



October 19, 2016

Debbie Schafer, Senior Environmental Specialist
San Diego Gas & Electric Company
4940 Carlsbad Boulevard
Carlsbad, CA 92008
Via Email

RE: ETS 28537 Ocean Ranch Substation Project – Additional Biological Project Information to Support the Data Request from the California Public Utilities Commission

Dear Debbie:

San Diego Gas & Electric Company (SDG&E) received a data request from the California Public Utilities Commission (CPUC) for the Ocean Ranch Project. The purpose of this letter is to provide additional background information on the proposed Ocean Ranch Substation site and staging yards in response to CPUC's data request items BIO-8 and BIO-9.

1.0 LITERATURE SEARCH RESULTS

1.1 San Diego Ambrosia

According to the California Department of Fish and Wildlife's California Natural Diversity Database (CNDDDB), two San Diego ambrosia (*Ambrosia pumila*) sightings were documented within 1 mile of the project. Details of the sightings are found in Occurrence 15 and 41 within the CNDDDB. Occurrence 15 is located approximately 0.9 mile north of the Corporate Centre Staging Yard, and Occurrence 41 occurs approximately 0.7 mile north of the San Luis Rey Staging Yard.

According to the CNDDDB, Occurrence 15 describes that this sighting of San Diego ambrosia was from 1936, and no San Diego ambrosia was found during surveys that were conducted in 1997, 1998, and 2012. Occurrence 15 also describes that no suitable habitat appears to exist in the region as of 2012, and that San Diego ambrosia is presumed to be extirpated. Occurrence 41 describes that San Diego ambrosia was sighted west of El Camino Real and along the current alignment of State Highway 76, however, this species was threatened during highway construction and some San Diego ambrosia were transplanted to Occurrence 65. Occurrence 65 is located approximately 4.3 miles northeast of the proposed Ocean Ranch Substation site. Occurrence 41 describes that some possible habitat may still exist in the vicinity, however, no San Diego ambrosia were observed in 2009 and 2012.

1.2 Stephens' Kangaroo Rat

According to the CNDDDB, the nearest Stephens' kangaroo rat (*Dipodomys stephensi*) population was documented approximately 0.5 mile north of the Corporate Centre Staging Yard. However, the CNDDDB occurrence report mentions that this population was extirpated by development activities. Due to the specific soil requirements of this species, based on the current soils and level of disturbance within the project area, and the lack of detection of sign or potential sign for this species during biological surveys, Stephens' kangaroo rat is not expected to occur, and further surveys are not warranted. Due to the lack of suitable habitat observed by the Pangea Biological (Pangea) biologists for Stephens' kangaroo rat within the Ocean Ranch project area, a USFWS Section 10(a)1(A) permittee for Stephens' kangaroo rat was not required to survey for Stephens kangaroo rat.

1.3 City of Oceanside

The City of Oceanside's General Plan land use map has designated the project sites for light industrial uses. The 11.5-acre Corporate Centre Staging Yard and the 5-acre USPS Staging Yard have general plan land designations of light industrial. The 0.5-acre San Luis Rey Staging Yard has a general plan land use designation of civil institutional, and the 0.5-acre Melrose Staging Yard has a general plan land use designation of Industrial General.

1.4 Natural Community Conservation Plan

The Multiple Habitat Conservation Program (MHCP) is a planning process that addresses plant and animal species in northwestern San Diego County, including Oceanside. The City of Oceanside is in the process of adopting a Subarea Habitat Conservation Plan (SAP)/Natural Community Conservation Plan (NCCP) that will address how the City will conserve natural biotic communities and sensitive plant and wildlife species pursuant to the California NCCP Act of 1991, the California Endangered Species Act (CESA), and the federal Endangered Species Act (ESA).

The MHCP designates the proposed Ocean Ranch substation site and associated staging yards as developed/disturbed land. The MHCP provides the follow guidelines for classifying land as disturbed land: "an area in which the vegetation cover comprises less than 10 percent of the surface area and where there is evidence of soil surface disturbance and compaction (e.g. grading); or where the vegetative cover is greater than 10 percent, there is soil surface disturbance and compaction, and the presence of building foundations and debris (e.g., irrigation piping, fencing, old wells, abandoned farming or mining equipment) resulting from legal activities (as opposed to illegal dumping)."

The City of Oceanside's SAP is the City's implementing conservation plan under the MHCP. The City of Oceanside's SAP Vegetation Communities Map designates the Ocean Ranch Substation site and all of the proposed staging yards as urban developed (Refer to City of Oceanside SAP Figure 3-1). No project features are located within any designated softline or hardline preserve areas as delineated on Figure 4-1 of the City of Oceanside SAP. The San Luis Rey Staging Yard is located to the south of a hardline preserve; however this is an existing developed SDG&E substation. The San Luis Rey Staging Yard is

within a Wildlife Corridor Planning Zone (WCPZ). The SAP provides development standards for projects that are located within the WCPZ; however, the Project does not propose any development at the San Luis Rey Staging Yard. Storage of materials and equipment within this existing facility would not consist of development and the projects' use of this facility would be consistent with the SAP. According to the SAP, the Ocean Ranch Substation site, and the following staging yards: Melrose, Corporate, and USPS are located within an Off-site Mitigation Zone. The Off-site Mitigation Zone is described as "nonpreserve parcels within the City that support natural vegetation outside of the wildlife corridor planning zone (WCPZ), agricultural exclusion zone, and coastal zone". Natural vegetation in the Off-site Mitigation Zone may be removed subject to SAP guidelines which include offsite mitigation. The Ocean Ranch Substation site and associated staging yards have been disturbed from past grading and/or development and would not result in the removal of any natural vegetation.

1.5 Previous Environmental Review

Ocean Ranch Substation Site and USPS Staging Yard

The Ocean Ranch Substation site and the USPS Staging Yard are located within the Pacific Coast Business Park Master Development Plan; which is an industrial development plan within the Rancho del Oro Specific Plan area.

The Pacific Coast Business Park Master Development Plan was approved and its Environmental Impact Report was certified in August 2005. Per that plan, the entire plan area has been graded to pads, and all infrastructure was installed including roads, drainages, and utilities. The Supplemental Environmental Impact Report for the Pacific Coast Business Park Master Development Plan Revision project stated that the entire Master Development Plan area has been graded and divided into large parcels, with streets and infrastructure in place to facilitate pending buildout of the Rancho del Oro Specific Plan area. The proposed Ocean Ranch Substation is located within the southern portion and the proposed USPS Staging Yard is located within the southeastern portion of the Pacific Coast Business Park Master Development Plan. The Supplemental EIR, prepared by Affinis in 2009, concluded that impacts to biological resources would be less than significant based on the findings of the Initial Study. The Initial Study (dated 2009) concluded that due to the graded and partially developed nature of the site, the proposed redistribution of land uses on site would not affect, either directly or indirectly, biological resources habitats or sensitive species; and that no impacts to biological resources would result from the project.

Corporate Centre Staging Yard

The proposed Corporate Centre Staging Yard is part of the Ocean Ranch Corporate Centre and has also been previously graded as part of the approval for the Ocean Ranch Corporate Centre Master Plan. Furthermore, the site for the Corporate Centre Staging Yard was approved for industrial development (the Windstar Project). The Windstar project was approved by the City of Oceanside Planning Commission on October 6, 2008. The Mitigated Negative Declaration that was prepared for the Windstar Project concluded the project, which proposed industrial development, would not result in substantial changes to the circumstances for which the project was originally undertaken and no new information of substantial importance was known at the time of the initial California Environmental

Quality Act (CEQA) review, therefore, it was determined that further environmental review was not required of the project.

Due to the previous grading and site preparation activities that were conducted for the Pacific Coast Business Park Master Development Plan and the Ocean Ranch Corporate Centre Master Plan, no sensitive biological resources remain on the project site. No potential habitat exists for state or federally listed species; therefore, take of such species would not occur.

2.0 PREVIOUS SITE DISTURBANCE

The project site has been approved for development as part of the Rancho Del Oro Specific Plan and the Pacific Coast Business Park Master Development Plan; or is located on previously developed sites.

2.1 Ocean Ranch Substation Site and USPS Staging Yard

The proposed Ocean Ranch Substation site was used as agricultural land in the early 2000's (Google Earth aerial photo dated 2003 and 2004). By 2008, the Ocean Ranch Substation site and the USPS Staging Yard were mass graded for the development of industrial uses per the approved Pacific Coast Business Park Master Development Plan. Currently, the proposed Ocean Ranch Substation site is entirely bounded by roads and existing industrial development. Soils that underlie the proposed project area consist primarily of loose to medium dense fill, medium dense to hard to very hard colluvium, and at depth very dense formational soils, which are primarily of the Santiago Formation. The project site consists of documented fill overlying alluvial and colluvial deposits. The substation site is maintained about once a year and consists of mowing and cleaning of the site; and was last maintained on July 3, 2016. The USPS Staging Yard site has been mowed annually for 10 to 12 years and most recently was mowed in October 2016.

2.2 Corporate Centre Staging Yard

The proposed Corporate Centre Staging Yard is part of the Ocean Ranch Corporate Centre and has also been previously graded as part of the approval for the Ocean Ranch Corporate Centre Master Plan. Furthermore, the site for the Corporate Centre Staging Yard was approved for industrial development (the Windstar Project). The Windstar project was approved by the City of Oceanside Planning Commission on October 6, 2008. The Mitigated Negative Declaration that was prepared for the Windstar Project concluded the project, which proposed industrial development, would not result in substantial changes to the circumstances for which the project was originally undertaken and no new information of substantial importance was known at the time of the initial CEQA review, therefore, it was determined that further environmental review was not required of the project. The Corporate Centre Staging Yard is mowed annually with the use of a tractor that pulls a mower behind, and hand work is conducted near the desilting basin.

2.3: San Luis Rey and Melrose Staging Yards

The San Luis Rey Staging Yard and the Melrose Staging Yard are existing active substation facilities, which were developed prior to 1994. The San Luis Rey Staging Yard is completely paved and no maintenance activities to natural areas occur. The Melrose Staging Yard is currently maintained twice a month; and trees requiring line clearance are maintained about once per year.

3.0 PROJECT SURVEYS

Pangea conducted biological surveys in March, May, and October 2015, and March 2016 to evaluate the potential presence of sensitive biological resources within the PSA. Pangea's survey results concluded that the project site has been graded and infill material was brought to the site to create the existing development pads. The project site was documented as consisting of disturbed habitat and landscaped vegetation. Although a site visit to a San Diego ambrosia reference population was not visited in conjunction with the surveys for the Ocean Ranch Substation project, the Pangea biologists have observed this species previously at other known locations within San Diego County, and therefore, are familiar with the search image for this species. In addition, San Diego ambrosia is a perennial herb with a blooming period between April and July (occasionally extending through October) and due to the perennial nature of this species, its presence can be detected year-round. Due to the specific soil requirements of this species, based on the current soils and level of disturbance within the project area, and the lack of detection of this species during biological surveys, San Diego ambrosia is not expected to occur, and further surveys are not warranted.

Due to the specific soil requirements of this species, based on the current soils and level of disturbance within the project area, and the lack of detection of sign or potential sign for Stephens' kangaroo rat during biological surveys, Stephen's kangaroo rat is not expected to occur, and further surveys are not warranted.

4.0 CONCLUSION

Due to the previous grading and site preparation activities that were conducted for the Pacific Coast Business Park Master Development Plan and the Ocean Ranch Corporate Centre Master Plan, no sensitive biological resources remain on the proposed substation site, or the USPS and Corporate Staging Yards. No potential habitat exists for state or federally listed species; therefore, take of such species would not occur.

No suitable habitat for the federally listed species, San Diego ambrosia and Stephens' kangaroo rat, or other federally listed species occurs within the PSA. The project site has been approved for development as part of the Rancho Del Oro Specific Plan and the Pacific Coast Business Park Master Development Plan.

Pangea conducted surveys to assess the potential biological impacts that would be associated with the proposed Ocean Ranch Substation project in 2015 and 2016. Pangea's survey results concluded that the project site has been graded and infill material was brought to the site to create the existing development pads. The project site was documented as consisting of disturbed habitat and landscaped vegetation.

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The San Luis Rey Staging Yard and the Melrose Staging Yard are existing active substation facilities. No development associated with the Ocean Ranch Project is proposed at these facilities. No vegetation or tree trimming would occur at the staging yards as part of the proposed project. Due to the disturbed and developed nature of these staging yards, the storage of construction equipment would not result in the "take" of state or federal species.

Please contact me at (760) 723-3231 if you have any comments or questions regarding this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Amy Rowland".

Amy Rowland
President