LS Power Grid California

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October 22, 2026

Thomas Alexander
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Power the South Bay Project (Application 24-05-014) Request for Minor Project Refinement No. 4 – New Street Staging Yard

Mr. Alexander:

LS Power Grid California, LLC (LSPGC) is hereby requesting approval of Minor Project Refinement No. 4 (MPR-4) from the California Public Utilities Commission (CPUC) for the Power the South Bay Project (Project). Approval of MPR-4 would authorize the use of a new 4.3-acre staging area (New Street Staging Yard) for Project construction, as well as a helicopter landing zone (LZ-1) within the staging area to support conductor stringing for the overhead transmission line. The proposed New Street Staging Yard and LZ-1 (herein referred to as the MPR-4 work area) are located south of Project Transmission Structure NN-14 along New Street in the City of San Jose, California.

The Project's Final Environmental Impact Report (FEIR) identified 12 potential staging areas for Project use. However, as stated in Section 2.8.2 of the FEIR, only three or four staging yards were expected to be needed, and the others were included because site availability during construction was uncertain. As anticipated, most of those staging areas are either unavailable or carry restrictive environmental constraints, and LSPGC is therefore proposing New Street Staging Yard to construct the Project as described in the FEIR. FEIR Section 2.8.1.3 also identified nearby staging areas as potential helicopter landing areas during conductor stringing, with fueling at local airfields. Those staging areas are likewise unavailable, so LSPGC proposes LZ-1 within New Street Staging Yard, on previously disturbed ground close to the conductor stringing work areas, with no ground disturbance beyond that already described for the staging yard. Fueling at the New Street Staging Yard from a fuel truck would reduce flight time by eliminating round trips to the airfield, would be the safer option for the construction crew, and would not involve overnight staging of the truck. Please refer to **Attachment B**, **MPR-4 Figure, Attachment C**, **MPR-4 Photograph Log**, and **Attachment D, MPR-4 Cultural Resources Survey Report**.

Attachment A: MPR-4 Form
Attachment B: MPR-4 Figure
Attachment C: MPR-4 Photograph Log

Attachment D: Cultural Resources Survey Report

Preconstruction Requirements and Permit/Approvals

Approval of MPR-4 will not change the conditions set forth in the FEIR, 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 or construction requirements. Furthermore, MPR-4 activities would not require permits from agencies not disclosed within the FEIR. LSPGC will submit a Helicopter Plan to the CPUC at least 14 days prior to the commencement of helicopter operations.

MPR-4 Request for Approval

LSPGC respectfully requests approval of MPR-4 as described within this request by October, 28, 2026. Should you have any questions or need additional information, please do not hesitate to contact me at djoseph@lspower.com.

Sincerely,

Dustin Joseph

Dustin Joseph
Director of Environmental Permitting

cc:

Lucy Marton (LSPGC)
Casey Carroll (LSPGC)
Jacob Diermann (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Vince Molina (ESA)
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ATTACHMENT A
MPR-4 Form

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: October 22, 2026

Report No.: MPR-4

Date Approved:

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The proposed Minor Project Refinement No. 4 (MPR-4) staging area (New Street Staging Yard) and proposed helicopter landing zone (LZ-1) are located within property owned by the City of San José.

Location/Milepost: The proposed New Street Staging Yard, including LZ-1, is located south of Project Transmission Structure NN-14 along New Street in the City of San José, California.

Land Use/Vegetative Cover: New Street Staging Yard, including LZ-1, is approximately 4.3 acres within disturbed land (primarily bare ground).

Sensitive Resources: There are no sensitive resources in the MPR-4 work area. 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-4 for the use of a new staging area (New Street Staging Yard) to facilitate transmission line construction activities for the Power the South Bay Project (Project), and for the establishment of a helicopter landing zone (LZ-1) within New Street Staging Yard, to support conductor stringing operations for the overhead portions of the Project transmission line, as described below and shown in **Attachment B, MPR-4 Figure**.

New Street Staging Yard

Preparation of New Street Staging Yard would involve clearing, grubbing, and limited grading as needed to establish a level work area. The staging area may be used as a refueling area for vehicles and construction equipment; as an equipment wash station; for assemblage; for storage of materials and equipment, storage containers, construction

trailers, and portable restrooms; 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.

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. New Street Staging Yard would be accessed via an existing road (New Street). See **Attachment B, MPR-4 Figure** for the location of the MPR-4 components.

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

Helicopter Landing Zone (LZ-1)

LZ-1 would provide sufficient space to safely land a light duty helicopter, provide fuel and light maintenance service, and stage rigging equipment and materials to be flown to the work areas.

LZ-1 is located within New Street Staging Yard, directly south of the Project's overhead transmission line alignment. Helicopter landing, fueling, and staging of rigging equipment and materials would all occur within LZ-1. Because LZ-1 is located entirely within the approximately 4.3-acre New Street Staging Yard footprint described above, no ground disturbance beyond that already described for preparation of the staging area would occur.

Helicopter Fueling

Helicopter fueling would be performed from a mobile fuel truck staged within the New Street Staging Yard, using Jet A aviation fuel consistent with the Project's Final Environmental Impact Report (FEIR) Section 3.6, which identifies Jet A as the fuel consumed by helicopter and helicopter support activities during Project construction. The fuel truck would arrive on site at the start of each work day requiring helicopter operations, and would leave the site at the end of each work day. No overnight staging of the fuel truck would occur within New Street Staging Yard. Fueling operations would be conducted in accordance with the Project Helicopter Plan, the site-specific Spill Prevention, Control, and Countermeasure Plan (SPCCP) required by APM HAZ-1, and the Hazardous Materials Management Plan (HMMP) required by APM HAZ-2. Spill prevention and cleanup equipment would be maintained at the fueling location at all times during fueling operations.

Consistent with the adopted Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and Section 2.8.1.3 of the FEIR, LSPGC would develop a Helicopter Plan setting forth all safety and operations procedures, and the plan would be submitted to the CPUC at least 14 days prior to the commencement of work that uses helicopters.

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

Original Condition: Use of the New Street Staging Yard and LZ-1 (MPR-4 work area) was not proposed within the Project's FEIR for reasons described herein; therefore, additional resource surveys were conducted to verify current conditions as described in the Resources section below. The MPR-4 work area is located within a previously disturbed, mostly flat area with no native habitat or sensitive aquatic features. Although the MPR-4 work area was not identified for use within the Project's FEIR, the site is located in close proximity to approved Project components and is therefore within the geographic study area analyzed within the FEIR. Further description of current conditions within the MPR-4 work 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 New Street Staging Yard in order to construct the Project as described in the FEIR.

With respect to helicopter operations, FEIR Section 2.8.1.3 states that during conductor stringing operations, helicopter takeoff and landing areas may include nearby staging areas, such as Staging Area 7, 8, and 9, and that the helicopter may temporarily land on existing or proposed access roads as needed. That section further states that local airfields would likely be used for takeoff and landing, fueling, maintenance, and long-term helicopter parking; that fueling would occur at local airfields and would comply with applicable rules and regulations; and that no fueling is anticipated to take place on Project rights-of-way (ROW) or staging areas. This request therefore deviates from FEIR Section 2.8.1.3 in two respects: LZ-1 is not located within Staging Area 7, 8, or 9, and helicopter fueling would occur at LZ-1 rather than at a local airfield.

The same site availability constraint applies to the staging areas identified in FEIR Section 2.8.1.3 as potential helicopter takeoff and landing areas: Staging Areas 7, 8, and 9 are not available for Project use. LZ-1 was identified because it is located within New Street Staging Yard, close to the conductor stringing work areas, on previously disturbed ground, and would involve no ground disturbance beyond that already described for the staging yard.

With respect to fueling, utilizing LZ-1 would significantly reduce flight time by eliminating round trips between the airfield and the overhead transmission line for refueling and would be the safer and more efficient option for the construction crew. Fueling onsite would also allow the contractor to maintain its current flight paths, whereas routing to a local airfield for refueling would require revisions to the Congested Airspace Plan and further coordination with the Federal Aviation Administration to confirm that the added air traffic is acceptable. No overnight staging of the fuel truck within the New Street Staging Yard is proposed.

Maps & Figures: Refer to **Attachment B, MPR-4 Figure**, for a map of the proposed New Street Staging Yard and LZ-1. Refer to **Attachment C, MPR-4 Photograph Log**, for pictures of the current conditions within the MPR-4 work area.

Environmental Impact: Utilization of New Street Staging Yard and establishment of LZ-1 as described herein 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 MMs; and would not require new regulatory approval. The MPR-4 work area would result in approximately 4.3 acres of temporary disturbance within previously disturbed land. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed MPR-4 work area is located within the geographic study area that was analyzed in the California Environmental Quality Act (CEQA) review process. Use of the MPR-4 work area would not require approval from any agencies not disclosed within the FEIR.

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

Previous Biological Survey Report Reference:
As the MPR-4 work area was not identified for use in the Project's FEIR, an aquatic resource delineation survey was performed September 29-30, 2025, to determine if there are any sensitive aquatic features present. A habitat assessment survey was also performed by a qualified biologist on November 24, 2025. 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 each site. California Natural Diversity Database, United States Fish and Wildlife Service (USFWS) species occurrence data and the California Native Plant Society rare plant inventory were reviewed to determine habitat requirements and if there were any nearby occurrences of special-status species that have PTO within New Street Staging Yard.

The New Street Staging Yard site is previously disturbed and primarily bare ground, with small patches of non-native grasses. The area west of New Street Staging Yard beside Zanker Road is covered in stinkwort (*Dittrichia graveolens*) and ice plant (*Carpobrotus edulis*) mats. Other non-native species immediately adjacent to the site are fivehorn smotherweed (*Bassia hyssopifolia*), bristly ox-tongue (*Helminthotheca echioides*), Italian thistle (*Carduus pycnocephalus*), harding grass (*Phalaris aquatica*), and Italian ryegrass (*Festuca perennis*). The proposed New Street Staging Yard has been previously graded and developed and does not exhibit signs of fossorial mammal activity.

Riparian woodland habitat was observed approximately 200 feet southwest of the proposed New Street Staging Yard in the form of a red willow (*Salix laevigata*) thicket. This thicket would not be impacted by MPR-4 activities. Protocol-level golden eagle surveys were completed in the second quarter (Q2) of 2026, and the results report was provided to the CPUC as an attachment to the Project's Q2 Quarterly Compliance Report submitted to the CPUC July 31, 2026. No golden eagles were observed during the survey, and the survey determined there is no suitable habitat for golden eagle within the MPR-4 work area. PTO for all other special-status plant and wildlife species listed in FEIR Tables 3.4-2 and 3.4-3 was determined to be Low or None, and there was no PTO for special-status species not disclosed within the FEIR. There were no special-status plant or wildlife species identified within New Street Staging Yard during the field surveys, and no sensitive aquatic features are present within the staging area.

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

Previous Cultural Survey Report Reference:
As the MPR-4 work area was not included in the Project's FEIR, an additional cultural resource survey and a desktop records search were performed to determine if there were any existing cultural resources onsite per APM CUL-4. The records search indicated there are no known cultural resources within 100 feet of the MPR-4 work area. The pedestrian field survey for the MPR-4 work area was performed on October 16, 2025, and no cultural resources were encountered. The survey methods and results are documented in **Attachment D, Cultural Resources Survey Report**.

Paleontological	☒	No Resources Present	☐	Resources Present	☐ N/A, Change would not affect resources

Previous Paleontological Survey Report Reference:
Paleontological resources within one mile of the Project's limits of construction (which includes the proposed MPR-4 work area) were studied, reviewed, and documented as part of LSPGC's application for a Certificate of Public Convenience and Necessity for the Project and Proponent's 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 the MPR-4 work area in the records search performed by San Diego Natural History Museum and the University of California Museum of Paleontology, and the proposed MPR-4 work area is located in an area with low paleontological potential.

Disturbance Acreage Changes: ☒ Yes ☐ No

The additional temporary disturbance resulting from New Street Staging Yard is approximately 4.3 acres within disturbed land. It should be noted that the majority of the staging areas proposed for use in the FEIR are not anticipated to be used by the Project; therefore, the addition of New Street Staging Yard would not result in a net increase of temporary disturbance beyond what was analyzed in the FEIR. LZ-1 is located entirely within the staging

yard footprint, so no additional disturbance would result beyond the approximately 4.3 acres associated with New Street Staging Yard.

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the FEIR as it relates to MPR-4.

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	☒ Y ☐ N	MPR-4 activities do not involve the installation of any new permanent facilities, nor performance of any new construction activities that have not been analyzed and disclosed within the Project's FEIR. Accordingly, approval of MPR-4 would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 3.7. Preparation of New Street 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. LZ-1 is located within the New Street Staging Yard footprint and would require no ground disturbance beyond what is described above. The Project SWPPP (WDID #201C411672) includes the MPR-4 work area, and all MPR-4 construction activities would adhere to requirements in the SWPPP, including the implementation of erosion control BMPs. In compliance with APM GEO-1 and the Project SWPPP, the MPR-4 work area would be stabilized and returned to approximate pre-construction conditions following use. The MPR-4 work area 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 for establishment of the staging area would be limited to grubbing, minor grading, or other shallow excavations such as for BMP installation and fencing installation. No ground disturbance is proposed for the use of LZ-1. Although no direct impacts to paleontological resources are anticipated during MPR-4 activities, 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. MPR-4 activities would be performed in compliance with APM GEO-1, as applicable. Therefore, the use of the MPR-4 work area as proposed herein would not result in new significant impacts or a substantial increase in the

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.
		severity of impacts analyzed and disclosed within the Project's FEIR, Section 3.7, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to geology, soils, or paleontological resources.
Hazardous Materials and Waste	☒ Y ☐ N	LSPGC and its contractors would comply with applicable rules and regulations pertaining to hazardous materials during construction activities within the MPR-4 work area to minimize the risk of a significant hazard from material transport, use, storage, and disposal. Hazardous materials such as diesel fuel would be stored as needed within New Street Staging Yard. Helicopter fueling would be conducted from a mobile fuel truck staged within the New Street Staging Yard using Jet A aviation fuel. The fuel truck would arrive at the start of each work day and leave at the end of each work day and would not be staged on site overnight. All activities within the MPR-4 work area would adhere to requirements within the site-specific SPCCP (APM HAZ-1), HMMP (APM HAZ-2), and Project Helicopter Plan, as applicable. Spill prevention and cleanup equipment would be maintained onsite during all fueling operations. FEIR Section 2.8.11.1 states that, based on the anticipated volume of hazardous liquid materials such as fuel that would be stored and dispensed at a staging area, an SPCCP may be required in accordance with applicable provisions of 40 CFR 112.1 through 112.7, and identifies APM HAZ-1 and APM HAZ-2 for that purpose. FEIR Section 3.6 identifies Jet A as the fuel consumed by helicopter and helicopter support activities, and FEIR Table 3.6-2 identifies 5,600 gallons of Jet A attributable to helicopter and helicopter support over the Project construction period. The change proposed herein is the location at which the helicopter is fueled, not the total quantity of Jet A consumed. The use of the MPR-4 work area 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 3.9, and no new or altered APMs or MMs would be required.
Agency Consultation?	☒ Y ☐ N	As needed, LSPGC would comply with requirements in the Project's HMMP and SPCCP, including regularly updating the California Environmental Reporting System website with the local Certified Unified Program Agency.
Hydrology/ Water Quality	☒ Y ☐ N	There are no jurisdictional aquatic features within the MPR-4 work area, and MPR-4 activities would not involve the installation of any new permanent facilities. The Project SWPPP includes the MPR-4 work area, and all MPR-4

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.
		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. Helicopter fueling introduces the potential for an accidental release of Jet A aviation fuel. Fueling would not occur within 250 feet of the edge of any vernal pool or within 100 feet of the edge of any other wetland, stream, or waterway. Spill prevention and cleanup equipment would be maintained onsite during all fueling operations. MPR-4 activities within the MPR-4 work area 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, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to hydrology or water quality.
Cultural and Tribal Cultural Resources	☒ Y ☐ N	As discussed in the Resources section in this MPR-4 request, there are no known sensitive cultural resources within the MPR-4 work area (see **Attachment D, Cultural Resources Survey Report**). As such, cultural and tribal monitoring is not anticipated to be required for MPR-4 activities. Although no direct impacts to cultural or tribal cultural resources are anticipated as a result of the use of New Street Staging Yard or LZ-1, 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. 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.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to cultural or tribal cultural resources.
Traffic and Circulation	☒ Y ☐ N	MPR-4 would not introduce any new construction activities or changes to the overall number of workers or construction-related vehicle trips evaluated in the Project FEIR, Section 3.17. New Street Staging Yard is located in proximity to other Project components and staging areas previously evaluated in the FEIR and would not result in changes to the Project construction schedule.

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.
		Use of LZ-1 for helicopter operations would require periodic resupply of a mobile fuel truck during the approximately four-week conductor stringing period described in FEIR Section 2.8.1.3. The fuel truck would travel to and from the Project site on a daily basis during helicopter operations, resulting in a limited number of temporary vehicle trips that were not specifically identified in the FEIR. These additional trips would occur only during the approximately four-week helicopter operations period and would represent a temporary and limited increase in vehicle activity associated with construction. The additional trips would not require changes to the existing roadway network, would not substantially increase construction traffic volumes or affect roadway operations, and would not alter the duration or overall schedule of Project construction. Therefore, the temporary increase in vehicle trips associated with fuel-truck resupply would not result in a new significant traffic or circulation impact or a substantial increase in the severity of traffic or circulation impacts previously evaluated in FEIR Section 3.17. MPR-4 activities are not anticipated to require the closure of any sidewalks or other public access facilities. Traffic control is not anticipated to be required, and emergency access would 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 MPR-4 activities, and the MPR-4 work area is located within an industrial area not frequented by residential motorists. Therefore, the use of the MPR-4 work area 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 3.17, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation related to traffic and circulation.
Air Quality	☒ Y ☐ N	The use of New Street Staging Yard would not result in new construction activities that have not been previously analyzed and disclosed within the Project's FEIR. There is no change to the overall construction schedule or equipment used. Helicopter use for conductor stringing is likewise a Project activity analyzed within the FEIR, and the proposed use of LZ-1 would not increase the number of aircraft, the duration of conductor stringing operations, or the total quantity of Jet A consumed, which FEIR Table 3.6-2 identifies as 5,600 gallons over the Project construction period. FEIR Section 2.8.1.3 states that local airfields would likely be used for takeoff and landing, fueling, maintenance, and long-term helicopter parking. Utilizing LZ-1 for helicopter

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.
		landing and refueling would reduce the number of ferry flights between the work area and a local airfield that would otherwise be required to refuel. The construction contractor has indicated that fueling at LZ-1 would significantly reduce flight time by eliminating round trips between the airfield and the right-of-way for refueling. All MPR-4 activities would be performed 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 Final emission controls, and equipment documentation and tracking is performed. In addition, fugitive dust control measures defined in MM 3.3-2b would be followed. MM 3.3-2b requires that all exposed surfaces, including staging areas and graded areas, be watered two times per day. Therefore, the use of the MPR-4 work area 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.
Agency Consultation?	☐ Y ☒ N	MPR-4 would not require agency consultation relating to air quality.
Noise and Vibration	☒ Y ☐ N	There are no sensitive receptors within 1,000 feet of the MPR-4 work area, and the New Street Staging Yard and LZ-1 are located within an industrial area. Although MPR-4 would involve temporary helicopter operations at LZ-1, these activities would occur for approximately four weeks and would be associated with the conductor stringing activities evaluated in the FEIR. Given the temporary nature of the helicopter operations and the substantial distance between LZ-1 and the nearest noise-sensitive receptors, MPR-4 would not be expected to result in a new significant noise or vibration impact or a substantial increase in the severity of noise or vibration impacts previously evaluated in the FEIR. FEIR Section 3.13.1.2 identifies residences, schools, hotels, hospitals, and nursing homes as land uses most sensitive to noise and identifies churches, libraries, and cemeteries as additional noise-sensitive land uses. Commercial and industrial uses are identified as the least sensitive land uses. The FEIR states that no receptors are within 1,000 feet of the proposed Newark to NRS 230 kV AC transmission line north of the San Jose-Santa Clara Regional Wastewater Facility (RWF), with the exception of the RWF Main Guard Shack on Los Esteros Road, and that the nearest residential sensitive receptors to the transmission line, located west of the RWF, are residential uses approximately 20 feet from the transmission line on Grand Boulevard in the

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.
		city of San Jose. The nearest sensitive receptors to New Street Staging Yard and LZ-1 are more than 7,000 feet from the staging area. Furthermore, helicopter operations for installation of the overhead transmission line were analyzed within the FEIR, and the overhead transmission line is located approximately 800 feet north of the proposed MPR-4 work area. Therefore, the use of the MPR-4 work area 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 3.13, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to noise and vibration.
Aesthetics/ Visual Resources	☒ Y ☐ N	The MPR-4 work area is located within Landscape Unit 2 studied in the Project's FEIR, Section 3.1.2.6. Landscape Unit 2 is described as predominately industrial, containing undeveloped land, landfills, wastewater treatment facilities, and other industrial warehouses and facilities. The MPR-4 work area is located on an undeveloped lot surrounded by wastewater treatment drying beds to the north, east, and south, and a wastewater treatment facility to the west. The parcel the MPR-4 work area is located on is bordered by Zanker Road on its west side and New Street to the north. The MPR-4 work area could be viewed by motorists traveling along these roads, although these would primarily be workers in the nearby industrial facilities as there are no residential units in the surrounding area. Use of New Street Staging Yard would be temporary, would not affect any scenic resources identified in the Project's FEIR, and the staging area is located in an industrial area adjacent to Project components analyzed in the FEIR, Section 3.1. Helicopter operations at LZ-1 would likewise be temporary, limited to the approximately four-week conductor stringing period described in FEIR Section 2.8.1.3, and would occur during anticipated working hours, Monday through Saturday, 6:00 a.m. to 6:00 p.m., subject to coordination with and approval by the RWF. The mobile fuel truck would be a temporary presence within the staging area during working hours and would not remain overnight. The staging area and LZ-1 would be restored to approximate pre-construction conditions following use, including any necessary repairs to infrastructure. Nighttime lighting would be in accordance with APM BIO-10 and MM 3.1-2 as needed. Therefore, the use of the MPR-4 work area 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 3.1, and no new or altered APMs or MMs would be required.

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?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to aesthetics or visual resources.
Vegetation and Wildlife	☒ Y ☐ N	As discussed in the Resources section in this MPR-4 request, biological surveys and desktop analysis conducted for the MPR-4 work area indicated PTO for special-status plant species as Low or None, and there are no sensitive aquatic features within the site. Although there were no sensitive wildlife species observed at New Street Staging Yard during biological surveys, potentially suitable foraging and nesting habitat for golden eagle occurs in the vicinity of New Street Staging Yard. One known nest site is located approximately 1 mile southwest of New Street Staging Yard. As such, protocol-level surveys for golden eagle were completed in compliance with APM BIO-11 and APM BIO-14 in Q2 2026. There were no golden eagle observed during the survey, and the survey report indicated there is no suitable habitat for golden eagle within the MPR-4 work area. As such, no additional protocol-level surveys for special-status species are anticipated to be required for the MPR-4 work area per MM 3.4-1d and APM BIO-3. Use of the MPR-4 work area is anticipated to begin in November 2026, outside of the avian nesting season (February 15–August 31); therefore, additional pre-construction nesting bird surveys (APM BIO-12, APM BIO-15) are not anticipated to be required. Helicopter operations at LZ-1 may introduce rotor noise, rotor downwash, and repeated low-altitude overflight, which represent a different disturbance profile than the ground-based staging activities. Golden eagle is a California Fully Protected species under Fish and Game Code Section 3511. In the event of the discovery of golden eagle nests or live individuals, a suitable buffer would be marked as a sensitive area and avoided to the extent practicable, with USFWS and/or California Department of Fish and Wildlife consulted if avoidance is not possible. 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 New Street Staging Yard or LZ-1, those impacts would be mitigated through the implementation of the following APMs and MMs, where applicable: • APM BIO-1: Restoration of Disturbed Areas • APM BIO-6: Vehicle Speed Limits • APM BIO-8: Excavation Wildlife Best Management Practices • APM BIO-9: Worker Environmental Awareness Program (WEAP) Training

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.
		• 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-14: Golden Eagle Protection • APM BIO-15: Nesting Bird Surveys • MM 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction • MM 3.4-1d: Protection of Special-Status Wildlife • MM 3.4-1e: Construction Worker Environmental Awareness Training Program (WEAP) Therefore, the use of the MPR-4 work area 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 3.4, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation relating to biological resources.
Wildfire	☒ Y ☐ N	The MPR-4 work area is not located in a high-fire severity zone as determined by the Department of Forestry and Fire Protection, nor in an area of elevated or extreme fire-threat as determined by CPUC. Storage and dispensing of Jet A aviation fuel would occur within the New Street Staging Yard from which vegetation would be cleared prior to use, during working hours only, with no overnight staging, and fueling operations would be conducted in accordance with the Project Helicopter Plan, the SPCCP (APM HAZ-1), and the HMMP (APM HAZ-2). The Project's WEAP training would be provided throughout construction, as needed, to accommodate new Project personnel and would address fire safety, prevention, and response procedures. Vegetation within New Street 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, the use of the MPR-4 work area 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 3.20, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-4 activities would not require agency consultation related to wildfire. As needed, LSPGC would coordinate with local emergency response agencies such as fire departments and police during Project construction.

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.

Approvals	Date	Name (print)	Signature	
LSPGC Project Manager		Lucy Marton		☐ Reviewed
LSPGC Environmental Project Manager		Dustin Joseph		☐ Reviewed
CPUC Project Manager				☐ Approved ☐ Approved with conditions (see below) ☐ Denied

For CPUC Compliance Manager Use Only		
☐ **Refinement Approved**	☐ **Refinement Denied**	☐ **Beyond Authority**

Conditions of Approval or Reason for Denial:

Prepared by: **Date:**

ATTACHMENT B
MPR-4 Figure

POWER THE SOUTH BAY PROJECT
Attachment B, MPR-4 - New Street Staging Yard and Landing Zone
City of San Jose, CA



LEGEND

MPR-4 Components

- Staging Area
- Landing Zone

General Features

- Municipal Boundary

0 50 100 200 300
Feet



G:\LS Power Centinella\MXD\Newark\MPR-4 Overview Map 100726.mxd 100726 RCQ

Sources: Heritage, 2023; LSPGC, 2023; Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

ATTACHMENT C
MPR-4 Photograph Log

Power the South Bay
MPR-4 Site Photographs

	**Photograph 1:** Photo of MPR-4 work area from the northwest side, facing southeast.
	**Photograph 2:** Photo of MPR-4 work area from the northeast side, facing south.

Power the South Bay
MPR-4 Site Photographs



Photograph 3:

Photo of MPR-4 work area from the northwest side, facing Zanker Road running south.

ATTACHMENT D
MPR-4 Cultural Resources Survey Report
(confidential not posted)