Revised Notice of Preparation for a Draft Environmental Impact Report

Date: February 25, 2022

To: Responsible/Trustee Agencies and Interested Parties

From: California Department of Fish and Wildlife

Subject: Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report for the

Southern California Gas Company California Desert Conservation Area Operations and Maintenance Long-Term Incidental Take Permit and Master Lake and Streambed

Alteration Agreement

SCH#: 2022010302

Revised NOP Public Review Period: February 25, 2022, to March 28, 2022

A revised Notice of Preparation (NOP) is being released for a second 30-day public review period to recognize the proposal for approval of a Master Lake and Streambed Alteration Agreement and provide other informational updates since the original NOP, which was posted on January 19, 2022. A public scoping meeting was held in an online webinar format on February 2, 2022, and included the revised information presented in this NOP. Therefore, a separate scoping meeting will not be held. Comments received during the first NOP public review period remain in the project record and need not be resubmitted.

A. Introduction

In accordance with Sections 15081 and 15082 of the California Environmental Quality Act (CEQA) Guidelines, the California Department of Fish and Wildlife (CDFW), as the CEQA lead agency, will prepare a Draft Environmental Impact Report (EIR) for the Southern California Gas Company (SoCalGas) California Desert Conservation Area (CDCA) Operations and Maintenance (O&M) Long-Term Incidental Take Permit (ITP) and Master Lake and Streambed Alteration Agreement (MLSAA) (Project). The Project applicant, SoCalGas, has filed an application with CDFW for an ITP under California Fish and Game Code Section 2081(b) and Title 14 of the California Code of Regulations, Sections 783.0–783.8, to authorize the otherwise prohibited "take" as defined by State law of six state-listed wildlife species incidental to SoCalGas ongoing O&M activities within the CDCA. The wildlife species protected by the California Endangered Species Act (CESA) that SoCalGas proposes for incidental take coverage under the ITP (Covered Species) are listed below in Table 1. Additionally, SoCalGas has notified CDFW of potential effects to streams and lakes which may adversely affect fish and wildlife resources pursuant to Fish and Game Code Section 1600 et seq. to obtain an MLSAA.

CDFW's consideration of the SoCalGas application and the proposed issuance of a long-term ITP under CESA, as well as the issuance of an MLSAA, together constitute the proposed discretionary approval of a project subject to required environmental review under CEQA. CDFW will comply with CEQA and fulfill its related obligations as a lead agency. (CEQA Guidelines, § 15367.) CDFW will also fulfill its obligations as the CEQA lead agency consistent with its CESA ITP certified regulatory program. (Id., § 15251, subd. (o); Cal. Code Regs., tit. 14, §§ 783.3, subd. (b), 783.5, subd. (d).)

Table 1. Incidental Take Permit Covered Species

Common Name	Scientific Name	State Status
Birds		
Least Bell's vireo	Vireo bellii pusillus	Endangered
Southwestern willow flycatcher	Empidonax traillii extimus	Endangered
Tricolored blackbird	Agelaius tricolor	Threatened
Reptiles		
Coachella Valley fringe-toed lizard	Uma inornate	Endangered
Desert tortoise	Gopherus agassizii	Threatened, Proposed Endangered
Mammals		
Mohave ground squirrel	Xerospermophilus mohavensis	Threatened

As required by CEQA, this NOP is being sent to the California Governor's Office of Planning and Research, responsible and trustee agencies, and interested members of the public who submitted a request for such notices. The purpose of the NOP is to inform recipients that CDFW is beginning preparation of a Draft EIR for the proposed Project and to solicit comments concerning the scope and content of the environmental information, including information relevant to an agency's statutory responsibilities in connection with the proposed Project. Information that would be most useful at this time would be descriptions of the significant environmental issues, reasonable alternatives, and mitigation measures you would like to have explored further in the Draft EIR.

This NOP includes background information regarding ongoing SoCalGas O&M activity in the CDCA (Section B), a description of the requested long-term ITP and MLSAA, and how ongoing O&M would be implemented consistent with relevant permitting requirements under CESA and Fish and Game Code Sections 1600 et seq. (i.e., the proposed Project) (Section C), a summary of potential Project impacts (Section D), information on how to provide comments to CDFW (Section E), and where documents are available for public review (Section F).

In accordance with CEQA Guidelines Section 15082(b), there will be a 30-day comment period for this NOP, beginning on February 25, 2022, and ending on March 28, 2022. CDFW welcomes agency and public input during the public review period. In the event that no response or well-justified request for additional time is received from any responsible, federal, or trustee agency by the end of the review period, CDFW may presume that such agencies have no comments.

B. Background and Project Location

B.1 Background

SoCalGas operates and maintains approximately 1,100 miles of transmission pipeline and 308 miles of main distribution pipelines within the CDCA. Each pipeline transports natural gas and includes appurtenant and support facilities including valve, metering, and pressure-limiting stations; cathodic protection equipment; aerial and ground markers; telecommunications equipment; and access roads. Routine and ongoing O&M of these pipelines is required by California Public Utilities

Commission General Order 112-E, in addition to the Federal Pipeline Safety Regulations under Title 49 of the Code of Federal Regulations, Parts 190, 191, and 192.

SoCalGas has been conducting O&M operations on its pipeline network within the CDCA for more than 70 years. Authorization for incidental take for ongoing O&M of the existing pipelines and appurtenant and supporting facilities has been occurring in accordance with an existing CESA Memorandum of Understanding (MOU) that CDFW executed with SoCalGas in 1997 under former Fish and Game Code Section 2081. (See Fish & G. Code, 2081.1.) The CESA MOU is set to expire on December 31, 2022. The long-term ITP SoCalGas seeks for its continued and ongoing O&M activity in the CDCA would replace the CESA MOU, consistent with the permitting criteria set forth in current Fish and Game Code Section 2081, subdivisions (b) and (c). Similarly, performance of repairs and maintenance activities within rivers, streams or lakes on SoCalGas's existing facilities has been authorized on an individual activity basis pursuant to Sections 1602-1603 of the Fish and Game Code. The MLSAA would include a sub-notification process that identifies covered activities, applicable measures, assessment of impacts, and determination of consistency with the MLSAA.

The 1995 Biological Opinion for Ongoing Maintenance Activities on SoCalGas's Pipeline System in the Southern California Deserts and 2017 Biological Opinion for Activities in the California Desert Conservation Area provided formal consultation from the U.S. Fish and Wildlife Service (USFWS) regarding the effects of SoCalGas pipeline activities on five of the Covered Species and their habitat (tri-colored blackbird was recently listed and thus not included in the previous documents). The CESA MOU along with the 1995 and 2017 Biological Opinions analyzed the impacts of SoCalGas O&M activities related to the natural gas pipelines.

In the CESA MOU, CDFW concluded 0&M activities would not result in jeopardy to the continued existence of the Covered Species if the terms and conditions therein were implemented. In the 1995 and 2017 Biological Opinions, USFWS concluded that 0&M activities would not likely result in destruction or adverse modification of critical habitat for the desert tortoise or jeopardize the continued existence of the desert tortoise.

In sum, SoCal Gas proposes to pursue a long-term state ITP from CDFW for its O&M activities in the CDCA region to replace the CESA MOU upon its expiration, as well as a new MLSAA for activities that could affect stream and lake resources subject to Fish and Game Code Section 1600 et seq. The state ITP and MLSAA would provide an enhanced conservation strategy and approach to minimizing impacts to fish and wildlife resources while eliminating the time and expense involved in processing individual state ITPs and LSAAs. An ITP application was submitted to CDFW on October 8, 2020 and was subsequently deemed complete on February 27, 2021. The ITP application includes the Covered Species identified in Table 1 above. The MLSAA notification was submitted on September 4, 2019. Issuance of an ITP and MLSAA constitute the discretionary action that requires the preparation of an EIR in accordance with CEQA. The ITP, if issued, would authorize O&M-related incidental take of the Covered Species subject to certain conditions under the CESA.

B.2 Project Location

The Project Area is defined as the SoCalGas Desert Region, which consists of approximately 9,480 acres within the CDCA. The CDCA is a 25-million-acre expanse of land that extends across the desert regions of seven southern California counties, including Inyo, Kern, Los Angeles, Riverside, San Bernardino, Imperial, and San Diego counties. In 1976, Congress designated the CDCA as a conservation area under the Federal Land Policy and Management Act.

The Project Area is located west of the Colorado River and includes Imperial County and desert portions of Kern, Los Angeles, Riverside, and San Bernardino counties. Most of the Project Area is within the Mojave Desert Region, and the southern area is within the Sonoran Desert. Project activities will also occur within ephemeral waters and several ROW crossings where perennial or intermittent groundwater could potentially persist. Locations include but are not limited to Homer Wash, Black Canyon Wash, Piute Wash, Coachella Canal, Whitewater River, Dry Morongo Wash, Mojave River, Big Rock Creek, Little Rock Creek, Alamo River, All-American Canal and numerous unspecified dry washes. The extent of the Project Area and general location of the SoCalGas natural gas pipeline rights-of-way (ROWs) are shown in Figure 1.

C. Project Description

The Project consists of issuance of an ITP and MLSAA for continued O&M activities within the CDCA; each is described separately below.

C1. ITP

The ITP would be specific to ongoing SoCalGas Covered Activities outlined in the CDFW 2081 ITP application for six state-listed species. The pipelines included in this Project include all major transmission pipelines and distribution pipelines located within areas of potentially suitable habitat for the Covered Species.

Covered O&M activities would occur along the SoCalGas natural gas pipeline ROW within the CDCA and would continue to be conducted on a regular and continuous basis to ensure that the system operates in compliance with all environmental and safety regulations. The Covered Activities are categorized into the following four classes, generally based on intensity of the activity:

- Class I: routine O&M activities on existing facilities within the ROW that do not result in new surface disturbance and use light-duty equipment;
- Class II: activities within the ROW that result in minimal amounts of surface disturbance using medium-duty equipment, as well as surface maintenance of existing access roads;
- Class III: activities within the ROW that result in moderate to major surface disturbance using medium- to heavy-duty equipment, as well as emergency repair activities; and
- Class IV: activities identified under Class I, II, and III that extend outside of pipeline ROW corridors on existing facilities or access roads up to 0.5 acre of disturbance outside the ROW.

Table 2 provides details of the ITP Covered Activities under each of the four classes, a description of each activity and the typical frequency and duration of the occurrence of activity. The Covered Activity descriptions are based on current methods used to repair, maintain, and operate gas pipelines and related facilities, as well as SoCalGas' past work experience in the southern California deserts. New technologies may create new or different types of O&M activity during the term of the permit requested by SoCalGas. To the extent the new O&M activities are consistent generally with the proposed Project and the related environmental effects addressed by CDFW during the current lead agency review effort, SoCalGas may seek approval from CDFW in the future to amend the permits to add the new O&M activities as Covered Activities under the permit, subject to CDFW's subsequent exercise of discretion and independent judgment as required by CEQA.

Table 2. ITP Covered Activities

Covered Activity	Activity Description	Duration/Frequency
Class I Activities		
Pipeline Inspection	Pipeline inspection regularly conducted over all portions of the pipeline system using on-the-ground visual inspection while driving a truck or on foot.	Throughout the year Approximately 4 times annually
	Inspections include pipelines (including spans over watercourses), maintenance roads, and support facilities. Crew members check and record ROW conditions, clear debris, replace missing or damaged pipeline markers and aerial patrol signs, ensure that pipeline markers are clearly visible, perform minor maintenance activities, and record conditions that may affect pipeline operations.	
Line Break Control	Line break controls are located at most main line valve stations, which are typically 8 to 10 miles apart. Line break controls on valve actuators are inspected and calibrated.	 Twice annually Typically completed within 5 to 10 days for the entire pipeline system each year
Valve Inspection and Lubrication	Work includes valve inspection, lubrication, and general maintenance (removal of vegetation and debris from valve station enclosures; touchup painting of valves and related equipment using lead-free paint).	Annually Frequency depends on valve classification (critical or non- critical)
Modulating Valves	Modulating (i.e., pressure-limiting) valves regulate the flow of gas through a pipeline. These valves are inspected and lubricated semi-annually to ensure proper function.	Semi-annually
Metering Systems	Fuel and flow meters located at main line valve stations measure the flow of gas through the pipeline. These meters must be inspected each month to ensure that they maintain their integrity and accuracy.	Monthly at any time of the year
Leakage Surveys	Gas leak surveys are conducted on all pipelines. Leaking gas from pressurized pipelines or appurtenant facilities can present hazardous conditions, which must be avoided.	 At least once per year along pipelines Twice per year in more densely populated areas Throughout the year for entire system
Removal of Liquids	Pipeline condensate is created as pressurized natural gas travels through the pipeline under differing temperature conditions. This condensate is collected into drums from collection valves along the pipelines. Crews collect the condensate at intervals dependent upon the rate of liquid accumulation in the particular pipeline. The condensate is disposed of in compliance with federal and state regulations.	 Collected at intervals dependent upon the rate of liquid accumulation in the particular pipeline throughout the year Ongoing process

Covered Activity	Activity Description	Duration/Frequency
Cathodic Protection Surveys	Cathodic protection is a method of preventing corrosion by making the pipeline surface a cathode in an electrochemical cell. Surveys determine pipe and soil electrical potentials. Surveys are conducted through existing test leads and are performed to ensure that the system is operating effectively. Simple testing instruments (hand-held potentiometers) are needed to determine millivolt current gradients on the pipeline.	 Annually Surveys typically require 10 days to complete, but some can require up to 90 days
Cathodic Protection Test Station Maintenance and Inspections	Cathodic protection inspections are needed to ensure that the system is operating effectively. The Cathodic Protection Test Stations (or Electrolysis Test Stations) are exposed to the elements and require ongoing repair and maintenance following natural events (e.g., earthquakes, fires, wildlife contact) and human-caused damage (e.g., vandalism, reckless 4-wheel drive vehicle use, farming activities) that may damage the electrical wires. Crews routinely inspect and maintain Cathodic Protection Test Stations by conducting pipe-to-soil surveys and bond reads.	 Inspections are bimonthly throughout the year Maintenance and inspection will vary in duration, size, and complexity for each pipeline
Rectifier Maintenance	An alternating current (AC) rectifier provides direct current for Cathodic Protection Test Stations. Rectifiers must be serviced so that they are in operating condition to protect the pipelines.	Annually Require 30 days to complete
Anode Irrigation	Cathodic protection system anodes are irrigated to increase the efficiency of the AC rectifier. A water truck is used to direct 200 to 2,400 gallons of water into a vent tube to irrigate the anodes. All of the water remains underground after completion of the activity. Water for anode irrigation is obtained from a local municipal source.	 Semiannually along the pipeline throughout the year Completed in less than a day at each location
Painting of Aboveground Pipes and Structures	Painting of aboveground pipes and structures, as necessary. General maintenance includes inspection, preparation, and painting of aboveground pipes and structures using lead-free paint.	• 14 to 21 days
Vegetation Trimming	Vegetation trimming is only associated with existing aboveground facilities within the footprint of previously disturbed areas. As such, it could occur in areas where vegetation has grown against any aboveground structure.	Conducted in combination with other listed operation and maintenance (O&M) activities
Vegetation Removal	Vegetation removal is only associated with existing aboveground facilities within the footprint of previously disturbed areas. As such, it could occur in areas where vegetation has grown against any aboveground structure.	Conducted in combination with other listed O&M activities

Covered Activity	Activity Description	Duration/Frequency
Class II Activities		
Right-of-Way/Access Road Repairs	Grading to repair eroded ROWs and access roads, as necessary. Road maintenance and repairs are critical in ensuring pipelines and ROWs are accessible at all times. Maintenance structures (e.g., culverts, sandbags, or riprap) may be installed (within the ROW) to prevent erosion. Repair activities may extend beyond the existing roadbed and berm but remain within the existing ROW. At the request of the tortoise Recovery Implementation Team (including USFWS and CDFW) to aid in avoidance of steep berm slopes, which can be problematic for tortoises, road maintenance may pull in up to 2 feet of berm on each side of the road to minimize slope angle/height.	 Occur at any time during the year, but typically only conducted during the dry season to avoid flowing water Up to 60 days per year to complete
Existing Access Road Surface Maintenance	Existing access road surface maintenance occurs on a regular basis to keep existing access roads in operational and safe conditions. Road maintenance and repairs are critical in ensuring the pipelines and ROWs are accessible at all times. Surface maintenance is accomplished by dragging the road with a truck or tractor, or by using a motor grader, backhoe, or loader. The road is repaired without substantially altering the road profile or the original road prism. All vehicles are required to stay on existing roads.	 Occur at any time during the year, but typically only conducted during the dry season to avoid flowing water Length of road surfaces subject to maintenance in any given year varies due to weather conditions
Class III Activities		
Pipeline Segment Replacements	Severe corrosion or other damage to a pipeline may be revealed through a below- grade inspection or an in-line inspection process, and any damaged segment(s) would need to be excavated and replaced. A typical excavation is between 1 foot and 1.5 feet below the bottom of the pipeline to allow removal and replacement. To avoid shoring, the excavation usually has a slope of 18 inches of width per 12 inches of depth. As a pipeline typically has 36 inches of cover, the excavation for a 16-inch line would be 4 to 5 feet deep and up to 8 feet wide; the excavation for a 30-inch line would be 5 to 6 feet deep and up to 8 feet wide. Excavated soil is stockpiled nearby until repairs are completed and then used for backfill. Alternatively, imported soil may be utilized as backfill, depending on native soil conditions. The disturbance area and time required to complete the job is dependent upon the length of the pipeline segment that requires replacement.	 Time dependent upon length of pipeline segment that requires replacement Occur at any time during the year

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Covered Activity	Activity Description	Duration/Frequency
Installation of Magnesium Anodes	Magnesium anodes are installed when cathodic protection surveys indicate pipeline segments with low pipe-to-soil electrical potentials. After the anodes are installed, a shallow trench is excavated between the pipeline and the anodes. Generally, the trench will have a depth of 3 to 6 feet, with a length of 5 to 10 feet and a width of 1 to 2 feet. Connecting wires are placed within the trench and welded into place around the pipeline.	 1-day completion 3 to 6 installations annually Occur at any time during the year
Installation of Deep Well Anodes	Deep well anodes are installed 200 to 600 feet below the ground surface and are generally located within 100 feet of depleted anode beds. During drilling, mud and spoil are removed by a vacuum truck and disposed of offsite at approved facilities. After the anodes are installed, a shallow trench is excavated between the pipeline and the anodes. Connecting wires are placed within the trench and welded into place around the pipeline. Each deep well anode lasts 15 to 20 years, and frequency of activity is determined by status of the existing deep well anode.	 Typically 4 weeks to complete or longer Occur at any time during the year
Installation of Replacement Horizontal Anodes	Horizontal anodes are installed when shallow-depth cathodic protection units do not maintain the desired pipe-to-soil electrical potentials. Horizontal anodes parallel the pipeline 400 to 800 feet from the ROW centerline and are installed at approximately the same depth as the pipeline. Shallow trenches are excavated to connect the anodes to the pipeline with connecting wires, which are cad welded around the pipe. Not as effective as deep well anodes, SoCalGas's use of horizontal anodes is infrequent and performed on an as-needed basis. Typically, horizontal anode installation disturbs 20,000 to 25,000 square feet of soil outside of the established ROW.	 5 to 7 days to complete Occur at any time during the year Infrequent and performed on an as- needed basis
Hydrostatic Testing	Any time there is a pipeline replacement, hydrostatic testing is required to test the integrity of the new pipeline. Testing is usually conducted at a laydown or other yard and the pipe is then transported to the installation site. For larger replacements of pipeline, hydrostatic testing would be completed in situ for direct evaluation of pipeline and leakage integrity.	Once per year and mostly as part of Pipeline Safety Enhancement Plan activities
Below-Grade Pipe and Coating Inspections	Pipelines are excavated and inspected when cathodic protection surveys indicate low pipe-to-soil electrical potentials, when SoCalGas's Pipeline Integrity Program (PIP) requires smart pig technology to inspect the inside of the pipeline, when hydrostatic testing is conducted, or when vulnerable areas of the pipeline are identified by	 Occur at any time of the year 5 to 10 days to complete

Covered Activity	Activity Description	Duration/Frequency
	SoCalGas. Pipe inspection disturbs 1,000 to 2,000 square feet of pipeline ROW. Cal/OSHA guidelines for Trenching and Excavation Safety Measures are applied based on the types of soils encountered. Excavated soil is staged in piles near the excavation until the inspection is complete, and then used for backfill. Visual inspection of buried pipelines involves excavation, inspection, repair (if necessary), and backfill.	
Valve/Pipeline Excavation and Recoating	At times, a below-grade pipeline inspection may reveal that the protective coating over the pipeline has failed. In these instances, the pipeline segment is excavated and recoated. Recoating of the pipeline involves two methods: (1) Installation of single or multiple joints of pipe would be accomplished with fusion-bonded epoxy already on the pipe; (2) at circumferential weld locations, the pipe would be coated with a two-part epoxy prior to being inspected and installed below ground.	 Recoating will take place any time there is a cylindrical cutout or new pipe is installed and can occur at any time of the year Duration of work depends on the length of pipeline that needs repair
Leak Excavations and Repairs	Pipeline inspections may detect signs of escaping gas. In these instances, that portion of the pipe would be excavated for visual inspection and confirmation of the leak. The pipe inspections for locating potential leaks would disturb 1,000 to 2,000 square feet of pipeline ROW, and a typical excavation is between 1 and 1.5 feet below the bottom of the pipeline to allow thorough inspection and repairs. To avoid shoring, the excavation usually has a slope of approximately 18 inches of width per 12 inches of depth. As a pipeline usually has 36 inches of cover, excavation for a 16- inch line would be 4 to 5 feet deep and up to 8 feet wide; excavation for a 30-inch line would be 5 to 6 feet deep and up to 8 feet wide. Typical repairs are made by welding bands or replacing the corroded pipeline segment. Excavated soil is staged in piles near the excavation until the inspection and repair are	 Occur at any time of the year 5 to 10 days to complete
Emergency Repairs	complete, and then used for backfill. Emergency situations are defined as any natural or human-caused events that require an immediate response by SoCalGas to protect human health, welfare, property, the natural environment, or system reliability. Emergency response actions are not limited to the actual repair of SoCalGas facilities and include preliminary site assessments conducted to understand the extent of the potential problem. These response actions are also designed to limit further potential threats.	 Most 0&M activities can routinely be conducted on specific schedules; however, emergencies may require SoCalGas to take immediate responsive action and preclude the implementation of avoidance and minimization measures. Anytime throughout the year Time required varies with each situation

Covered Activity	Activity Description	Duration/Frequency
	Emergency repairs may be necessary to address pipeline leaks or breaks; to prevent leaks from occurring in the near future; to fix access roads severely damaged by natural disasters; or for any other condition that jeopardizes system reliability, property, human health, or the environment.	
Emergency Repairs – Fire Response	Fires may threaten aboveground structures, including pipelines and facilities. They may also damage the protective coating of the pipeline and cause substantial damage to facilities, resulting in the loss of facility use or possible rupture of the gas pipeline. When these situations arise, crews may be required to create firebreaks or fire roads in an effort to stop the fire, or to minimize the resulting damage. These activities are typically performed by the local fire department(s).	As-needed basis
	Actual fire- related activities are dependent on the local fire department(s), allowing the work to be performed when conditions are safe.	
Emergency Repairs – Slope, Slump, and Slide Stabilization	Saturation of soils and/or erosion can result in unstable slopes, slumps, landslides, and other conditions that may threaten pipelines and facilities. When these emergency situations arise, crews are required to stabilize the surrounding areas immediately.	As-needed basis
	An immediate response is particularly important when pipeline pressure must be reduced or shut off. Often during these response actions, the slopes are stabilized temporarily until long-term solutions can be planned or implemented.	
Emergency Repairs – Emergency Repairs	Emergency repairs may be necessary to respond to pipeline leaks or breaks; to prevent leaks from occurring in the near future; to fix access roads severely damaged by natural disasters; or for any other condition that jeopardizes system reliability, property, human health, or the environment.	As-needed basis
	Most emergency repair situations affect less than 1 acre, although the amount of habitat disturbance varies depending upon the nature of the emergency and the weather conditions.	
Emergency Repairs – Emergency Pipeline Integrity Program Response	In some instances, inspection data identify pipeline anomalies that require an immediate response to identify the problem, possibly resulting in emergency repair work.	As-needed basisFix the anomaly within 5 days for emergency situations
	Depending upon the nature of the anomaly and the urgency required, several correlation digs may be necessary to inspect and verify the anomaly.	

Covered Activity	Activity Description	Duration/Frequency
	Repair activities would be conducted in accordance with federal regulations. Digs to inspect and repair the anomaly would consist of, at a minimum, excavating and inspecting the pipeline, repairing the anomaly, and backfilling the excavation.	
	In emergency situations, crews are required to excavate and repair or replace pipelines that have serious anomalies within specified regulatory time limits.	
Class IV Activities		
Class IV activities include any of the previously described activities that occur outside of SoCalGas' ROW corridors	Class IV activities include placement of cathodic protection units (including pipeline segment replacements, deep well, shallow well, and horizontal well); facility installation along existing pipeline segments; creating staging or laydown sites, equipment stockpile or spoils pile deposition areas; repairing large pipeline washouts; and relocating segments of existing pipeline due to corrosion, damage, or other conditions.	Varies with 0&M activity
	The extent of disturbance outside of the existing pipeline ROWs would vary with the activity, and are dependent on ROW width, topography, layout, and other factors.	
	Up to 0.5 acre of disturbance outside of a pipeline ROW, per activity, would qualify as a Covered Activity.	

C2. MLSAA

O&M activities which may affect streams and lakes that support fish and wildlife subject to FGC Section 1600 et seq. would be subject to the MLSAA for waterways including, but not limited to, Homer Wash, Black Canyon Wash, Piute Wash, Coachella Canal, Whitewater River, Dry Morongo Wash, Mojave River, Big Rock Creek, Little Rock Creek, Alamo River, All-American Canal, and various ephemeral desert washes. All activities describe temporary ground disturbance. No permanent impacts are being requested; if permanent impact activities are required, individual notifications will be submitted to CDFW. The activity descriptions identify key components, the work force and equipment typically required to complete the activity, and the frequency of occurrence. For all activities, the extent of disturbance will be limited to the smallest area feasible. The activities described herein are based on SoCalGas's best current available knowledge and identify the activities used to repair, maintain, operate, and improve natural gas pipelines and associated facilities. The activities requested are identified in three general categories of actions.

- Category 1: Access Road and Right-of-Way Maintenance and Repairs
- Category 2: Above Ground Maintenance
- Category 3: Below Ground Maintenance

Due to the multitude of activities required to keep the SoCalGas system functioning safely and efficiently, there may be other activities that are necessary to perform. In addition, the technology for safely repairing and maintaining natural gas pipelines is continually evolving. As a result, these new technologies may create new activity types not currently identified below. SoCalGas anticipates that all routine repair and maintenance activity types, including those not explicitly described in this Notification, as well as future repair and maintenance activities that result from technology advancements, will be covered by the Streambed Alteration Agreement if they fall within the general categories of activities defined below.

Category 1: Access Road and Right-of-Way Maintenance and Repairs

Access Road and Right-of-Way Maintenance and Repairs occurs on a regular as-needed basis to keep the roads in a safe navigable condition. This activity includes grading to repair eroded right-of-way (ROW) or existing access roads, as necessary, usually following seasonal rains. Generally, the goal is to bring the road back to a safely passable state without altering the original road profile and berm height. Infrequently repair work may extend beyond the existing roadbed temporarily to restore larger wash-outs. Minor brushing of vegetation that has encroached into the road prism may occur. Road maintenance and repairs are critical to ensure the pipeline and ROW are always accessible. The length of access roads subject to maintenance varies in any given year due to conditions such as weather patterns and available funding.

Equipment for this work includes four-wheel drive, rubber-tired pickup trucks (accompany vehicles), and typically at least one grader, blade, or tractor may be used for standard maintenance. For repairs, a backhoe, front-end loader, or small track-mounted earth moving equipment, such as an excavator with a claw attachment for moving large boulders, which can block the road, may be utilized. Crew size range from two to four members. This activity can occur at any time during the year but is typically only conducted during the dry season to avoid flowing water.

Category 2: Above Ground Maintenance and Repairs

Above Ground Maintenance occurs on above-ground pipelines and support facilities which are inspected and maintained on an on-going basis. Maintenance includes painting/coating/wrapping, minor repairs and abatement (i.e., fittings and band repairs). To complete maintenance activities crews must be able to access the pipeline, therefore vegetation brushing and/or tree trimming may be required around pipe facilities. At most, vegetation will be trimmed to the surface, no impacts to the root or root balls will occur. Brushing will be kept to the minimum required for work to occur. Equipment required may include four-wheel drive, pickup trucks, and inspection/maintenance equipment, welding gear, painting tools, hand-tools and tarps. Vegetation will not be removed using heavy equipment, such as excavators or back-hoes. Crew sizes range from one to up to 10 members. This activity occurs throughout the year. Span inspections are typically conducted once every 2 years.

Category 3: Below Ground Maintenance and Repairs

Component Maintenance involves the replacement, repair, and abandonment of pipeline components. These pipeline components can include rectifiers, valve boxes, risers, producers, and drip legs. Equipment includes backhoes, welding trucks, cranes, hand-tools and crew trucks. Crew size varies depending on job complexity. Depending on the nature of the repairs needed, several days may be required to complete a single job. This regular activity can occur throughout the year.

Pipeline Segment Replacement are periodically required. occurs when inspections The disturbance area and the time required to complete this activity would depend upon the length of pipeline segments needing replacement. A typical excavation extends beneath the bottom of the pipe to allow inspection, removal and replacement. Excavated soil is staged in piles near the excavation until the inspection and repairs are completed and subsequently returned to the excavation. Imported sand or soil may be staged and utilized as back fill depending on native soil conditions. All excavations are returned to preconstruction grade contours. Equipment typically includes a flatbed truck, trailer or dump truck with trailer, backhoe, trailer-mounted compressor, truck-mounted crane, and a side boom. Welding equipment and associated inspection equipment are required to connect the new section of piping and other appurtenant facilities. Replacement of pipeline segments usually requires ten to twelve workers. This activity can occur at any time during the year.

Hydrostatic Testing of existing pipelines and newly replaced segments occurs to comply with the Department of Transportation/Office of Pipeline Safety (OPS) and CPUC approved Pipeline Safety Enhancement Plan (PSEP) natural gas pipeline regulations. Excavations are required to cut and cap the pipeline, fill the pipeline with water, monitor testing, de-water, and tie back to service. Hydrostatic test water will either be disposed of at an approved disposal facility or discharged to land or surface water in accordance with the requirements in the Statewide General Order for Discharge from Natural Gas Utility Construction, Operation, and Maintenance Activities (Order 2017-0026-DWQ) Equipment utilized may vary but often includes crew trucks, hand-tools, water trucks, baker tanks, and water pumps. Number of crew members varies from 4 to 12 people. This activity may occur at any time during the year.

Leak Excavations and Repair occurs if testing or other analysis indicates leaking gas. Typical repairs are made by welding bands or replacing the affected pipeline segment. Excavated soil is stockpiled adjacent to the excavation, but outside the waterway when possible until the inspection and repairs are complete at which time all excavated soil is then backfilled. Equipment includes pickup trucks, flatbed truck, trailer or dump truck with trailer, a backhoe, welding equipment and a trailer-mounted compressor. Crews range from four to eight workers, and duration of work may be 5-10 days on average. This activity may occur at any time during the year.

Buried Pipe and Coating Inspections may occur when hydrostatic testing or other analysis reveals potentially vulnerable pipeline segments which require excavation, visual inspection and abatement. Excavated soil is stockpiled adjacent to the excavation, but outside the waterway when possible until the inspection and repairs are complete at which time all excavated soil is then backfilled. Equipment includes pickup trucks, a flatbed truck, trailer or dump truck with trailer, backhoe, and trailer-mounted compressor. Crew size is approximately about four workers. This activity may occur at any time during the year.

Valve and Pipeline Excavation and Re-coating occurs when below grade inspection reveals failed pipeline coating requiring excavation and re-coating of the pipeline segment. Equipment includes pickup trucks, flatbed trucks, trailer or dump truck with trailer, backhoe, trailer-mounted compressor, and portable sand-blaster. Crew size is approximately four to five workers. Duration for excavation and recoat is approximately one day. This activity may occur at any time during the year.

External Corrosion Direct Assessment occurs to ensure the pipeline protective wrap shows no signs of degradation. Direct assessment of external corrosion requires excavation, inspection, then backfill. Equipment required includes pick-up trucks and excavators. Crew size varies and is based on the length and complexity of the project. This activity can occur at any time during the year.

In-Line Inspection (ILI) is required by the California Public Utilities Commission (CPUC), the Federal Pipeline Safety Improvement Act of 2002 (49 CFR, Title 49, section 195.452), and the Department of Transportation (DOT) Pipeline Hazardous Materials and Safety Administration (PHMSA). These regulations require internal inspection of the natural gas transmission lines once every 5 to 7 years. ILI involves several phases that have the potential to create surface disturbance including preparation of the pipeline for inspection (valve and fitting replacements and retrofits); correlation/validation digs to check and/or repair pipeline anomalies if discovered; and as-needed pipeline replacement. Once a pipeline is inspected, correlation/validation digs are required to verify the inspection results, even if no anomalies are reported. Correlation/validation digs consist of excavating the pipeline, pipeline inspection and repair if needed, and backfill. At least three to five correlation/validation digs are required to verify the data from the smart pig inspection. A visual inspection is required if an anomaly is identified in the smart pig data. Anomaly and correlation/validation inspection digs often happen in the same excavation. This activity can occur at any time of the year. Please see the Pipeline Segment Replacement discussion below for further details regarding pipeline replacements which can be required based on the inspection results. Retrofitting of valves and other fittings requires excavating an area of approximately 20 feet by 20 feet to expose, removing existing valve, and welding a new valve in place. Retrofitting requires approximately two to five workers for a duration of 3 to 5 weeks. The launchers and receivers are (to the greatest extent possible) installed within the fence-line of an existing SoCalGas valve station facility. Equipment used for ILI activities includes a backhoe, welding truck, crew truck, and a crane/boom truck. This activity requires approximately two to five workers over 3 to 5 weeks to complete.

Vault Replacements occur when existing vaults deteriorate and require replacement. The vaults are replaced "in-kind" and require excavation to remove the old vault and install the replacement. This work usually involves a backhoe, boom truck or crane and personnel in pickup trucks. A crew of four or five personnel will replace a vault in about one week.

Drip Leg Inspection, Removal and Installation may require physical inspection which involves excavating the drip leg (typically located beneath the main pipe) and visually inspecting the leg or using X-ray/ultrasonic waves to ascertain integrity. Older drip legs may be replaced with new drip

legs reducing the likelihood of excavation for future inspections, as new drip-legs are self-monitoring. This activity can occur at any time during the year.

Potholing are small excavations (approximately 10 inches diameter) over the pipeline which provide data on the amount of material covering the pipeline and determines the exact location/direction of pipeline fittings prior to any retrofitting activities. Potholes are created by hand excavation or by using an "air-knife". A vacuum truck uses compressed air to create a hole over the pipeline and removes the soil into a holding tank. The air-knifed soils are then used as back-fill. This activity can occur at any time during the year.

Pipeline Erosion Repair Buried pipelines crossing beneath creeks can become exposed due to natural erosive forces that constantly change the composition and structure of creek bottoms. Storms can also move rocks and/or boulders in the stream, which can cause substantial damage to the pipeline coating and compromise the integrity of the pipeline, potentially leading to pipeline failure. Erosion repair includes removing obstructions and repairing/maintaining/replacing existing protections. This activity may also require performing full circumference excavations; removing the existing pipeline wrap, inspecting the pipeline for damage, and repairing the pipeline using bands of pipe welded in place. Upon completion of the inspection and repair, the pipeline is recoated and the excavation is back-filled. This activity typically occurs during dry conditions.

D. Potential Environmental Effects

Pursuant to CEQA Guidelines Section 15063(a), CDFW has elected to proceed directly to the preparation of a Draft EIR rather than preparing an Initial Study. CDFW has determined as the CEQA lead agency that substantial evidence supports a fair argument that the proposed ITP and MLSAA requested by SoCalGas may result in a significant impact to the Covered Species and wildlife associated with lake and stream resources. These potentially significant effects and other environmental effects that may be caused by CDFW issuing an ITP and MLSAA that will condition the implementation of ongoing SoCalGas O&M activity will be addressed and analyzed in detail in the Draft EIR.

The impact analysis in the EIR will be conducted in accordance with CEQA and the CEQA Guidelines and address each threshold question in Appendix G, Environmental Checklist Form, of the CEQA Guidelines. An example of the Environmental Checklist Form can be found at the following website: https://califaep.org/docs/2019-Appendix_G_Checklist.pdf. This link is provided to assist the public and agencies in preparing written scoping comments.

Potential issues and impacts to the existing environment to be analyzed in the Draft EIR include the following environmental topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils (including Paleontological Resources)

- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Transportation
- Tribal Cultural Resources
- Wildfire

The Project is expected to result in no impacts or less than significant impacts to the following environmental issues, and therefore will not be analyzed in the Draft EIR, unless substantial evidence to the contrary is submitted during scoping:

- Agriculture and Forestry Resources
- Energy
- Land Use
- Mineral Resources

- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems

The EIR, consistent with CEQA, will include sufficient information to facilitate meaningful public review and informed public decision making regarding the significant effects to the environment that may be caused by CDFW issuance of an CESA ITP and MLSAA as requested by SoCalGas. The EIR will include information regarding the environmental baseline, including the past, current, and reasonably foreseeable expected future environmental impacts of SoCalGas ongoing O&M activity in the Project Area. The EIR will also include by resource category an analysis of whether issuance of an ITP and MLSAA conditioning continued SoCalGas O&M activity will cause an incremental physical change to the baseline condition and, importantly, whether any such change is significant for purposes of CEQA in CDFW's independent lead agency judgment. In addition, the EIR will evaluate potential environmental effects of SoCalGas's best management and standard practices, as well as applicant-proposed measures, and analyze whether or to what extent those measures may avoid or substantially lessen any significant effects caused by the proposed issuance of the ITP and MLSAA. Where needed, the Draft EIR will identify potentially feasible mitigation measures to avoid and/or substantially lessen any significant adverse effects identified in the EIR's impact analysis.

The EIR will also address the cumulative environmental consequences of the proposed Project in combination with other closely related past, present, and reasonably foreseeable future projects in the area. In particular, the EIR will evaluate whether the incremental contribution of any environmental effect caused by the proposed issuance of the ITP and MLSAA conditioning ongoing SoCalGas O&M activity is cumulatively considerable and, therefore, significant. This will serve to satisfy CEQA requirements regarding potential regional cumulative effects.

In compliance with CEQA Guidelines Section 15126.6, the EIR will describe and evaluate the effects of a reasonable range of alternatives to the proposed Project and will compare the impacts of the alternatives to the impacts of the proposed Project. The EIR will also identity any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain their reasoning. The EIR will provide an analysis of the No Project Alternative and will also identify the Environmentally Superior Alternative. The alternatives to be analyzed in the EIR will be developed during the environmental review process and will consider input received during public scoping period.

E. Submitting Comments

At this time, CDFW is soliciting comments on the NOP regarding your views on how the Project may affect the environment. This information will be considered when preparing the Draft EIR's discussion of environmental topics, significant effects, mitigation measures, and alternatives. Because of time limits mandated by state law, comments should be provided no later than 5:00 p.m. on March 28, 2022 (the end of 30-day comment period, which starts on February 25, 2022).

Your options for submitting comments are by U.S. mail, or by email. Comments should include "SoCalGas O&M – NOP Scoping Comments" in the subject line, and the name and physical address of the commenter should be contained in the body of the email or letter.

Please send all comments to:

California Department of Fish and Wildlife

Attention: Alisa Ellsworth, Environmental Program Manager

Mailing Address: 3602 Inland Empire Boulevard, Suite C-220, Ontario, California 91764

OR via email: alisa.ellsworth@wildlife.ca.gov; include "SoCalGas O&M - NOP Scoping Comments"

in the subject line

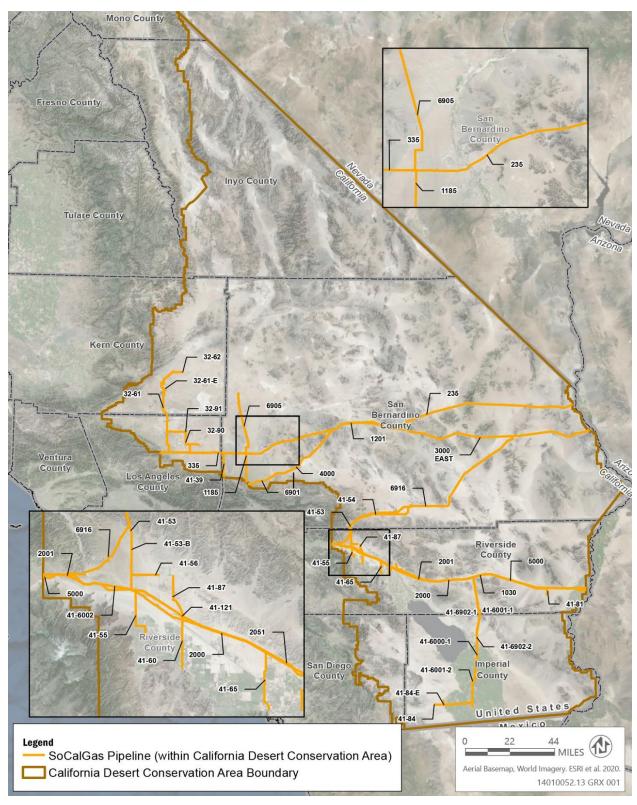
All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR, which is anticipated to be available for public review in the fourth quarter of 2022.

F. Location of Documents Available for Public Review

The NOP and all public review documents for this Project will be available for review online at https://www.wildlife.ca.gov/Notices.

Due to COVID-19, public libraries and county offices are currently closed or have limited office hours available. Instead, a hard copy of the NOP is available for review by appointment at the CDFW Inland Deserts Region Office, located at the following address:

CDFW Inland Deserts Region Office 3602 Inland Empire Boulevard, Suite C-220 Ontario, California 91764



Source: Figure produced by AECOM in 2021

Figure 1: Project Area and SoCalGas Pipeline Location Overview