and water truck will be utilized onsite as additional precautionary measures during the course of work in the MPR-20 work area. Therefore, the proposed MPR-20 work 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 MPR-20 work 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
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For CPUC Compliance Manager Use Only

<input type="checkbox"/> Refinement Approved	<input type="checkbox"/> Refinement Denied	<input type="checkbox"/> Beyond Authority
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Conditions of Approval or Reason for Denial:

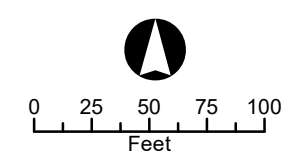
Prepared by: Fernando Guzman, WSP, CPUC Compliance Manager **Date:**

ATTACHMENT B
MPR-20 Figure

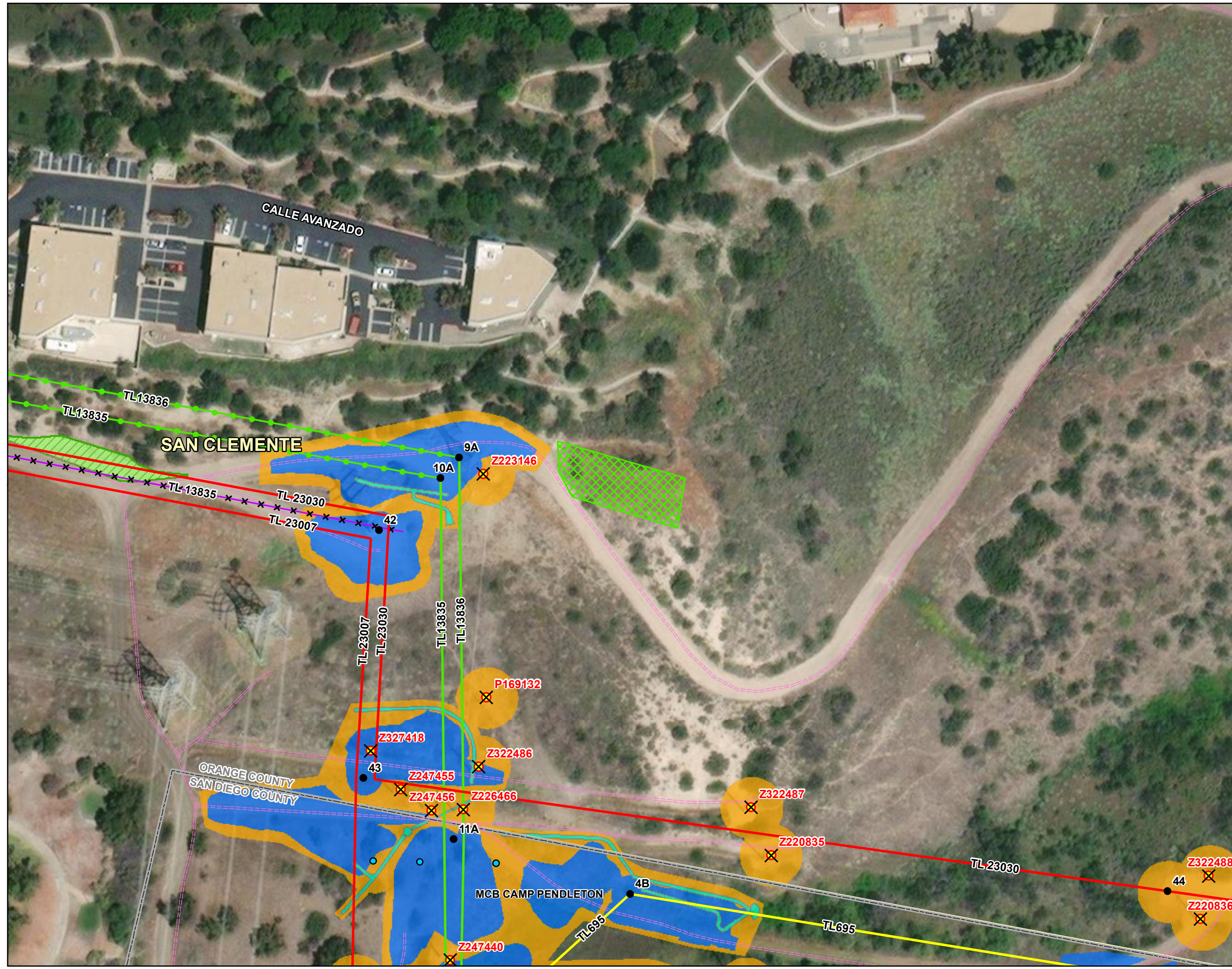
SOCRE PROJECT
MPR-20
San Clemente
Orange County, CA

LEGEND

-  Existing 138 kV Overhead Transmission Line (for Reference Only)
-  County Boundary
-  Municipal Boundary
-  MCB Camp Pendleton Boundary
- MPR-20 Components**
-  Additional Temporary Work Area
- Proposed Project**
-  New Transmission Standard Pole
-  Remove Existing Structure
-  Temporary Shoofly Pole
-  230 kV Overhead Transmission Line
-  138 kV Overhead Transmission Line
-  69 kV Overhead Transmission Line
-  Existing Access Road
-  BMP Feature
-  Work Pad
-  Temporary Work Area
-  Temporary Pulling/Stringing Site



Data Sources: ESRI, Orange Co., SANDAG, SanGIS, SDG&E, USDA.
 SPCS NAD83 CA Zone VI Feet.
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 SJW 06-12-23



ATTACHMENT C
MPR-20 Site Photographs

SOCRE South Orange County Reliability Enhancement

MPR-20 PHOTO LOG



Photograph 1:
View of the proposed MPR-20 work area (green polygon), which is contiguous with the approved work area for location 9A (bare ground area) previously approved under NTP-7. MPR-20 proposes a temporary laydown area for cut sections of Z223146 during removal-from-service procedures. Facing: East.



Photograph 2:
Dominant vegetation within the proposed work area consists of coastal goldenbush (*Isocoma menziesii*), California sagebrush (*Artemisia californica*), Italian rye grass (*Lolium multiflorum*), Maltese star-thistle (*Centaurea melitensis*), and brome (*Bromus* sp.), with occurrences of lemonade berry (*Rhus integrifolia*) and black mustard (*Brassica nigra*). Facing: Southeast.



Photograph 3:

View of the eastern end
of the proposed
MPR-20 temporary
work area.
Facing: Northwest.