



California Public Utilities Commission



March 26, 2026

Dustin Joseph
LS Power Grid California, LLC
Via email: DJoseph@lspower.com

Re: CPUC Approval of Minor Project Refinement 1 for the Power the South Bay Project

Mr. Joseph,

On March 20, 2026, LS Power Grid California, LLC (LSPGC) requested California Public Utilities Commission (CPUC) approval of LSPGC's proposed Minor Project Refinement 1 (MPR-1) for the Power the South Bay Project (Project) (Application 24-05-014) seeking authorization to use a new approximately 10-acre staging area for Project construction activities.

Pursuant to the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted by the CPUC in its decision to approve the Project on March 19, 2026, CPUC Energy Division staff may approve requests by LSPGC for minor project refinements if such refinements do not: (1) increase the severity of an environmental impact or result in a new significant impact based on the criteria used in the Final Environmental Impact Report (FEIR) certified for the Project; (2) substantively conflict with any adopted mitigation measure or applicable law or policy; or (3) trigger a new permit requirement.

The FEIR analyzed 12 potential sites that could be used as staging areas for Project construction, but assumed that LSPGC would ultimately use only three or four staging areas. In the MPR-1 request form (see Attachment 1), LSPGC explains that the majority of the staging areas included in the FEIR are either not available for use or have restrictive environmental constraints. Accordingly, LSPGC proposes the use of a new approximately 10-acre staging area (Fremont Staging Yard), located south of the Newark Substation along Auto Mall Parkway in the City of Fremont, as one of the three or four staging areas. Although the Fremont Staging Yard was not identified in the FEIR, LSPGC asserts that the use of the Fremont Staging Yard would be consistent with the conditions set forth in the FEIR, and would not change the type of equipment, number of construction personnel, or number of staging areas used.

The MPR-1 request asserts that LSPGC's use of the Fremont Staging Area would have the potential to impact the following California Environmental Quality Act (CEQA) resource areas: Aesthetics, Air

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Quality, Biological Resources, Cultural Resources and Tribal Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Transportation, and Wildfire. The use of this staging area would also have the potential to impact Utilities and Service Systems. Accordingly, as a condition of approval of MPR-1, LSPGC will be expected to comply with Applicant-Proposed Measure (APM) UTIL-1 for ground-disturbing activities within the staging area.

I concur that the aforementioned impacts would be consistent with the impacts analyzed in the FEIR and would be addressed by existing measures in the MMCRP adopted for the Project. Furthermore, I concur that the use of the Fremont Staging Yard would not increase the severity of any environmental impact or result in a new significant impact, substantively conflict with any mitigation measure or applicable law or policy, or trigger any new discretionary permit requirement. **Therefore, I approve LSPGC's requested MPR-1, provided that the proposed activities are carried out in accordance with the methods, measures, and conditions set forth in the FEIR, MMCRP, Notice to Proceed #0 (NTP-0), and this letter, including the conditions of approval specified in the approved MPR-1 form enclosed herein as Attachment 1.**

Please feel free to contact me at tommy.alexander@cpuc.ca.gov with any questions or concerns regarding this letter.

Thank you,



Tommy Alexander
CEQA Project Manager
California Public Utilities Commission

Cc: Lucy Marton, LSPGC
Michelle Wilson, CPUC
Phill Peters, ESA
Vince Molina, ESA

Attachment:

1. Power the South Bay Project LSPGC MPR-1 Request (Approved)

Attachment 1

Power the South Bay Project LSPGC MPR-1 Request (Approved)



Power the South Bay Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the EIR, create a new significant impact, are located within the geographic boundary of the study area of the EIR, and that do not conflict with any mitigation measure or applicable law or policy.

Date Requested: March 20, 2026

Report No.: MPR-1

Date Approved: March 26, 2026

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The proposed Minor Project Refinement No. 1 (MPR-1) staging area (Fremont Staging Yard) is located within property owned by the City of Fremont.

Location/Milepost: The proposed Fremont Staging Yard is located south of the Newark Substation along Auto Mall Parkway in the City of Fremont, California.

Land Use/Vegetative Cover: The proposed Fremont Staging Yard is approximately 10 acres in disturbed land (primarily non-native vegetation).

Sensitive Resources: There is potential to occur (PTO) for sensitive wildlife species within the Fremont Staging Yard. See resource discussions below.

Modification From: Permit Plan/Procedure Specification Drawing
 Mitigation Measure Other:

LS Power Grid California, LLC (LSPGC) is requesting approval of MPR-1 for the use of a new staging area (Fremont Staging Yard) to facilitate transmission line construction activities for the Power the South Bay Project (Project), as described below and shown in **Attachment B, MPR-1 Figure**.

Preparation of the Fremont Staging Yard would involve clearing, grubbing, and limited grading as needed to establish a level work area. The staging area may be used for assemblage; for storage of materials and equipment, storage containers, construction trailers, and portable restrooms; as a refueling area for vehicles and construction equipment; as an equipment wash station; and for parking and lighting. Transmission line materials required for the Project, such as conduit and cables, would be received and temporarily stored at the staging area as needed

before installation. Construction workers would typically meet at the staging area each morning and park their vehicles. Construction equipment and vehicles associated with Project construction would be parked within the staging area while inactive.

Geotextile fabric and gravel may be used to line the ground at the staging area to create stable surface conditions and prevent unnecessary sediment transport off-site. Perimeter security fencing would be installed around the outer limits of the staging area. Lighting would also be installed for security purposes. Temporary construction power would be provided via existing distribution lines near the staging area. Temporary generators would be a contingency if distribution power is unavailable at the staging area.

The Fremont Staging Yard would be accessed via an existing driveway off Auto Mall Parkway. A new temporary access road would be constructed from the driveway to the staging area. The access road would be approximately 520 feet long and 30 feet wide. Vegetation would be removed along the access road path and the road would be graded, compacted, and gravel would be placed for stability. See **Attachment B, MPR-1 Figure** for the location of the MPR-1 components.

Stormwater best management practices (BMPs) such as silt fence and straw wattle would be installed within and surrounding the Fremont Staging Yard in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Following completion of Project construction, the Fremont Staging Yard would be stabilized as needed in accordance with the SWPPP.

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

Original Condition: The Fremont Staging Yard was not proposed within the Project's Final Environmental Impact Report (FEIR) for reasons described herein, therefore additional resource surveys were conducted to verify current conditions as described in the Resources section below. The staging area is located within a previously disturbed, mostly flat area with no native habitat or sensitive aquatic features. Although the MPR-1 staging area was not identified for use within the Project's FEIR, it is in close proximity to approved Project components and are therefore within the geographic study area analyzed within the FEIR. Further description of current conditions within the staging area is described in the resource discussions herein.

Justification for Change: The Project's FEIR (Section 2.8.2) identified 12 potential staging areas for Project use. It is stated in Section 2.8.2 of the FEIR that although only three or four staging areas were anticipated for use during construction, optionality was included because site availability during construction was an uncertainty. As expected, the majority of the staging areas included in the FEIR are either not available for use, or have restrictive environmental constraints. As such, LSPGC is proposing the use of Fremont Staging Yard as one of the Project's three or four yards, in order to construct the Project as described in the FEIR.

Maps & Figures: Refer to **Attachment B, MPR-1 Figure**, for a map of the proposed Fremont Staging Yard. Refer to **Attachment C, MPR-1 Photograph Log**, for pictures of the current conditions within the Fremont Staging Yard.

Environmental Impact: Utilization of the Fremont Staging Yard would not change the nature or substantially 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 regulatory approval. The Fremont Staging Yard is approximately 10 acres within disturbed land. The staging area will be

stabilized as needed in accordance with the SWPPP during construction and following completion of construction. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): LSPGC will enter into a lease agreement with the property owner of the Fremont Staging Yard (City of Fremont) prior to use. There are no other agency permits required for use of Fremont Staging Yard.

Resources:			
Biological	<input type="checkbox"/> No Resources Present	<input checked="" type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
<p>Previous Biological Survey Report Reference: As Fremont Staging Yard was not identified for use in the Project’s FEIR, an aquatic resource delineation survey was performed September 30, 2025, to determine if there are any sensitive aquatic features present within the Fremont Staging Yard (see Attachment D, MPR-1 Jurisdictional Delineation Survey Report). A habitat assessment survey was also performed by a qualified biologist on November 24, 2025 (see Attachment E, MPR-1 Habitat Assessment Survey Report). Prior to the field surveys, the list of special-status species that have potential to occur (PTO) within the Project area (FEIR Tables 3.4-2 and 3.4-3) was reviewed for the site. California Natural Diversity Database (CNDDDB), United States Fish and Wildlife (USFWS) species occurrence data and the California Native Plant Society (CNPS) rare plant inventory were reviewed to determine habitat requirements and if there were any nearby occurrences of special-status species that have PTO within Fremont Staging Yard. Additional details are included below:</p> <p>The site is heavily disturbed and appears to be subject to routine discing, mowing, or other vegetation management activities. Furthermore, the site appears to have been previously or prepared for development as evidenced by installed drainage pipes which were observed outside the proposed staging area footprint. Vegetation covers the majority of the proposed Fremont Staging Yard site and consists of non-native upland mustard or star-thistle fields defined as having black mustard (<i>Brassica nigra</i>), short-podded mustard (<i>Hirschfeldia incana</i>), cultivated radish (<i>Raphanus sativus</i>), or other mustards occur with non-native plants at greater than 80% relative cover in the herbaceous layer, with mustards being the dominant herbaceous species. The staging area is dominated by black mustard, and almost entirely composed of non-native species.</p> <p>Of the 29 plant species observed during the habitat assessment, only one native plant, willow herb (<i>Epilobium brachycarpum</i>), was observed. This site’s habitat type is most closely associated with the “Disturbed” land cover/vegetation community included in Figure 3.4-1 of the FEIR. Prevalence of fossorial mammals was low, with no evidence of California ground squirrel activity, thus providing limited burrow availability. There were no special-status plant or wildlife species identified during the surveys, and no sensitive aquatic features are present within Fremont Staging Yard. Analysis by the qualified biologist determined there was a moderate PTO for four wildlife species listed in the FEIR Table 3.4-3, included in Table 1 below. PTO for all other plant and wildlife special-status species listed in FEIR Tables 3.4-2 and 3.4-3 is considered Low or None, and there was no PTO for special-status species not disclosed within the FEIR.</p>			

Table 1: Special-Status Species PTO for Fremont Staging Yard

Common Name Scientific Name	Status (State/Federal)	Identification Period	Potential to Occur	Survey Requirements
Invertebrates				
Large marble butterfly <i>Euchloe ausonides</i>	--/--	Flight season is estimated to be February - April	Moderate. There are CNDDDB occurrences within 5 miles of the project area. Suitable habitat with nectar sources occur within Fremont Staging Yard.	None – this species does not have State or Federal status.
Birds				
White-tailed kite <i>Elanus leucurus</i>	--/FP	Year-round	Moderate. Suitable foraging habitat occurs within Fremont Staging Yard with low potential for nesting in the surrounding habitat.	MM 3.4-1d: Preconstruction clearance surveys will be performed within 7 days of start of construction.
Northern harrier <i>Circus hudsonius</i>	CSC/--	Year-round	Moderate. May forage over area but suitable isolated, dense grassland or marsh nesting habitat does not occur within Fremont Staging Yard and is limited in the adjacent areas.	MM 3.4-1d: Preconstruction clearance surveys will be performed within 7 days of start of construction.
Western burrowing owl (BUOW) <i>Athene cunicularia hypugaea</i>	SC/--	Year-round	Moderate. Multiple CNDDDB records occur within 1 mile of Fremont Staging Yard. However, the habitat is subject to regular mowing and discing and burrow availability is low.	APM BIO-11: BUOW take avoidance surveys will be performed prior to construction in accordance with the California Department of Fish and Wildlife (CDFW) 2012 Staff Report.

Status Codes:

State: CE = CA State Endangered; CSC = CA Species of Special Concern; SC = CA State Candidate for Listing

Federal: FP = Federally Proposed

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

Previous Cultural Survey Report Reference:

As Fremont Staging Yard was not included in the Project's FEIR, an additional cultural resource survey and desktop records search was performed to determine if there were any existing cultural resources onsite per APM CUL-4 (see **Attachment F, MPR-1 Cultural Field Survey Report**). The records search determined there are no known cultural resources within 100 feet of the Fremont Staging Yard site. The pedestrian field survey for Fremont Staging Yard was performed on October 15, 2025. There was one non-significant historic isolate (c1900 glass bottle fragment) encountered during the survey. Based on the cultural records search, background research, and the field survey, the historical isolate does not meet the criteria for listing on the California Register for Historical Resources (CRHR) and is not a historical resource per the California Environmental Quality Act (CEQA).

Paleontological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
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Previous Paleontological Survey Report Reference:

Paleontological resources within one mile of the Project's limits of construction (which includes the proposed Fremont Staging Yard) were studied, reviewed, and documented as part of LSPGC's application for a CPCN for the Project and Proponents Environmental Assessment. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 3.7). No records of paleontological resources were identified within Fremont Staging Yard in the records search performed by San Diego Natural History Museum (SDNHM) and the University of California Museum of Paleontology (UCMP), and the proposed staging area is located in an area with low paleontological potential.

Disturbance Acreage Changes: Yes No

The additional temporary disturbance resulting from the proposed Fremont Staging Yard is summarized in **Table 2** below. It should be noted, the majority of the staging areas proposed for use in the FEIR are not anticipated to be used by the Project, and the Project plans to utilize no more than three to four staging areas as stated in Section 2.8.2 of the FEIR, therefore the addition of Fremont Staging Yard would not result in a net increase of temporary disturbance beyond what was analyzed in the FEIR.

Table 2: Temporary Disturbance from MPR-1

MPR-1 Component	Temporary Disturbance (Disturbed)
Fremont Staging Yard	10 acres
Fremont Staging Yard Access Road	0.3 acres
Total	10.3 acres

The following table includes environmental analysis representative of CEQA Appendix G Checklist Sections addressed in the FEIR as it relates to MPR-1.

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, Seismicity, Paleontological Resources	<input checked="" type="checkbox"/> Y	MPR-1 activities do not involve the installation of any new permanent facilities, nor performance of any new construction activities. Accordingly, approval of MPR-1 would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 3.7. Preparation of the Fremont Staging Yard would involve clearing, grubbing, and limited grading as needed to establish a level work area. Gravel would also be placed within the staging area for stabilization as needed to maintain a stable surface. The Project SWPPP would include Fremont Staging Yard, and all MPR-1 construction activities will adhere to requirements in the SWPPP, including the implementation of erosion control BMPs. In compliance with APM GEO-1 and the Project
	<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>SWPPP, Fremont Staging Yard will be stabilized and returned to approximate pre-construction conditions following use.</p> <p>Fremont Staging Yard is located in an area with low paleontological potential, and there are no known paleontological resources within the site, therefore monitoring is not anticipated to be required. Ground disturbance would be limited to grubbing, minor grading, or other shallow excavations such as for BMP installation and fencing installation. Although no direct impacts to paleontological resources are anticipated during the use of Fremont Staging Yard, any indirect impacts that may occur as a result of an unanticipated discovery of paleontological resources would be mitigated through implementation of APM PALEO-1 and APM PALEO-2 as needed.</p> <p>MPR-1 activities will be performed in compliance with APM GEO-1, as applicable. Therefore, impacts to geology, soils, seismicity and paleontological resources would remain similar to those addressed within the Project's FEIR, Section 3.7. No new or altered APMs or MMs would be required.</p>
Agency Consultation?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	MPR-1 activities would not require agency consultation relating to geology, soils, or paleontological resources.
Hazardous Materials and Waste	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	MPR-1 does not involve the performance of any new construction activities or the use of any new equipment beyond what was described in the Project's FEIR. Hazardous materials such as diesel fuel would be stored as needed within Fremont Staging Yard. All activities would adhere to requirements within the site-specific Spill Prevention, Control, and Countermeasure Plan (SPCCP) (APM HAZ-1) and Hazardous Materials Management Plan (HMMP) (APM HAZ-2), as applicable. The Project would also develop a Hazardous Materials Business Plan (HMBP) in accordance with federal and state regulations if applicable thresholds for storage of hazardous materials are reached. Therefore, impacts related to hazards and hazardous materials would remain similar to those analyzed within the Project's FEIR, Section 3.9. No new or altered APMs or MMs would be required.
Agency Consultation?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	As needed, LSPGC would comply with requirements in the Project's HMMP and SPCCP, including regularly updating the local Certified Unified Program Agency via the California Environmental Reporting System website.

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.
Hydrology/ Water Quality	<input checked="" type="checkbox"/> Y	<p>There are no jurisdictional aquatic features within Fremont Staging Yard and MPR-1 activities do not involve the installation of any new permanent facilities. The Project SWPPP will include Fremont Staging Yard, and all MPR-1 activities would adhere to requirements and BMPs within the SWPPP. Although impacts to hydrology and water quality are not anticipated, any indirect impacts that might occur would be mitigated with the implementation of APM WQ-1, APM HAZ-1, APM HAZ-2, MM 3.9-1b, MM 3.9-1c, and the Project SWPPP, which contains measures to reduce or eliminate pollutants in storm water discharges from the site during construction that may otherwise violate water quality standards.</p> <p>MPR-1 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 impacts that would be different from the impacts addressed in the Project's FEIR, Section 3.10. No new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural and Tribal Cultural Resources	<input checked="" type="checkbox"/> Y	<p>As discussed in the Resources section in this MPR-1 request, there are no known sensitive cultural resources within the Fremont Staging Yard site. As such, cultural and tribal monitoring is not anticipated to be required for MPR-1 activities. Although no direct impacts to cultural or tribal cultural resources are anticipated as a result of the use of Fremont Staging Yard, any indirect impacts that may occur as a result of an unanticipated discovery of cultural resources would be mitigated through implementation of APM CUL-1, APM CUL-2, APM CUL-3, APM CUL-4, APM CUL-5, and MM 3.5-1 as needed. Therefore, impacts to cultural and tribal cultural resources would remain similar to those addressed within the Project's FEIR, Sections 3.5 and 3.18. No new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation relating to cultural or tribal cultural 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	<p>MPR-1 is not proposing any new activities or change in the volume of workers or construction-related vehicle trips disclosed in the FEIR, Section 3.17. Fremont Staging Yard is located close to other Project components and staging areas analyzed within the FEIR. There are also no changes to the construction schedule that would result from the use of Fremont Staging Yard.</p> <p>Use of Fremont Staging Yard is not anticipated to require the closure of any sidewalks or trails. Traffic control is not anticipated to be required, and emergency access will be maintained throughout construction. Any damage to roads, sidewalks, or other infrastructure would be repaired per MM 3.17-2b. In addition, there are no bus stops that would be impacted by the use of Fremont Staging Yard, and the staging area is located within an industrial area not frequented by residential motorists. Accordingly, impacts resulting from the use of Fremont Staging Yard would remain similar to those analyzed within the Project's FEIR, Section 3.17, and no new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation related to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input checked="" type="checkbox"/> Y	<p>The use of Fremont Staging Yard would not result in new construction activities that have not been previously analyzed and disclosed within the Project's Final FEIR. There is no change to the overall construction schedule or equipment used that will result from the use of Fremont Staging Yard.</p> <p>All MPR-1 activities would take place in accordance with MM 3.3-2a, ensuring that at least 75 percent of equipment horsepower hours related to off-road construction equipment includes Tier 4 emission controls, and equipment documentation and tracking is performed as needed. In addition, fugitive dust control measures defined in MM 3.3-2b would be followed.</p> <p>Therefore, the use of Fremont Staging Yard as proposed herein would not result in new significant impacts or a substantial increase in the severity of impacts analyzed and disclosed within the Project's FEIR, Section 3.3, and no new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 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 checked="" type="checkbox"/> Y	There are no sensitive receptors within 1,000 feet of Fremont Staging Yard, and the staging area is located in an industrial area. As MPR-1 also does not propose the performance of any new activities not disclosed within Section 3.13 of the Project's FEIR, utilization of Fremont Staging Yard would not be expected to create any new impacts related to noise and vibration not already analyzed within the FEIR. No new or altered APMs or MMs would be required.
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input checked="" type="checkbox"/> Y	<p>Fremont Staging Yard is located within Landscape Unit 1 studied in the Project's FEIR, Section 3.1.2.6. Landscape Unit 1 is described as industrial, containing parking lots, warehouses, office buildings, and undeveloped land. Fremont Staging Yard is located in an undeveloped lot surrounded by undeveloped land to the northwest and southeast, warehouses to the northeast, and industrial and open space to the southwest. The parcel Fremont Staging Yard is located on is bordered by Auto Mall Parkway and a sidewalk on its' west side and railroad tracks on its' south side. Pacific Commons Linear Park Trail runs along the northern perimeter of the parcel. This trail will not be impacted by MPR-1 activities, and is not identified as a scenic resource by the City of Fremont General Plan or the Project's FEIR. The proposed staging area would not be visible from Cushing Parkway or any major roads or scenic trails. Fremont Staging Yard could be viewed by pedestrians, bikers or motorists traveling on Auto Mall Parkway or Pacific Commons Linear Park Trail. These would primarily be workers in the nearby industrial facilities or recreational trail users as there are no residential units in the surrounding area and it is surrounded primarily by open space.</p> <p>Use of Fremont Staging Yard would be temporary, would not affect any scenic resources identified in the Project's FEIR, and it is located in an industrial area adjacent to Project components analyzed in the FEIR, Section 3.1. Fremont Staging Yard would be restored to approximate pre-construction conditions following use, including any necessary repairs to roads or other infrastructure. Nighttime lighting, if needed, would be in accordance with APM BIO-10 and MM 3.1-2. Therefore, impacts would remain similar to those addressed in the Project's Final FEIR, Section 3.1. No new or altered APMs or Mitigation Measures (MMs) would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation relating to aesthetics or visual 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.
Vegetation and Wildlife	<input checked="" type="checkbox"/> Y	<p>As discussed in the Resources section in this MPR-1 request, biological surveys and desktop analysis conducted for Fremont Staging Yard indicated PTO for special-status plant species is low or none, and MPR-1 would result in a total of 10.3 acres of temporary disturbance to disturbed land. There are no sensitive aquatic features within the site. Although there were no sensitive wildlife species observed during biological surveys, Fremont Staging Yard has a moderate PTO for large marbled butterfly, white-tailed kite, northern harrier, and BUOW. Pre-construction surveys for special-status species will take place in accordance with MM 3.4-1d, APM BIO-3, APM BIO-11 prior to vegetation clearing.</p> <p>Direct impacts to biological resources are not anticipated, but to the extent that any indirect impacts may occur to sensitive species within or in the vicinity of Fremont Staging Yard, those impacts will be mitigated through the implementation of the following APMs and MMs:</p> <ul style="list-style-type: none"> • APM BIO-1: Restoration of Disturbed Areas • APM BIO-3: Preconstruction Sweeps • APM BIO-6: Vehicle Speed Limits • APM BIO-8: Excavation Wildlife Best Management Practices • APM BIO-9: Worker Environmental Awareness Program (WEAP) Training • APM BIO-10: Outdoor Lighting Measures • APM BIO-11: Special-Status Bird Surveys • APM BIO-12: Nesting Bird Protection Measures • APM BIO-13: Raptor Surveys • APM BIO-15: Nesting Bird Surveys • MM 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction • MM 3.4-1a: Avoid Impacts to Rare Plants • MM 3.4-1d: Protection of Special-Status Wildlife • MM 3.1-1e: Construction WEAP <p>As such, impacts to biological resources would remain similar to those addressed in the Project's FEIR, Section 3.4. No new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-1 activities would not require agency consultation relating to biological 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.
Wildfire	<input checked="" type="checkbox"/> Y	<p>Fremont Staging Yard is not located in a high-fire severity zone as determined by the Department of Forestry and Fire Protection (CAL FIRE), nor is it located in an area of elevated or extreme fire-threat as determined by CPUC.</p> <p>The Project's Workers' Environmental Awareness Program training will be provided throughout construction, as needed, to accommodate new Project personnel and will address fire safety, prevention, and response procedures. Vegetation within Fremont Staging Yard would be cleared prior to use to prevent ignition, and there are no road or lane closures anticipated that would require traffic control. Therefore, potential impacts related to wildfire resulting from MPR-1 would be similar to those disclosed in the FEIR, Section 3.20. No new or altered APMs or MMs would be required.</p>
	<input type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	<p>MPR -1 activities would not require agency consultation related to wildfire. As needed, LSPGC will coordinate with local emergency response agencies such as fire departments and police during Project construction.</p>
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
LSPGC Project Manager	03/20/2026	Lucy Marton	<i>Lucy Marton</i>	<input checked="" type="checkbox"/> Reviewed
LSPGC Environmental Project Manager	03/20/2026	Dustin Joseph	<i>Dustin Joseph</i>	<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	3/26/26	Tommy Alexander	<i>Tommy Alexander</i>	<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied

For CPUC Compliance Manager Use Only

Refinement Approved

Refinement Denied

Beyond Authority

Conditions of Approval or Reason for Denial:

Ground-disturbing work at the Fremont Staging Yard (e.g., grading, fence installation) could impact Utilities and Service Systems. As a condition of approval, LSPGC will be expected to comply with APM UTIL-1 for any ground-disturbing work activities within the staging area and access road. Pursuant to Mitigation Measure 3.3-2a, LSPGC will be expected to ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 final emission controls (i.e., not just "Tier 4 emissions controls"). The preparation and use of the access road will be subject to the same measures and conditions as the staging area itself, as applicable.

Prepared by: Tommy Alexander, CPUC Project Manager

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