DRAFT

Mitigated Negative Declaration and Supporting Initial Study

for

Pacific Gas and Electric Company Gas Pipeline-300A/B Vegetation Management Project

San Benito County, California

Lead Agency:

State of California, Department of Fish and Wildlife
1234 East Shaw Avenue
Fresno, CA 93710
Contact: Sarah Bahm
(559) 243-4014

Project Proponent:

Pacific Gas and Electric Company
6111 Bollinger Canyon Road
San Ramon, CA 94583
Contact: Vick Germany, AICP
(925) 328-5176

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Contents

Tables

Figures

Appendices

1. Project Overview

Pacific Gas and Electric Company (PG&E) proposes the PG&E Gas Pipeline-300A/B Vegetation Management Project (project) to remove vegetation along numerous segments of natural gas pipelines (GL) 300A and GL 300B rights-of-way (ROWs) in an unincorporated portion of San Benito County, California. The proposed project would increase gas pipeline safety through the removal of incompatible vegetation that currently prohibits access to ROWs, including in cases of emergency, and the ability to conduct leak surveys, which are necessary to maintain natural gas pipeline integrity.

PG&E has submitted a Notification of Lake or Streambed Alteration to the California Department of Fish and Wildlife (CDFW) for vegetation removal activities that would take place within 26 ephemeral stream crossings. CDFW is the only public agency with discretionary authority over the project. Consequently, CDFW has determined that it is the appropriate California Environmental Quality Act (CEQA) lead agency pursuant to Section 15051 of the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Division 6, Chapter 3) (State of California 2014).

This initial study/mitigated negative declaration (IS/MND) evaluates this project as proposed by the project proponent (i.e., PG&E). It includes Applicant-Proposed Measures (APMs) and Lead Agency mitigation measures (MMs) that contribute to the project's design and are required to be implemented to reduce any potential impacts of the proposed project to less than significant. The project and vicinity provide potentially suitable habitat for federally and state listed wildlife species. There is also potential for historical artifacts and paleontological resources to be present in the project area. Through implementation of APMs and MMs before, during, and after project activities, the project shall avoid impacts to listed species and other sensitive environmental resources.

1.1 Purpose

PG&E owns and operates over 6,750 miles of natural gas transmission pipelines throughout northern and central California. The majority of PG&E's gas transmission ROW was established decades ago. Clearing of the vegetation in the ROW has occurred intermittently since pipelines were installed from the 1920s through the present day. A large portion of the ROW is overgrown with vegetation that can pose a safety issue by interfering with general maintenance, the protective coating and cathodic protection[1] of the pipelines, and response to emergencies. The primary objectives for keeping vegetation cleared in the ROW are:

- Support and facilitate effective pipeline surveillance;
- Prevent damage to the pipelines and infrastructure;
- Provide access for maintenance activities, including leak detection surveys, and,
- Provide access for emergency response.

PG&E and the California Public Utilities Commission (CPUC) require the management of vegetation within gas transmission ROWs in order for thorough and complete leak detection and cathodic surveys to be conducted as required by federal law (49 CFR§192.707(a), 192.605, 192.613, 192.705, 192.706, 192.707). CPUC General Order No. 112-E, *State of California Rules Governing Design, Construction, Testing, Operation, and*

[1] This refers to the prevention of corrosion of the gas pipeline by causing it to act as the cathode rather than as the anode of an electrochemical cell.

Maintenance of Gas Gathering, Transmission, and Distribution Piping Systems (CPUC 2008) incorporates, by reference, all direction contained in 49 CFR 192. In response to CPUC Resolution L-403 (adopted Sept 23, 2010), PG&E is to conduct instrument based leak detection (ground and aerial) on the approximately 4,200 pipeline miles (out of approximately 6,750 total miles) rated Class 1 and 2. The leak detection surveys schedule requires a ROW be cleared and maintained within the pipe zone of all high-pressure gas transmission pipelines. PG&E created *Utility Standard: TD-4490S (Publication Date: 11/26/2014, Effective. Date: 12/15/2014; rev 2): Gas pipeline Rights-of-Way Management* to further describe PG&E's requirement for vegetation and structures when managing the natural gas pipeline ROW. The utility standard is described in Section 2.2 Vegetation Maintenance Methods.

In a report issued to the CPUC entitled *Accelerated Natural Gas Transmission System Aerial and Ground Leak Survey Trends Report*, PG&E summarized results of system-wide leak detection surveys conducted in 2010 (PG&E 2011). The purpose of leak detection surveys is to provide early detection of potential maintenance problems to ensure public safety in the area of the pipelines. According to the report findings, a number of leaks were detected in the gas pipelines. Historically, PG&E has conducted aerial leak detection surveys. PG&E has now adopted a ground-based leak survey method using hand-held instrumentation.

1.2 Location and General Information

For the Gas Pipeline-300A/B Vegetation Management Project, PG&E proposes to remove trees and woody brush in riparian and non-riparian areas along 37.5 miles of the GL 300A and GL 300B ROWs in an unincorporated portion of San Benito County, as shown in Figures 1.2-1 and 1.2-2. The project extends from approximately 6.4 miles southeast of the community of Tres Pinos east through the Diablo Mountain Range to approximately 6.5 miles east of the town of Panoche. The project is located within the San Benito, Cherry Peak, Panoche Pass, and Llanada United States Geological Survey (USGS) 7.5-minute topographic quadrangles. San Benito County Zoning and Land Use Designations for the project location are Agricultural Rangeland and Large Parcel Agriculture, respectively. Although project activities would be located along the 37.5-mile ROW, vegetation removal would only be required in select areas along the ROW comprising approximately 18.17 acres. Temporary work and staging areas comprise an additional 5.5 acres; however, vegetation will not be removed in these areas, except where these areas overlap with vegetation removal work areas.

The areas where project vegetation removal would occur are referred to as "work areas" in this Initial Study. Thirty-five separate "study areas" were delineated to include 250-foot buffers around work areas, in order to encompass each of the proposed project work areas and illustrate environmental conditions within specific sections of the project, including all drainage crossings. Delineation of the study areas, as depicted on Figures 1.2-1 and 1.2-2 and shown in more detail in Appendix A, was done by grouping work areas in close proximity to one another, specifically where there was overlap within a 250-foot buffer around the work area. Figures 1.2-1 and 1.2-2 illustrate the locations of the 35 study areas that encompass proposed vegetation removal work areas. The 250-foot study area buffer shown on maps in Appendix A was used as this was the survey buffer for most biological special-status species surveys.

Project "staging areas" include the temporary work and staging areas where vegetation will not be removed. Project "access routes" include overland travel access paths to work areas and staging areas from existing dirt, gravel, or paved roads. Project staging areas and access routes were identified after study areas were assigned, yet staging areas and access routes were evaluated for environmental conditions in this Initial Study.

Figure 1.2-1.
Project Location (Western Segment)

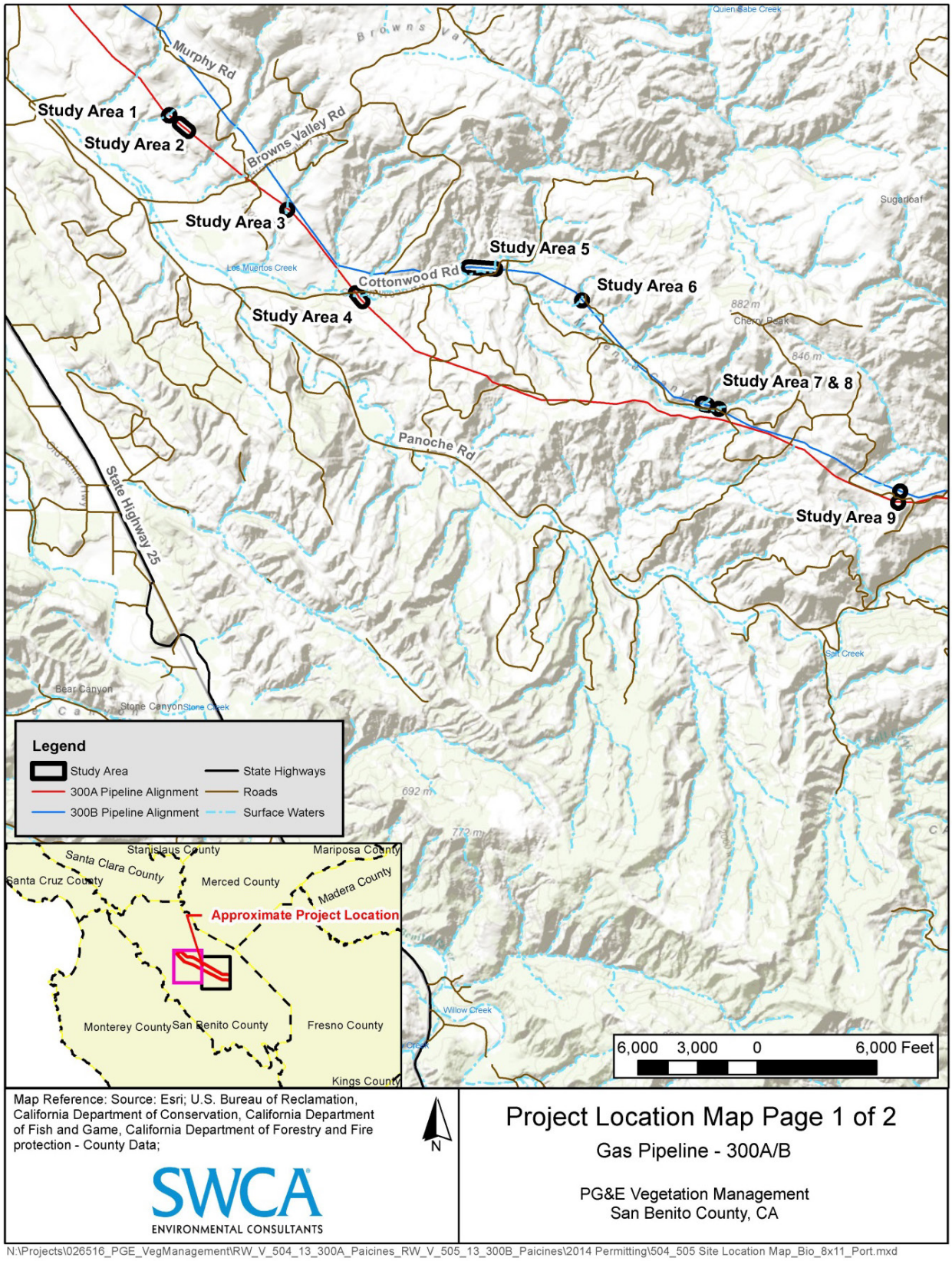
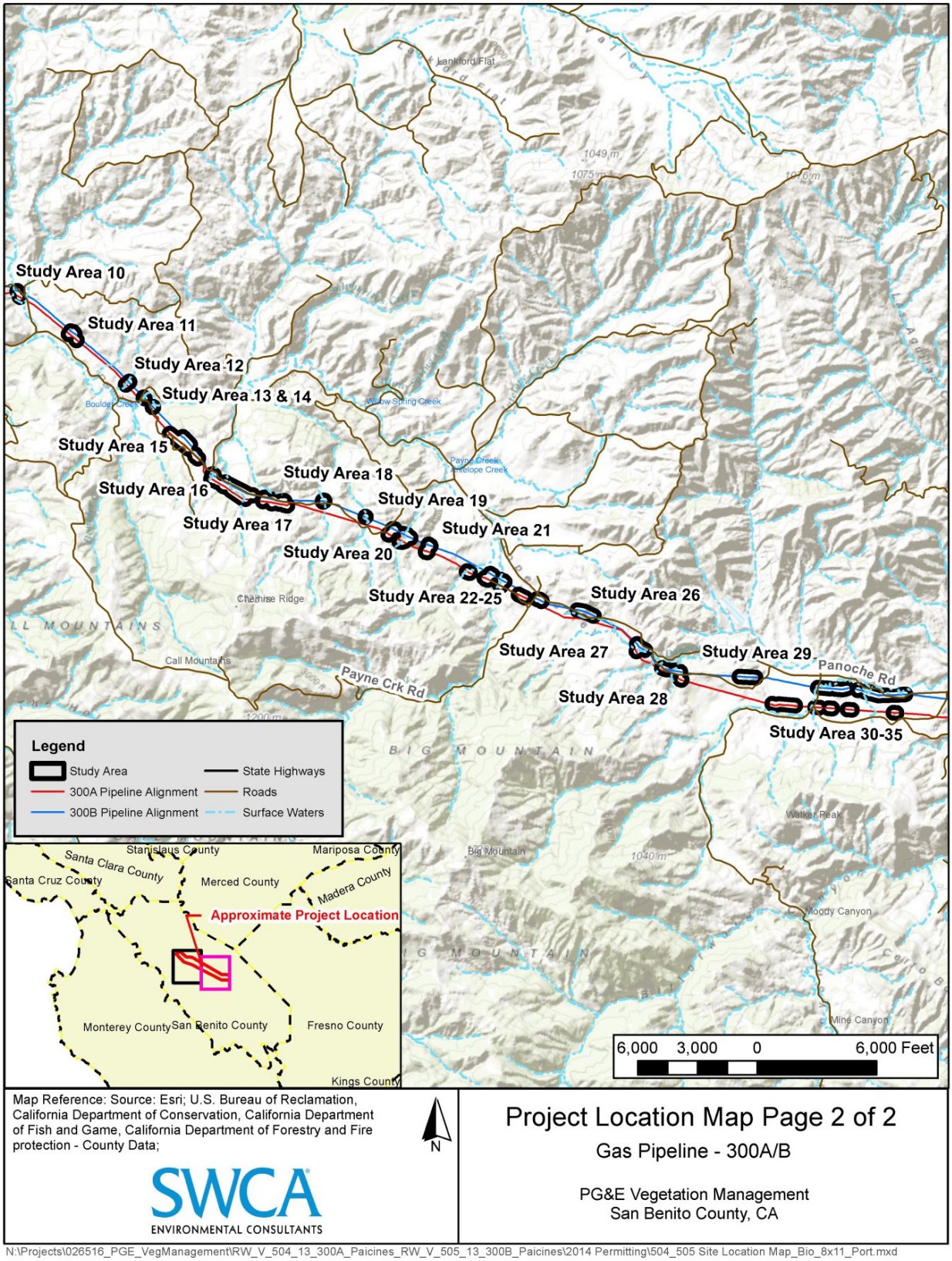


Figure 1.2-2.
Project Location (Eastern Segment)



2. Project Description

2.1 Proposed Project Extent

The proposed project includes work areas where vegetation removal would take place, staging areas for project vehicles and equipment, and overland access routes to work and staging areas. Maps in Appendix A illustrate the project study areas, work areas, staging areas, and overland access routes associated with the project.

Work areas total approximately 18.17 acres for vegetation removal areas and 5.5 acres for staging and temporary work areas. Within work areas, only trees and brush would be removed or trimmed in accordance with PG&E's Gas Pipeline Rights-of-Way Management Utility Standard 4490S (see Section 2.2, Vegetation Maintenance Methods, below).

2.2 Vegetation Maintenance Methods

PG&E proposes to remove vegetation within the project ROW, in accordance with Gas Pipeline Rights-of-Way Management Utility Standard 4490S, as described below.

A "hard cut" is the severe change from one zone to another without a natural transition between the two zones. The Vegetation Zone Design avoids hard cuts in ROW that begin from the area over the pipelines (defined as the Pipe Zone) and expands to the outer edges beyond the Pipe Zone called Border Zones. The Vegetation Zone Design allows the landscape to incorporate an environmentally balanced "feather cut" from the Pipe Zone as it moves outward to the Border Zone.

- *Pipe Zone:* Trees, woody shrubs, and woody vegetation must be removed from the Pipe Zone (5 feet from either side of the pipe's outer edge). Lawns, flowers, low-profile grasses, and low-growing herbaceous plants are permitted to remain within the Pipe Zone (Figure 2.2-1).

- *Border Zone:* Trees, woody shrubs, or woody vegetation exceeding 8 inches or of a species likely to exceed 8 inches in diameter at 4.5 feet above ground (diameter at breast height [DBH]) at maturity, and the trunk or main branch is 5 to 10 feet from the outer edges of the pipelines, must be removed. The Border Zone extends from the edge of the Pipe Zone out an additional 5 feet from either side of the pipe (Figure 2.2-1).

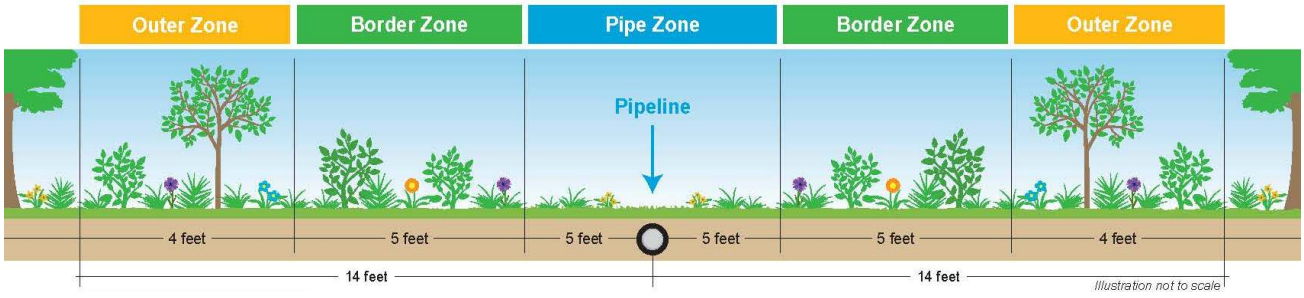
- *Outer Zone:* Trees, woody shrubs, or woody vegetation exceeding 36 inches in DBH or of a species likely to grow to and exceed 36 inches in DBH at maturity, and the trunk or main branch is 10 to 14 feet from the outer edges of the pipelines, must be removed. The Outer Zone extends from the edge of the Border Zone out an additional 4 feet from either side of the pipe (Figure 2.2-1).

In summary, PG&E proposes to remove all trees within approximately 10 feet of the outer edge of the pipe and all other woody vegetation within 5 feet of the outer edge of the pipeline. Vegetation determined to be a hazard outside of the Pipe and Border Zones up to 14 feet from the edge of the pipeline may also be removed.

A schematic of the approximate vegetation management buffer zones is provided in Figure 2.2-1 below. Stumps (and corresponding root ball) up to 1 foot in height will remain. Herbaceous vegetation will remain in all zones. Small brush species will not be removed from the Border or Outer zones. Surface soil distur-

bance would be limited to vehicle traffic into and out of the work areas, staging areas, and overland access routes as well as foot traffic from the crew in these areas. The selective removal of trees and brush would not result in the creation of bare ground surface. Damage to surface soil from tree removal is not anticipated as large trees would be sectioned and sections lowered to the ground with ropes.

Figure 2.2-1[2].
PG&E Gas Line Vegetation Removal Buffer Zones



Brush and tree species that are proposed for removal include, but are not limited to, blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), willow (*Salix* spp.), California buckeye (*Aesculus californica*), foothill pine (*Pinus sabiniana*), juniper (*Juniperus* sp.), coyote brush (*Baccharis pilularis*), and mule fat (*Baccharis salicifolia*). Table 2.2-1 below includes a complete inventory of tree and brush species to be removed.

Table 2.2-1.
Project Vegetation to be Removed

	DBH Class			
Tree Species	**Less than 4 inches**	**4-23 inches**	**Equal to or Greater than 24 inches**	**Tree Totals**
blue oak	--	34	6	40
coast live oak	1	2	2	5
oak (spp.)	--	24	8	32
ash	--	2	--	2
juniper	--	5	--	5
mulberry	--	2	--	2
cottonwood	--	1	--	1
willow	1	1	--	2
buckeye	--	5	3	8
foothill pine	--	21	2	23
pine (spp.)	13	25	15	53
elderberry	--	2	--	2
TOTALS	**15**	**124**	**36**	**175**

[2] A pipeline may not always be located in the center of the easement as shown in the figure. The dimensions shown in the figure are for illustrative purposes only.

Table 2.2-1.
Project Vegetation to be Removed

	DBH Class			
Tree Species	**Less than 4 inches**	**4-23 inches**	**Equal to or Greater than 24 inches**	**Tree Totals**
Brush Species		**Brush Units[1]**		**Cubic Feet**
Manzanita		2		528.40
coyote brush		50		13,210.00
Sagebrush		109		28,797.80
Mulefat		50		13,210.00
Chamise		5		1,321.00
Whitethorn		1		264.20
Buckwheat		2		528.40
Toyon		3		792.60
oak (spp.)		7		1,849.40
pine (spp.)		1		264.20
Juniper		9		2,377.80
leather oak brush		2		528.40
poison oak		3		792.60
mixed shrub species (sagebrush, buckwheat, black sage, goldenbush, chamise, California matchweed, juniper, coyote brush, sticky monkey flower)		53		14,002.60
TOTALS		**297**		**78,467.40**

Notes:

1. A brush unit is a 6’5” by 6’5” by 6’5” cube or 264.20 cubic feet.

Table 2.2-2 below outlines the general vegetation removal methods to be employed in each of the project work areas, noted by study area. However, PG&E would determine the most appropriate method by which vegetation would be maintained on a site-specific basis. In areas where small (less than 6 inches DBH) woody vegetation grows within the Pipe and Border Zones, PG&E would manually clear and/or trim woody and/or brambly vegetation with chainsaws and/or loppers. In areas where woody vegetation is greater than 6 inches DBH within the Pipe, Border, or Outer Zones, equipment used may include chainsaws, chippers (truck mounted or steel tracked), tractors, and compact rubber-tracked loaders (e.g., Caterpillar 279C model). Vegetation would be cut to within 1 foot of ground level as needed to allow surveyor foot access directly atop existing gas pipelines for mandated annual leak surveys. Cut vegetative “spoils” would be lopped or chipped and scattered within the ROW segments, but outside of any drainages and avoiding any sensitive resources. Oak trees over 4 inches DBH would be cut into 6-foot to 8-foot lengths and piled next to the closest access road at the request of the property owner. In areas where large, continuous sections of upland brush need to be removed (e.g., Study Areas 31-35), vegetation will be mowed to within 1 foot of ground level using a mower mounted on a compact rubber-tracked loader.

Heavy equipment use would be restricted to existing paved and dirt roads to the extent feasible. Access to the work areas would be gained from existing paved and dirt roadways and overland access routes (see Appendix A). Grading would not occur. Where necessary, pick-up trucks, rubber-tired articulated log skidders, compact rubber-tracked loaders, truck-mounted chippers, and a 32-inch steel-track chipper would be driven overland or staged in non-native grassland, blue oak woodland, or Diablan sage scrub habitats. Maps in Appendix A illustrate the proposed overland access routes, work areas, and staging areas for the project as well as the vegetation removal type within each work area and sensitive environmental resources (e.g., nest locations, watercourses) in proximity to work areas. No vegetation removal is anticipated for project access routes or staging areas. Operations would be limited to the dry season (June 1 – October 15) and would not take place on saturated soils that may produce sediment in quantities sufficient to cause a visible increase in turbidity of downstream waters in receiving waters or that violate water quality requirements.

Table 2.2-2.
Proposed Vegetation Removal Methods and Machinery, Defined by Study Area, to be Used for the Project

Study Area	Overland Vehicle Access Required?	Removal Method			Equipment to be Used				
		Lop & Scatter	Mow with Compact Rubber Tracked Loader	Remove & Chip Material	Hand Crews	Pick-Up Truck	Compact Rubber Tracked Loader	Truck Mounted Chipper	Steel Tracked Chipper
1	✓			✓	✓	✓		✓	
2		✓			✓				
3					✓				
4		✓			✓				
5					✓				
6	✓			✓	✓	✓		✓	
7	✓			✓	✓	✓		✓	
8	✓			✓	✓	✓		✓	
9	✓	✓			✓	✓			
10		✓			✓				
11	✓			✓	✓	✓		✓	
12	✓			✓	✓	✓			
13		✓			✓				
14	✓			✓	✓			✓	
15	✓	✓	✓	✓	✓	✓	✓		✓
16	✓		✓	✓	✓	✓	✓	✓	✓
17	✓			✓	✓	✓	✓		✓
18	✓			✓	✓	✓	✓	✓	
19	✓			✓	✓	✓	✓	✓	
20	✓			✓	✓	✓	✓		✓

Table 2.2-2.
Proposed Vegetation Removal Methods and Machinery, Defined by Study Area, to be Used for the Project

Study Area	Overland Vehicle Access Required?	Removal Method			Equipment to be Used				
		Lop & Scatter	Mow with Compact Rubber Tracked Loader	Remove & Chip Material	Hand Crews	Pick-Up Truck	Compact Rubber Tracked Loader	Truck Mounted Chipper	Steel Tracked Chipper
21	✓			✓	✓	✓	✓	✓	
22	✓			✓	✓	✓		✓	
23	✓	✓		✓	✓	✓	✓		✓
24	✓		✓		✓	✓			
25	✓			✓	✓	✓		✓	
26	✓	✓			✓	✓			
27	✓	✓		✓	✓	✓		✓	
28	✓	✓		✓	✓	✓	✓	✓	
29		✓			✓				
30	✓	✓			✓	✓			
31	✓		✓		✓				
32	✓	✓	✓		✓	✓			
33	✓	✓	✓	✓	✓	✓		✓	
34	✓	✓	✓		✓	✓			
35	✓	✓	✓		✓	✓			

Herbicides would be applied to the cut-stump of removed vegetation. If herbicide is required, when administering, the type used and buffer for application away from water bodies would comply with the 2006 *Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog* (Environmental Protection Agency [EPA] 2007) and will be rated for aquatic use by the California Department of Pesticide Regulation (Cal DPR).

All vegetation removal within CDFW jurisdictional features (i.e., bed, bank and channel) (26 stream crossing areas) would be done using hand tools and accessed on foot. Equipment noted in Table 2.2-2 may be used in nearby riparian areas. No dredge or fill activity is proposed within stream crossings as part of the project activities. No work would be conducted in wetted portions of creeks and streams and no dewatering would be required. An Activity Specific Erosion and Sediment Control Plan (A-ESCP) and Best Management Practices (BMPs) would be employed to ensure that no silt or hazardous material enters watercourses during the project. This could include use of straw wattles near drainages, hazardous materials, and fuel secondary containment as appropriate (see Section 2.5, Applicant-Proposed Measures, below).

When crews are working within areas that contain invasive plant species, identified by the biologist during pre-activity surveys, all project equipment (including crewmembers' clothing and footwear) would be cleaned before leaving the site that contains invasive plant species in order to eliminate project-based

spread of invasive plants. Non-native invasive plants removed would be properly disposed of at an appropriate facility (see Section 2.5, Applicant-Proposed Measures, below).

2.3 Site Restoration

Upon project completion, all project equipment and materials would be removed from the project area. Project BMP materials used, such as straw wattles, would be removed and disposed of at an appropriate facility. See Section 2.5, Applicant-Proposed Measures for additional information.

2.4 Schedule

Project activities are anticipated to take approximately 2 months and would range from June 1 and October 15, 2016 to avoid impacts to sensitive natural resources. Work would occur during daylight hours, beginning at least 0.5 hour after sunrise and ending at least 0.5 hour before sunset, Monday through Friday.

2.5 Applicant-Proposed Measures

To avoid and minimize potential impacts to environmental resources, PG&E would implement APMs before, during, and after project activities. These would also include PG&E BMPs and the requirements of applicable agency work authorization permits. The APMs are incorporated into the proposed project and are listed below in the order respective of subjects in the Section 3 IS checklist sections. By their inclusion in this IS/MND, these APMs are required to be implemented by PG&E for this proposed project and would be included in the Mitigation Monitoring and Reporting Plan (MMRP). This IS/MND also includes MMs required by the Lead Agency to further avoid, minimize, and mitigate impacts to a less than significant level (see Section 3, Initial Study Checklist and Environmental Analysis).

APM 1 PG&E shall provide notification to landowners a minimum of 30 days before the start of the project. Notification shall be provided by mailing notices to all properties within 500 feet of each work area, staging area, and access route. The announcement shall:

- Describe where, when, and what access and project activities will occur;
- Describe hours of activity; and,
- Provide point of contact information for complaints related to access and project activities.

APM 2 Before project commencement, safety training shall include, but not be limited to, the following information, which shall be verified by the onsite Crew Manager:

- All livestock and crops shall remain undisturbed;
- All materials and refuse brought into the project work areas, staging areas, and access routes shall be removed following completion of project activities. Materials and refuse shall be stored onsite such that it does not exit the work area, staging area, or access route; and,
- All fences and gates shall remain as found, and as requested by the affected landowner.

APM 3 Vegetation removal crews shall have a 'water buffalo' (i.e., a type of water tank), or equivalent equipment, with a minimum capacity of 300 gallons for dust and fire suppression.

APM 4 This project may involve the operation of diesel-fired off-road vehicles and/or construction equipment with engines of 25 brake horsepower or greater. Vehicles and equipment with diesel engines shall be maintained regularly to ensure that machinery is performing properly. These units shall not idle their primary diesel engine for more than five consecutive minutes.

APM 5 Vehicle speeds shall not exceed 15 miles per hour on existing unpaved access routes and shall not exceed 10 miles per hour on overland access routes. Crews shall avoid colliding with wildlife.

APM 6 Before the start of project activities, all crewmembers shall attend an Environmental Awareness Training presented by a qualified biologist. A training brochure describing special-status species and associated critical habitat, APMs and MMs, the limits of the project work areas, applicable laws and regulations, and penalties for non-compliance shall be distributed to the crewmembers during the training. Crews shall contact the PG&E project biologist or the on-site biological monitor if there are any questions during the project related to site access, materials laydown, wildlife, plants, water features, or any other resources. Upon completion of training, crewmembers shall sign a training form indicating they attended the program and understood the measures. PG&E shall conduct follow-up environmental tailboard trainings on an as needed basis in the field.

APM 7 Crews shall not harass any wildlife and shall allow all wildlife to leave the project area on their own volition.

APM 8 If any special-status species are observed during the project, crews shall stop work that may affect the species and immediately contact the biological monitor, who shall contact the PG&E project biologist. The PG&E biologist shall contact CDFW and/or USFWS to determine if additional measures are required.

APM 9 Vegetation removal activities shall occur during daylight hours at least 0.5 hour after sunrise and stop at least 0.5 hour before sunset to ensure that the biological monitor and crews are able to see any special-status wildlife that may occupy the work areas.

APM 10 A qualified biologist shall ensure that the spread or introduction of invasive exotic plant species shall be avoided to the maximum extent possible. A qualified biologist shall survey the project work areas, access routes, and staging areas for invasive plants within 14 days of the start of project activities. Areas infested with invasive plants and their seeds will be clearly identified by the biologist during the Environmental Awareness Training. Project crewmembers shall adhere to the following measures when working in areas where invasive plant species are present:

- Remove mud, dirt, and plant parts from project equipment before moving into a work area.
- Clean equipment before moving out of the project area into an un-infested area.

- Workers shall inspect, remove, and properly dispose of soil, weed seed, and plant parts found on their clothing and equipment.
- Avoid areas infested with invasive weeds and their seeds, or plan to work in those areas last.
- Avoid creating soil conditions that promote weed germination and establishment by minimizing ground disturbance caused by manual/mechanical treatments for invasive weeds and general vegetation management.
- A qualified biologist shall confirm when crewmembers and equipment are approved to move into un-infested areas.

APM 11 Vegetation removal shall only occur in non-wetted watercourses, and shall not disturb any wetted areas of watercourses or water features in the project. If herbicide is required for removal within or near watercourses, when administering, the type used and buffer for application away from water bodies would comply with the 2006 Final Stipulated Injunction and Related Information Involving Pesticides and the California Red-legged Frog (EPA 2007) and will be rated for aquatic use by the Cal DPR.

APM 12 Standard PG&E BMPs for sediment and erosion control shall be implemented to prevent runoff into adjacent wetlands or waterways if necessary. All small mammal burrows shall be avoided during BMP installation or application. Plastic mono-filament netting (erosion control matting) or similar material containing netting shall not be used in the project area. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.

APM 13 All chipped or lopped vegetative material shall be distributed within the project ROW segments as agreed upon with the landowner(s). No chipped material shall be broadcast into watercourses or sensitive areas, including areas containing small mammal burrows, as defined by the biological monitor.

APM 14 Vehicle and equipment fueling and maintenance operations shall be conducted in designated areas only. No equipment refueling shall take place within 100 feet of any water feature. Crews shall inspect equipment for leaks regularly and make repairs immediately if leaks are detected. Spill kits shall be on hand to manage any unanticipated spills of materials from project equipment.

APM 15 Crews shall provide secondary containment for any hazardous materials and prevent hazardous material contact in environmentally sensitive areas, storm water drainages, or waterways.

APM 16 Vehicle and equipment parking shall be confined to existing cleared, previously disturbed areas to the extent feasible. Where parking, staging, and vehicle access must occur within non-disturbed areas, a qualified biologist shall survey the area for special-status species or sensitive habitat immediately before use. All parking shall occur in areas of low vegetation height and crews shall have fire extinguishing tools (e.g., extinguisher, shovel) on-hand at all times to avoid potential fires. All equipment staged overnight shall be placed at least 100 feet from waterways, regardless of whether water is present. Crews shall look under parked vehicles for wildlife before moving.

APM 17 All trash and debris within work areas shall be placed in animal-proof containers before the end of each workday to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish. Containers shall be emptied at least once per week and all rubbish shall be disposed of at an appropriate off-site location.

APM 18 Trash dumping, firearms, open fires (such as barbecues), hunting, and pets are prohibited in the project area.

APM 19 Before the start of any project work, all crewmembers shall attend an Environmental Awareness Training presented by a qualified archaeologist. The training will include an overview of cultural resources and potential for encounter of these resources as well as outlining areas where cultural resources are more likely to be present. Upon completion of training, crewmembers shall sign a training form indicating they attended the program and understood the measures. PG&E will conduct follow-up environmental tailboard trainings on an as needed basis in the field.

APM 20 In the event that any discoveries of cultural or historic features, artifacts, or structures are encountered during project-related disturbance in the study areas not identified above, all work in the immediate vicinity of the discovery shall be halted until a qualified archaeologist can evaluate the significance of the find in accordance with the provisions of CEQA Section 15064.5. The archaeologist shall complete any requirements for the mitigation of adverse effects on any resources determined to be significant, PG&E shall determine the appropriate avoidance measures or other appropriate mitigation in consultation with a qualified archaeologist, the landowner, and CDFW. With the permission of the landowner, significant cultural materials shall be curated according to current professional standards.

APM 21 Section 7050 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human burial. If human remains are encountered during any project-related activity, the following measures shall apply:

- Stop all work within 100 feet;
- Immediately contact a PG&E Cultural Resource Specialist, who will then notify the County coroner;
- Secure the location, but do not touch or remove remains and associated artifacts;
- Do not remove associated spoils or pick through them;
- Record the location and keep notes of all calls and events; and
- Treat the find as confidential and do not publically disclose the location.

If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of such identification. The most likely descendant shall work with the PG&E Cultural Resource Specialist to develop a program for re-interment or other disposition of the human remains and any associated artifacts. No additional work shall take place within the immediate vicinity of the find until the appropriate actions have been implemented.

APM 22 Before the start of any project work, all crewmembers shall attend an Environmental Awareness Training presented by a qualified paleontologist. The training will include an overview of paleontological resources and potential for encounter of these resources as well as outlining areas where paleontological resources are more likely to be present. Upon completion of training, crewmembers will sign a training form indicating they attended the program and understood the measures. PG&E shall conduct follow-up environmental tailboard trainings on an as needed basis in the field.

APM 23 In the event that the inadvertent discovery of any surficial paleontological resources are encountered during project activities, the construction contractor shall cease activity in the affected area until the discovery can be evaluated by a qualified paleontological resource specialist in accordance with the provisions of CEQA Section 15064.5.

APM 24 PG&E shall implement its hazardous substance control and emergency response procedures, as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during implementation of the project. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures required in PG&E's A-ESCP also require implementing appropriate control methods and approved containment and spill-control practices for project activity and materials stored onsite. If it is necessary to store chemicals onsite, they shall be managed in accordance with all applicable regulations and the A-ESCP. Material safety data sheets shall be maintained and kept available onsite, as applicable. PG&E's emergency response plan shall include protocols for dealing with emergency and evacuation issues as well as contacts and meeting points.

APM 25 The project's worker environmental awareness program shall communicate environmental issues and appropriate work practices specific to this project. This awareness shall include spill prevention and response measures, and proper BMP implementation. The training shall emphasize site-specific physical conditions to improve hazard prevention (such as identification of flow paths to nearest water bodies) and shall include a review of all site-specific water quality requirements, including applicable portions of erosion control and sediment transport BMPs, health and safety plan, and hazardous substance control and emergency response plan.

APM 26 Quiet equipment (equipment that incorporates noise-control elements into the design) shall be used during project implementation as feasible. This may include, but not be limited to, use of a muffler on engine exhaust points.

APM 27 Where feasible, use of a barrier around wood and vegetation chippers shall be implemented when work is conducted within 0.25 mile of a residence.

APM 28 PG&E shall follow its standard practice for vegetation management and use of equipment in wildland areas. Project personnel shall be directed to drive on areas that have been cleared of vegetation or on wetted vegetation, park away from dry vegetation, and carry water, shovels, and fire extinguishers in times of high fire hazard. PG&E shall also prohibit trash burning. Spark arrestors would be installed on equipment using internal combustion engines. Additionally, fire-suppression materials and equipment shall be kept adjacent to work areas, and shall be clearly marked.

APM 29 Traffic control devices and signage shall be used as needed when work vehicles are entering or exiting county roads.

APM 30 Portable toilets shall be brought in to provide facilities for work crews and shall be transported to work areas. Waste shall be disposed of at a local wastewater treatment plant by the service provider.

2.6 Land Uses and Setting Context

The project is located in rural San Benito County, within the Agricultural Rangeland General Plan designation and AR (Agricultural Rangeland) zone. The 37.5-mile gas pipeline route traverses primarily undeveloped land. Agricultural uses near the project include row crops, livestock grazing, and accessory structures. Scattered residential development is located in the area. The topography consists of rolling hills and valleys vegetated with oak woodland, grasses, and scrub. The project crosses 26 ephemeral stream corridors which support riparian vegetation.

The project is located near Panoche Road, Browns Valley Road, Cottonwood Road, Payne Creek Road, Moody Canyon Road, and several unnamed private access roads. Work crews would use existing public roads, PG&E access roads, and other private access roads (given landowner permission) as necessary. Overland vehicle use would be required to access many of the work areas (see Table 2.2-2). These areas are undeveloped, with the exception of row crops near private access roads and Browns Valley Road, which would be used to access Study Areas 1, 2, and 3.

2.7 Required Agency Approvals

A California Fish and Game Code Section 1602 Lake or Streambed Alteration Agreement would be required.

2.8 Relationship to Local Plans

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

2.9 Public Notice

The 45-day comment period for the Draft IS/MND is from December 1, 2015 to January 15, 2016. Comments may be submitted by fax, email, or United States Mail. Please be sure to include your name, address, and telephone number.

Written comments on the Draft IS/MND should be sent to: Sarah.Bahm@wildlife.ca.gov; or via mail to: Sarah Bahm, California Department of Fish and Wildlife, 1234 East Shaw Avenue, Fresno, California 93710; or fax to (559) 243-4020, Attn: Sarah Bahm. For electronic access to the MND, see CDFW's website at:

http://www.wildlife.ca.gov/Notices. Hardcopies of the IS/MND may be reviewed at the following locations during the following hours:

California Department of Fish and Wildlife
1234 East Shaw Avenue
Fresno, California 93710

1130 East Shaw Avenue, Suite 206
Fresno, California 93710

Hours:
8:00 AM – 5:00 PM, Monday-Friday

San Benito County Free Library
470 5th Street
Hollister, California 95023

Hours:
10:00 AM – 6:00 PM, Monday
12:00 PM – 8:00 PM, Tuesday
10:00 AM – 6:00 PM, Wednesday
12:00 PM – 8:00 PM, Thursday
2:00 PM – 6:00 PM, Friday

3. Initial Study Checklist and Environmental Analysis

The impact analysis presented below is based on the CEQA Guidelines for the evaluation of impacts on the environment and the CEQA checklist questions presented below, and considers applicable plans, policies, and regulations when evaluating potential impacts and developing mitigation measures. Analysis of potential effects on the environment consider the actions identified in the project description (refer to Section 2) including APMs, which shall be implemented by PG&E as part of the project actions (refer to Section 2.5). APMs are referenced as applicable in each resource section. Additional mitigation measures are included in applicable resource sections to reduce identified significant, adverse, environmental impacts to less than significant. Sections 3.1, 3.3, and 3.4 each include a subsection describing methodology in order to describe the additional technical review required for these sections.

3.1 Aesthetics

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
(c)	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

3.1.1 Introduction

This section describes the existing physical environment within the project and concludes that, with implementation of APMs, impacts to the visual landscape would be less than significant.

3.1.1.1 Methodology

Visual or aesthetic resources are the natural and cultural features of the environment that can be seen and that contribute to the public's enjoyment of the environment. Visual resource or aesthetic impacts are generally defined in terms of a project's physical characteristics and potential visibility, and the extent that the project's presence would change the visual character and quality of the environment in which it would be located.

Visual resources were evaluated in the field and potential visual changes due to project activities during initial vegetation removal were evaluated. The evaluation of potential changes in the area's visual character is presented in the following paragraphs.

3.1.2 Regulatory Setting

3.1.2.1 Federal

No federal regulations or policies related to visual resources are applicable to the project.

3.1.2.2 State

No state regulations or policies related to visual resources are applicable to the project.

3.1.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.1.3 Environmental Setting

3.1.3.1 Aesthetic Context of the Project and its Vicinity

The project is located in a rural area of unincorporated San Benito County. The project vicinity is highly scenic and generally undeveloped. The visual landscape is characterized by rolling hillsides, riparian corridors, canyons, oak woodland, scrub, agricultural and ranch roads, row crops, scattered residences, and agricultural accessory structures including barns. Based on review of the County's Scenic Roads and Highways Element (County of San Benito 1980) there are no County-designated scenic highways proximate to the project. State Route 25, a minimum of two miles to the west of the project (Study Areas 1 and 2), is eligible for State scenic designation.

3.1.3.2 Existing Views of the Project

Views to and from the project are dominated by the rolling hillsides, which limit long-range and expansive views along public roadways. The existing gas pipeline is underground, with the exception of creek and canyon crossings, including within 26 of the proposed study areas. The study areas and access routes are visible in 17 locations from Panoche Road (Study Areas 2, 9, 10, 11, 13, 14, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 33) and six locations from Cottonwood Road (Study Areas 4, 5, 7, 8, 9, and 10), in varying degrees depending on intervening topography, trees, and other vegetation.

3.1.4 Impacts

(a) Would the project have a substantial adverse effect on a scenic vista?

As noted above, long-range views and scenic vistas as seen from public roadways are limited by the area's topography. During vegetation removal, temporary visual changes due to human presence and on-site staging of equipment and materials would occur. Effects during project activities would be short-term (approximately 2 months for the entire project), at different locations throughout this time period, and the presence of equipment at the work sites would be generally consistent with existing agricultural and rangeland uses in the area. Therefore, effects during project activities would not result in a substantial adverse effect on a scenic vista. Native vegetation would be chipped, lopped or sectioned and left onsite, and any bare ground

would be reseeded with a native mix upon completion of the project, as noted in MM BIO-14 (Section 3.4.5). The removal of vegetation and trees within the 23 areas visible from public roadways would be largely unnoticeable based on the existing vegetation that would remain in the landscape surrounding the work areas, and rolling topography that limits long range scenic views and scenic vistas. The following locations are in close enough proximity to the roads that the removal of vegetation and trees would be noticeable, in Study Areas 10, 13 25, 26, 27, 31, 33, but based on the small scale of the removal, site restoration required in MM BIO-14 (Section 3.4.5), and the rationale described above, in the long term, the effect would be less than significant.

(b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The project would require the removal of 160 trees over 4 inches in diameter (Table 2.2-1). The removal of the trees would not be visible from State Route 25 (eligible for state scenic highway designation) due to intervening topography. The closest work area to State Route 25 is approximately 2 miles away. No rock outcroppings or historic buildings would be affected. No impact would occur.

(c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The project does not include grading or the construction of new facilities. In the short term, the presence of equipment and vehicles may be noticeable to travelers on Panoche Road and Cottonwood Road; however, this type of activity is expected in rural and agricultural areas. Vegetation and tree removal would not be noticeable in the long term within the overall landscape, due to large areas of open space and varying terrain. As noted in MM BIO-14 (Section 3.4.5), PG&E would implement site restoration, which would prevent visual scarring or the appearance of bare patches within the landscape. The visual character of the area would remain rural and scenic. Therefore, potential impacts to visual character and quality would be less than significant.

(d) Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

The proposed project does not include nighttime work that would necessitate the use of lighting within work areas. No new lighting or sources of glare are proposed. No impact would occur.

3.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1 Introduction

This section describes agricultural and forestry resources within the project area, analyzes potential impacts to these resources from the proposed project, and concludes that no significant impacts to agricultural resources would occur.

3.2.2 Regulatory Setting

3.2.2.1 Federal

No federal regulations or policies related to agricultural resources are applicable to the project.

3.2.2.2 State

California Land Conservation Act (Williamson Act)

In 1965, the California State Legislature enacted the California Land Conservation Act, or "Williamson Act," to encourage the preservation of the state's agricultural lands and to prevent their premature conversion to non-agricultural uses. In order to preserve agricultural uses, the Williamson Act program established an agricultural preserve contract procedure by which any local jurisdiction within the state would tax landowners at a reduced rate, based on the value of the land for its current use as opposed to its unrestricted market value. In return, the landowners sign a Williamson Act contract with the local jurisdiction, agreeing to keep their land in agricultural production or another approved compatible use for at least a 10-year period.

Lands that qualify as Class I and Class II in the Soil Capability Classification System or lands that qualify for a rating of 80 to 100 in the Storie Index Rating are considered to be Prime Agricultural Land under the Williamson Act.

California Government Code, Section 51238, states that, unless otherwise decided by a local board or council, the erection, construction, alteration, or maintenance of electric and communication facilities, as well as other facilities, are determined to be compatible uses within any agricultural preserve. Also, Section 51238 states that a Board of Supervisors may impose conditions on lands or land uses to be placed within preserves to permit and encourage compatible uses in conformity with Section 51238.1.

3.2.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.2.3 Environmental Setting

In San Benito County, 584,600 acres of agricultural land are currently under Williamson Act contracts (including Non-Renewals), which constitute about 70% of all agricultural land in the county (County of San Benito 2014). The existing gas pipelines traverse lands under contract, and the project would be located in areas under contract. Approximately 75% of the total land area in San Benito County is agricultural land, and 91% of that agricultural acreage is grazing land and 4% is prime farmland. The project is not located on farmland that has been designated as Prime, Unique, or Farmland of Statewide Importance. Based on review of the California Department of Conservation Farmland Mapping and Monitoring Program San Benito County Important Farmland 2010 map, the project is located within areas designated as Grazing Land (California Department of Conservation, Division of Land Resource Protection 2011).

3.2.4 Impacts

(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project is not located on farmland designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance so would not convert such land to non-agricultural use. No impact would occur.

(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

The proposed project does not include a new use or structure, and is limited to management of vegetation along the existing pipelines, which is an allowed use in the agricultural designation. The proposed actions within the project area would not result in a reduction in land used for grazing, would not affect crop production, and would not result in a disruption to existing agricultural uses due to the short timeframe required to complete vegetation removal within each work area. Therefore, the project would not conflict with existing zoning or Williamson Act contracts.

Incidental nuisance effects to agricultural lands and operations may occur during the project, including disruption of livestock by the presence and use of equipment, creation of dust and noise, accidental equipment spill or leaks, improper containment and removal of materials and trash, and introduction or spread of invasive plants. These effects shall be addressed through standard programs and policies and coordination with each affected landowner. As noted in APMs 1 and 2 (Section 2.5), PG&E shall notify each affected property owner a minimum of 30 days before entering the identified work areas, staging areas, or access routes, which would reduce the potential for conflicts with livestock and private use of agricultural lands. All gates shall be left as found (open or closed), and as requested by the property owner, and all personnel shall participate in safety training to ensure avoidance of livestock, attention to gates and fences, and proper storage and removal of materials and refuse from the work areas, staging areas, or access routes. Hazardous material containment (APMs 14, 15, and 24), erosion control measures (APM 12), fugitive dust reduction (APM 3), and management of invasive weeds (APM 11) shall be implemented to reduce the potential for any incidental changes to adjacent agricultural lands. Therefore, potential impacts would be less than significant.

(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The proposed project would not be located within forest land or timberland; therefore, no impact would occur.

(d) Result in the loss of forest land or conversion of forest land to non-forest use?

The proposed project would not be located within forest land or result in conversion of forest land to non-forest use. Therefore, no impact would occur.

(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?

The proposed project is limited to removal and management of vegetation along existing gas pipelines within the existing ROW. This action would not result in a loss of agricultural land, and would not be inconsistent with existing agricultural uses in the area. No new structures, grading, or surfacing is proposed. The project would not result in the conversion of Farmland or forest land, and no impact would occur.

3.3 Air Quality and Greenhouse Gases

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Air Quality				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
(d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
(e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒
Greenhouse Gas Emissions				
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
(b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

3.3.1 Introduction

This section describes existing conditions, potential project-related impacts, and APMs for air quality and greenhouse gas (GHG) issues. Included are descriptions of the environmental setting in terms of existing air quality that could be affected by the proposed project. Federal, state, and regional air quality regulations are discussed, followed by discussions of APMs and evaluation of impacts. The analysis concludes that the project would result in less than significant air quality impacts, including less than significant GHG emissions.

3.3.1.1 Methodology

The proposed project does not include any grading or construction activities. Vegetation removal activities would occur over a 2-month period. Due to the nature of the project, formal construction and operational air quality modeling and analysis was not conducted; however, the California Emissions Estimator Model™ (CalEEMod) was used to estimate the emissions generated by the project. This approach was used to address Monterey Bay Unified Air Pollution Control District (MBUAPCD) thresholds of significance for operational emissions. The MBUAPCD currently only identifies fugitive dust (PM10) emission thresholds for construction activities. These thresholds and emissions estimates are identified and analyzed in Section 3.3.4 below. Basic

strategies to mitigate construction phase air quality impacts are provided by the MBUAPCD. APMs 3, 4, and 5 (Section 2.5) shall be implemented to address state and regional plans, policies, and requirements.

3.3.2 Regulatory Setting

3.3.2.1 Federal

Air Quality

Federal air quality policies are regulated through the federal Clean Air Act (CAA). Pursuant to the CAA, the EPA has established National Ambient Air Quality Standards (NAAQS) for the following air pollutants (called "criteria" pollutants): carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 microns in aerodynamic diameter (PM_{10}), particulate matter less than 2.5 microns in aerodynamic diameter ($PM_{2.5}$), and lead. The NAAQS represent levels established to avoid specific adverse health and welfare effects associated with each pollutant with a margin of safety. Table 3.3-1 summarizes the NAAQS.

EPA has designated counties in California as either in "attainment" or "nonattainment" for each NAAQS. A region that is meeting the air quality standard for a given pollutant is designated as being in "attainment" for that pollutant. If the region is not meeting the air quality standard, then the region is designated as being in "nonattainment" for that pollutant. If a region is designated as nonattainment for a NAAQS, the CAA requires the state to develop a State Implementation Plan (SIP) to demonstrate how the standard would be attained, including the establishment of specific requirements for review and approval of new or modified stationary sources of air pollution. The federal attainment status for the county is listed in Table 3.3-2.

Greenhouse Gases

GHGs are any gases that absorb infrared radiation in the atmosphere, and are different than the criteria pollutants discussed in Air Quality, above. The primary GHGs that are emitted into the atmosphere as a result of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. These are most commonly emitted through the burning of fossil fuels (oil, natural gas, and coal), agricultural practices, decay of organic waste in landfills, and a variety of other chemical reactions and industrial processes (e.g., the manufacturing of cement).

GHG and climate change are national and global issues that must be considered on a large scale. Most individual activities would not cause an individually significant GHG effect. Therefore, the potential significance of a project's impact on GHGs and climate change must be considered in the context of the project's contribution of GHG in combination with all other sources.

On October 30, 2009, the EPA published the Mandatory Reporting Rule (codified in 40 Code of Federal Regulations [CFR] Part 98), which requires mandatory reporting of GHG emissions from large sources and suppliers in the United States. In general, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, facilities injecting CO_2 underground, and facilities that emit 25,000 metric tons or more per year of carbon dioxide equivalent (CO_2e) emissions are required to submit annual reports to the EPA.

On December 7, 2009, the EPA Administrator signed two findings regarding GHGs. The first was that the current and projected concentrations of the six key well-mixed GHGs in the atmosphere (CO_2, CH_4, N_2O, hydrofluorocarbons [HFC], perfluorocarbons [PFC], and sulfur hexafluoride [SF_6]) threaten the public health and welfare of current and future generations. The second finding was that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare. While these findings do not themselves impose requirements on

industry or other entities, the EPA is developing vehicle emission standards under the CAA as a result of these findings.

Table 3.3-1.
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m3)		0.075 ppm (147 µg/m3)		
Respirable Particulate Matter (PM_{10})[8]	24 Hour	50 µg/m3	Gravimetric or Beta Attenuation	150 µg/m3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m3		—		
Fine Particulate Matter ($PM_{2.5}$)[8]	24 Hour	—	—	35 µg/m3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m3	Gravimetric or Beta Attenuation	12.0 µg/m3	15 µg/m3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m3)		9 ppm (10 mg/m3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m3)		—	—	
Nitrogen Dioxide (NO_2)[9]	1 Hour	0.18 ppm (339 µg/m3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m3)		0.053 ppm (100 µg/m3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[10]	1 Hour	0.25 ppm (655 µg/m3)	Ultraviolet Fluorescence	75 ppb (196 µg/m3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m3)	
	24 Hour	0.04 ppm (105 µg/m3)		0.14 ppm (for certain areas)[10]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[10]	—	
Lead[11,12]	30 Day Average	1.5 µg/m3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m3		
Visibility Reducing Particles[13]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m3)	Ultraviolet Fluorescence			
Vinyl Chloride[11]	24 Hour	0.01 ppm (26 µg/m3)	Gas Chromatography			

Table 3.3-1.
Federal and State Ambient Air Quality Standards

Source: California Air Resources Board 2013.

Notes:

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of CCR Title 17.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the United States EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the United States EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the United States EPA.
8. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m3 to 12.0 µg/m3. The existing national 24- hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
10. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

3.3.2.2 State

Air Quality

The California Clean Air Act, approved in 1988 and amended in 1992, established the California Ambient Air Quality Standards (CAAQS). These standards, summarized in Table 3.3-1 above, are generally more stringent and include more pollutants than the NAAQS. Similar to the EPA, the California Air Resources Board (CARB) designates counties in California as being in “attainment” or “nonattainment” for the CAAQS. The state attainment status for San Benito County is listed in Table 3.3-2. CARB has the primary responsibility for producing the SIP for nonattainment pollutants. However, CARB relies on and oversees the efforts of regional air districts to adopt and implement air quality regulations and plans, including CARB-suggested

control measures and additional emission reduction strategies for sources under their jurisdiction. CARB consolidates statewide implementation plan requirements for mobile sources and consumer products with locally adopted district plans and submits the completed SIP to EPA. The SIP thus consists of the emissions standards for vehicular sources and consumer products set by CARB, as well as attainment plans adopted by the air districts and approved by CARB.

Table 3.3-2.
North Central Coast Air Basin Attainment Status for San Benito County– January 2013

Pollutant	State Standards[1]	National Standards
Ozone (O_3)	**Nonattainment**[2]	Attainment/Unclassified[3]
Inhalable Particulates (PM_{10})	**Nonattainment**	Attainment
Fine Particulates ($PM_{2.5}$)	Attainment	Attainment/Unclassified[4]
Carbon Monoxide (CO)	Monterey County – Attainment San Benito County – Unclassified Santa Cruz County – Unclassified	Attainment/Unclassified
Nitrogen Dioxide (NO_2)	Attainment	Attainment/Unclassified[5]
Sulfur Dioxide (SO_2)	Attainment	Attainment[6]
Lead	Attainment	Attainment/Unclassified[7]

Source: MBUAPCD 2013a

Notes:
1. State designations based on 2009 and 2011 air monitoring data.
2. Effective July 26, 2007, the ARB designated the NCCAB a nonattainment area for the State ozone standard, which was revised in 2006 to include an 8-hour standard of 0.070 ppm.
3. On March 12, 2008, EPA adopted a new 8-hour ozone standard of 0.075 ppm. In April 2012, EPA designated NCCAB attainment/unclassified based on 2009-2011 data, with a design value of 0.070 ppm.
4. In 2006, EPA revised the 24-hour standard for $PM_{2.5}$ from 65 to 35 µg/m3. In 2009, EPA designated the NCCAB as attainment/unclassified.
5. In 2011, EPA indicated it plans to designate the entire state as attainment/unclassified for the 2010 NO2 standard. Final designations have yet to be made by EPA.
6. In June 2011, the ARB recommended to EPA that the entire state be designated as attainment for the 2010 primary SO2 standard. Final designations have yet to be made by EPA.
7. On October 15, 2008 EPA substantially strengthened the national ambient air quality standard for lead by lowering the level of the primary standard from 1.5 µg/m3 to 0.15 µg/m3. Final designations were made by EPA in November 2011.
8. Nonattainment pollutants are highlighted in Bold.

Regulations that contain mobile source control measures pertaining to heavy-duty, off-road equipment are implemented by CARB. The regulations for in-use off-road diesel equipment are designed to reduce nitrogen oxides (NO_x) and diesel particulate matter from existing fleets of equipment. All equipment owners are subject to a 5-minute idling restriction in the rule for off-road fleets (13 CCR 2449). CARB expects to enforce other portions of this rule for large fleets starting in July 2014 and in 2019 for small fleets (as according to ARB Mail-Out #MSCD 13-25 [CARB 2013]). Depending on the size of the fleet, the equipment owner would need to ensure that the average emissions performance of the fleet meets certain statewide standards.

Diesel engines on portable equipment and vehicles are subject to various CARB Airborne Toxic Control Measures that dictate how diesel sources must be controlled statewide. For example, the measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling generally limits idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes or periods aggregating more than five minutes in any one hour (13 CCR 2485). The CARB Portable Equipment Registration Program allows owners or operators of portable engines and associated equipment commonly

used for construction to register their units under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts.

Greenhouse Gases

The framework for regulating GHG emissions in California falls under the implementation requirements of the Global Warming Solutions Act of 2006 (referred to as Assembly Bill [AB] 32), which was signed into law by the California State Legislature in 2006. AB 32 requires CARB to design and implement emission limits, regulations, and other measures such that statewide GHG emissions are reduced in a technologically feasible and cost-effective manner to 1990 levels by 2020. Carbon dioxide is the most abundant GHG and is estimated to represent approximately 80-90% of the principal GHGs that are currently affecting the earth's climate.

According to CARB, transportation (vehicle exhaust) is one of the main sources of GHG in the state. The statewide 2020 emissions limit is 427 million metric tons CO_2e; CO_2 emissions account for approximately 90% of this value (CARB 2007).

3.3.2.3 Local

Air Quality

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities. The project would conform to MBUAPCD standards.

3.3.3 Environmental Setting

The project site is within the North Central Coast Air Basin (NCCAB), which forms an area of 5,159 square miles consisting of Monterey, Santa Cruz, and San Benito Counties. San Benito County is in the eastern portion of the NCCAB. San Benito Valley runs northwest-southeast and has the Gabilan Range as its western boundary. To the west of the Gabilan Range is the Salinas Valley, which extends from Salinas at its northwestern end to King City at its southeastern end. The semi-permanent high-pressure cell in the eastern Pacific is the basic controlling factor in the climate of the NCCAB.

3.3.3.1 Air Quality

The MBUAPCD is the agency responsible for regulating air quality within the NCCAB by implementing applicable regional, state, and federal rules and regulations for any direct and area sources of criteria air pollutants and toxic air contaminants.

Ambient air quality standards are set to establish levels of air quality that must be maintained to protect the public from the adverse effects of air pollution. As of January 2013, the NCCAB is in attainment of all federal ambient air quality standards (MBUAPCD 2013a). However, under the generally more stringent state standards, the NCCAB is currently in nonattainment for O_3, 8-hour standard, and Inhalable Particulate Matter (PM_{10}) (MBUAPCD 2013a).

To achieve compliance with the state air quality standards, the MBUAPCD adopted the Air Quality Management Plan (AQMP) in 1991 (most recently revised in 2008), which established control measures for achieving and maintaining attainment with the state O_3 standard (MBUAPCD 2008a). Ozone, the primary constituent of smog, is formed in the atmosphere through complex chemical reactions involving volatile organic compounds (VOC) and NO_x in the presence of sunlight. The primary sources of VOC in the NCCAB are on- and off-road motor vehicles, cleaning and surface coatings, solvent evaporation, landfills, petroleum production and marketing, and prescribed burning. Primary sources of NO_x are on- and off-road motor vehicles, stationary source fuel combustion, and industrial processes. The basin also experiences air quality impacts associated with transported Bay Area NO_x emissions (MBUAPCD 2013a). The 2009-2011 Triennial Plan Revision (MBUAPCD 2013b) of the AQMP documented that the air basin continued to attain the 1-hour O_3 standard and recommended adoption of five control measures to make progress towards achieving the 8-hour standard (MBUAPCD 2013b).

Area-wide sources are the main contributor to reactive organic gas (ROG) emissions in the region; mobile sources are the main contributor to the MBUAPCD's NO_x emissions inventory, which is also significantly impacted by transported Bay Area NO_x emissions.

3.3.3.2 Greenhouse Gases

Baseline GHG emissions in the unincorporated area of San Benito County were developed for 2005 and 2009 (Association of Monterey Bay Area Governments [AMBAG] 2012). These inventories were generally divided into four GHG emission sectors: residential, commercial/industrial, transportation, and waste generation. Based on this inventory, in 2009, there were 115,502 metric tons of CO_2 equivalent (CO_2e) emitted within San Benito County's unincorporated areas. The 2005 GHG emissions inventory shows there were 111,197 metric tons of CO_2e emitted in the unincorporated area of San Benito County. For 2005 and 2009, the greatest contributor to San Benito County's unincorporated GHG emissions was transportation. The potential effects of climate change on San Benito County are related to temperature, precipitation, snowpack storage and water supply, extreme weather events, sea level rise, water supply, water quality, and agriculture. There is significant uncertainty associated with predicting county-specific changes for these various climate change-related effects.

3.3.4 Impacts

3.3.4.1 Air Quality

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The MBUAPCD uses future population projections to generate emission forecasts upon which the AQMP and necessary control measures are based. Because the project would not result in an increase in population or long-term operational emissions, indirect emissions associated with the project are deemed to be consistent with the AQMP. The project activities would not directly implicate or conflict with any control measures within the AQMP. The proposed project would not conflict with or otherwise obstruct implementation of the AQMP. Therefore, no impact would occur.

(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The project would generate vehicle emissions from use of equipment and worker trips. Use of vehicles on unpaved roadways, overland access, and vegetation removal would generate fugitive dust. Project activity emissions are typically considered short term, as they occur only during project vegetation maintenance activities. For the proposed project, emissions would be limited to an approximately 2-month period. The potential for significant air quality impacts is minimized by the limited duration and scale of the project.

The MBUAPCD has developed criteria pollutant emission thresholds, which meet or exceed state and federal air quality thresholds, and established criteria in the MBUAPCD's 2008 CEQA Air Quality Guidelines to identify the level of construction and operational activity that could result in significant impacts if not mitigated. Per the MBUAPCD CEQA Air Quality Guidelines, construction-related impacts to air quality would be potentially significant if a project would generate PM_{10} emissions of 82 pounds per day or more. The MBUAPCD assumes that the 82 pounds per day threshold could be exceeded when minimal earthmoving activities exceed 8.1 acres per day (MBUAPCD 2008b).

The project's total estimated activity footprint over a 2-month period is approximately 23.67 acres (18.17 acres for vegetation removal areas and 5.5 acres for staging and temporary work areas), and no ground disturbance is proposed for this project. Equipment would access work areas over approximately 3.17 acres of unpaved roads. This level of activity is substantially below the 8.1 acres per day threshold, and no grading is proposed. There are no extenuating circumstances that would indicate that PM_{10} emissions may approach the 82 pounds per day threshold. In addition, PG&E shall implement dust control measures as necessary (APM 3, Section 2.5), which would reduce emissions of PM_{10}. Based on air emissions modeling conducted using CalEEMod, the project would not result in the generation of emissions above identified thresholds, as shown in Table 3.3-3, below.

Operational emissions would include emissions during vehicle trips to and from the work areas for maintenance activities. The initial vegetation management emissions would be below identified thresholds of the MBUAPCD CEQA Air Quality Guidelines for all criteria pollutants, as shown in Table 3.3-3. Therefore, impacts would be less than significant.

Table 3.3-3.
Vegetation Management Activity CalEEMod Result Emissions

Pollutant Source	MBUAPCD Threshold of Significance[1]	Project Operational (Maintenance) Emissions (Lb/day)[2]
VOC	137 lb/day (direct and indirect)	0
NO_x as NO_2	137 lb/day (direct and indirect)	52.21
PM_{10}	82 lb/day (on-site)[3] AAQS exceeded along unpaved roads (off-site)	11.64
CO	LOS at intersection/road segment degrades from D or better to E or F or V/C ratio at intersection/road segment at LOS E or F increases by 0.05 or more or delay at intersection at LOS E or F increases by 10 seconds or more or reserve capacity at unsignalized intersection at LOS E or F decreases by 50 or more[4] 550 lb/day (direct)[4]	27.88
SO_x as SO_2	150 lb/day (direct)[3]	0.06

Source: MBUAPCD 2008b

Notes:

1. Projects that emit other criteria pollutant emissions would have a significant impact if emissions would cause or substantially contribute to the violation of State or national AAQS. Criteria pollutant emissions could also have a significant impact if they would alter air movement, moisture, temperature, climate, or create objectionable odors in substantial concentrations. When estimating project emissions, local or project-specific conditions should be considered.
2. Results of CalEEMod used to estimate the emissions generated by project activities.
3. The District's 82 lb/day operational phase threshold of significance applies only to onsite emissions and project-related exceedances along unpaved roads. These impacts are generally less than significant. On large development projects, almost all travel is on paved roads (0%) unpaved), and entrained road dust from vehicular travel can exceed the significance threshold. Please contact the Air District to discuss estimating emissions from vehicular travel on paved roads. District-approved dispersion modeling can be used to refute (or validate) a determination of significance if modeling shows that emissions would not cause or substantially contribute to an exceedance of State and national AAQS.
4. Modeling should be undertaken to determine if the project would cause or substantially contribute (550 lb/day) to exceedance of CO AAQS. If not, the project would not have a significant impact.

(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

As shown in Table 3.3-3 in Section 3.3.4.1(b) above, the project would not emit significant quantities of criteria pollutants during short-term project activities. The project would not cause any growth-inducing effects or cause an exceedance of established population projections to occur (refer to Section 3.12.4(a)), which may indirectly generate additional emission sources. However, the NCCAB is currently in nonattainment for O_3 (8-hour standard) and PM_{10}. As standard practice, PG&E maintains equipment in proper working condition, and would minimize equipment idling as feasible (APM 4, Section 2.5). With implementation of standard practices and APMs 3 and 4, potential impacts would be less than significant.

(d) Expose sensitive receptors to substantial pollutant concentrations?

Implementation of the proposed project would not generate substantial levels of air emissions. Residences within 0.5 mile of the project would not be adversely affected based on implementation of APM 3 (fugitive dust control). Therefore, potential impacts would be less than significant.

(e) Create objectionable odors affecting a substantial number of people?

The project does not include any elements that would generate objectionable odors; therefore no impact would occur.

3.3.4.2 Greenhouse Gas Emissions

(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

GHG and climate change are national and global issues that must be considered on a large scale. Most individual activities would not cause an individually significant GHG effect. Therefore, the potential significance of a project's impact on GHGs and climate change must be considered in the context of the project's contribution of GHG in combination with all other sources.

The MBUAPCD has not yet adopted plans for regulating GHGs or addressing climate change, although it maintains an inventory of GHG emissions both basin-wide and by county. Therefore, a screening level analysis was conducted using the thresholds adopted by the San Luis Obispo County Air Pollution Control District (SLOAPCD) for the South Central Coast Air Basin because the climate zones, land uses, and population distribution are similar to the project area (rural, agricultural). Based on thresholds in the SLOAPCD's CEQA Air Quality Handbook (SLOAPCD 2012), a project could potentially result in a significant impact associated with GHG emissions if it exceeds the Bright-Line Threshold of 1,150 metric tons of CO_2e per year. An exceedance of this threshold would require preparation of CalEEMod modeling to quantify emissions and determine impacts.

According to the SLOAPCD CEQA Air Quality Handbook, the relevant 1,150-metric ton significance criterion is equivalent to a general heavy industrial facility of 53,000 square feet (1.2 acres) or a commercial research and development facility of 93,000 square feet (2.1 acres) (SLOAPCD 2012). The project is limited to vegetation removal, does not include any stationary sources of GHG emissions, and would not result in the generation of a substantial number of additional trips or vehicle miles traveled in the short or long term. Based on a comparison with uses that exceed the identified threshold, GHG emissions from this project would be less than 1,150 metric tons per year.

The proposed project would not generate significant project-related traffic and would not require a long-term energy source. Therefore, the project's individual short-term contribution to overall GHG emissions would be less than significant.

(b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

As noted above, there are no MBUAPCD policies or regulations specifically related to GHG emissions. However, as discussed above, the project would not exceed adopted GHG thresholds applied by adjacent jurisdictions and is not anticipated to generate significant GHG emissions. The project would not conflict with the statewide regulations listed above. Therefore, there is no impact.

3.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
(c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

3.4.1 Introduction

This section describes biological resources in the project area and vicinity, and identifies potential impacts to habitats and species that could result from the proposed project activities. The analysis concludes that, with implementation of APMs and MMs, impacts to biological resources would be less than significant.

3.4.1.1 Methodology[3]

This section summarizes the methods used to identify resources and analyze potential impacts to biological resources, including waters and wetlands and special-status plants and wildlife. PG&E's consultant, SWCA Environmental Consultants (SWCA) reviewed and surveyed the project biological study area (BSA) that includes work areas, staging areas, access routes, the maximum anticipated extent of project-related

[3] This section was excerpted from the *Biological Resources Survey Report for the Vegetation Management for Gas Pipeline-300A/B San Benito County, California* (April 2015).

impacts within the project footprint, and an additional survey buffer beyond the project footprint, ranging from 50 to 500 feet depending on the biological resource of concern. Species-specific survey buffers and methods are discussed in "Survey Methods" below.

Within the BSA, 35 separate study areas were delineated to encompass each of the proposed work areas and help illustrate biological conditions within specific areas in the project. Delineation of the study areas, as depicted on Figures 1.2-1 and 1.2-2 and in Appendix A, was done by grouping work areas in close proximity to one another, specifically where there was overlap within a 250-foot buffer around the work area. The 250-foot study area buffer was used as this was the survey buffer for most special-status species surveys (exceptions are rare plant surveys: 50-foot buffer, and nest surveys for raptors: 500-foot buffer).

As used here, the term "special-status species" is defined as including plants and animals meeting the criteria defined below.

A plant species was considered to be of special-status if it met one or more of the following criteria:

- Listed, proposed for listing, or candidate for listing, as threatened or endangered under the federal Endangered Species Act (FESA; 50 CFR 17.11 for wildlife; 50 CFR 17.12 for plants; 67 Federal Register 40658 for candidates) and various notices in the Federal Register for proposed species);
- Listed under the California Endangered Species Act (CESA) as threatened or endangered, or proposed or candidates for listing;
- Designated as rare under the Native Plant Protection Act (NPPA); or,
- Species that otherwise meet the definition of rare, threatened, or endangered species under CEQA. For the purposes of this project, that includes species listed by the California Native Plant Society (CNPS) in the online version of its Inventory of Rare and Endangered Plants of California as Rank 1A, 1B, 2A, and 2B.

Special-status wildlife included species that met one or more of the following criteria:

- Listed, proposed for listing, or candidate for listing as threatened or endangered under the FESA;
- Listed or candidates for listing as threatened or endangered under the CESA;
- Designated as Species of Special Concern (fish and wildlife species that do not have state or federal threatened or endangered status but may still be threatened with extinction) or a Fully Protected Species by CDFW; or
- Species that otherwise meet the definition of rare, threatened, or endangered species under CEQA.

Natural communities were considered special-status if they are identified on the CDFW List of Vegetation Alliances and Associations as being highly imperiled, also classified by CDFW as ranks S1 to S3 in the California Natural Diversity Database (CNDDB) and natural communities of special concern.

Literature Review

Before conducting field surveys, a literature review was conducted by PG&E's consultant, SWCA, to gain insight into what species have been documented in the project vicinity. The review was initiated with a query of the CNDDB to identify reported occurrences of sensitive species within 5 miles of the proposed work areas. Records searched were expanded to 10 miles from the project when assessing San Joaquin kit

fox (*Vulpes macrotis mutica*) records. In addition to the CNDDB query, the CNPS Electronic Inventory of Rare and Endangered Plants of California for the Tres Pinos, Quien Sabe Valley, Cherry Peak, Panoche Pass, Paicines, Cerro Colorado, San Benito, and Llanada USGS 7.5-minute quadrangles were reviewed to provide information on rare plants that are known to occur in the area. The USFWS online Wetlands Mapper was queried to identify potential jurisdictional wetlands and streams in the BSA. Existing environmental documents and reports were also reviewed for background information and recent findings in the vicinity. Scientists with experience working in the region were contacted for information regarding special-status wildlife occurrences.

Survey Methods

SWCA, Biological Monitoring and Assessment Specialists (BioMaAS), and Biosearch Associates (Biosearch) biologists conducted field surveys of the BSA. The purpose of the field surveys was to identify the presence of habitats appropriate for special-status species that could be impacted by proposed project activities. Based on the results of the literature review, biologists conducted general habitat assessment surveys for species listed with potential to occur in the BSA. Biologists also conducted nesting bird surveys, rare plant surveys, jurisdictional wetland assessments, and focused habitat assessment surveys for San Joaquin kit fox, San Joaquin antelope squirrel (*Ammospermophilus nelsoni*), California tiger salamander (*Ambystoma californiense*), and California red-legged frog (*Rana draytonii*). Specific survey methods are discussed in detail below.

Jurisdictional Wetlands and Waters

SWCA biologists conducted reconnaissance-level surveys on August 18, 19, 20, 21, and 22, 2013 and July 9, 10, and August 6, 2014, identifying potential jurisdictional wetlands and waters that cross project work areas, staging areas, and access routes. Where any potential jurisdictional features intersected with proposed work areas, staging areas, and access routes, biologists recorded the vegetation to be removed within the potential jurisdictional feature, physical characteristics of the feature (e.g., bank, bed, presence of water), and potential special-status species habitat within and surrounding the feature.

Rare Plants

An SWCA biologist conducted rare plant surveys on May 6, 7, and 8, 2014. Surveys for special-status plant species were conducted via walking transects covering all proposed work areas and staging areas and a 50-foot buffer beyond the work areas. The project access routes without a buffer were surveyed at this time as well. Study Areas 11-17 had a reduced survey buffer of 30 feet on either side of the pipe centerline due to restricted access. The rare plant survey was conducted during the approximate blooming period for all special-status plant species with potential to occur in the BSA, with the exception of chaparral ragwort (*Senecio aphanactis*). Habitat elements associated with chaparral ragwort were assessed during the rare plant survey to determine if suitable habitat was present.[4] The SWCA biologist referred to *The Jepson Manual* to further identify and key plant species. During rare plant and wildlife surveys, plant communities within the BSA were recorded. Plant communities were defined according to *Preliminary Descriptions of the Terrestrial Natural Communities of California*.

San Joaquin Kit Fox

Biosearch biologists conducted reconnaissance-level field surveys for San Joaquin kit fox on May 6, 7, and 8, 2014. Survey methodology followed the early evaluation requirements provided by USFWS. Focused surveys

[4] It should be noted that 2014 was an exceptionally dry year and some rare plants that have potential to occur in the area may not have been in bloom due to the low amount of rainfall received.

were not conducted for this species, as the purpose of the surveys was to determine if available habitat was present for San Joaquin kit fox. The San Joaquin kit fox survey area included the proposed work areas, staging areas, access routes, and an additional 200-foot buffer surrounding proposed work areas. Surveys within Study Areas 11-17 had reduced survey buffers of 30 feet on either side of the pipe centerline due to restricted access.

Each study area was surveyed via walking transects to identify vegetation communities and habitat features. Habitat features for San Joaquin kit fox, including prey availability and den potential, were evaluated at each of the 35 study areas in the BSA. The presence of potential predators and competitors was also noted.

California Tiger Salamander

Biosearch biologists conducted reconnaissance-level field surveys for California tiger salamander on May 6, 7, and 8, 2014. Survey methodology followed current guidelines provided by the USFWS and CDFW. The survey area for California tiger salamander included the proposed work areas, staging areas, access routes, and an additional 250-foot buffer surrounding proposed work areas. Surveys within Study Areas 11-17 had reduced survey buffers of 30 feet on either side of the pipe centerline due to restricted access.

Each study area was surveyed via walking transects to identify suitable habitat features for California tiger salamander, including aquatic and upland habitat features. Aerial photos of each study area and vicinity were analyzed for suitable nearby aquatic breeding habitat. Focused surveys were not conducted for this species as the purpose of the surveys was to determine if available habitat was present for California tiger salamander.

California Red-Legged Frog

SWCA biologists conducted reconnaissance-level field surveys for California red-legged frog on August 18, 19, 20, 21, and 22, 2013. The survey area for California red-legged frog included the proposed work areas, staging areas, access routes, and an additional 250-foot buffer surrounding proposed work areas. Additionally, Biosearch biologists recorded any potential California red-legged frog habitat features observed while conducting surveys for California tiger salamander on May 6, 7, and 8, 2014.

Each study area was surveyed via walking transects to identify suitable habitat features for California red-legged frog, including aquatic and upland habitat features. Aerial photos of each study area and vicinity were analyzed for suitable nearby aquatic breeding habitat. Focused surveys were not conducted for this species as the purpose of the surveys was to determine if available habitat was present for California red-legged frog.

San Joaquin Antelope Squirrel

Biosearch biologists conducted reconnaissance-level field surveys on May 6, 7, and 8, 2014. The survey area for San Joaquin antelope squirrel included the proposed work areas, staging areas, access routes, and an additional 200-foot buffer surrounding proposed work areas. Surveys within Study Areas 11-17 had reduced survey buffers of 30 feet on either side of the pipe centerline due to restricted access.

Each study area was surveyed via walking transects to identify suitable vegetation communities and habitat features for San Joaquin antelope squirrel. Habitat features for San Joaquin antelope squirrel, including arid grassland and shrub-land, were evaluated at each of the 35 study areas. The presence of potential predators and competitors was also noted. Focused surveys were not conducted for this species as the purpose of the surveys was to determine if available habitat was present for San Joaquin antelope squirrel.

Nesting Migratory Birds

SWCA, BioMaAS, and Biosearch biologists conducted nesting bird surveys on May 6, 7, and 8, 2014. The survey area for nesting birds consists of the proposed work areas, staging areas, access routes, and an additional 100-foot buffer surrounding work areas for passerines and other non-raptor species and a 500-foot buffer for raptors.

Surveys were conducted via walking scans from vantage points that maximized visual coverage of all potential nesting habitat within the survey buffers. High-powered binoculars and spotting scopes were used to determine if nests were present and if avian species were displaying mating or nesting behavior. Active nests (containing an adult bird, eggs, or chicks) observed were noted and coordinates were recorded using a Trimble GeoXT global positioning system (GPS) unit capable of sub-meter accuracy.

3.4.2 Regulatory Setting

3.4.2.1 Federal

Federal Endangered Species Act

The FESA protects plants and wildlife that are listed by USFWS and the National Oceanic and Atmospheric Administration National Marine Fisheries Service as endangered or threatened. Section 9 of the FESA prohibits the taking of endangered wildlife, where taking is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 CFR 17.3). For plants, this statute governs removing, possessing, maliciously damaging, or destroying any endangered plant on federal land and removing, cutting, digging-up, damaging, or destroying any endangered plant on non-federal land in knowing violation of state law (16 United States Code [U.S.C.] 1538). Under Section 7 of the FESA, federal agencies are required to consult with USFWS if their actions, including permit approvals or funding, may adversely affect a federally listed species or its designated critical habitat. Through consultation and the issuance of a biological opinion, USFWS may issue an incidental take statement allowing take of the species that is incidental to otherwise authorized activity provided the action will not jeopardize the continued existence of the species. Section 10 of the FESA provides for issuance of incidental take permits to private parties in association with development of a Habitat Conservation Plan.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA) implements international treaties between the United States and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. As authorized by the MBTA, USFWS may issue permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits.

Federal Clean Water Act

The purpose of the Clean Water Act (CWA) is to "restore and maintain the chemical, physical, and biological integrity of the nation's waters." Section 404 of the CWA prohibits the discharge of dredged or fill material into "waters of the United States" without a permit from United States Army Corps of Engineers (USACE). The definition of waters of the United States includes rivers, streams, estuaries, the territorial seas, ponds, lakes, and wetlands. Wetlands are defined as those areas "that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do

support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). The EPA also has authority over wetlands and may override a USACE permit.

Substantial impacts to wetlands may require an individual permit. Projects that only minimally affect wetlands may meet the conditions of one of the existing Nationwide Permits. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions; this certification or waiver is issued by the applicable California Regional Water Quality Control Board (RWQCB).

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act, originally passed in 1940, provides for the protection of the bald eagle and the golden eagle (as amended in 1962) by prohibiting the take, possession, sale, purchase, barter, offer to sell, purchase or barter, transport, export or import, of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit (16 U.S.C. 668(a); 50 CFR 22, U.S. Code 2004). Take includes inactive nests as well as active nests. "Take" includes pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb (16 U.S.C. 668c; 50 CFR 22.3, U.S. Code 2004). The 1972 amendments increased civil penalties for violating provisions of the Act.

3.4.2.2 State

California Endangered Species Act

The CESA generally parallels the main provisions of the FESA, but unlike its federal counterpart, the CESA applies the take prohibitions to species proposed for listing (called "candidates" by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows for take incidental to otherwise lawful activities. Project proponents wishing to obtain incidental take permits are able to do so through a permitting process outlined in the California Code of Regulations, Title 14, Section 783.

Fully Protected Species

The State of California first began to designate species as "Fully Protected" before the creation of the CESA and the FESA. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction, and included fish, mammals, amphibians, reptiles, and birds. Most fully protected species have since been listed as threatened or endangered under the CESA and/or the FESA. The Fully Protected Species Statute (California Fish and Game Code sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), 5515 (fish)) provides that fully protected species may not be taken or possessed at any time. Furthermore, CDFW may authorize take of fully protected species only in very limited circumstances, such as for necessary scientific research.

California Fish and Game Code Section 1602

Section 1602 of the California Fish and Game Code requires that Notification of Lake or Streambed Alteration be submitted to CDFW and the notification deemed complete by CDFW for any activity that may, "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake." CDFW reviews the proposed actions and, if the activity would result in a substantial adverse effect to fish and wildlife resources, submits to the applicant a draft agreement with measures to protect the affected fish and wildlife resources. The final proposal that is mutually agreed upon by the department and the applicant is

the Final Lake or Streambed Alteration Agreement. PG&E has notified CDFW of Streambed Alteration under Section 1602 (Notification number 1600-2013-0172-R4) for the proposed project.

California Protection for Birds (Fish and Game Code Sections 3503, 3503.5, 3513, & 3800)

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by in the California Fish and Game Code or any regulation made pursuant thereto. Section 3503.5 provides protection for all birds of prey, including their eggs and nests. In addition, Section 3513 states that it is unlawful to take or possess any migratory bird as designated in the MBTA or any part of such migratory birds except as provided by rules and regulations under provisions of the MBTA. Section 3800 states that it is unlawful to take non-game birds and defines non-game birds as, "all birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds."

California Species of Special Concern

California designation of Species of Special Concern (SSC) is done for the purpose of identifying non-state listed wildlife species that have been extirpated, are experiencing or formally experiencing population declines, or have naturally small populations that makes the species highly susceptible to risk from any factor(s). SSC designation is an administrative designation and carries no formal legal status. However, Section 15380 of the CEQA Guidelines indicates that SSCs should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

3.4.2.3 Local

San Benito County General Plan

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.4.3 Environmental Setting[5]

The project extends from approximately 6.4 miles southeast of the community of Tres Pinos east through the Diablo Mountain Range to an area located approximately 6.5 miles east of the town of Panoche. The BSA ranges in topography from nearly flat (less than 5% grade) to steep slopes (greater than 45% grade). The elevation within the BSA ranges from approximately 800 to 2,500 feet above mean sea level.

3.4.3.1 Vegetation Types

Plant communities observed within the BSA included non-native grassland, blue oak woodland, Diablan sage scrub, mule fat scrub, and ruderal/developed, as described below.

[5] This section was excerpted from the *Biological Resources Survey Report for the Vegetation Management for Gas Pipeline-300A/B San Benito County, California* (April 2015).

Non-Native Grassland

Non-native annual grassland is found throughout most of California, primarily below 3,000 feet on fine-textured soils. This vegetation type is dominated by introduced Mediterranean annual grasses in association with many species of non-native and showy native forbs (herbaceous annual plants such as wildflowers), especially in years of abundant rainfall. In this naturalized plant community, annual grasses out-compete native grasses and forbs. Growth, flowering, and seed-set occur from winter through spring. Most annuals in this community die by summer and persist as seeds until the return of winter rains. Non-native annual grasslands provide foraging habitat for a variety of wildlife species. Raptors, such as red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipiter cooperii*), and American kestrel (*Falco sparverius*), often forage in annual grasslands, while species such as western meadowlark (*Sturnella neglecta*) may use these areas for nesting. Reptiles commonly found within non-native annual grasslands include western fence lizard (*Sceloporus occidentalis*) and gopher snake (*Pituophis melanoleucus*). Common mammals potentially present in non-native annual grasslands include Botta's pocket gopher (*Thomomys bottae*), voles (*Microtus* spp.), and deer mice (*Peromyscus* spp.).

Non-native grassland habitat was observed throughout the BSA with the largest contiguous expanses occurring in Study Areas 1-13 and 24-35. Scattered oak trees comprise a component of the non-native grassland matrix in areas where canopy cover is not sufficient to be characterized as oak woodland. Vegetation observed during the surveys included Mediterranean grasses such as ripgut brome (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), red brome (*Bromus madritensis* ssp. *rubens*), rattail fescue (*Festuca myuros*), and oats (*Avena* spp*.)*. Introduced broadleaf herbaceous species (forbs) occurring within annual grassland include red-stemmed filaree (*Erodium cicutarium*), bur-clover (*Medicago polymorpha*), and vetch (*Vicia americana*). Native associates of these grasslands include purple needle grass (*Stipa pulchra*), foothill needlegrass (*Stipa lepida*), blue-eyed grass (*Sisyrinchium bellum*), yellow Mariposa lily (*Calochortus luteus*), blue dicks (*Dichelostemma capitatum*), brodiaea (*Brodiaea sp.*), common fiddleneck (*Amsinckia intermedia*), milkmaids (*Cardamine californica*), Pacific sanicle (*Sanicula crassicaulis*), common cryptantha (*Cryptantha intermedia*), and lupine (*Lupinus* spp.). Wildlife observed in non-native grassland during BSA surveys included western fence lizard, loggerhead shrike (*Lanius ludovicianus*), white-crowned sparrow (*Zonotrichia leucophrys*), California quail (*Callipepla californica*), and red-tailed hawk. Evidence of American badger (*Taxidea taxus*) (den site and foraging) was observed in non-native grassland habitat at Study Areas 23 and 30.

Blue Oak Woodland

Blue oak woodland is a highly variable climax woodland dominated by blue oak (*Quercus douglasii*), but usually including individuals of other oaks. Stands vary from open savannahs with grassy understories to dense woodlands with shrubby understories. These habitats occur on well-drained soils in the Mediterranean California climate zone, usually below 3,000 to 4,000 feet elevation. Associate species include manzanita (*Arctostaphylos* spp.), ceanothus (*Ceanothus* spp.), holly-leaf cherry (*Prunus ilicifolia*), and needlegrass. Oak woodland and its understory offers habitat for a variety of wildlife species, including foraging habitat for coyote (*Canis latrans*), black-tailed deer (*Odocoileus hemionus columbianus*), and bobcat (*Lynx rufus*), and nesting and foraging habitat for a variety of songbirds, raptors, and roosting bats.

Blue oak woodland was one of the dominant vegetation communities observed throughout the BSA, most often occurring between Study Areas 11 through 23. Numerous blue oaks grow onsite with occasional coast live oak, juniper, and foothill pine, ranging from dense cismontane woodland to a more open canopy characteristic of oak savannah. The understory primarily consists of non-native grasses and herbs such as ripgut brome, soft chess, fescue, oats, geranium (*Geranium dissectum*), and miscellaneous native herbaceous annuals such as miner's lettuce (*Claytonia perfoliata*), bedstraw (*Galium aparine*), and Pacific sanicle. Wild-

life species observed in blue oak woodland in the BSA include golden eagle (*Aquila chrysaetos),* acorn woodpecker (*Melanerpes formicivorus*), Anna's hummingbird (*Calypte anna*), wild turkey (*Meleagris gallopavo*), yellow-rumped warbler (*Dendroica coronata*), chestnut backed chickadee (*Poecile rufescens*), bushtit (*Psaltriparus minimus*), song sparrow (*Melospiza melodia*), northern mockingbird (*Mimus polyglottos*), scrub jay (*Aphelocoma californica*), and California towhee (*Pipilo crissalis*). In addition, evidence of wild pig (*Sus scrofa*) and desert woodrat[6] (*Neotoma lepida*) was seen throughout several study areas in the BSA.

Diablan Sage Scrub

Diablan sage scrub is found in the drier interior of the Coast Ranges from Mount Diablo in the north to the Cholame Hills in the south. Generally located inland of the coastal fog zone, this habitat is often found on hot southern exposures with shallow, rocky soils. Species commonly occurring within this habitat type include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), and sticky monkey flower (*Mimulus aurantiacus*). Diablan sage scrub provides shelter and foraging habitat for a variety of wildlife species, including but not limited to black-tailed jackrabbit (*Lepus californicus*), desert cottontail (*Sylvilagus audubonii*), and various lizards (*Lacertilian* spp.), and nesting and foraging habitat for a variety of passerine and raptor species.

Diablan sage scrub was observed at several locations throughout the BSA where proposed vegetation removal activities would occur. Diablan sage scrub in the BSA ranged from sparse to densely vegetated areas and was frequently observed on moderately sloped hillsides. Dominant species observed within this habitat type included California sagebrush, California buckwheat, black sage, and goldenbush (*Ericameria* sp.). Associated shrub and herb species included chamise (*Adenostoma fasciculatum*), sawtooth goldenbush (*Hazardia squarrosa*), California matchweed (*Gutierrezia californica*), and sticky monkey flower. Wildlife species observed in Diablan sage scrub included Anna's hummingbird and Bewick's wren (*Thryomanes bewickii*). Mammalian and reptilian species observed during the survey include desert cottontail, western whiptail (*Cnemidophorus tigris*), and western fence lizard.

Mule Fat Scrub

Mule fat scrub occurs in intermittent stream channels and riparian areas with coarse substrate and a moderate depth to the water table. These areas are subject to frequent flooding which results in a tall, herbaceous riparian scrub community with low species diversity. Mule fat is the dominant species in this community with associates including Santa Barbara sedge (*Carex barbarae*), sandbar willow (*Salix hindsiana*), arroyo willow (*Salix lasiolepis*), and stinging nettle (*Urtica* dioica ssp. *holosericea).* In the absence of frequent flooding, mule fat scrub would likely succeed to cottonwood (*Populus* sp.) or sycamore (*Platanus* sp.) dominated forests or woodlands. Mule fat scrub typically occurs below 2,000 feet from Tehama County in the north, through the Coast Ranges and Sierra Nevada, to southern California and northwestern Baja California in the south. Mule fat scrub provides shelter and foraging habitat for small mammals, reptiles, and avian species.

Mule fat scrub was observed in riparian areas at Study Areas 5, 10, and 13 in the BSA. Mule fat was the dominant species observed within this habitat type with white sage (*Salvia apiana*) and non-native annual grasses frequently occurring within the area. Wildlife species or sign of species observed in mule fat scrub

[6] Evidence of woodrat scat was observed surrounding a cavity within one blue oak. Scant evidence of stick build-up or house material was observed near the woodrat scat. Given the surrounding habitat (oak savannah with little understory) and lack of house material it was concluded that the woodrat evidence observed was from a desert woodrat and not from a dusky-footed woodrat (*Neotoma fuscipes*).

during the field surveys included desert cottontail, black-tailed jackrabbit, western fence lizard, Heermann's kangaroo rat (*Dipodomys heermanni*), and various passerine species.

Ruderal and Developed

Ruderal/developed habitat includes areas that were disturbed by past land use practices, development, and/or ground disturbance. Plant species in these areas often include non-native weeds or ornamental landscaping. Few locations, including Study Areas 25 and 36, include ruderal and developed areas within the BSA. Ruderal and landscaped plants observed in these areas include milk thistle (*Silybum marianum*), oats, brome (*Bromus* spp.), cudweed aster (*Pseudognaphalium luteoalbum*), sow-thistle (*Sonchus oleraceus*), Italian thistle (*Carduus pycnocephalus*), and pomegranate (*Punica granatum*) and other landscaped trees. Wildlife observed in the ruderal/developed areas includes Brewer's blackbird (*Euphagus cyanocephalus*), American crow (*Corvus brachyrhynchos*), song sparrow, and turkey vulture (*Cathartes aura*). Ruderal and developed areas typically provide low habitat value for sensitive plants and wildlife species. However, the trees and infrastructure in these areas may provide suitable foraging and nesting habitat for avian species.

3.4.3.2 Wetlands, Waters, and Riparian Areas

No formal delineation of waters of the United States and/or State was undertaken as part of this study. Wetland features recorded in the National Wetlands Inventory near the project were identified using the USFWS online Wetlands Mapper. Twenty-six CDFW-jurisdictional features and adjacent riparian areas are located within the proposed work areas based on the reconnaissance-level surveys described in Section 3.4.1.1. These CDFW-jurisdictional features consist of ephemeral drainages throughout the project area that ultimately drain to the Pajaro River to the west or Panoche Creek to the east.

No discharge of dredge or fill material is anticipated within USACE regulatory jurisdiction and, therefore, the project would not be subject to Section 401 or 404 permitting under the CWA. PG&E has submitted a Notification to CDFW under Section 1602 of the Fish and Game Code (Notification number 1600-2013-0172-R4). Tables 3.4-1 and 3.4-2 below provide a compiled list of all riparian vegetation proposed for removal within CDFW-jurisdictional features and adjacent riparian areas.

Table 3.4-1.
Trees to be Removed within CDFW-Jurisdictional Features and Adjacent Riparian Areas

	DBH Class			
Tree Species	**Less than 4 inches**	**4-23 inches**	**Equal to or Greater than 24 inches**	**Tree Totals**
blue oak	--	34	6	40
coast live oak	1	2	2	5
cottonwood	--	1	--	1
willow	1	1	--	2
buckeye	--	3	3	6
foothill pine	--	21	2	23
elderberry	--	2	--	2
TOTALS	**2**	**64**	**13**	**79**

Table 3.4-2.
Brush to be Removed within CDFW-Jurisdictional Features and Adjacent Riparian Areas

Brush Species	Brush Units	Cubic Feet
Manzanita	2	528.40
coyote brush	50	13,210.00
Sagebrush	68	17,965.60
Mulefat	50	13,210.00
Chamise	5	1,321.00
Whitethorn	1	264.20
Buckwheat	2	528.40
Toyon	3	792.60
leather oak brush	2	528.40
poison oak	3	792.60
TOTAL	**186**	**49,141.20**

Notes:

1. A brush unit is a 6'5" by 6'5" by 6'5" cube or 264.20 cubic feet.

3.4.3.3 Special-status Species

Special-Status Plants

None of the 12 special-status plant species identified during desktop review (Table 3.4-3; below) were observed during rare plant surveys. Field surveys were conducted within the approximate blooming period for all of the identified species, with the exception of chaparral ragwort. Chaparral ragwort is a California Rare Plant Rank 2B.2 species (rare, threatened, or endangered in California but more common elsewhere) that has been recorded in the Cerro Colorado USGS quadrangle. No CNDDB occurrences of this species have been recorded within 5 miles of the BSA. Chaparral ragwort is an annual herb known to occur on alkaline flats and in dry, open rocky areas in foothill woodlands, northern coastal scrub, and coastal sage scrub habitats. Dry, open rocky areas were observed in the BSA at Study Areas 2, 7, and 26.

Table 3.4-3.
Special-status Plant Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Blooming Period	Legal Status Federal/ State/CRPR	Potential for Occurrence
San Joaquin spearscale *Atriplex joaquinana*	Annual herb that occurs in meadows, seeps, and playas with alkaline soils. 1-835 meters.	April-October	-- / -- / 1B.2	**Low:** Suitable habitat not present in the proposed work areas. Species not observed during surveys.
round-leaved filaree *California macrophylla*	Annual herb; cismontane woodland, valley and foothill grassland; clay soil. 15-1,200 meters.	March-May	-- / -- / 1B.1	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.
San Benito evening primrose *Camissonia benitensis*	Annual herb; California endemic; occurs in chaparral or foothill woodlands with sandy or gravelly serpentine soil. 600-1280 meters.	April-June	FT/ -- / 1B.1	**None:** Serpentine soils not observed in the proposed work areas. No CNDDB occurrences recorded within 5 miles of the project. Species not observed during surveys of the BSA.
chaparral harebell *Campanula exigua*	Annual herb that occurs on talus slopes, usually on serpentine soils. 275-1250 meters.	May-June	-- / -- / 1B.2	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.
Hospital Canyon larkspur *Delphinium californicum* ssp.*interius*	Perennial herb that occurs in broadleaf upland forest, chaparral, coastal prairie, and coastal scrub. 230 to 1095 meters.	April - June	-- / -- / 1B.2	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.
Diablo Range hare-leaf *Lagophylla diabolensis*	Annual herb that occurs in cismontane woodlands and valley and foothill grasslands with clay soils. 365-885 meters.	April-September	-- / -- / 1B.2	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys. No CNDDB occurrences recorded within 5 miles of the project site.
pale-yellow layia *Layia heterotricha*	Annual herb; California endemic; cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland; alkaline or clay soil. 300-1,705 meters.	March-June	-- / -- / 1B.1	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.
showy golden madia *Madia radiate*	Annual herb that generally occurs on slopes in open woodland on the eastern side of the Coast Ranges. 300-1000 meters.	March-May	-- / -- / 1B.1	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.

Table 3.4-3.
Special-status Plant Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Blooming Period	Legal Status Federal/ State/CRPR	Potential for Occurrence
Indian Valley bush-mallow *Malacothamnus aboriginum*	A shrub associated with chaparral, typically occurring on open rocky slopes. 150-700 meters.	May-July	-- / -- / 1B.2	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys.
marsh silverpuffs *MIcroseris paludosa*	Perennial herb that occurs in moist grasslands and open woodlands. 5-300 meters.	April-June	-- / -- / 1B.2	**Low:** Suitable habitat present in the BSA; however, species not observed during surveys. No CNDDB occurrences recorded within 5 miles of the project.
shining navarretia *Navarretia nigelliformis* ssp. *Radians*	Annual herb; California endemic; occurs in vernal pools in cismontane woodland and valley and foothill grassland. Some individuals found in seasonally moist areas. 76-1,000 meters.	April-July	-- / -- / 1B.2	**None:** Vernal pools not present in the BSA and no CNDDB occurrences recorded within 5 miles of the project. Species not observed during surveys.
chaparral ragwort *Senecio aphanactis*	Annual herb occurring on alkaline flats and dry open rocky areas. 10-550 meters.	January-April	-- / -- / 2B.2	**Low:** Dry rocky slopes present in the BSA. Survey conducted just outside of appropriate blooming period for this species; however, no CNDDB occurrences have been recorded within 5 miles of the project.

General references: CNPS 2014, Baldwin et al 2012, CNDDB 2014

Status Codes

--= No status

Federal:
FT =Federal Threatened

California Rare Plant Rank (CRPR):
Rank 1B = rare, threatened, or endangered in California and elsewhere.
Rank 2B = rare, threatened, or endangered in California, but more common elsewhere.

Threat Code:
.1 = Seriously endangered I California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 = Fairly endangered in California (20-80% occurrences threatened)

Special-Status Wildlife Species

Eighteen special-status wildlife species were determined to have potential to occur in the BSA (Table 3.4-4 at the end of this section). Five of the wildlife species with potential to occur in the BSA—San Joaquin kit fox, California tiger salamander, California red-legged frog, San Joaquin antelope squirrel, and golden eagle—are state and/or federally listed. Townsend's big-eared bat (*Corynorhinus townsendii*) is a state candidate for listing. The remaining wildlife species—American badger, western red bat (*Lasiurus blossevillii*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis*), burrowing owl, loggerhead shrike, western pond turtle (*Actinemys marmorata*), western spadefoot (*Spea hammondii*), San Joaquin whipsnake (*Masticophis flagellum ruddocki*), coast horned lizard (*Phrynosoma blainvillii*), California legless lizard (*Anniella pulchra*) and yellow-breasted chat (*Icteria virens*)—are state species of special concern. Although these species have the potential to occur within or adjacent to the BSA based on presence of suitable habitat, only golden eagle and loggerhead shrike were observed during field surveys.

San Joaquin Kit Fox

San Joaquin kit fox, a federally endangered and state threatened species, generally occurs on natural lands in California's Central Valley and some interior basins and ranges to the west, extending from Contra Costa County in the north to northern Ventura and Santa Barbara Counties in the south. The largest remaining populations are known to occur in Kern and San Luis Obispo Counties. San Joaquin kit fox occupy a variety of habitats including grasslands, agricultural lands, and converted landscapes such as canals, culverts, and other urban areas. Habitats generally identified as favorable to San Joaquin kit fox include saltbush (*Atriplex* spp.) scrubland, red brome grassland, alkali sink scrublands, and wild oat grasslands. Other habitats, profoundly altered habitats, or fragmented habitats (urban areas) are typically considered of low suitability to San Joaquin kit fox. Loose soils are generally important for kit fox as they use dens for shelter. Kit fox will either construct their own den or utilize small mammal burrows constructed by other mammals such as American badger, California ground squirrel (*Otospermophilus beecheyi*), or coyote. Den entrances are typically 5 to 8 inches wide in diameter and may have scat near the burrow openings. Natal/pupping dens are active from September through May. San Joaquin kit fox occupy many dens during the year within a home range up to 12 miles. This species competes for a limited food source of rodents and small mammals with other species such as red or gray foxes, coyotes, bobcats, and raptors. San Joaquin kit fox are active year-round, primarily at night; however, they are occasionally seen active during the day.

No San Joaquin kit fox sightings or evidence of this species (scat or tracks) were observed during field surveys; however, four large burrows were observed. One of the burrows was located approximately 10 feet from the proposed work area at Study Area 24. The burrow had an opening approximately 6 to 7 inches in diameter. The other three burrow sites were observed within 50 feet of Study Area 31 with openings ranging from 6 to 8 inches in diameter. It should be noted that given the presence of California ground squirrel in the area, the distribution and number of potential burrows will likely fluctuate over time. Study Areas 1-9 and 24-35 are located within the range for San Joaquin kit fox. There are no San Joaquin kit fox occurrence records more recent than 1989 within 10 miles Study Areas 1-9. Recent occurrences (2005) of San Joaquin kit fox have been recorded as close as 5.8 miles east of the project. Study Areas 24-35 are situated in moderate terrain between Panoche Pass and the edge of Panoche Valley and support suitable open, grassland habitat with connectivity to occupied areas in Panoche Valley. Based on the current distribution for this species and site factors within the BSA, there is high potential for San Joaquin kit fox to occur in the BSA.

California Tiger Salamander

California tiger salamander, a federally and state threatened species, is a large (3-6.5 inches, snout-vent length), stocky salamander that is black to dark brown with striking white, cream-colored or pale yellow spots. This species primarily inhabits grassland and oak savanna habitats, generally below 3,600 feet and is

also known to use coastal scrub in Monterey, Santa Cruz, and Santa Barbara Counties. Adults spend most of their lives underground, typically in burrows of California ground squirrels and Botta's pocket gophers. California tiger salamanders are known to inhabit the deeper reaches of burrows during warmer months. Adult California tiger salamander migrate to and from breeding ponds during the rainy season (October-April) in association with rainfall events and have been found up to 2,200 meters (7,218 feet) from the nearest breeding site. Males will typically spend 6-8 weeks at breeding ponds, while females usually spend only 1-2 weeks. Vernal pools and semi-permanent ponds provide waters ideal for egg-laying while perennial ponds free of introduced aquatic predators, especially predatory fishes, may also provide productive breeding habitat. Following metamorphosis, juvenile salamanders appear to seek the closest cover they encounter, including temporary cover such as cracks in the earth, debris, or deeper refugia including gopher and ground squirrel holes.

The nearest CNDDB occurrences for this species were recorded approximately 1.3 miles south of Study Area 4 and 1.7 miles south of Study Area 7 as recently as 2000. Four additional CNDDB records are located between 4 to 5 miles from Study Area 1 (2003) and Study Area 33 (1992 and 2010). Suitable upland and aquatic habitat for this species is present throughout the BSA. Study Areas 1-13 and Study Areas 24-35 contain extensive patches of non-native grassland habitat with small mammal burrows that may provide suitable upland habitat for this species. The portion of the BSA between Tres Pinos Creek and Panoche Pass (Study Areas 13-23) support habitats (blue oak woodland and Diablan sage scrub) that are less suitable for this species.

Forty-two ephemeral and perennial ponds were identified from aerial imagery and topographic maps within 1.24 miles of all Study Areas in the BSA. Five of the 42 of the ponds were visited during the field surveys; however, no aquatic sampling for California tiger salamander larvae was conducted. Three ponds visited (near Study Areas 18, 24, and 26) provide suitable breeding habitat and another two ponds (near Study Areas 7 and 22) were dry in early May 2014. Given the known occurrences in the region, the availability of suitable upland habitat and potential breeding ponds within 1.24 miles of all Study Areas, there is moderate potential for California tiger salamander to occur in the BSA.

California Red-legged Frog

California red-legged frog, a federally threatened and state species of special concern, occurs in various habitats during its life cycle. Breeding areas include aquatic habitats such as lagoons, streams, and natural and human-made ponds. This species prefers aquatic habitats with little or no flow, the presence of surface water until at least early June, surface water depths to at least 2.3 feet, and the presence of emergent vegetation (e.g., cattails and bulrush). The largest densities of California red-legged frog are typically associated with dense stands of overhanging willows and an intermixed fringe of sturdy emergent vegetation (e.g., cattails, bulrush). Dispersing breeding adult California red-legged frog are known to travel distances from 0.25 mile to more than 2 miles to breeding locations without apparent regard to topography, vegetation type, or riparian corridors. Non-breeding migrations are typically much shorter, and dispersal distances are believed to depend on the availability of suitable habitat and prevailing environmental conditions. Upland habitats including small mammal burrows and woody debris can also be used as refuge during the summer if water is scarce or unavailable. Dispersal habitat makes it possible for California red-legged frogs to locate new breeding and non-breeding sites, and is crucial for conservation of the species.

The eastern portion of the BSA (Study Areas 11-21, 24, and 25) is located within USFWS-designated critical habitat for California red-legged frog. Critical habitat for this species does not necessarily indicate species presence or require additional regulatory restrictions. Rather, critical habitat delineates specific areas in which primary constituent elements that are necessary to support one or more of the species' life history functions are present and that are essential to the conservation of this species. All the primary constituent

elements (aquatic breeding habitat, aquatic non-breeding habitat, upland habitat, and dispersal habitat) occur within 1.24 miles of the BSA. Non-native grassland that supports small mammal burrows was observed throughout the BSA and may provide suitable dispersal and upland habitat for this species during the breeding season (October 16-May 31). Forty-two ephemeral and perennial ponds were identified from aerial imagery and topographic maps within 1.24 miles of all Study Areas in the BSA. These ponds may provide suitable aquatic breeding and aquatic non-breeding habitat for this species.

CNDDB records indicate California red-legged frog were observed as recently as 2005 within 1 mile of Study Areas 13 and 14. Additional CNDDB observations of California red-legged frog have been recorded approximately 1 mile south of Study Area 4 along Panoche Creek (1999) and approximately 2.5 miles west and northwest of Study Areas 1 and 2 (1998, 1999, and 2006). Given the known occurrences in the region, the availability of suitable upland habitat and potential breeding ponds within 1.24 miles of all Study Areas, and site conditions at the proposed work areas, there is moderate potential for California red-legged frog to occur in the BSA.

Western Red Bat

The western red bat, a state species of special concern, has been documented in California from Shasta County south to the Mexico border, and from the coast east to the Sierra Nevada/Cascade Crest. Despite the extent of this range, most documentation of the species is localized to the California Central Valley with approximately 83 percent of observed breeding sites found adjacent to the Sacramento and San Joaquin Rivers. The western red bat is typically found in mature riparian habitat and roosts almost exclusively in the foliage of trees and shrubs for day, night, maternity, and winter hibernation roosting purposes. The roost sites are usually surrounded by leaves, but are open to the ground. Although this species will occasionally return to the same roost locations day after day, individuals often switch roosting locations. Little is known about the exact roosting habits and needs of this species. Mating for this species typically occurs in the fall (August-September) with 2 to 5 pups being born the following spring. The young are weaned and generally fly between 3 to 6 weeks after birth.

Potential roosting habitat for western red bat was observed in much of the BSA, in the form of deciduous trees within or near ephemeral drainages. Deciduous trees that may provide suitable roosting habitat for this species make up less than half of the project vegetation scheduled for removal (Table 2.2-1). No evidence of western red bat (e.g., guano below trees) or roosting bats were observed during the habitat assessment surveys. There is low potential for this species to occur within deciduous trees throughout the BSA.

San Joaquin Antelope Squirrel

San Joaquin antelope squirrel, also referred to as the Nelson's antelope squirrel, is a state threatened species endemic to California. Based on historical and current records, the floor of the Panoche Valley and the surrounding foothills are occupied by this species, and the Panoche Valley, together with the Tumey Hills and Ciervo Hills to the east and south represents one of the few areas outside core habitats in the southern San Joaquin Valley where the species persists in significant numbers. San Joaquin antelope squirrel occurs in arid grassland and shrub-land communities. This species is most common in areas with widely spaced shrubs, primarily saltbush and ephedra, although it also inhabits grasslands with no shrub cover. San Joaquin antelope squirrel occurs primarily on sandy loam soils on level to gently sloping ground in areas free of flooding. San Joaquin antelope squirrel live underground in burrows, which are critical for shelter and temperature regulation. This species sometimes digs its own burrows, but often uses those dug by kangaroo rats. San Joaquin antelope squirrel feeds on green vegetation, insects, and seeds. California ground squirrels are known to compete with and displace San Joaquin antelope squirrel.

The majority of the BSA is located outside of the current known range for San Joaquin antelope squirrel and the BSA does not provide suitable habitat for this species. The hilly areas between Panoche Pass and the edge of Panoche Valley (Study Areas 24-35) are at the edge of the current range. Grassland habitat in this area may provide connectivity with occupied habits to the east in Panoche Valley. Although grassland habitat may be suitable for San Joaquin antelope squirrel, grassland habitat in this section of the BSA is not ideal for this species due to the mosaic of interspersed blue oak woodland. Such areas provide perch sites for predatory raptors which reduces habitat quality for this species. A high abundance of California ground squirrel, known to compete with and displace San Joaquin antelope squirrel, was observed during field surveys throughout the BSA.

The nearest CNDDB record for San Joaquin antelope squirrel is a museum specimen collected from Panoche Pass, near Study Area 25, in 1929. Based on species records, site conditions, and the location of the project in proximity to the current known range for this species, there is low potential for San Joaquin antelope squirrel to occur between Study Areas 24-35, and no potential for this species to occur west of Study Area 24.

American Badger

American badger, a state species of special concern, is a heavy-bodied, short-legged, grayish mammal with a white medial stripe from the nose over the top of the head and down the back. American badger feet are black with extremely long front claws. This species prefers open areas and may frequent shrublands with little groundcover. American badger is typically found in relative dry grasslands and open forests. Although badgers are known to be active during the day, it is primarily a nocturnal species. American badgers are active all year, but may sleep in dens for several days or weeks during severe winter weather. Den sites consist of underground burrows that are dug out with the badger's long front claws and are used for sleeping, hunting and feeding, and natal (breeding) sites. Badgers are known to occupy numerous den sites, often using a new den every day. Ground squirrels are a primary food source along with pocket gophers, kangaroo rats, prairie dogs, and mice. This species is also known to eat scorpions, insects, snakes, lizards, and birds, especially when ground squirrel populations are low.

No American badgers were observed during the field surveys; however, evidence of this species was observed at multiple locations in the BSA. A badger den was observed in non-native grassland habitat approximately 600 feet west of Study Area 30. Evidence of foraging was observed approximately 100 feet west of Study Area 23. Claw marks typical to that of badgers were observed on the inner walls of burrows with large piles of dirt placed near burrow openings.

Additional suitable foraging and refuge habitat is present in non-native grasslands as well as grassland areas in blue oak woodlands throughout the BSA. Badgers have large home ranges and can dig numerous burrows in a single night while foraging. As such, the distribution and number of American badger dens in the BSA may vary over time. Based on habitat availability and evidence of badger observed in the BSA, this species is likely to occur within the BSA.

Golden Eagle

The golden eagle is afforded federal protection under the Bald and Golden Eagle Protection Act (BGEPA; 16 U.S.C. 668-668c). Furthermore, it is a fully protected species under the California Fish and Game Code, as well as listed as a CDFW Watch List species within nesting and wintering habitats. The golden eagle is an uncommon resident throughout California, with eagles generally absent from the immediate coast, urbanized areas, and heavily forested mountains. During winter there is some migratory movement, especially of immature eagles, into agricultural land, grassy plains, desert edges, and larger valleys, where they may not

occur during the nesting season. Golden eagles nest as early as January in temperate regions, fledging in June and produce a single brood. Fledglings typically remain in the breeding area until July or August. Golden eagles favor open country such as broken woodland, savannahs, grasslands, chaparral, sagebrush flats, desert edge, montane valleys, and even occasionally alpine tundra; however, nesting is restricted to rugged, mountainous country, such as the Tehachapi Mountains that border the Antelope Valley, where steep cliffs or medium-to-tall trees border more open country for hunting or scavenging.

Golden eagle foraging habitat (grassland, woodland) is located throughout the BSA. Suitable nest trees for this species are located in the BSA; however, no eagle nests were observed during nesting bird surveys. Study Areas 9-35 provide steep hillsides and, in some areas, cliff faces located within a windy region suitable for this species. SWCA and Biosearch biologists, while conducting surveys on May 6, 2014, observed a first year juvenile golden eagle soaring above Study Area 18 and a pair of adult golden eagles soaring approximately 1,000 feet north of Study Area 19. Based on habitat availability and observations of this species, this species is likely to occur within the BSA.

Burrowing Owl

Burrowing owl, a state species of special concern, is a small-bodied bird of prey (8-10 inches in length, with a wingspan of 21 inches) with distinctively bright yellow eyes and long legs. Burrowing owls typically occur in open, dry grasslands and agricultural areas with sparse to no vegetation. This species occupies ground squirrel burrows or other burrow-like structures for breeding and shelter. Burrowing owls make use of burrows continuously throughout the year (nesting and wintering), and typically forage within 600 meters (1,968.5 feet) of nests during the breeding season (February-September). This species is typically active at dawn and dusk hunting a wide variety of prey, including insects, small mammals, amphibians, and reptiles. Although most burrowing owl activity occurs during dawn and dusk, this species is also active during the day and at night. Burrowing owls are known to display a characteristic bobbing behavior when disturbed.

No burrowing owl or sign (e.g., pellets, whitewash, feathers) were observed in the BSA during field surveys. Study Areas 1-13 and Study Areas 24-35 contain extensive patches of non-native grassland habitat with small mammal burrows that may provide suitable nesting and overwintering habitat for burrowing owl. CNDDB records indicate one wintering burrowing owl was observed approximately 0.3 mile north of the BSA between Study Areas 8 and 9 in 2002. Additional burrowing owls have been recorded (CNDDB) approximately 4 miles east of the eastern end of the BSA in Panoche Valley as recently as 2004. Based upon existing site conditions and CNDDB records, the non-native grassland habitat within the BSA has moderate potential to support burrowing owl.

Loggerhead Shrike

Loggerhead shrike, a state species of special concern, is a common resident and wintering bird in lowlands and foothills of California. In California, this species breeds primarily in shrublands or open woodlands with a fair amount of grass cover and areas of bare ground. Loggerhead shrike typically lay eggs in March into May and young become independent in July or August. This species requires tall shrubs, trees, or manmade structures (fence or power lines) for hunting perches. Loggerhead shrike also requires impaling sites for prey manipulation and storage, often in the form of sharp, thorny plants or barbed-wire fences. Prey items for this species include arthropods, reptiles, amphibians, small rodents, and birds.

Loggerhead shrike foraging and nesting habitat is located throughout the BSA. During May 2014 nesting bird surveys, a loggerhead shrike adult was observed hunting and bringing prey items to an active nest located approximately 100 feet southeast of the work area within Study Area 3. Based on habitat availability and the nesting observation of this species, this species is likely to occur within the BSA.

Yellow-breasted Chat

Yellow-breasted chat, a state species of special concern, is a passerine bird that typically occurs in early successional riparian habitats with a well-developed shrub layer and an open canopy. This species' nesting habitat comprises the borders of streams, creeks, rivers, and sloughs within dense shrub such as willow and blackberry. Diet of yellow-breasted chats typically consists of insects, spiders, and wild fruits and berries.

Marginal shrub nesting habitat for this species is present within the mule fat scrub and Diablan sage scrub habitats in the BSA. The most recent CNDDB occurrence for yellow-breasted chat (1998) was recorded approximately 3.5 miles west of the western end of the project. Based on habitat availability, there is low potential for this species to occur within the BSA.

Western Pond Turtle

Preferred habitat for the western pond turtle, a state species of special concern, consists of calm waters, such as streams or pools, with vegetated banks and log or rock basking sites. Western pond turtle may use upland habitat extending as far as 0.5 kilometer (0.3 mile) away from water. Stream-dwelling individuals will occasionally move away from flood-prone creeks during the rainy season. It has been suggested that western pond turtle may use two types of nesting sites. Most commonly, eggs are laid in sandy banks close to water; however, eggs may occasionally be laid considerable distances away from water. Nests located out of the floodplain may confer some reproductive advantage in regions that are prone to periodic flooding. Upland habitats are important to western pond turtles as wet season refugia, nesting sites, and shallow cover during periods where streams and ponds are dry.

No western pond turtles were observed in the BSA during the field surveys. Perennial ponds within close proximity to the work areas, such as the pond within Study Area 18, may provide aquatic habitat for this species. Western pond turtle may also occur on access roads and in grassland areas, serving as basking or refuge sites within close proximity to aquatic habitats. Western pond turtle has been observed (CNDDB) as recent as 2005 within 1 mile of Study Areas 13 and 14. Although proposed project activities will not occur within or impact ponds or other aquatic areas suitable for western pond turtle, there is a low potential for this species to occur along access routes or in grassland areas within approximately 0.3 miles of aquatic sites.

San Joaquin Whipsnake

San Joaquin whipsnake, also commonly referred to as the San Joaquin coachwhip, is a state species of special concern. This species occurs in the deserts south of Mono County and the foothills of the Coast Ranges south of San Francisco Bay. Whipsnakes occur in open terrain and are most abundant in grass, desert, scrub, chaparral, and pasture habitats. Whipsnakes seek cover in rodent burrows, bushes, trees, and rock piles. They hibernate in soil or sand approximately 0.3 meters (1 foot) below the surface, sometimes at the base of plants. Whipsnakes are diurnal, usually active mid-morning and late afternoon from March through October.

The BSA is located within the current range of San Joaquin whipsnake and suitable habitat for this species was observed throughout the BSA. Non-native grassland and Diablan sage scrub habitats may provide foraging and refuge sites for this species. CNDDB records indicate six San Joaquin whipsnake occurrences within 5 miles of the BSA, the majority of which are located to the west along State Route 25. The nearest occurrences were recorded in 1993 approximately 2 miles west of Study Areas 7 and 8 and 2.5 miles west of Study Area 11 along Panoche Road. Adjacent habitat consists of grazed non-native grasslands and Tres Pinos Creek. Based on known occurrences in the region and site conditions in the BSA, there is moderate potential

for San Joaquin whipsnake to occur within the project vicinity, however, whipsnakes are more likely to occur near Study Areas 1-14.

Coast Horned Lizard

Coast horned lizard is a state species of special concern that occurs in valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats. This species typically inhabits open habitats, especially in sandy areas, washes, and flood plains. Horned lizards forage on the ground in open areas, typically between shrubs and often near ant, a favored prey item, nests. Little is known about horned lizard breeding habitat requirements although eggs are apparently laid on loose soils.

Suitable habitat for this species was observed throughout the BSA. Sandy washes were observed within Study Areas 4, 5, 10, 31, and 33. One CNDDB record indicates that a coast horned lizard was observed in 1993 along Panoche Road near Study Areas 12-14. Based on known occurrences in the region and site conditions in the BSA, there is low potential for coast horned lizard to occur in the BSA.

California Legless Lizard

The California legless lizard is a state species of special concern that typically occurs in moist warm loose soil with plant cover. The species occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores (*Platanus* spp.), cottonwoods (*Populus* spp.), or oaks. This species is often encountered buried in leaf litter and are known to burrow in the surface layers of loose soil.

There are no CNDDB records for this species within 5 miles of the project, yet suitable habitat for this species was observed throughout the BSA. Sandy washes within the BSA were observed within Study Areas 4, 5, 10, 31, and 33. Based on site conditions in the BSA, there is low potential for California legless lizard to occur in the BSA.

Western Spadefoot

The western spadefoot is a state species of special concern that occurs primarily in grasslands, but may also occur in valley-foothill woodlands in California's Central Valley, adjacent foothills, and within Coast Ranges. Western spadefoot are almost completely terrestrial and enter water only to breed. During dry periods this species either construct their own burrows, up to 3 feet in depth, or occupy small mammal burrows. Western spadefoot breed from January to May in temporary pools and drainages that form following winter or spring rains. Little is known about the dispersal distance that this species ranges from breeding areas to aestivation areas.

No western spadefoot were observed in the BSA during the field surveys. Perennial ponds within close proximity to the work areas, such as the pond within Study Area 18, may provide aquatic habitat for this species. Western spadefoot may also occur in grassland areas serving as dispersal or aestivation (e.g., burrows) within close proximity to aquatic habitats. Western spadefoot has been observed (CNDDB) as recently as 2000, approximately 0.7 mile southwest of Study Area 2. Although proposed project activities will not occur within or impact ponds or other aquatic areas suitable for western spadefoot, there is moderate potential for this species to occur along access routes, in grassland, or areas with sandy soils.

Nesting Migratory Birds

Most bird species with the potential to nest in the BSA are protected under the MBTA as well as California Fish and Game Code Sections 3503, 3503.5, 3505, 3513, 3800, and 3801.6. Additional protections are provided to state-listed and fully protected bird species under CESA and California Fish and Game Code Sections

3511, respectively. The migratory bird nesting season is generally identified as February-September, but varies by species.

During avian nesting surveys, active passerine and raptor nests were observed in trees, shrubs, and tree cavities within and around the proposed work areas, including within some of the trees and shrubs proposed for removal. A variety of avian activity was observed during the field survey in 2014, including long flights, short flights, foraging, calling, and singing. Ten active nests were observed within the BSA. Maps in Appendix A depict the locations of all active nests observed in 2014. Considering the survey results, it is likely for avian species to nest near or within work areas during the breeding season.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
Amphibians			
California tiger salamander *Ambystoma californiense*	Occurs in grasslands or oak woodlands that support natural ephemeral pools or ponds that mimic them. This species requires seasonal water for breeding and small mammal burrows, crevices in logs, piles of lumber, and shrink-swell cracks in the ground for refuges. To be suitable, aquatic sites must retain at least 30 centimeters of water for a minimum of 10 weeks in the winter.	FT / ST / SSC	**Moderate.** Suitable upland habitat for this species is present throughout the project although higher quality habitat dominated by grasslands is present along the western third of the project. Suitable aquatic breeding habitat is present within 1.24 miles of each Study Area. CNDDB records as recent as 2010 are located approximately 1.3 and 1.7 miles south of the Study Areas 4 – 8. Project activities not anticipated to impact this species with implementation of APMs and MMs.
California red-legged frog *Rana draytonii*	Aquatic habitats with little or no flow and surface water depths to at least 2.3 feet. Presence of fairly sturdy underwater supports such as cattails.	FT / -- /SSC	**Moderate:** Suitable upland habitat for this species is present throughout the project and suitable aquatic breeding habitat is present in close proximity (within 1.24 miles) to project. CNDDB records as recent as 2005 are located within 1 mile of Study Areas 13 and 14. Project activities not anticipated to impact this species with implementation of APMs and MMs.
western spadefoot *Spea hammondii*	Inhabits vernal pools in primarily grassland, but also in valley and foothill hardwood woodlands.	-- / -- / SSC	**Moderate.** Suitable upland habitat for this species is present in grassland or sandy soil areas of the BSA. CNDDB records as recent as 2000 are located approximately 0.7 miles southwest of Study Area 2. Project activities not anticipated to impact this species with implementation of APMs and MMs.
Reptiles			
California legless lizard *Anniella pulchra*	Occurs in sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces. This species is often encountered buried in leaf litter and are known to burrow in the surface layers of loose soil.	-- / -- / SSC	**Low:** Suitable habitat for this species observed throughout the BSA including sandy washes observed at Study Areas 4, 5, 10, 31, and 33. No CNDDB records for this species within 5 miles of the project. Project activities not anticipated to impact this species with implementation of project APMs and MMs.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
western pond turtle *Actinemys marmorata*	Quiet waters of ponds, lakes, streams, and marshes. Typically in the deepest parts with an abundance of basking sites. May use upland areas within 0.3 miles of aquatic areas for cover, basking, and nesting.	-- / -- / SSC	**Low:** Suitable aquatic habitat for this species was observed adjacent to Study Area 18. The nearest CNDDB occurrence was recorded within 1 mile of Study Areas 13 and 14 in 1993. Project activities not anticipated to impact this species with implementation of APMs and MMs.
blunt-nosed leopard lizard *Gambelia sila*	Occurs in semiarid grasslands, alkali flats, and washes in California's San Joaquin Valley and nearby valleys and foothills. Diurnal. Uses mammal burrows and dens for shelter.	FE / SE / FP	**None.** The project is outside (west) of the current known distribution of this species.
San Joaquin whipsnake *Masticophis flagellum ruddocki*	Occurs in open, dry, treeless areas including grassland and saltbrush scrub. Mammal burrows are used for refuge and oviposition sites. Diurnal.	-- / -- / SSC	**Moderate.** The habitat elements (dry, open grasslands) that are typically associated with the species are present, in particular along the western and eastern portions of the BSA. The most recent CNDDB occurrence (1993) was recorded approximately 2 miles west of Study Areas 7 and 8. Project activities not anticipated to impact this species with implementation of APMs and MMs.
coast horned lizard *Phrynosoma blainvillii*	Occurs in open areas with low growing vegetation and sandy soils. Typically found in sandy washes with scattered shrubs and along dirt roads as well as in grasslands, woodlands, chaparral, and coniferous forests below 8000 feet.	-- / -- / SSC	**Low:** Sandy washes observed at Study Areas 4, 5, 10, 31, and 33 in the BSA. One CNDDB record indicates this species was observed in 1993 along Panoche Road near Study Areas 12-14. Project activities not anticipated to impact this species with implementation of project APMs and MMs.
Birds			
golden eagle *Aquila chrysaetos*	Occurs in natural open and semi-open areas avoiding developed areas and uninterrupted stretches of forest. Inhabit areas with canyons, rocky terrain, and riverside cliffs and bluffs. Nest on cliffs and steep escarpments in grassland, chaparral, scrub, forest, and other vegetated areas.	BGEPA / -- / FP	**High.** Available nesting and foraging habitat located within project. Adult pair and first year juvenile observed soaring near Study Areas 18 and 19. Project activities not anticipated to impact this species with implementation of APMs and MMs.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
tricolored blackbird *Agelaius tricolor*	Occurs along coastal areas from northern California to northern Baja California. Preferred habitats include annual grasslands, vernal pools, and other seasonal wetlands. Found in large colonies (up to tens of thousands of individuals).	MBTA/–/SSC	**None.** Nesting habitat for this is not present in the BSA. The most recent CNDDB occurrence (1998) was recorded approximately 2.25 miles west of the project. Project activities not anticipated to impact this species.
burrowing owl *Athene cunicularia*	Small diurnal owl with yellow eyes and long legs that lives in burrows in grasslands, rangelands, agricultural areas, deserts, and other open, dry areas with low vegetation. Burrowing owls often occupy small mammal burrows rather than digging their own.	MBTA/–/SSC	**Moderate.** Habitat elements (grasslands and burrows) typically associated with the species are present in the non-native grassland and oak woodland portions of the BSA. CNDDB records show this species was observed within approximately 1 mile of Study Areas 8 and 9 as recent as 2002. Project activities not anticipated to impact this species with implementation of APMs and MMs.
Swainson's hawk *Buteo swainsoni*	Often nests peripheral to riparian areas. Majority of California Swainson's hawks nest within 50 miles of Sacramento. Typically associated with agriculture in California.	MBTA/ST/--	**None.** Marginal foraging habitat for this species occurs in the BSA and ephemeral stream areas within the BSA unlikely to be used as nesting areas by this species. The only CNDDB occurrence near the project is from 1899 and it was located approximately 1.6 miles west of the project. This species is believed to be extirpated from this location and no active or inactive raptor nests were observed in the western portion of the project during the breeding bird surveys.
mountain plover *Charadrius montanus*	A migratory species that winters in California's Sacramento, San Joaquin and Imperial Valleys in short-grass plains and fields, plowed fields and sandy deserts where it forages on insects. Species migrates to the western Great Plains and Rocky Mountains to breed.	MBTA/--/SSC	**None.** Habitat for this species does not occur in the BSA. CNDDB records show this species was observed approximately 4.5 miles east of the eastern end of the alignment as recent as 2003. Project activities not anticipated to impact this species.
yellow-billed cuckoo *Coccyzus americanus*	Occur within primary woodland habitat. Rely upon meandering riparian system with healthy hydrology that is constantly eroding and depositing and creating young riparian habitat.	MBTA/SE/--	**None.** Habitat for this species does not occur in the BSA. CNDDB record for this species from 19th Century. Species not expected to occur.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
yellow-breasted chat *Icteria virens*	Dense riparian thickets and brush. Eats small invertebrates and fruits.	MBTA/--/SSC	**Low.** Marginal habitat for this species is present within the mule fat scrub and Diablan sage scrub habitats in the BSA. The most recent CNDDB occurrence (1998) was recorded approximately 3.5 miles west of the western end of the project alignment. Project activities not anticipated to impact this species with implementation of APMs and MMs.
loggerhead shrike *Lanius ludovicianus*	Common resident and wintering bird in lowlands and foothills in California. Breeds primarily in shrublands or open woodlands with a fair amount of grass cover and areas of bare ground.	MBTA/--/SSC	**High.** Available nesting and foraging habitat located within project. Active nest located near work area within Study Area 3. Project activities not anticipated to impact this species with implementation of APMs and MMs.
Mammals			
pallid bat *Antrozous pallidus*	Common in low elevations in California within open, dry habitats with rocky areas for roosting. Roosts include caves, crevices, mines, buildings, and occasionally hollow trees.	-- / -- / SSC	**Low.** Marginal roosting habitat (tree crevices) for this species may occur within BSA. No current known roosts for this species are known within San Benito County. There are no CNDDB occurrence records for this species within 5 miles of the project. Project activities not anticipated to impact this species with implementation of APMs and MMs.
San Joaquin antelope squirrel *Ammospermophilus nelson*	Occur on dry, gently rolling grassy hills with sparse shrubs with sandy soils in Central California. Use burrows for shelter.	-- / ST / –	**Low.** Grassland habitat in the eastern end of the project (Study Areas 24-35) may provide suitable habitat for this species, although this area is at the western edge of its current known range. The most recent CNDDB record within 5 miles is of a museum specimen collected from Panoche Pass in 1925. Project activities not anticipated to impact this species with implementation of APMs and MMs.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
Townsend's big-eared bat *Corynorhinus townsendii*	Occurs in colonial roosts within caves, human-made structures (e.g., mines, tunnels, buildings), or hollowed out trees. Roosts in the open, hanging from walls and ceilings. Abundant in mesic habitats.	-- / CT / SSC	**Low.** Marginal roosting habitat (hollow trees) for this species may occur within BSA. There is a CNDDB occurrence record for this species approximately 1.7 miles east of the project in the vicinity of a mine. Project activities not anticipated to impact this species with implementation of APMs and MMs.
giant kangaroo rat *Dipodomys ingens*	Occur in sandy and arid grasslands in western central California. Nocturnal. Occupy burrows typically in well drained, sandy-loam soils located on gentle slopes (less than 11 percent).	FE / SE / –	**None.** The BSA is located outside of the current known range for this species. CNDDB occurrences are recorded in Panoche Valley more than 4.5 miles east of the eastern end of the BSA.
western mastiff bat *Eumops perotis*	Occurs in many open, semi-arid and arid habitats. Primarily a cliff-dwelling species, where maternity colonies number 30 to several hundred. This species has also been found in similar crevices in large boulders and buildings. Occasionally found in trees.	-- / -- / SSC	**Low.** Typical roosting habitat for this species not observed within BSA. There are no CNDDB occurrence records for this species within 5 miles of the project. Project activities not anticipated to impact this species with implementation of APMs and MMs.
Tulare grasshopper mouse *Onychomys torridus tularensis*	Typically occur in hot, arid shrubland communities along the western margin of Tulare Basin. This species is nocturnal and active year round.	-- / -- / SSC	**None.** The BSA is located outside of the current known range for this species. The nearest CNDDB occurrences are recorded in Panoche Valley more than 5 miles east of the eastern end of the BSA.
western red bat *Lasiurus blossevillii*	Typically found in mature riparian habitat and roosts almost exclusively in the foliage of trees and shrubs for day, night, maternity, and winter hibernation roosting purposes. Roost sites are usually surrounded by leaves, but are open to the ground.	-- / -- / SSC	**Low.** Suitable roosting habitat located throughout the BSA. No CNDDB records for this species located within 5 miles of BSA. Project activities not anticipated to impact this species with implementation of APMs and MMs.
American badger *Taxidea taxus*	Drier open stages of shrub, forest, and herbaceous habitats, with friable soils; needs sufficient food and open, uncultivated ground; digs burrows.	-- / -- / SSC	**High:** Suitable habitat for this species is present throughout the BSA. Badger dens were observed within the vicinity of Study Areas 23 and 30. No American badger were observed during survey. Project activities not anticipated to impact this species with implementation of APMs and MMs.

Table 3.4-4.
Special-status Wildlife Species Analyzed for Potential Occurrence

Species Name	Habitat and Distribution	Legal Status Federal/ State/ Other	Potential for Occurrence
San Joaquin kit fox *Vulpes macrotis mutica*	Occur in grasslands, agricultural lands, and petroleum fields and urban areas. Use dens for shelter, protection, and reproduction.	FE/ST/–	**High.** Study Areas 24-35 may provide suitable dispersal habitat (grasslands) for this species. Suitable den sites were observed at Study Areas 24 and 31, however no sign of San Joaquin kit fox was observed. Project activities not anticipated to impact this species with implementation of APMs and MMs.

General references: Unless otherwise noted all habitat and distribution data provided by California Natural Diversity Database

Status Codes
--= No status

Federal:
FE = Federal Endangered
FT = Federal Threatened
MBTA = Migratory Bird Treaty Act
BGEPA = Bald and Golden Eagle Protection Act

State:
SE = State Endangered
ST = State Threatened
CT = Candidate Threatened

Other:
SSC = California Special Concern Species
FP = Fully Protected Species

3.4.4 Impacts

(a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Although there is potential for special-status species to occur within the BSA and project, impacts to special-status species would be less than significant if APMs 5 through 19 and MMs listed in Section 3.4.5 below are implemented. Below is a detailed assessment of project impacts to special-status species.

Special-Status Plants

Potential project impacts to special-status plants include direct removal during vegetation maintenance activities or incidental impacts through project activities such as vehicle impacts. No special-status plants were observed during rare plant surveys and impacts to special-status plants are not anticipated. With implementation of APMs 6, 7, and 10 (Section 2.5) and MMs BIO-1, 2, and 4 (Section 3.4.5), any impacts to special-status plants would be less than significant.

Special-Status Wildlife

With the required implementation of APMs and MMs (listed in each species impact subsection below), impacts to all special-status wildlife would be less than significant.

San Joaquin Kit Fox

The project would include temporary disturbance to potential dispersal habitat for San Joaquin kit fox. Potential direct impacts could occur if individuals were to enter active work areas, staging areas, or access routes during project activities (e.g., vehicle strike of individual). Other effects could include San Joaquin kit fox being killed or injured via collapse of an occupied den or harassed by noise or vibration associated with project activities. Potential indirect impacts could include alteration of migration or foraging behavior because of project activities.

Implementation of APMs 5-9, 16, 17 and MMs BIO-1, 2, 3, and 7, would reduce potential direct and indirect impacts to San Joaquin kit fox to less than significant. MM BIO- 3 requires pre-activity surveys to ensure that no San Joaquin kit fox individuals are migrating through the work area. MM BIO-7 requires pre-activity surveys to identify any potential kit fox dens within or adjacent to work areas and establishment of no-work exclusion zones for any potential dens observed.

California Tiger Salamander

The project would include temporary disturbance to potential upland and dispersal habitat for California tiger salamander. The project would not impact aquatic breeding habitat for this species. Potential direct impacts could occur if the individuals were to enter active work areas, staging areas, or access routes during project activities or burrows where California tiger salamander are present collapse from project activities. Other impacts could include California tiger salamander being crushed, entombed in burrows, killed or injured by project equipment or worker foot-traffic, or harassed by noise or vibration associated with project activities. Potential indirect impacts could include alteration of migration behavior because of project activities. The project would be conducted outside of the California tiger salamander breeding season, a period when salamanders remain in small mammal burrows. Impacts to California tiger salamander individuals within burrows are not anticipated as project work would be conducted during warm months when salamanders are typically deeper in burrows. In addition, burrows shall be avoided to the maximum extent possible, and in the event any small mammal burrow entrances become temporarily covered due to

project activities, a qualified biologist shall immediately uncover the entrance by hand to avoid entrapment of California tiger salamander individuals.

Project impacts to upland California tiger salamander habitat and California tiger salamander individuals will be less than significant with implementation of APMs 5-10, 14, 15, 16 and MMs BIO-1, 2, 3, 5, and 6. MM BIO- 3 requires a pre-activity survey for California tiger salamander individuals within the project work areas, staging areas, and access routes in order to avoid impacts. MM BIO-5 reduces potential impacts by requiring work be conducted outside of the California tiger salamander breeding season and by prohibition of work following rain events to avoid impacts to potentially migrating individuals (e.g., out-migrating juveniles). MM BIO-6 requires a small mammal burrow avoidance protocol including flagging burrows to avoid impacts to salamanders potentially occupying those burrows.

California Red-legged Frog

The project would include temporary disturbance to potential upland and dispersal habitat for California red-legged frog and aquatic non-breeding habitat. Potential direct impacts could occur if individuals were to enter active work areas, staging areas, or access routes during project activities. Other effects could include California red-legged frog being crushed, entombed in burrows, killed or injured by project equipment or worker foot-traffic, or harassed by noise or vibration associated with project activities. Potential indirect impacts could include degradation of water quality downstream of the project resulting from sedimentation or spills of hazardous materials in the action area.

The project would not cause any direct or indirect impacts to California red-legged frog aquatic breeding habitat, as none is present within work areas. In addition, the project would not include any direct or indirect impacts to non-breeding aquatic habitat because the proposed activities would not alter existing hydrology at the crossings and activities are not proposed in wetted portions of the creeks (APM 12). The project would include removal of riparian vegetation in upland and dispersal habitat that may provide upland shelter and dispersal opportunities for the species. However, the amount of vegetation to be removed (approximately 18.17 acres of impact area, approximately 8.15 acres of which are within California red-legged frog critical habitat) is not likely to impact the survival of the species, as hundreds of acres of suitable upland shelter and dispersal habitat are present in the vicinity of the project and will remain undisturbed by project activities.

With implementation of APMs 5-9, 11, 14, 15, 16 and MMs BIO-1, 2, 3, 5, and 6, impacts to California red-legged frog individuals would be less than significant. The project would be conducted outside of the breeding season (MM BIO-5), a period when California red-legged frogs tend to remain in wetted streams, creeks, and ponds. Pre-activity surveys for California red-legged frog within drainages and adjacent cover, including flagging burrows for avoidance (MM BIO-3 and 6) will be conducted to ensure project activities do not impact this species. APM 9 requires all project work to occur during daylight hours so that any potential California red-legged frogs occurring within work areas, staging areas, and access routes can be easily identified and avoided.

Western Red Bat and Other Roosting Bats

Potential direct impacts to western red bat and other roosting bats could occur if individuals are roosting in the active work areas during vegetation removal activities. Potential indirect impacts could include noise disturbance (e.g., activity causing alteration of roosting behavior) and the removal of potential roosting habitat.

The project may result in impacts to potential roosting habitat for bats through removal of vegetation. However, the amount of vegetation to be removed (approximately 18.17 acres of impact area) is not likely to impact the survival of any bat species with potential to occur, as hundreds of acres of roosting habitat, that

will not be disturbed by project activities, are present adjacent to project vegetation removal areas. The amount of potential bat roost habitat lost from project activities may affect a few bat individuals, yet this small amount of habitat loss is not likely to have an effect on the population for any bat species with potential to occur.

No significant impacts to bats are anticipated with implementation of the monitoring and avoidance protocol specified in MM BIO-11 as well as APMs 6-9 and MMs BIO-1 and 2. The monitoring and avoidance protocol shall include biological monitoring within suitable bat roosting habitat during project activities, and shall include identification of potential roosting habitat, surveys using appropriate methods (e.g., emergence surveys with night optics, spotlighting, acoustic survey), and for any roosting bats observed, implementation of an exclusion plan specific to the roosting species developed in consultation with and approved by CDFW before implementation.

San Joaquin Antelope Squirrel

Although there is low potential for San Joaquin antelope squirrel to occur within the project area, potential direct impacts could occur if individuals were to enter active work areas, staging areas, or access routes during project activities (e.g., vehicle strike of individual) or activities cause collapse of burrows occupied by San Joaquin antelope squirrel. Potential indirect impacts to San Joaquin antelope squirrel include altering breeding behavior via noise disturbance or temporary alteration of movement or foraging behavior.

With implementation of APMs 5-9, 16 and MMs BIO-1, 2, 3, and 8 that require pre-activity surveys and no-work exclusion buffers in the event this species or its sign is detected during surveys (MM BIO-8), potential impacts to San Joaquin antelope squirrel would be less than significant.

American Badger

Potential direct impacts to American badger from project activities could occur if individuals were to enter active work areas, staging areas, or access routes during project activities (e.g., vehicle strike of individual) or impacts to badger habitat such as equipment use causing collapse of dens. Potential indirect impacts to badgers could include alteration of foraging or breeding behavior or temporary alteration of movement or foraging behavior.

Project impacts would be less than significant to American badger or badger dens with implementation of APMs 5-9, 17 and MMs BIO-1, 2, 3, and 9, including pre-activity surveys for badger individuals (MM BIO-3) and pre-activity surveys to identify any potential badger dens within project areas and establishment of no-work exclusion zones for any potential dens observed (MM BIO-9). Although badger dens were located within the BSA, impacts to American badger would be less than significant with implementation of project APMs and MMs.

Golden Eagle

Potential direct impacts to golden eagles could occur via removal of potential nest trees. Potential indirect impacts could include noise or visual disturbance from project activities to nesting eagles. No vegetation removal will occur in areas where eagles are nesting.

With implementation of APMs 5-9, 17 and MMs BIO-1, 2, 3, and 12, there would be no project impacts to golden eagle (a CDFW fully protected species). MM BIO-12 requires pre-activity nest surveys for all project work done during the avian nesting season and establishment of appropriate no work exclusion areas for any nests observed. Furthermore, the project would commence after eagle nestlings have typically fledged and nest disturbance or failure due to noise or visual disturbance is not likely.

Burrowing Owl

Potential direct impacts to burrowing owl from project activities could occur if individuals were to enter active work areas, staging areas, or access routes during vegetation removal activities (e.g., vehicle strike of individual) or impacts to burrowing owl habitat such as equipment use causing collapse of breeding burrows. Potential indirect impacts could include alteration of breeding behavior via noise disturbance. With implementation of APMs 5-10, 17 and MMs BIO-1, 2, 3, and 10, including pre-activity surveys and avoidance of active burrows, impacts to burrowing owl would be less than significant.

Loggerhead Shrike

Potential direct impacts to loggerhead shrike from project activities could occur via removal of potential nest trees. Potential indirect impacts could include nest abandonment via noise disturbance. The project could result in impacts to potential nesting and foraging habitat for this species through removal of vegetation. However, the amount of vegetation to be removed (approximately 18.17 acres of impact area, much of which is not suitable nesting habitat for this species) is not likely to impact the survival of the species, as hundreds of acres of suitable nesting and foraging habitat are present in the vicinity of the project and will remain undisturbed by project activities.

Project impacts to loggerhead shrike would be less than significant with implementation of APMs 5-9, 16 and MMs BIO-1, 2, 3, and 12, including pre-activity nesting bird surveys and implementation of no-work exclusion buffers for any active nests identified during nesting bird surveys.

Yellow-breasted Chat

Potential direct impacts to yellow-breasted chat could occur via removal of potential nest trees. Potential indirect impacts could include nest abandonment via noise disturbance. The project could result in impacts to potential nesting and foraging habitat for this species through removal of vegetation. However, the amount of vegetation to be removed (approximately 18.17 acres of impact area, much of which is not suitable nesting habitat for this species) is not likely to impact the survival of the species, as hundreds of acres of suitable nesting and foraging habitat are present in the vicinity of the project and will remain undisturbed by project activities.

Project impacts to yellow-breasted chat would be less than significant with implementation of APMs 5-9, 17 and MMs BIO-1, 2, 3, and 12, including pre-activity nesting bird surveys and implementation of no-work exclusion buffers for any active nests identified during nesting bird surveys.

Western Pond Turtle

Potential direct impacts to western pond turtle could occur if migrating individuals were to enter or be buried in the soil and litter in active work areas, staging areas, or access routes during vegetation removal activity or equipment operation (e.g., vehicle strike of individuals). Potential indirect impacts to this species could include alteration of foraging or migration behavior due to temporary noise disturbance or equipment barriers, resulting from project activities.

No project work would be conducted within wetted areas of creeks or ponds (APM 11), and pre-activity surveys for western pond turtles near ponds, within potential basking areas, and suitable upland refugia would be conducted to ensure project activities do not impact turtles (MM BIO-3), and any observed turtles are avoided during the project (APMs 7 and 8). With implementation of APMs 5-9, 11, 12, 14-16 and MMs BIO-1, 2, 3, and 5, potential impacts to western pond turtle would be less than significant.

San Joaquin Whipsnake

Potential direct impacts to San Joaquin whipsnake could occur if migrating individuals were to enter active work areas, staging areas, or access routes during vegetation removal activity or equipment operation (e.g., vehicle strike or trampling). Potential indirect effects to this species could include alteration of foraging or migration behavior due to temporary noise disturbance or equipment barriers, resulting from project activities.

Project activities would be conducted during the active period for this species when individuals within work areas, staging areas, or access routes are more easily identifiable. With implementation of APMs 5-9, 11, 16 and MMs BIO-1, 2, and 3, including pre-activity surveys for this species and avoidance of any observed individuals (MM BIO-3), potential impacts to San Joaquin whipsnake would be less than significant.

Coast Horned Lizard

Potential direct impacts to coast horned lizard could occur if migrating individuals were to enter active work areas, staging areas, or access routes during vegetation removal activity or equipment operation (e.g., vehicle strike or trampling). Potential indirect effects to this species could include alteration of foraging or migration behavior due to temporary noise disturbance or equipment barriers, resulting from project activities.

With implementation of APMs 5-9, 11, 16 and MMs BIO-1, 2, and 3, including pre-activity surveys for this species and avoidance of any observed individuals (MM BIO-3), potential impacts to coast horned lizard would be less than significant.

California Legless Lizard

Potential direct impacts to California legless lizard could occur if migrating or resident individuals were to be present in active work areas, staging areas, or access routes during vegetation removal activity or equipment operation (e.g., vehicle strike or trampling). Potential indirect effects to this species could include alteration of foraging or migration behavior due to temporary noise disturbance or equipment barriers, resulting from project activities.

With implementation of APMs 5-9, 11, 16 and MMs BIO-1, 2, and 3, including pre-activity surveys for this species and avoidance of any observed individuals (MM BIO-3), potential impacts to California legless lizard would be less than significant.

Western Spadefoot

The project would not impact aquatic breeding habitat for western spadefoot. Potential direct impacts to western spadefoot could occur if migrating individuals were to enter active work areas, staging areas, or access routes during vegetation removal activity or equipment operation (e.g., vehicle strike of individuals) and crushing individuals buried in soil by vehicles or heavy equipment. Potential indirect impacts to western spadefoot could include alteration of foraging behavior via noise disturbance or temporary alteration of movement or foraging behavior because of project activities.

Project impacts to upland western spadefoot habitat and western spadefoot individuals will be less than significant with implementation of APMs 5-9, 11, 16 and MMs BIO-1, 2, 3, 5 and 6. The project would be conducted outside of the breeding season (MM BIO-5) for this species, a period when western spadefoot primarily remain buried in the soil. Impacts to any western spadefoot individuals buried in loose soils would be reduced by pre-activity surveys to be conducted for western spadefoot individuals within the project work

limits (MM BIO-3) including hand raking litter or duff and inspecting the ground surface in work areas for litter and loose soil burrowing species.

Nesting Migratory Passerine Birds and Raptors

Project activities would be conducted within the nesting season for many passerine and raptor species. Potential direct impacts to nesting birds could occur via removal of nest trees or shrubs. Potential indirect impacts could include nest abandonment via noise disturbance. With implementation of APMs 5-9, and 16 and MMs BIO-1, 2, 3, and 12, including pre-activity nesting bird surveys and avoidance of active nests, impacts to nesting birds would be less than significant.

(b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project includes removal of vegetation within 26 ephemeral drainages and adjacent riparian areas. The trees and shrubs to be removed within these drainages and adjacent riparian areas are shown in Tables 3.4-1 and 3.4-2, respectively. As noted previously, the project would not be subject to Section 404 or 401 permitting under the CWA. PG&E has submitted a Notification for Lake or Streambed Alteration to CDFW for vegetation removal within CDFW-jurisdictional features. With implementation of MM BIO-13, Replacement Planting, impacts to riparian habitat would be less than significant.

PG&E is proposing to provide in-kind mitigation for removed vegetation in jurisdictional areas through replanting riparian vegetation within the Pajaro Watershed.

(c) Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The proposed project would not have an impact on federally protected wetlands.

The project includes removal of vegetation within 26 ephemeral drainages and adjacent riparian areas. All vegetation within these drainages would be removed by hand and no discharge of dredge or fill material is anticipated within USACE regulatory jurisdiction and, therefore, the project would not be subject to Section 404 or 401 permitting under the CWA.

(d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project does not include any features that would interfere substantially with wildlife movement from one area to another. The project is located in a rural area with little development. The project area is near potential breeding habitat for California tiger salamander, California red-legged frog, western pond turtle, and western spadefoot, but it does not impede access to a pond or adjacent upland habitat. Work would be conducted during the dry season when these species are not expected to be dispersing to and from breeding sites. While potential nesting sites for migratory birds will be removed, hundreds of acres of suitable nesting and foraging habitat are present near the project and will remain undisturbed by project activities. If San Joaquin kit fox, San Joaquin antelope squirrel, American badger, western red bat, burrowing owl, western pond turtle, San Joaquin whipsnake, coast horned lizard, California legless lizard, and western spadefoot do occur in the project area, foraging and dispersal opportunities may be temporarily reduced during the vegetation removal period. Impacts to wildlife movement would be less than significant because project activities would not occur at any one specific location longer than one week and barriers to migration would

be temporary. Furthermore, a biologist will be present during all project activities to inspect work areas and surrounding areas to ensure no wildlife becomes entangled or entrapped in work materials and equipment.

(e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County does not have the CPUC's exclusive jurisdiction over the proposed project, local zoning and planning regulations still apply to the extent that they do not conflict or interfere with CPUC's regulation of public utilities, including the safe operation of natural gas pipelines. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

(f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. Furthermore, the project does not fall within the coverage area of any HCPs or NCCPs. No impact would occur.

3.4.5 Mitigation Measures

The following mitigation measures shall be implemented by PG&E:

MM BIO-1: **Qualified Biologist.** At least 30 days before the start of any project activities, PG&E shall submit the names and credentials of biologists proposed to perform pre-activity surveys and monitoring to CDFW for approval. A qualified biological monitor is a person who has completed at least 4 years of university training in wildlife biology or a related science and/or has demonstrated field experience in the identification and life history of the species likely to occur in the project area.

MM BIO-2: **Biological Monitoring.** Qualified biological monitor(s) shall be present during all project activities to facilitate avoidance of special-status species and nesting birds.

MM BIO-3: **Special-status Wildlife Pre-Activity Surveys.** Qualified biologist(s) shall conduct pre-activity surveys within seven days of the start of project activities for special-status species that have potential to occur in proximity to work area (e.g., San Joaquin kit fox, California tiger salamander, California red-legged frog, San Joaquin antelope squirrel, American badger, western red bats, burrowing owl, western pond turtle, coast horned lizard, California legless lizard, western spadefoot, and San Joaquin whipsnake).

- The survey area shall include the work areas, staging areas, and access routes and within a 1,000-foot radius of the work areas and staging areas. If the 1,000-foot radius is not within the existing right-of-way, this distance may be reduced due to right-of-way constraints and restricted access. However, the biologist shall visually survey at least 1,000

feet using binoculars, spotting scopes and other visual surveying equipment. Surveys of access routes shall be confined to the access route due to restricted access. Surveys shall include hand raking litter or duff and inspecting the ground surface in work areas for litter and loose soil burrowing species.

- If any special-status species are observed during the pre-activity survey, project activities shall not commence and the qualified biologist shall contact the PG&E biologist who shall consult with CDFW and USFWS to determine if additional measures are required.

- Prior to beginning project activities every morning, a qualified biologist shall survey the immediate work area for special-status wildlife. Project activities shall not begin until the species moves out of the area on its own volition. If the individual does not move out of the area, the qualified biologist shall contact the PG&E biologist who shall consult with CDFW and USFWS to determine if avoidance is feasible and if any additional measures are required.

- If any special-status species are observed within or move into an active work area during project activities, all work shall stop until the species moves out of the area on its own volition. If the individual does not move out of the area, the qualified biologist shall contact the PG&E biologist who shall consult with CDFW and USFWS to determine if avoidance is feasible and if any additional measures are required.

MM BIO-4: **Special-status Plant Species Pre-Activity Surveys.** A qualified botanist shall conduct pre-activity surveys within seven days of all project activity within work areas, staging areas, and access routes for rare plants. Any rare plant occurrence shall be flagged and avoided by 50 feet by all project personnel, vehicles, and equipment. The specified rare plant buffer size may be reduced on a case-by-case basis if there is a compelling biological or ecological reason to do so (e.g., the biology of the species, level of project activity, topography, land use type, vegetation, etc.). Any variance from the specified buffer distances shall be approved by CDFW via email before implementation. The request shall include the species, location, reason for the reduced buffer, proposed avoidance buffer size, duration, biological or ecological justification for the reduction, the name and contact information of the qualified botanists(s) proposing the reduced buffer size, and the botanist(s) conducting subsequent monitoring, if applicable. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-5: **Season and Weather Restrictions.** Project activities shall be conducted from June 1 to October 15 (dry season) to facilitate avoidance of California tiger salamander, California red-legged frog, and western spadefoot. No activities shall occur within 48 hours following a significant rain event (greater than 0.25 inch in a 24-hour period).

MM BIO-6: **Burrow Avoidance.** All small mammal burrows shall be avoided in order to avoid potential impacts to California tiger salamander, California red-legged frog, and special status small mammals. A qualified biologist shall survey for and clearly flag all small mammal burrow entrances within 50 feet of work areas, staging areas, and access routes and clearly delineate a 50-foot no-work exclusion zone around the entrance with flagging for avoidance before project activities commence. Flagged burrows shall be visually inspected at least twice daily by a qualified biologist to ensure entrances are not covered by project activities.

In the event that a burrow entrance becomes temporarily covered due to project activities, the qualified biologist shall immediately uncover by hand the entrance to avoid entrapment of California tiger salamander, California red-legged frog, and special status small mammals and shall notify CDFW and USFWS within 24 hours of any such occurrences. If project activities will occur within the 50-foot no-work exclusion zone, only crews on foot with hand tools and equipment exerting a lower ground pressure, measured in pounds per square inch (psi), than an average walking human shall be utilized. Equipment and crews shall avoid all flagged burrow entrances. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-7: **San Joaquin Kit Fox Surveys.** Within 30 days of project activity at sites from Panoche Pass east (Study Areas 24-35), a qualified biologist shall perform transect surveys of the project area to identify suitable San Joaquin kit fox dens within the work areas, staging areas, and access routes and a 250-foot radius of work and staging areas. Surveys of access routes shall be confined to the access route due to restricted access. If potential San Joaquin kit fox dens or kit fox individuals are observed, they shall be avoided by establishing no-work exclusion zones. No-work exclusion zones shall be clearly delineated by a qualified biologist using flagging material. The radius of these zones shall have the following distance measured outward from the den or burrow entrances or the edge of the population: Potential Den-50 feet; Known Den-100 feet; Natal or Pupping Den-to be determined on a case-by-case basis in coordination with USFWS and CDFW. There shall be no destruction of dens. If dens are located within the work area and cannot be avoided, a qualified biologist shall determine if the dens are occupied following the procedures outlined in "U.S. Fish and Wildlife Service Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance" (USFWS 2011). If work must occur within the exclusion zones, the qualified biologist shall contact the PG&E biologist who shall consult with CDFW and/or USFWS to determine if avoidance is feasible and if any additional measures are required. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-8: **San Joaquin Antelope Squirrel Surveys.** Within 30 days of project activity at sites from Panoche Pass east (Study Areas 24-35), a qualified biologist shall perform pre-activity surveys for San Joaquin antelope squirrel within the work areas, staging areas, and access routes, and a 50-foot radius of work areas and staging areas in areas of suitable habitat. Surveys of access routes shall be confined to the access route due to restricted access. Visual and auditory transect surveys shall be conducted when temperatures are between 20-30°C (68-86°F), cloud cover is less than 80%, and there is no rain or foggy conditions to determine presence of San Joaquin antelope squirrel. If San Joaquin antelope squirrel is detected, a 50-foot no-work exclusion zone shall be delineated around the burrows with flagging and full-time biological monitoring shall be conducted at the location during vegetation removal activities. If any San Joaquin antelope squirrel individuals are observed within or move into an active work area and/or exclusion zone during project activities, qualified biologist shall implement MM BIO-3 for avoidance. The specified exclusion zone size may be reduced on a case-by-case basis if there is a compelling biological or ecological reason to do so (e.g., the biology of the species, level of project activity, topography, land use type, vegetation, etc.). Any variance from the specified buffers shall be approved by CDFW via email before implementation. The request shall include the species, location, reason for the reduced buffer, proposed avoidance buffer size, duration, biological or ecological justification for the reduction, the name and contact information of the qualified wildlife biologist(s) proposing the

reduced buffer size, and the biologist(s) conducting subsequent monitoring, if applicable. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-9: **American Badger Surveys.** A pre-activity survey shall be conducted by a qualified biologist for American badger no less than 14 days and no more than 30 days before the start of project activity. The survey area will include the project work areas, staging areas, and access routes as well as a 250-foot buffer surrounding work areas and staging areas. Surveys of access routes shall be confined to the access route due to restricted access. The status of all dens shall be determined (e.g., potential den, known den, etc.) and mapped based on presence or absence of sign or presence observed. If active badger dens (e.g., sign or presence) are observed, work activities shall be avoided within 50 feet of active dens, until a qualified biologist has determined that the den is no longer active. The biologist shall clearly delineate the 50-foot no-work exclusion zone. The specified badger exclusion zone may be reduced on a case-by-case basis if there is a compelling biological or ecological reason to do so (e.g., the biology of the species, level of project activity, topography, land use type, vegetation, etc.). Any variance from the specified buffers shall be approved by CDFW via email before implementation. The request shall include the species, location, reason for the reduced buffer, proposed avoidance buffer size, duration, biological or ecological justification for the reduction, the name and contact information of the qualified wildlife biologist(s) proposing the reduced buffer size, and the biologist(s) conducting subsequent monitoring, if applicable. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-10: **Burrowing Owl Surveys.** A burrowing owl survey shall be conducted in suitable habitat (Study Areas 1-13, 24-35) within 14 days before the start of project activity following the survey methods in the CDFW 2012 Staff Report on Burrowing Owl Mitigation. If owls are present, a qualified biologist shall implement an exclusion zone of 50 meters surrounding an active non-nesting owl burrow and 200 meters surrounding an active nesting owl burrow. The specified burrowing owl exclusion zone distances may be reduced on a case-by-case basis if there is a compelling biological or ecological reason to do so (e.g., the biology of the species, level of project activity, topography, land use type, vegetation, etc.). Any variance from the specified buffers shall be approved by CDFW via email before implementation. The request shall include the species, location, reason for the reduced buffer, proposed avoidance buffer size, duration, biological or ecological justification for the reduction, the name and contact information of the qualified wildlife biologist(s) proposing the reduced buffer size, and the biologist(s) conducting subsequent monitoring, if applicable. At the conclusion of all project activities, all flagging shall be removed.

MM BIO-11: **Bat Monitoring and Avoidance Protocol.** PG&E shall develop a project-specific monitoring and avoidance protocol to avoid impacts to special-status bat species such as the western red bat. The monitoring protocol shall include the following:

- A qualified biological monitor shall assess all removal areas and identify which trees provide suitable bat roosting habitat at least 30 days the start of all project activities.
- Any suitable roost trees shall be inspected for bat sign (e.g., guano) and roosting bat individuals within 14 days of the start of project activities within any work or staging area.

- If removal of trees providing suitable roosting habitat must be conducted during the maternity season (May – mid-August), preconstruction surveys for bats shall be conducted no more than 14 days prior to the start of project activities via appropriate methods (e.g., emergence surveys with night optics, spotlighting, acoustic survey). If bats are found during surveys, removal of that roost tree shall be delayed until the end of the maternity season, or until a qualified bat biologist has determined that the young are volant.

- If removal of trees that provide suitable bat roosting habitat occurs outside of the maternity season:

  - Preconstruction surveys for bats shall be conducted no more than 14 days prior to the start of project activities via appropriate methods (e.g., emergence surveys with night optics, spotlighting, acoustic survey).

  - If bats are found roosting in a tree to be removed, an exclusion plan specific to the species roosting in removal tree(s) shall be developed in consultation with and approved by CDFW prior to implementation. The plan shall include, but is not limited to, methods to safely exclude roosting bats from tree(s) to be removed, monitoring of roost during eviction and a discussion of the amount, type and distance of sufficient suitable habitat from the tree(s) to be removed.

MM BIO-12: **Pre-Activity Nesting Bird Surveys.** A qualified biologist shall conduct pre-activity nesting bird surveys no more than 14 days before the start project activity within work or staging areas. Nest surveys will be conducted from the ROW and focus on fully protected and listed raptors within ½ mile, non-listed raptors within 500 feet, and all other birds within 250 feet of project work and staging areas. If nesting activity is detected during the survey, a qualified biologist shall delineate the following no-work buffers around each active nest: ½ mile for fully protected and listed raptors, 500 feet for non-listed raptors, and 250 feet for all other birds. Work activities within the established buffer zone shall be prohibited until a qualified biologist has determined that young have fledged and are no longer reliant on the nest site or parental care. The specified nest buffer size may be reduced on a case-by-case basis if there is a compelling biological or ecological reason to do so (e.g., the biology of the species, level of project activity, topography, land use type, vegetation). Any variance from the specified buffers shall be approved by CDFW via email before implementation. The request shall include the species, location, reason for the reduced buffer, proposed avoidance buffer size, duration, biological or ecological justification for the reduction, the name and contact information of the qualified wildlife biologist(s) proposing the reduced buffer size, and the biologist(s) conducting subsequent monitoring, if applicable. At the conclusion of all project activities, all flagging or buffer markers shall be removed.

MM BIO-13: **Replacement Planting.** PG&E shall compensate for the removal of vegetation within CDFW-jurisdictional features and adjacent riparian areas (Tables 3.4-1 and 3.4-2) by replanting riparian vegetation following the mitigation ratios below:

- 1:1 for trees less than 4-inches DBH

- 3:1 for trees between 4-inches – 23-inches DBH

- 10:1 for trees equal to or greater than 24-inches DBH
- Brush will be mitigated for by replacing the volume of brush removed with the equivalent volume of native brush. The amount of native brush to be planted will be determined by using the typical volume at maturity of each brush species.

Tables 3.4-5 and 3.4-6 below summarize the tree and brush species to be replanted and the number of tree plantings to be planted or goal mitigation volume (brush) within riparian areas, based on the mitigation ratios above. The size of native plantings to be used will be dependent on the planted species and shall be coordinated with CDFW. Riparian vegetation mitigation monitoring and reporting will be conducted according to the terms of the CDFW-approved Revegetation Plan developed as a Protective Measure of the Streambed Alteration Agreement. At a minimum, mitigation monitoring and maintenance will be conducted over a five-year period to ensure a minimum of 70 percent survival of the plantings after five years.

Table 3.4-5.
Trees to be Replanted (by DBH class) for Trees Removed within CDFW-Jurisdictional Features and adjacent Riparian Areas

	Number of Replacement Tree Plantings by DBH Class			
Tree Species	**Less than 4 inches (Replaced 1:1)**	**4-23 inches (Replaced 3:1)**	**Equal to or Greater than 24 inches (Replaced 10:1)**	**Total Replacement Plants**
blue oak	--	102	60	**132**
coast live oak	1	6	20	**17**
cottonwood	--	3	--	**3**
willow	1	3	--	**4**
buckeye	--	9	30	**24**
foothill pine	--	63	20	**73**
elderberry	--	6	--	**6**
TOTALS	**2**	**192**	**130**	**324**

Table 3.4-6.
Brush Volume Mitigation Goal for Brush to be Removed within CDFW-Jurisdictional Features and Adjacent Riparian Areas

Brush Species	Brush Volume Mitigation Goal (cubic feet)
manzanita	528.40
coyote brush	13,210.00
sagebrush	17,965.60
mulefat	13,210.00
chamise	1,321.00
whitethorn	264.20
buckwheat	528.40
toyon	792.60
leather oak brush	528.40
poison oak	792.60
TOTAL	**49,141.20**

MM BIO-14: **Site Restoration.** Prior to the start of and following project activities, a qualified biologist shall estimate the amount of bare ground in project work areas, overland travel routes, and staging areas. If disturbance resulting from project activities creates bare ground in excess of 30 percent of the original bare ground, these areas shall be prepared and reseeded with a CDFW-approved native seed mix (e.g., at least three locally native grass and/or wildflower species) immediately after project completion or by no later than November 15. In PG&E's easements, PG&E shall monitor these areas annually after seeding for a period of two years and reseed if there is less than 70% cover.

3.5 Cultural Resources and Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☒	☐	☐
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
(c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
(d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074?	☐	☒	☐	☐

3.5.1 Introduction

This section describes the existing cultural and paleontological resources in the project area and discusses potential impacts associated with the project. Cultural resources can reflect the history, diversity, and culture of the region and people who created them. They are unique in that they are often the only remaining evidence of activity that occurred in the past. Cultural resources can be natural or built, purposeful or accidental, physical or intangible. They encompass archaeological, traditional, and built environment resources, including but not necessarily limited to buildings, structures, objects, districts, and sites. Tribal cultural resources are sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe.

Information in this section was compiled from *Cultural Resources Assessment Report RW-V-504/505-13_L-300A and 300B Vegetation Management* prepared by Garcia and Associates (Garcia and Associates 2014). The analysis concludes that, with implementation of APMs and mitigation measures, impacts to cultural resources and tribal cultural resources would be less than significant.

3.5.2 Regulatory Setting

3.5.2.1 State

The regulatory framework that mandates consideration of cultural resources in project planning includes requirements of the State of California under CEQA. Cultural resources include prehistoric and historic archaeological sites, districts, and objects; standing historic structures, buildings, districts, and objects; and locations of important historic events or sites of traditional and/or cultural importance to various groups. Cultural resources may be determined significant in terms of national, state, or local criteria, either individually or in combination. Resource evaluation criteria are determined by the compliance requirements of each specific project.

California Environment Quality Act

The CEQA Statutes and Guidelines (Title 14 of CCR 15064.5) include procedures for identifying, analyzing, and disclosing potential adverse impacts to historical resources, which include all resources listed in or formally determined eligible for the National Register of Historic Places (NRHP), the CRHR, or local registers. CEQA further defines a "historical resource" as a resource that meets any of the following criteria:

- A resource listed in, or determined to be eligible for listing in, the NRHP or CRHR.
- A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k), unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- A resource identified as significant (e.g., rated 1-5) in a historical resource survey meeting the requirements of PRC Section 5024.1(g) (Department of Parks and Recreation [DPR] Form 523), unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the determination is supported by substantial evidence in light of the whole record. Generally, a resource is considered "historically significant" if it meets the criteria for listing on the CRHR.

Under Section 21083.2 of CEQA, a "unique" archaeological resource is an object, artifact, or site that can be clearly shown to meet any of the following criteria:

- Contains information needed to answer important scientific research questions, and a demonstrable public interest in that information exists.
- Has a special and particular quality such as being the oldest of its type, or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Register of Historical Resources Criteria of Evaluation

The CRHR is a listing of California resources that are significant within the context of California's history, and includes all resources listed in or formally determined eligible for the NRHP. The CRHR is a statewide program of similar scope to the NRHP. In addition, properties designated under municipal or county ordinances are also eligible for listing in the CRHR. A historic resource must be significant at the local, state, or national level under one or more of the following four criteria defined in the CCR Title 14, Chapter 11.5, Section 4850:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (Criterion 1);
2. It is associated with the lives of persons important to local, California, or national history (Criterion 2);
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values (Criterion 3); or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

Historical resources must also possess integrity of location, design, setting, materials, workmanship, feeling, and association (14 CCR 4852[c]). The CRHR criteria are similar to the NRHP criteria, and are tied to CEQA, as any resource that meets the above criteria is considered a historical resource under CEQA.

Regulations Concerning Discovery of Human Remains

California PRC Section 5097.98 (Notification of Native American human remains, descendants; disposition of human remains and associated grave goods) mandates that the lead agency adhere to the following regulations when a project results in the identification or disturbance of Native American human remains:

> *(a) Whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24 hours of their notification by the Native American Heritage Commission. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials.*
>
> *(e) Whenever the commission is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendent and the mediation provided for in subdivision (k) of Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.*
>
> *(g) Notwithstanding the provisions of Section 5097.9, the provisions of this section, including those actions taken by the landowner or his or her authorized representative to implement this section and any action taken to implement an agreement developed pursuant to subdivision (l) of Section 5097.94, shall be exempt from the requirements of the California Environmental Quality Act (Division 13 [commencing with Section 21000]).*
>
> *(h) Notwithstanding the provisions of Section 30244, the provisions of this section, including those actions taken by the landowner or his or her authorized representative to implement this section, and any action taken to implement an agreement developed pursuant to subdivision (1) of Section 5097.94 shall be exempt from the requirements of the California Coastal Act of 1976 (Division 20 [commencing with Section 30000]).*

AB 52 and Tribal Cultural Resources

AB 52 establishes a formal role for California Native American tribes in the CEQA process. CEQA lead agencies are required to consult with tribes about potential tribal cultural resources in the project area, the potential significance of project impacts, the development of project alternatives and the type of environmental document that should be prepared.

- A "Native American tribe located in California that is on the contact list maintained Native American Heritage Commission" (NAHC). This definition does not distinguish between federally recognized and non-federally recognized tribal groups, and is therefore more inclusive than the federal definition of "Indian tribe" (PRC § 21073).

- To qualify as a tribal cultural resource, it must either be 1) listed on or eligible for listing on the California Register of Historical Resources or a local historic register or, 2) or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a Tribal Cultural Resource (PRC § 21074). Tribal Cultural Resources include "non-unique archaeological resources" that, instead of being important for "scientific" value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC § 21080.3.1(a)).

- Consultation in the context of AB 52 is the meaningful and timely process of seeking, discussing, and carefully considering the views of others. Meaningful consultation usually consists of face-to-face meetings conducted in such a way that recognizes the cultural values of all parties involved and makes a concerted effort to reach an agreement. Consultation should recognize the tribe's potential need for confidentiality regarding places that hold traditional tribal significance. Consultation with tribes is considered the best way for lead agencies to determine if a project could result in significant environmental impacts to tribal cultural resources (PRC § 21080.3.1(a); GC § 65352.4).

A project that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC § 21084.2).

3.5.2.2 Local

San Benito County General Plan

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.5.3 Environmental Setting

The project, located entirely within San Benito County, is predominately situated along the western Diablo Range. The project extends from approximately 6.4 miles southeast of the community of Tres Pinos and heads east through the Diablo Mountain Range to an area located approximately 6.5 miles east of the town of Panoche. The northern extent of the Diablo Range is situated approximately 25 miles east of Monterey Bay and is separated from the coast by the Salinas Valley and River (20 miles to the southwest), the Gabilan Range (5 miles to the southwest), and San Benito River (2 miles to the southwest). Highway 25 and Panoche Road run roughly parallel to the west.

Three kinds of cultural resources, classified by their origins, are considered in this assessment: prehistoric, ethnographic, and historic. Prehistoric archaeological resources are associated with the human occupation and use of California prior to prolonged European contact. In California, the prehistoric period began over 12,000 years ago and extended through the eighteenth century until 1769, when the first Europeans settled in California. Ethnographic resources represent the heritage of a particular ethnic or cultural group, such as

Native Americans or African, European, Latino, or Asian immigrants. Historic-period resources, both archaeological and architectural, are associated with Euro-American exploration and settlement of an area and the beginning of a written historical record. The following prehistoric, ethnographic, and historical background provides the context for the evaluation of the CRHR eligibility of any identified cultural resources within the study area for this project.

3.5.3.1 Prehistoric Setting

Human populations have occupied the Central Coast region for at least 10,000 years. However, little is known about the prehistory of the region and the project area in particular because of a lack of previous research. The culture-historical chronological sequence for the Central Coast region consists of seven periods, based on a general evolutionary sequence hallmarked primarily by different artifact types: Paleo-Indian (before 8000 B.C.), Millingstone Period (8000 to 3500 B.C.), Early Period (3500 to 660 B.C.), Middle Period (600 B.C. to cal A.D. 1000), Middle-Late Transition Period (A.D. 1000 to 1250), and Late Period (A.D. 1200 to 1769) (Garcia and Associates 2014).While there have been no recorded prehistoric sites within the project area or vicinity, previous cultural resources investigations in the Central Coast region have revealed that the coastal region and the interior ranges, including the project area, were utilized by native groups throughout the prehistoric period for hunting and foraging. Evidence of seasonal camps are likely near or at the surface within the project area, specifically near natural water sources and on gently sloped or flat land.

3.5.3.2 Ethnographic[7] Setting

The Native Americans who inhabited land within the project before the Spanish entry in 1769 are referred to as Costanoans, or Ohlone, as the Native American community refers to themselves. The term “Costanoan” derives from the Spanish word costaños or “coast people” and refers to an ethnolinguistic group of people that lived in the area from San Francisco to Big Sur on the central coast, eastward into the Central Valley before contact with European Americans. Ethnographic and ethnohistoric information about the Ohlone derives primarily from the accounts of early explorers and missionaries. When detailed ethnographic information began to be collected on their lifeways, the people and their culture had already undergone drastic changes due to European American, Spanish, and Mexican contact. The Costanoans spoke a language considered to be one of the eight major subdivisions of the Miwok-Costanoan, as categorized by linguistics, which belonged to the Utian family within the Penutian language stock. The Ohlone were politically organized by tribelets, each having a designated territory. A tribelet consisted of one or more villages and camps in a territory designated by physiographic features. Tribelets generally had 100 to 250 members.

Since the 1980s, the modern Ohlone community has undergone a period of revitalization based on familial ties and former rancheria affiliations. Although they have yet to receive formal recognition from the federal government, the Ohlone are becoming increasingly organized as a political unit and have developed an active interest in preserving their ancestral heritage. Descendants of the Ohlone still live in the area, and many are active in maintaining their traditions and advocating for Native American issues (Garcia and Associates 2014).

3.5.3.3 Historical Setting

Spanish and Mexican exploration of the Monterey region began with the Portolá expedition in 1769. Between 1770 and 1771, the Spanish established the Monterey presidio and mission, which became the capital of Spanish and Mexican California. Four of California’s missions were established in what became Monterey and San Benito Counties: Carmel (1770), San Antonio (1771), Soledad (1791), and San Juan

[7] Ethnography is the study and systematic recording of human cultures.

Bautista (1797). Mission San Juan Bautista, located in San Benito County and approximately 14 miles west of the project, was the seventh mission to be built in California. Agricultural pursuits and livestock characterized land use during this period. The vicinity of project remained largely undeveloped until after Mexico seceded from Spain in 1822 following the Mexican War of Independence (1810 to 1821).

Much of the early social and economic activity in San Benito County was centered around Mission San Juan Bautista. With the secularization of the mission system, the majority of the land that once belonged to Mission San Juan Bautista was converted into land grants by the Mexican government. The Rancho San Justo land grant covered 34,620 acres in San Benito County and was given to Jose Castro by Governor Juan B. Alvarado in 1839, then sold to Don Francisco Perez Pacheco in 1850, the same year California was incorporated into the United States. In 1855, Rancho San Justo was sold again to Dr. Thomas Flint and Colonel William Welles Hollister, who had both arrived in the area after driving a herd of thousands of sheep from Illinois and Ohio to San Benito County. A few years later, in 1861, their partnership was dissolved and Hollister claimed all the land west of the San Benito River while Flint claimed all the land east of the river, including the vicinity of the project.

Today, the predominant land use of the Diablo Range is for agriculture and grazing lands, mixed with isolated areas of low-density rural development. Portions of the project along the western edge of the Diablo Range are used as agricultural fields and vineyards; however, most of the project area and vicinity have remained undeveloped (Garcia and Associates 2014).

3.5.3.4 Results

Records Search and Historical Research

The California Historical Resources Information System (CHRIS) information centers operate as repositories of information regarding cultural resources in California, and are administered by the California Office of Historic Preservation. On June 5, 2014, Garcia and Associates conducted a records search at the Northwest Information Center of CHRIS to compile data regarding previously conducted surveys and recorded cultural resources within a 0.25-mile radius of the proposed project. The results of the records search indicate that no previously recorded cultural resources, including prehistoric or historic-period archaeological resources or built environment resources, have been documented within the project area or within a 0.25-mile radius of the project area. The records search indicated that one previous cultural resources study has been conducted within the project area. This study included a pedestrian survey of a 40-foot segment of pipeline 300A. No cultural resources were identified within the project area during the study. Additionally, one previous cultural resources study has been conducted with 0.25-mile of the project area. No cultural resources were identified within a 0.25-mile of the project area during the study.

Historic maps depicting features, such as towns, roads, railroads, creeks, and sloughs, were reviewed in order to provide additional information regarding the potential for the presence of historic-period resources within the project area. No cultural resources were identified within the project area as a result of the historic map review (Garcia and Associates 2014).

Site Sensitivity Analysis

A site sensitivity analysis was conducted to assess the likelihood of encountering prehistoric cultural resources. The majority of the project area is located on moderately- to steeply-sloped mountainous terrain which would not have been attractive for prehistoric occupation. However, there are a number of locations within the project area containing trees and other vegetation slated for removal that are situated within drainages and riparian corridors that are on gently sloped terrain and are considered highly sensitive for surface prehistoric resources. A review of the geology and soils indicates a low sensitivity for buried prehistoric

archaeological deposits in the project area, largely based on the steep topography. However, as indicated by previous archaeological research conducted in the coastal region, as well as the ethnographic record, the interior ranges, which include the project area, were utilized by native groups throughout the prehistoric period for hunting and foraging. Evidence of seasonal camps may be found near or at the surface within the project area, specifically near natural water sources and on gently sloped or flat land. Surface resources in this context within the project area might include lithic scatters, ground stone artifacts, bedrock mortars, and midden soils with shellfish remains, animal remains, and burned rock. Isolated artifacts in the project area, associated with hunting, might include obsidian and chert projectile points and knives (Garcia and Associates 2014).

Native American Outreach

Native American Heritage Commission

The NAHC is the official state repository of Native American sacred site location records. On June 6, 2014, Garcia and Associates sent a letter describing the project with a map depicting the project area to the NAHC requesting a review of the Sacred Lands File and a list of representatives from the Native American community to contact regarding cultural resources for the project. The NAHC responded in a letter dated June 20, 2014, which stated that a review of the scared lands file failed to indicate the presence of sacred lands in the immediate project area. The NAHC provided a list of local groups and individuals to contact for further information regarding local knowledge of sacred lands.

On June 23, 2014, Garcia and Associates contacted the groups and individuals provided by the NAHC. A letter and project location map were sent to chairperson Valentin Lopez of the Amah Mutsun Tribal Band, Edward Ketchum of the Amah Mutsun Tribal Band, chairperson Irene Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista, Michelle Zimmer of the Amah Mutsun Tribal Band of Mission San Juan Bautista, Linda G. Yamane of the Ohlone Indian Tribe, Jakki Kehl of the Ohlone Indian Tribe, representative Ramona Garibay of the Trina Marine Ruano Family, and chairperson Ann Marie Sayers of the Indian Canyon Mutsun Band of Costanoan. Several responses have been received, which mainly consist of requests to be notified if significant resources are identified during the project. Appendix B provides details of the initial consultation.

AB 52

AB 52 directs tribes to contact all CEQA lead agencies to formally request to be notified of projects in regions the tribe is traditionally affiliated. Within 14 days of deciding to undertake a project or determining that an application for a project is complete, the CEQA lead agency must formally notify all tribes that have requested this notification. Notification usually takes the form of a letter and should be followed with a phone call confirming that the appropriate representative has received the project information.

Only one tribe has contacted CDFW, and their region of interest does not incorporate the project area.

3.5.4 Impacts

(a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

No historical resources have been identified within the project area. However, project activities within environmentally sensitive areas (ESAs) may result in substantial adverse change in the significance of a historical resource from vehicle travel or vegetation removal. With implementation of APMs 19-21 and MM CR 1 the potential for an adverse change in the significance of a historical resource would be less than significant.

(b) Would the project cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?

No unique archaeological resources have been identified in the project area. However, project activities within ESAs may result in substantial adverse change in the significance of a unique archaeological resource from vehicle travel or vegetation removal. With implementation of APMs 19-21 and MM CR 1 the potential for an adverse change in the significance of a historical would be less than significant.

(c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

No formal cemeteries or other places of human internment have been identified within the project area. Human remains are not expected to be encountered during project activities. In the event that any human remains or related resources are discovered, such resources would be treated in accordance with state and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5(e). If human remains are discovered, they would be evaluated by the County coroner as to the nature of the remains. If the remains are determined to be of Native American origin, the NAHC would be contacted and a Most Likely Descendent identified. Incorporation of APM 22 into the project will ensure a less than significant impact and compliance with Section 70505 of the California Health and Safety Code and PRC Section 5097.98.

(d) Would the project cause substantial adverse change in the significance of a tribal cultural resource as defined in Section 21074?

No tribal cultural resources have been identified in the project area. However, project activities within environmentally sensitive areas (ESAs) may result in substantial adverse change in the significance of a tribal cultural resource from vehicle travel or vegetation removal. With implementation of APMs 19-21 and MM CR 1 the potential for an adverse change in the significance of a tribal cultural resource would be less than significant.

3.5.5 Mitigation Measures

The following mitigation measures shall be implemented by PG&E:

Cultural and Historical Resources

MM CR-1: **Cultural Resource Monitoring.** Archaeological monitoring shall be conducted within the project study areas considered to have the highest potential for prehistoric cultural resources. These areas include Study Areas 1, 4, 5, 7, 8, 10, 12, 14, 16, 17, 22, 23, 27, 28, 31, and 33. The purpose of the archaeological monitor is to facilitate the identification and avoidance of potential cultural resources during project activities.

3.6 Geology, Soils, and Paleontology

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
(ii) Strong seismic ground shaking?	☐	☐	☒	☐
(iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
(iv) Landslides?	☐	☐	☐	☒
(b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

3.6.1 Introduction

This section describes the existing geology, soils, and paleontology setting and potential impacts from the proposed project. Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the geologic record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., track ways, imprints, burrows, etc.). In general, fossils are greater than 5,000 years old (middle Holocene) and are typically preserved in sedimentary rocks. The project would result in less than significant impacts with respect to geology, soils, and paleontology.

3.6.2 Regulatory Setting

3.6.2.1 Federal

Based on the nature of the project (vegetation removal), no federal regulations are applicable.

3.6.2.2 State

Alquist-Priolo Earthquake Fault Zoning Act

Alquist-Priolo Earthquake Fault Zoning Act is the State law that focuses on hazards from earthquake fault zones. The purpose of this law is to mitigate the hazard of surface fault rupture by regulating structures designated for human occupancy near active faults. As required by the Act, the California Geological Survey has delineated Earthquake Fault Zones along known active faults in California.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was enacted in 1997 to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to map areas subject to seismic hazards. In cases where site-specific seismic hazard risks are present, a geotechnical investigation of the site must be conducted and appropriate mitigation measures incorporated into the project design before development permits will be granted. Additionally, the Act requires a Standardized Natural Hazards Disclosure Statement form be completed by real estate sellers if a property is within one of the designated natural hazards areas.

CEQA and Paleontological Resources

The CEQA Statutes and Guidelines (Title 14 of CCR 15064.5) include procedures for identifying, analyzing, and disclosing potential adverse impacts to historical resources, which include all resources listed in or formally determined eligible for the NRHP, the CRHR, or local registers. CEQA includes in its definition of historical resources "any object [or] site …that has yielded or may be likely to yield information important in prehistory" (14 CCR 15064.5[3]), which is typically interpreted as including fossil materials and other paleontological resources. More specifically, destruction of a "unique paleontological resource or site or unique geologic feature" constitutes a significant impact under CEQA per Appendix G of the CEQA Guidelines.

Treatment of paleontological resources under CEQA is generally similar to treatment of cultural resources, requiring evaluation of resources in the project; assessment of potential impacts on significant or unique resources; and development of mitigation measures for potentially significant impacts, which may include monitoring, combined with data recovery excavation and/or avoidance.

3.6.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.6.3 Environmental Setting

3.6.3.1 Geology

The project lies within the Coastal Ranges geomorphic province of California (Norris and Webb 1976; Harden 2004). This linear province stretches for over 370 miles from the Transverse Ranges in the south to Oregon and is bounded to the east by the Great Valley and the west by the Pacific Ocean. The project is located on

the eastern margin of the central Diablo Mountain Range, a prominent front of rugged peaks, table mountains, and rolling foothills extending south from the San Francisco Bay Region to McClure Valley in Kern County. This range, reaching elevations of nearly 1 mile high, follows the coast inland for nearly 190 miles and is composed of rock suites of Mesozoic and Cenozoic ages (Harden 2004).

The geologic history of the Coastal Ranges includes several major events spanning from the Mesozoic to the Present. Starting around 140 million years ago (Ma) the Farallon plate began subducting (plate moving below other plate and sinking into Earth mantle) beneath the North American plate. Subduction lifted and welded deep-water sedimentary deposits onto the continental margin, and also formed a distinctive metamorphic rock series. This mélange, or sedimentary and metamorphic suite, would become part of the Coastal Ranges' backbone over 100 million years later—the Franciscan complex (Norris and Webb 1976; Harden 2004). Several other events were occurring which would add to the geologic identity of the Coastal Ranges, and North America overrode the Farallon plate by the Miocene (20 Ma). The San Andreas transform boundary was created and spread along the coast, and by the late Pliocene (3 Ma) had pushed the Coastal Ranges up to their modern prominence (Norris and Webb 1976; Harden 2004).

Locally, the project extends from the Panoche Valley, a locally enclosed basin in the shadow of the Griswold Hills, and roughly parallels the Diablo Mountains northwestward until ending in Tres Pinos Creek Valley. The region has been mapped in detail by Dibblee and Minch (2007a, b, c, d, e) at a scale of 1:24,000. Surficial geology in the project area consists of Holocene and Pleistocene alluvial sediments, Eocence Tres Pinos Sandstone deposits, and Jurassic metamorphic and igneous rocks of the Great Valley sequence.

3.6.3.2 Soils

Based on Chapter 11 (Safety) of the San Benito County General Plan Background Report, Figure 11-1, Soil Associations in San Benito County (County of San Benito 2010a), soil associates underlying the proposed study areas include:

- **Panoche-Los Banos-Panhill:** nearly level to steep, well drained, medium and moderately-fine textured soils on alluvial fans and terraces.
- **Rincon-Antioch-Cropley:** nearly level to strongly sloping, well-drained and moderately well drained, medium to fine-textured soils on terraces and alluvial fans.
- **San Benito-Gazos-Linne:** rolling to very steep, well-drained and somewhat excessively drained, moderately fine-textured soils formed over sandstone and shale.
- **Sorrento-Yolo-Mocho:** nearly level to sloping, well-drained, medium-textured soils on flood plains and alluvial fans.
- **Vallecitos-Gaviota-Cibo:** strongly sloping to very steep, well-drained and somewhat excessively drained, medium and fine-textured soils formed over sandstone, shale, or basic igneous rocks.

3.6.3.3 Seismic Setting

Active geologic features within the county are well known, including the San Andreas Fault Zone. The San Andreas Fault is a right lateral strike slip fault and can be traced from offshore near Cape Mendocino in Humboldt County to the Salton Sea in the Imperial Valley. The San Andreas Fault spans the length of San Benito County, stretching 60 miles from the Santa Cruz County line in the north to the Monterey County line in the south. The San Andreas Fault strike is 45 degrees west of north, roughly parallel to the San Benito

River. Other faults near the project include the Bradford Fault and Llanada Fault, which traverse the pipeline route mid-way between Paicines and Panoche (San Benito County 2010a).

The 2008 Report by the Working Group on California Earthquake Probabilities identified a 93% probability of a magnitude 6.7 or greater earthquake, and a 16% probability of magnitude 7.5 or greater earthquake occurring during the next 30 years in northern California (USGS 2008). The San Andreas and Calaveras Faults have the highest earthquake probability within the county. A major earthquake in areas far removed from San Benito County also could have significant direct impacts in the county, including seismic shaking, liquefaction, and ground rupture (County of San Benito 2013).

3.6.3.4 Landslides and/or Liquefaction

Areas at risk for landslides within San Benito County, as determined by the San Francisco Bay Landslide Team, are concentrated along steep topographic slopes within the Gabilan Range. Landslides could occur near Hollister, Tres Pinos, and Paicines. Existing landslides, earthflows, and other similar features are abundant along the numerous faults throughout the county. Some flood prone areas in San Benito County are located in remote tributary valleys that may also be affected by landslides and/or combined hazard effects that could impair emergency response (County of San Benito 2013).

Ground failure and liquefaction has been reported for historical earthquakes within San Benito County. Ground failures and liquefaction near Hollister and San Juan Bautista have been documented including during the 1989 Loma Prieta earthquake when sand boils, lateral spreading, and ground settlement were reported at four locations within San Benito County (County of San Benito 2013). Risk of liquefaction is considered highest near Quaternary alluvial deposits, where soil saturation is close to the land surface, including near surface streams.

3.6.3.5 Paleontology

Geologic units from geological maps of the project area were analyzed for their potential paleontological sensitivity based on the existing literature. The paleontological review was conducted in accordance with the professional guidelines established by the Society of Vertebrate Paleontology (SVP) (1995). Paleontological sensitivity is defined as the potential for a geological unit to produce scientifically significant fossils. In its "Standard Guidelines for the Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontological Resources", the SVP (1995:23) defines four categories of paleontological sensitivity (potential) for Rock units: high, low, undetermined, and no potential. No records searches or field surveys were conducted as part of the paleontological review. The project traverses a large region and covers 14 mapped geologic units; however there is no planned subsurface work for the project. Of these geologic units covered, nine have low sensitivity for paleontological resources, three have unknown sensitivity, and two are considered moderately sensitive for paleontological resources. Table 3.6-1 lists these units along with their descriptions, sensitivity rankings, and study area location.

Table 3.6-1.
Paleontological Sensitivity Rankings for the Paicines Constraints Analysis

Age	Unit	Description	Sensitivity	Study Area
Holocene	Qg	Alluvial gravel and sand of major stream channels	Low	4, 5
	Qa	Alluvial gravel, sand and clay of valley areas	Low	4, 5, 12, 13, 22, 27, 28, 31- 33, Panoche Road
	Qls	Landslide rubble	Low	4, 11, 12-17

Table 3.6-1.
Paleontological Sensitivity Rankings for the Paicines Constraints Analysis

Age	Unit	Description	Sensitivity	Study Area
Pleistocene	Qoa	Dissected alluvial gravel and sand, undeformed	Unknown	11, 22-24
	Qoa1	Older higher level dissected alluvial gravel and sand deposits, undeformed	Unknown	1, 2
	Qoa2	Younger lower level dissected alluvial gravel and sand deposits, undeformed	Unknown	5
	QTs	San Benito Gravel: Pebble gravel/conglomerate of mostly Franciscan rock detritus in sandy to clayey matrix, light gray-brown matrix	Moderate	2, 3, 5, 6, 8-11, 15-20, 22, 25, 26, 29
	QTt	Tulare Formation: Alluvial gravel/conglomerate of pebbles and angular cobbles of Franciscan detritus in sandy to clayey matrix, light gray-brown matrix	Moderate	26-28, 30-35
Eocene	Ttp	Tres Pinos Sandstone: Sandstone, light gray to tan, thick-bedded, medium grained, arkosic	Low	4
Jurassic	sp	Coast Range Ophiolite Complex: hydrothermally metamorphosed from ultramafic igneous rocks, such as dunite or diorite, blue green-gray, massive, amorphous, hydrous magnesium silicate, much fracture and slickensided from expansion	Low	22
	ob	Basalt, black, as flows, locally pillowed	Low	33
Jurassic & Cretaceous	gl	Glaucophane blueschist, schistose but massive, coherent, metamorphosed from ultramafic igneous rock	Low	7, 8, 14
	fg	Greenstone (metabasalt), black, massive, aphanitic	Low	16
	fs	Graywacke sandtone, gray, massive to bedded, hard, fine grained, contains many dark grains, includes interbeds of gray claystone-siltstone, somewhat shattered and sheared	Low	11, 15-30, 32, 33

Note: All geologic data from Dibblee and Minch (2007a, b, c, d, e).

Holocene-aged (10,000 years before present [BP] to Recent) units of alluvial origins (Qq, Qa, Qls) consist of unconsolidated to poorly-consolidated silts, sands and gravels, and may contain bones from modern vertebrates but are too young to contain significant paleontological resources near the surface. Excavations in these deposits could encounter older, sensitive deposits underlying the Holocene sediments. Therefore, Holocene-aged units are assigned low sensitivity for paleontological resources at the surface, increasing with depth.

Pleistocene-aged (1.8 Ma to 10,000 BP) units of alluvial origins (Qoa, Qoa1, Qoa2) consist of sands and gravels deposited by flowing rivers and streams. Currently it is unknown whether these units have yielded fossils in the past; however, they are similar in depositional environment and age to other fossil-bearing deposits from California. Therefore, Pleistocene alluvial deposits are assigned unknown sensitivity for paleontological resources, pending further analysis.

The Pleistocene San Benito Gravel (QTs) and Tulare Formation (QTt) are terrestrial stream and river deposits consisting of coarser sedimentary material originating from rocks of the Franciscan complex. Fossil vertebrates were reported from the San Benito Gravel as early as 1925 (Kerr and Schenck cited in Wilmarth 1938), while the Tulare Formation is well known for producing fossils of fresh water invertebrates (Page 1983). Therefore, the Pleistocene San Benito Gravel and Tulare Formation are assigned moderate sensitivity for paleontological resources.

The Eocene (56 Ma to 33.9 Ma) Tres Pinos Sandstone (Ttp) is a deposit of thick-bedded, massive sands laid down in shallow marine conditions off the California Coast. No diagnostic or significant vertebrate fossils have been recovered from the Tres Pinos Sandstone (Kerr and Shenck 1925 cited in Wilmarth 1938). Therefore, this unit is assigned a low sensitivity for paleontological resources.

The remaining older units, including the Mesozoic Coast Range Ophiolite Complex (sp), basalt (ob), glaucophane blueschist (gl), greenstone (fg), and Franciscan greywacke (fs) are from environments that are not conducive to fossil preservation (due to either high temperatures or high pressures) and as such all assigned a low sensitivity for paleontological resources.

3.6.4 Impacts

(a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The proposed project is located a minimum of approximately 2 miles from the State of California designated Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault (California Department of Conservation 1986a, 1986b). The proposed project is limited to the removal of vegetation within pipeline ROWs and would only expose people to adverse effects during a ground shaking event during the approximate two-month work window. Based on the distance to the San Andreas Fault and the short window of work required for the proposed project, the potential for fault-induced ground rupture across the project area that would result in loss, injury, or death is judged to be low and the impact would be less than significant.

Beneficial Effect: The proposed project would facilitate leak detection and repairs of the gas pipelines if they were damaged during an earthquake.

(ii) Strong seismic ground shaking?

The most likely sources of a large earthquake and seismic ground shaking include the San Andreas Fault and Calaveras Fault. The proposed project is limited to the removal of vegetation within pipeline ROWs and would only expose people to adverse effects during a ground shaking event if it occurred during the two-month work window. Workers would abide by existing regulations regarding worker safety and impacts due to strong seismic ground shaking would result in less than significant impacts.

(iii) Seismic-related ground failure, including liquefaction?

Vegetation removal would be located in areas potentially subject to liquefaction during a ground-shaking event due to the presence of alluvium, surface, and groundwater. In the event liquefaction occurs, the project would not be affected because it does not include structural development. Risk to project workers would be limited to the two-month work window. Workers would be expected to abide by existing regulations required worker safety. Impacts would be less than significant.

Beneficial Effect: The proposed project would facilitate leak detection and repairs of the gas pipelines if they were damaged during an earthquake.

(iv) Landslides

Areas potentially at risk of landslides are generally limited to steeply sloping areas. The proposed project does not include grading or structural development, and would not include any actions that have the potential to create or exacerbate slope failure. Therefore, there would be no impact.

Beneficial Effect: The proposed project would facilitate leak detection and repairs of the gas pipelines if they were damaged during a landslide.

(b) Would the project result in substantial soil erosion or the loss of topsoil?

The proposed project does not include grading or development, and would not result in substantial soil erosion or loss of topsoil. Implementation of the A-ESCP (Section 2.2), APM 12 (Section 2.5), MM BIO-14 (Section 3.4) and the proposed limitation of actions outside of the wet season would reduce the potential for erosion, and impacts would be less than significant.

(c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

The proposed project would not be located on known unstable geologic units or soils. The project would not require grading, and vegetation removal would not cause or be affected by landslides, lateral spreading, liquefaction, or collapse. The project does not include the extraction of groundwater and, therefore, would not result in or contribute to subsidence. Therefore, there would be no impact.

(d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

The project would not include the construction of any structures and would not be affected by expansive soils. No impact would occur.

(e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The proposed project does not include the installation of septic tanks or wastewater disposal systems. No impact would occur.

(f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

No paleontological resources have been identified within the project area. However, the project has the potential to impact paleontological resources if the work affects sensitive, previously undisturbed surficial sediment or sedimentary rock. Based on the nature and size of the project, which does not include grading or other significant earth moving activity, the potential for significant paleontological discovery and impact are anticipated to be low within the proposed work areas. With implementation of APMs 22 and 23, potential impacts to paleontological resources would be less than significant.

3.7 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
(b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
(f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
(h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

3.7.1 Introduction

This section describes the environmental setting and impacts related to hazards and hazardous materials. For the purposes of this analysis, the term “hazards” refers to risk associated with such issues as fires, explosions, exposure to hazardous materials and interference with emergency response plans. For this analysis, “hazardous material” is defined by the California Health and Safety Code, Section 25501: “because of their quantity, concentration, or physical or chemical characteristics, [they] pose a significant present or potential hazard to human health and safety or to the environment if release into the workplace or the environment.”

For this analysis, “hazardous waste” is defined by the California Health and Safety Code Section 25517 and in 22 CCR Section 66261.2 as follows: “because of their quantity, concentration, or physical or chemical characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious

illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed."

Based on the impact analysis, the project would not result in potentially significant adverse impacts from hazards, hazardous materials, or hazardous waste.

3.7.2 Regulatory Setting

3.7.2.1 Federal

United States Environmental Protection Agency

The EPA is primarily responsible for the enforcement and implementation of federal laws and regulations pertaining to hazardous materials. San Benito County is within EPA Region IX, which includes Arizona, California, Hawaii, and New Mexico. Management of hazardous materials is governed by the following law and agencies: the Comprehensive Environmental Response, Compensation, and Liability Act, and the Superfund Amendments and Reauthorization Act of 1986; the Resource Conservation and Recovery Act; the Federal Insecticide, Fungicide, and Rodenticide Act; the Toxic Substances Control Act of 1976, the Occupational Health and Safety Administration; and the Hazardous Waste Operations and Emergency Response.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) oversees floodplain safety, manages the national flood insurance program, and prepares Flood Insurance Rate Maps (FIRM) for communities participating in the federal flood insurance program.

Bureau of Land Management (BLM) – Hollister Field Office 2008 Fire Management Plan

The Bureau of Land Management (BLM) Hollister Fire Management Plan (FMP) is a fire management plan for all BLM land within San Benito County. The plan identifies conditions related to fire management, and provides recommendations for wildland fire suppression, prescribed fire and non-fire fuel treatment projects, and community involvement. The guidelines in the FMP prioritize public and firefighter safety, hazardous fuel reduction, and wildlife risk reduction through prevention, mitigation, and education. The FMP also identifies four specific fire management units and associated fire fuel treatment objectives: the Panoche Wilderness Study Area, the San Benito Natural Area, the Clear Creek Serpentine Area of Critical Environmental Concern, and the San Joaquin Valley South Special Management Area. There is also an Interim Management Plan for the San Benito Mountain Research Area.

3.7.2.2 State

California Fire Plan

The Strategic California Fire Plan was finalized in June 2010, and directs each California Department of Forestry and Fire Protection (CAL FIRE) Unit to prepare a locally specific Fire Management Plan. In compliance with the California Fire Plan, individual CAL FIRE units are required to develop Fire Management Plans for their areas of responsibility. These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties. The plans include stakeholder contributions and priorities, and identify strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

San Benito-Monterey Fire Unit Fire Management Plan

The San Benito-Monterey Fire Plan of 2009 was implemented to prevent the ignition and spread of unwanted, human-caused fires, with an emphasis on reducing losses as a result of large, damaging fires. The

action plan for the unit identifies the process that the San Benito-Monterey CAL FIRE Unit will take to achieve this goal. The plan uses fire history, fuels data, weather data, and assets at risk to identify and prioritize target areas that will receive the majority of pre-fire management activities. The plan also includes proactive pre-fire suppression activities, and public information and education programs. The Unit encompasses over 3 million acres, which includes over 2 million acres within the State Responsibility Area (SRA), representing one of the largest state responsibility jurisdictions in the state. The San Benito-Monterey Fire Plan was adopted in 2009.

California Environmental Protection Agency/Department of Toxic Substance Control

The Department of Toxic Substances Control (DTSC), a division of the California Environmental Protection Agency (CalEPA), has primary regulatory responsibility over hazardous materials in California, working in conjunction with the federal EPA to enforce hazardous materials laws and regulations. DTSC can delegate enforcement responsibilities to local jurisdictions. The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 26. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal.

California Department of Industrial Relations, Division of Occupational Health Administration

The California Department of Industrial Relations, Division of Occupational Safety and Health Administration (CalOSHA), assumes primary responsibility for developing and enforcing workplace safety regulations within the state.

California Office of Emergency Services

The California Office of Emergency Services (OES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks, and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 in order for the state to receive federal funding. The Disaster Mitigation Act of 2000 requires a state mitigation plan as a condition of disaster assistance.

3.7.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.7.3 Environmental Setting

The proposed study areas are located in rural San Benito County, and are not located in proximity to schools or hospitals. Land uses are limited to agriculture, undeveloped open space, and scattered residences and agricultural support structures.

3.7.3.1 Hazardous Materials

Based on a review of the State Water Resources Control Board (SWRCB) GeoTracker (SWRCB 2014) and DTSC Envirostor databases (DTSC 2014), accessed July 8, 2014, there are five properties enrolled in the SWRCB Irrigated Land Regulatory Program proximate to project Study Areas 1, 2, 3, and 4. This program prevents agricultural discharges from impairing waters that receive such discharges by issuing waste discharge requirements or conditional waivers of waste discharge requirements.

The project is not located in any sites identified on a list of hazardous materials sites pursuant to Government Code Section 65962.5, including the Cortese List (DTSC 2012).

3.7.3.2 Wildland Fire Hazards

CAL FIRE and BLM have primary wildland fire management responsibilities in the county including within the vicinity of the project. The San Benito County Fire Department (CAL FIRE under contract with the County), Aromas Tri-County Fire Department, Hollister Fire Department, and San Juan Bautista Volunteer Fire Department have fewer responsibilities for wildland fires. The expanding wildland urban interface (WUI) area and increasing urban populations create a potential for large, damaging, and costly wildfires. Fifty-six percent of the area within the San Benito-Monterey Fire Unit has an overall fire hazard rating of high in the SRA, 30% is rated very high, and 14% is rated moderate. Annual grassland, oak woodland, brush, and conifer species are the four most distinct wildland fuel types in the San Benito County portion of the San Benito-Monterey Fire Unit (County of San Benito 2010a).

The most recent study conducted by CAL FIRE (2007) of Fire Hazard Severity Zones in San Benito County indicates that the project falls within moderate, high, and very high fire hazard severity zones. Severity is measured using three criteria: fuel loading (vegetation); fire weather (winds, temperatures, humidity levels and fuel moisture contents); and topography (degree of slope) (CAL FIRE 2012). According to the San Benito County Community Wildfire Protection Plan (CWPP), the majority of the county falls within a high fire hazard severity zone (CAL FIRE 2007), and particularly the lands in the northernmost and eastern portions of the county including the project location (San Benito County Fire Safe Council 2010). The San Benito County CWPP identifies communities with priority ratings for also being “at-risk” proximate to the project area including Antelope Valley, Paicines, Panoche Valley, and Tres Pinos.

3.7.4 Impacts

(a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed project would not require the routine transport, use, or disposal of hazardous materials. The proposed project would use some hazardous materials that are limited to approved herbicides and oils and fuels associated with vehicles and with equipment used for vegetation removal, including chainsaws, chippers, tractors, and compact rubber-tracked loaders. Refueling and equipment maintenance would not occur within 100 feet of surface waters or drainages (APM 14) and secondary containment would be provided for any hazardous materials (APM 15, Section 2.5). Regular fueling and maintenance activities would be performed offsite. Given the minimal amounts of hazardous materials anticipated for use in the project and the measures in place to contain these materials, potential impacts would be less than significant.

(b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

PG&E would properly maintain all project equipment to prevent leaks of fuels, lubricants, or other fluids into waterways. Emergency spill supplies and equipment would be kept adjacent to work areas, and would be clearly marked. PG&E would take appropriate precautions when handling and/or storing chemicals (e.g., fuel and hydraulic fluid) near surface waters and drainages, and all applicable state and federal laws and regulations would be followed (APMs 14 and 15, Section 2.5). Appropriate materials would be onsite to prevent and manage incidental spills or leaks (A-ESCP, Section 2.2). Therefore, the project would not create a significant hazard to the public or the environment as a result of the release of hazardous materials, and potential impacts would be less than significant.

(c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The proposed project is not located within one-quarter mile of an existing or proposed school; no impact would occur.

(d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The proposed project is not located on a site that is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5; no impact would occur.

(e) Would the project or a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The proposed project is not located within the Airport Influence Area or Airport Land Use Commission Review Area for the Hollister Municipal Airport (San Benito County Airport Land Use Commission 2012), and is not within two miles of a public airport or public use airport. The project would entail vegetation management and does not include any elements that would have an adverse effect on air traffic, nor would it expose onsite workers to safety hazards related to air traffic. Therefore, there would be no impact.

(f) Would the project occur within the vicinity of a private airstrip, or would the project result in a safety hazard for people residing or working in the project area?

Project Study Areas 1 and 2 are located approximately one mile from a private airstrip that is not in regular use. The project would entail vegetation management and does not include any features that would adversely affect air traffic, and would not expose onsite workers to increased risk because of the potential use of the landing strip during project implementation. Therefore, potential impacts would be less than significant.

(g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would not impair implementation of, or physically interfere with, an emergency response plan or emergency evacuation plan because no road closures are proposed or anticipated. As a standard measure, emergency access and evacuation procedures would be developed and implemented as part of the onsite health and safety plan (APM 24, Section 2.5). Therefore, impacts would be less than significant. The proposed project would facilitate leak detection and repairs of the gas pipelines in the event of an emergency.

(h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Implementation of the project would require the use of equipment within rural vegetated wildlands that are susceptible to wildland fires. Heat or sparks from vehicles or equipment have the potential to ignite dry vegetation and cause a fire. Spark arrestors would be used on all internal combustion engines. Open fires are not proposed and would not be allowed at or near worksites. With the implementation of preventative measures as described in APM 3, 24 and 28 (Section 2.5), the potential for fire would be less than significant.

3.8 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
(b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?	☐	☐	☐	☒
(d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☐	☒
(e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
(f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
(j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

3.8.1 Introduction

This section documents the existing hydrological setting in the project and evaluates the potential impacts of project implementation.

3.8.2 Regulatory Setting

3.8.2.1 Federal

Federal Clean Water Act

In addition to Section 404 of the CWA described under Section 3.4.2.1, Section 303 of the CWA requires states to adopt water quality standards for all surface water of the United States. In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendments to the CWA added Section 402(p), which establish a framework for regulating municipal and industrial stormwater discharges, including discharges associated with construction activities, under the NPDES program. The SWRCB and the RWQCBs are responsible for ensuring implementation and compliance with the provisions of the federal CWA.

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program, which subsidizes flood insurance to communities that limit development in floodplains. As part of this program, FEMA maps all United States areas that fall within a 100-year floodplain (i.e., areas with a greater than 1% annual probability of flooding). Project study areas within the high-risk flood zones (Zone A, 100-year floodplain, no base elevation determined) include the following:

- Study Areas 4 and 5 (Los Muertos Creek)
- Study Area 10 (Las Aguilas Creek)
- Study Areas 13 and 14 (Tres Pinos Creek)
- Study Area 33 (Panoche Creek)

All other study areas are located within FEMA Zone X (locations outside of the 0.2% annual chance flood).

3.8.2.2 State

Porter-Cologne Water Quality Control Act

SWRCB and the nine RWQCBs have State authority to regulate water quality under the Porter-Cologne Water Quality Control Act (Porter-Cologne) and CCR Title 27 Sections 22560 through 22565. The SWRCB and the RWQCBs have the authority under this act to regulate waste discharge to surface waters or land.

California Fish and Game Code

Under Sections 1600–1616 of the California Fish and Game Code, CDFW regulates activities that would substantially alter the bed, channel, or bank of any river, stream, or lake. This is discussed further in Section 3.4, Biological Resources.

Groundwater Management Act

The Groundwater Management Act (California Water Code Section 10750-10755.4) provides a systematic procedure for a management agency to develop a groundwater management plan. San Benito County Water District, in collaboration with local organizations, has developed a groundwater management plan consistent with the California Water Code, and is actively managing groundwater resources.

3.8.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.8.3 Environmental Setting

3.8.3.1 Climate

San Benito County has a moderate California coastal climate with a hot and dry summer season typically lasting from May through October. Average annual rainfall ranges from seven inches in the drier eastern portion of the county to 27 inches per year in high elevations to the south (County of San Benito 2010a). Most of the annual rainfall occurs in the fall, winter, and to a lesser extent spring, generally between November and April.

3.8.3.2 Surface Water Resources

Twenty-six CDFW-jurisdictional features and adjacent riparian areas are located within the proposed work areas. These features consist of ephemeral drainages throughout the project that ultimately drain to either the Pajaro River to the west or Panoche Creek to the east. Creeks that the project crosses include Los Muertos Creek, Las Aguilas Creek, Tres Pinos Creek, and Panoche Creek.

3.8.3.3 Groundwater Resources

Groundwater is the major source of water supply in San Benito County. Groundwater is generally available throughout the county for limited domestic and livestock supplies. The county includes all or portions of 12 groundwater basins that provide water for municipal, agricultural, and industrial uses. Most groundwater production and use in the county occurs in the Gilroy-Hollister groundwater basin to the north of the project. The basin, composed of alluvial deposits with varying aquifer properties and both unconfined and confined conditions, has been subdivided for management purposes into subbasins (County of San Benito 2010a). Underlying groundwater basins include Tres Pinos Valley (near Study Areas 1 through 8) and Panoche Valley (near Study Areas 29 through 35). The Tres Pinos Valley groundwater basin drains northward as part of the San Benito River system, and Panoche Valley groundwater basin drains east towards the San Joaquin River (County of San Benito 2010a).

3.8.4 Impacts

(a) Would the project violate any water quality standards or waste discharge requirements?

Potential water pollutants could be generated including soil sediment and petroleum-based fuels or lubricants associated with equipment used during the project. The project does not include any grading activities and all project activities would be conducted outside of the wet season. APMs 11-15, and 26 (Section 2.5) would restrict vegetation removal and fueling activities to areas away from water features and require standard sediment and erosion control and would ensure that no silt or hazardous material enters watercourses during the project. Therefore, the project would not violate any water quality standards or waste discharge requirements, and potential impacts would be less than significant.

(b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

The project would include the use of at least 300 gallon water buffalos to implement dust and fire suppression as necessary (APM 3, Section 2.5). This use would not result in a significant demand for water resources, and existing supply is adequate for use during the 2-month project period. Therefore, the project would not deplete groundwater supplies and does not include any actions that would affect groundwater recharge. Impacts would be less than significant.

(c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite?

The proposed vegetation removal activities would not alter the existing drainage patterns within the project, and would not result in the alteration of affected creeks; no impact would occur.

(d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Proposed actions within Study Areas 4, 5, 10, 13, 14, and 33 (Flood Zone A) would be limited to vegetation removal, which would not alter the existing drainage patterns or result in an increase in surface runoff that could increase flooding on or off-site. If the proposed project would create bare ground in excess of 30 percent of the original cover, the area would be reseeded to reduce runoff, as required by MM BIO-14 (Section 3.4). Impacts would be less than significant.

(e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The proposed project would not include grading activities or the creation of additional impervious surfaces. No stormwater drainage systems are present within the project. If project soil disturbance creates bare ground in excess of 30 percent of the original cover, then the area will be reseeded with a native mix after project completion (MM BIO-14; Section 3.4). Therefore, impacts would be less than significant.

(f) Would the project otherwise substantially degrade water quality?

Please refer to (a) above. Potential impacts would be less than significant.

(g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The proposed project does not include housing; no impact would occur.

(h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The proposed project does not include the construction of any structures; no impact would occur.

(i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The proposed project does not include any actions that would result in on or off-site flooding, and does not include any permanent structures. The project would be implemented outside of the wet season, and would not expose workers to potential flood risk. Therefore, no impact would occur.

(j) Would the project be exposed to inundation by seiche, tsunami, or mudflow?

The proposed project does not include any structures or features that would be affected by mudflow, and the project is not located in an area subject to seiche or tsunami. Therefore, no impact would occur.

3.9 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Physically divide an established community?	☐	☐	☐	☒
(b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
(c) Conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?	☐	☐	☐	☒

3.9.1 Introduction

This section includes information on the regulatory and environmental setting and includes analysis of potential land use impacts resulting from the project.

3.9.2 Regulatory Setting

3.9.2.1 Federal

No federal regulations or policies related to land use and planning resources are applicable to the project.

3.9.2.2 State

No state regulations or policies related to land use and planning resources are applicable to the project.

3.9.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.9.3 Environmental Setting

The project is located in rural San Benito County, within the Agricultural Rangeland General Plan designation and AR (Agricultural Rangeland) zone (County of San Benito 2010b).The AR zone and land use designation applies to remote hillside areas, watershed, and rangeland. These areas generally lack transportation access and utility services, and are within high to very high fire hazard zones. The intent of the AR zone is to provide areas to be used for agricultural rangeland.

3.9.4 Impacts

(a) Would the project physically divide an established community?

The proposed project is limited to vegetation management activities within a rural area. The project would not physically divide an established community; no impact would occur.

(b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

As stated previously, the project is not subject to local discretionary regulations. However, the project would be consistent with the policies of the San Benito County General Plan, as noted in applicable resource sections in this document. As discussed in Sections 3.1, Aesthetics, and 3.11, Noise, the project would have less than significant visual and noise impacts. PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

(c) Would the project conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan?

See response to 3.4 Biological Resources (f).

3.10 Minerals

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
(b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

3.10.1 Introduction

This section discusses potential minerals found in San Benito County and the potential for minerals to be present and recoverable in the project study areas.

3.10.2 Regulatory Setting

3.10.2.1 Federal

There are no specific federal regulations applicable to mineral resources.

3.10.2.2 State and Local

California Surface Mining and Reclamation Act of 1975

The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted in response to land use conflicts between urban growth and essential mineral production. SMARA (PRC Section 2710 et seq.; subsequently amended) is the primary regulation for onshore surface mining in the State. SMARA mandated that aggregate resources throughout the State be identified, mapped, and classified by the State geologist so that local governments could make land use decisions in light of the presence of aggregate resources and the need to preserve access to those resources. Local jurisdictions are required to enact specific plan procedures to guide mineral conservation and extraction at particular sites, and to incorporate mineral resource management policies in their general plans. The Division of Mines and Geology has prepared Mineral Land Classification Maps for aggregate resources. The maps designate four different types of resource sensitivities. The four sensitivity types are:

- **Mineral Resource Zone (MRZ) -1:** Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood for their presence exists.
- **MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- **MRZ-3:** Areas containing mineral deposits the significance of which cannot be evaluated from available data.
- **MRZ-4:** Areas where available information is inadequate for assignment of any other MRZ zone.

3.10.3 Environmental Setting

Two MRZ Sectors fall within San Benito County, including Sectors E and F. Sector F is located near the Pajaro Gap, over 20 miles northwest of the project area. Sector E is located along the channel of the San Benito River from Tres Pinos to the county line in the northwest, and approximately 0.5 mile southwest of Study Areas 1, 2, 3, and 4. This sector includes the Holocene Stream Channel and Terrace Deposits adjacent to the San Benito River and Tres Pinos Creek. Total reserves in Sector E were calculated at 226 million tons; all resources were considered Portland cement concrete grade (PCC grade), and all the resources were classified as MRZ-2 (County of San Benito 2013).

3.10.4 Impacts

(a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Based on available geologic maps, it is unlikely that economically significant mineral deposits are present in the project area. The project is located within a geologic area made up largely of sandstone, shale, and conglomerate and is underlain by igneous and sedimentary rock. While mineral deposits along the Tres Pinos River near Paicines, and outside of the project, have been shown to contain significant mineral deposits (or where it is judged that a high likelihood exists for their presence), none of the project lies within this zone. Therefore, no impact would occur.

(b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The proposed project is not located on a locally-important mineral resource recovery site; no impact would occur.

3.11 Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.11.1 Introduction

This section analyzes the potential noise sources associated with project vegetation removal, including the use of chainsaws, chippers, and equipment for vegetation removal, chipping, and hauling.

3.11.2 Regulatory Setting

3.11.2.1 Federal

There are no federal regulations that limit overall environmental noise levels for this type of project.

3.11.2.2 State

There are no state regulations specific to the project.

3.11.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted)

permits prior to commencing project activities. Although PG&E's project is not subject to County plans, policies, or regulations, it is nevertheless consistent with general plan policies and the County's noise ordinances. Under County Code Section 19.39.051 (Q), public utility personnel are exempt from the Noise Chapter.

3.11.3 Environmental Setting

The proposed project is located in rural areas in the county, within agricultural lands. The area is sparely populated, and a majority of the project is not proximate to existing residences. Study Areas 8, 15, 16, 20, 21, and 22 are within approximately 0.6 mile (3,170 feet) from the nearest residence; Study Areas 3 and 4 are within 0.3 mile (1,585 feet) of a residence; and Study Areas 11, 12, 23, and 26 are within approximately 0.2 mile (1,060 feet) of a residence. Study areas 5, 10, and 25 are within 0.1 mile (530 feet) of a residence. All other study areas are located over 0.6 mile from the closest residence. All study areas are located in areas that provide habitat for wildlife and grazing land for livestock, and many areas are located in riparian areas. Existing ambient noise levels in the area have not been measured. Noise sources include traffic and agricultural uses.

3.11.4 Impacts

(a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The proposed project would occur within 35 individual study areas over a 2-month period. The average work time within each study area would vary, and would be limited to daylight hours at least 0.5 hour after sunrise and up to 0.5 hour after sunset (APM 9, Section 2.5). The use of equipment including chainsaws, chippers, and project vehicles would generate noise that would be noticeable by residents and potentially livestock; however, these activities would be short term, temporary, and would not occur during nighttime hours. In accordance with APM 1, PG&E would provide notification to landowners including a description of the project schedule and contact information for submitting complaints about potential nuisances including noise. The project would not generate stationary or operational noise in the long term. Therefore, based on the nature of the project and implementation of APMs 1, 9, 26, and 27, potential impacts would be less than significant.

(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The project does not include any actions that would generate vibrations or groundborne noise; no impacts would occur.

(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The project actions are short term and would not result in a permanent increase in the ambient noise level; no impact would occur.

(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Please refer to (a) above. Based on the short-term nature of the project, and implementation of and APMs 1, 9, 26, and 27, the temporary increase in ambient noise levels would not be substantial. Potential impacts would be less than significant.

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project is not located within 2 miles of a public airport or public use airport; no impact would occur.

(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Project Study Areas 1 and 2 are located approximately 1 mile from a private airstrip that is not in regular use. Due to the short term nature of the project work and the limited use of the private airstrip, onsite workers are not expected to be adversely affected. No impact would occur.

3.12 Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
(c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.12.1 Introduction

This section describes the existing conditions and potential impacts to population and housing. The project would neither impact the regional or local population nor require the displacement of existing housing.

3.12.2 Regulatory Setting

3.12.2.1 Federal

There are no federal regulations relevant to population and housing applicable to the project.

3.12.2.2 State

There are no state regulations relevant to population and housing applicable to the project.

3.12.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.12.3 Environmental Setting

The project is located in a sparsely developed area of San Benito County, just east of Paicines. The areas surrounding the existing study areas are predominately rural ranch land. The proposed project does not include developing new housing or businesses or land use changes. The majority of project crewmembers are expected to come from the local area or commute from neighboring counties and cities.

3.12.4 Impacts

(a) Would the project induce substantial population growth in an area, either directly or indirectly?

The proposed project would not result in an increase in utility or infrastructure capacity. The existing workforce is sufficient to supply the expected approximately 8 to 24 workers per day over approximately 2 months and would not require workers to relocate to the area. The project would not alter the location, distribution, density, or growth rate of the population and would not result in direct or indirect impacts to population growth. No impact would occur.

(b) Would the project displace substantial existing numbers of existing housing units, necessitating the construction of replacement housing elsewhere?

The proposed project would not require the displacement of housing; no impact would occur.

(c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing?

The proposed project would not require the displacement of people; no impact would occur.

3.13 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
(i) Fire protection?	☐	☐	☒	☐
(ii) Police protection?	☐	☐	☐	☒
(iii) Schools?	☐	☐	☐	☒
(iv) Parks?	☐	☐	☐	☒
(v) Other public facilities?	☐	☐	☐	☒

3.13.1 Introduction

This section describes the existing conditions and potential impacts to public services. Public services include fire and police protection and maintenance of public facilities, such as schools and hospitals. No impacts would occur to public services because of this project.

3.13.2 Regulatory Setting

3.13.2.1 Federal

No federal regulations relevant to public services are applicable to the project.

3.13.2.2 State

California Fire Code

In accordance with CCR Title 8, Division 1, Chapter 4, the California Division of Occupational Safety and Health (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all fire-fighting and emergency medical equipment.

3.13.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local

ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.13.3 Environmental Setting

3.13.3.1 Emergency Services

Structural fire management responsibilities in the county are distributed among the San Benito County Fire Department, the Aromas Tri-County Fire Department, the Hollister Fire Department, and the San Juan Bautista Volunteer Fire Department. As noted in Section 3.7.3.2, the project area falls within San Benito County's moderate, high, and very high fire hazard severity zones. When resources are available, and under existing aid agreements, CAL FIRE may assist other departments with structural fires and other types of wild-land fire calls. The CAL FIRE station nearest to the project is the Antelope Station located at 20400 Panoche Road about 18 miles east of Paicines. The next closest station is the CAL FIRE Bear Valley Station located just north of Paicines at 25820 Airline Highway.

Law enforcement and emergency services within the project vicinity are provided by the San Benito County Sheriff's Office which is made up of 16 units and divisions and has 21 sworn deputy allocations serving the unincorporated parts of the county (County of San Benito 2013). This number does not include sworn officers for incorporated cities. This represents a 2013 staffing level of 1.1 officers per 1,000 residents, based on an unincorporated population of approximately 18,427.

The nearest medical facility to the project is Hazel Hawkins Memorial Hospital located in Hollister, approxi-mately 10 miles north of Paicines.

3.13.3.2 Schools

The nearest schools to the project include Willow Grove Elementary School and Cienega Elementary School (both located just north and west, respectively, of Paicines and approximately 2 miles west of Study Area 1). Panoche Elementary School is located approximately 5 miles east of Study Area 33.

3.13.3.3 Parks

San Benito County includes approximately 144,416 acres of parkland within several large and significant parklands that are owned and operated by the federal and state governments, including Pinnacles National Park (approximately 17 miles north of Paicines), Hollister Hills State Recreational Vehicle Area (approxi-mately 9 miles west of Paicines), and Fremont Peak State Park (approximately 13 miles west of Paicines).

3.13.3.4 Other Public Services

There are no other applicable public services proximate to the study areas.

3.13.4 Impacts

(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

(i) Fire protection?

The proposed project is limited to vegetation removal within a 2-month timeframe. As noted in APM 28 (section 2.5), PG&E will implement standard practices to reduce the potential for an accidental fire during

project activities. Based on the duration of the project and implementation of APM 28, the project is not anticipated to create any additional demand for fire protection, and would not require the construction of new facilities. Impact would be less than significant.

(ii) Police protection?

Based on the nature and duration of the project, additional demand for police protection is not anticipated, and the project would not require the construction of new facilities. No impact would occur.

(iii) Schools?

The project would be located 2 miles from the nearest school and would not increase the number of students using these facilities. No impacts to schools would occur.

(iv) Parks?

The project would be located 9 miles from the nearest park and would not increase the number of individuals using these facilities. No impacts to parks would occur.

(v) Other public facilities?

The proposed project would not result in an increase in population, and would not affect any noted public facilities. No impact would occur.

3.14 Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

3.14.1 Introduction

This section evaluates existing recreational opportunities and the project's potential to cause increases in use or the need for construction and expansion of recreational facilities. The proposed project would not have impacts to recreational opportunities.

3.14.2 Regulatory Setting

3.14.2.1 Federal

No federal regulations relevant to recreation are applicable to the proposed project.

3.14.2.2 State

No state regulations relevant to recreation are applicable to the proposed project.

3.14.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.14.3 Environmental Setting

See 3.13.3.3 Parks. No recreational resources are located within the project area (County of San Benito 2010c).

3.14.4 Impacts

(a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project is limited to vegetation removal within the identified study areas, which would result in 8 to 24 workers onsite per day. Workers are anticipated to come from the existing regional workforce, and the project would not result in additional housing or population growth. Therefore, the project would not create a new or increased demand for parks or recreational facilities in the county, and no impact would occur.

(b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project would not include recreational facilities or the expansion of existing facilities; no impact would occur.

3.15 Traffic and Transportation

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
(b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
(c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
(d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
(e)	Result in inadequate emergency access?	☐	☐	☐	☒
(f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

3.15.1 Introduction

This section describes existing traffic and transportation conditions. The project would not result in impacts to traffic and transportation.

3.15.2 Regulatory Setting

3.15.2.1 Federal

There are no federal regulations relevant to traffic and transportation applicable to the project.

3.15.2.2 State

There are no state regulations relevant to traffic and transportation applicable to the project.

3.15.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over

the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.15.3 Environmental Setting

Roadways and intersections are rated at varying levels of service (LOS). LOS is a measure of roadway operating conditions, ranging from LOS A, which represents the best range of operating conditions to LOS F, which represents the worst. LOS can be estimated based on the average delay experienced by vehicles on the roadway.

Access to project work areas would be provided by Panoche Road (also known as Junction 1) (a two-lane arterial), local roads including Browns Valley Road, Cottonwood Road, Payne Creek Road, Moody Canyon Road, several unnamed private access roads (with landowner permission), and PG&E access roads. Panoche Road would be accessed via State Route 25, which is classified as a Rural Minor Arterial south of Hollister. State Route 25 operates at LOS A in the vicinity of the project (County of San Benito 2010a). The intersection of State Route 25 and Panoche Road is operating at an acceptable LOS based on 2009 data identified in the General Plan Background Report (County of San Benito 2010a).

3.15.4 Impacts

(a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Traffic generated by the project would be limited to a 2-month period. Vehicles would include light duty trucks for crew transport and vegetation hauling, and transport trailers to haul the equipment to each study area. Approximately 8 to 24 workers would travel to each work area per day. The project would not generate long-term increases in traffic. The limited number of daily workers would not generate noticeable additional trips on local roadways or State Route 25. Based on the size and short-term nature of the project, the project would not degrade LOS on the affected roadways, and no impact would occur.

(b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Please refer to (a) above. Based on the size and duration of the project, no impact would occur.

(c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

The project does not include air traffic or a change in air traffic location. No impact would occur.

(d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project does not include any structures or design features and would not result in incompatible vehicles or equipment in the area. As applicable, standard traffic controls and signage would be used to ensure the safety of workers, the public, and landowners (APM 29, Section 2.5). For use of pri-

vate roads, property owners would be notified a minimum of 30 days before the start of the project (APM 1, Section 2.5). Potential impacts would be less than significant.

(e) Result in inadequate emergency access?

Existing emergency access in the vicinity of the project would not be affected by project activities as the project activities would not block any roads. No impact would occur.

(f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Please refer to (a) above. Based on the location and nature of the project, no impact would occur.

3.16 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
(b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
(c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
(e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
(g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

3.16.1 Introduction

This section evaluates the potential impacts of the project on utilities and service systems including wastewater, solid waste, stormwater drainage facilities, and water supplies. The project would not result in impacts to utilities or service systems.

3.16.2 Regulatory Setting

3.16.2.1 Federal

There are no federal standards relevant to utilities and service systems applicable to the project.

3.16.2.2 State

Groundwater Management Act

The Groundwater Management Act (California Water Code Section 10750-10755.4) provides a systematic procedure for a management agency to develop a groundwater management plan and is described under Section 3.8.2.2.

California Code of Regulation

In accordance with CCR Title 27, Division 2, Subdivision 1, Chapter 4, Section 21440 through 22103, solid and hazardous waste transfer and disposal facilities in San Benito County are regulated jointly by the Central Coast RWQCB and the California Department of Resources Recycling and Recovery (CalRecycle) (formerly the Integrated Waste Management Board). Compost facilities are regulated under CCR Title 14, Division 7, Chapter 3.1 Section 17850 through 17895, by CalRecycle. Permit requests, Reports of Waste Discharge, and Reports and Disposal Site Information are submitted to the RWQCB and CalRecycle, and are used by the two agencies to review, permit, and monitor these facilities. Both the RWQCB and CalRecycle regulate facilities individually and through local enforcement agencies staffed by San Benito County employees. In San Benito County, the local enforcement agency for CalRecycle was the Environmental Health Division.

The Integrated Waste Management Department is responsible for oversight of landfill operations and the County refuse/recycling contract. In addition, this Department is responsible for compliance with State of California mandated waste diversion goals of 50% (AB 939) and serves as lead agency for the San Benito County Integrated Waste Management Regional Agency, which consists of the unincorporated County and the cities of Hollister and San Juan Bautista. The San Benito County Integrated Waste Management Regional Agency is primarily responsible for ensuring compliance with federal and state mandated regulations that ensure public health and safety related to refuse and household hazardous waste. Activities consist of the following: landfill operations oversight and regulatory compliance, refuse and recycling contract oversight, Household Hazardous Waste program, Small Quantity Generator program, and public education on waste diversion and household hazardous waste.

California Environmental Protection Agency/Department of Toxic Substance Control

As described in Section 3.7.2.2, DTSC has primary regulatory responsibility over hazardous materials in California, working in conjunction with the EPA to enforce and implement hazardous materials laws and regulations.

3.16.2.3 Local

The CPUC has exclusive jurisdiction over the location, design, construction, operation, maintenance, and repair of PG&E's gas transmission system (Article XII, Section 8 of the California Constitution). CPUC Decision 10-04-034 clarifies that the CPUC'S authority preempts local zoning regulations, ordinances, codes, or requirements that conflict with the CPUC's regulatory power as granted by California State Legislature over the construction, maintenance, and operation of utility property. Although San Benito County lacks discretionary authority over the proposed project, CPUC-regulated gas utilities are still required to obtain local ministerial permits. Therefore, as stated in CPUC Decision 10-04-034 regarding a project proposed by the owner of a gas utility under CPUC jurisdiction, PG&E shall obtain all applicable ministerial (non-preempted) permits prior to commencing project activities.

3.16.3 Environmental Setting

3.16.3.1 Water

Underlying groundwater basins within the project area are described in Section 3.8.3.3. The project would not require the use of wells or groundwater; water would come from municipal, private, or CAL FIRE sources.

3.16.3.2 Wastewater

There are no permanent or temporary wastewater facilities in the project area.

3.16.3.3 Landfills

The John Smith Road Landfill is the operating solid waste landfill within the county (about 7 miles north of Paicines and just east of the city of Hollister). It is a Class III municipal waste landfill owned by the County and operated by a private firm, Waste Connections. There are several compost sites that process inert, green, and agricultural waste within the county. San Benito County provides a receiving site for household hazardous waste (HHW) disposal at the John Smith Road Landfill site. It receives HHW, including car batteries, latex paints, used oil and oil filters, anti-freeze, pesticides, herbicides, paints and thinners, and pool chemicals.

3.16.4 Impacts

(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

The proposed project would not result in the generation of wastewater; no impact would occur.

(b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The proposed project would not result in a long-term demand for water resources or generate wastewater; it would not require or result in the construction of new water or wastewater treatment facilities, or expansion of existing facilities. No impact would occur.

(c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The project would not increase impervious surfaces or generate stormwater requiring management; it would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. No impact would occur.

(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

The project would include the use of water buffalos to implement dust suppression as necessary (APM 3, Section 2.5). This use would not result in a significant demand for water resources, and existing supply is adequate for use during the 2-month project period. Therefore, impacts would be less than significant.

(e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Portable toilets will be used within or near project work areas and waste would be disposed of at a local wastewater treatment plant by the service provider (APM 30, Section 2.5). There would be no long-term generation of domestic waste. Therefore, impacts would be less than significant.

(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Waste generated by the project would be limited to refuse generated by employees and vegetative "spoils" that would be lopped or chipped and scattered within the ROW, stacked for landowners' use for native oak tree removal, or hauled off-site for invasive plant material. Trash, debris, and invasive plant material hauled off-site (per APM 17, Section 2.5) would be reused or disposed of as appropriate and would not affect the permitted capacity at the local landfill. Therefore, impacts would be less than significant.

(g) Comply with federal, state, and local statutes and regulations related to solid waste?

Disposal of waste would comply with all applicable regulations. No impact would occur.

3.17 Mandatory Findings of Significance

	Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☐	☒	☐
(c)	Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

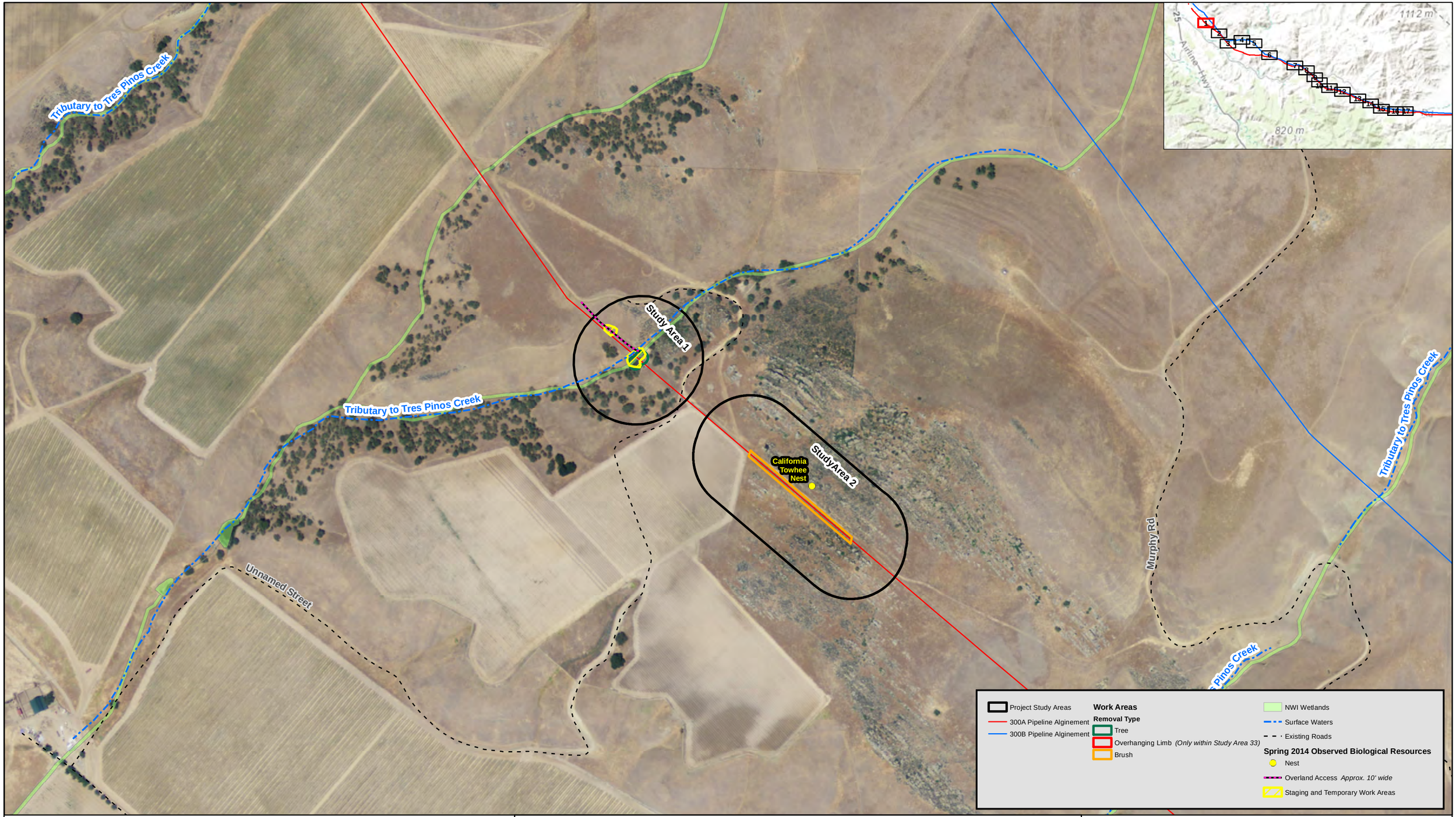
(a) PG&E submitted a Lake or Streambed Alteration Notification under California Fish and Game Code Section 1602 to the California Department of Fish and Wildlife. Section 3.4, Biological Resources, and Section 3.5, Cultural Resources, discuss the existing resources in the project area and conclude that the project would result in less-than-significant impacts to all biological and cultural resources with implementation of APMs and mitigation measures. Based on the discussions in Sections 3.4 and 3.5, the project does not have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of a rare or endangered plant or animal; or eliminate important examples of the major periods of California history or prehistory. Consistent with the CEQA Guidelines (Section 15065), a project could have a significant cumulative impact if the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of present projects, and the effects of probable future projects. Cumulative impacts can result from individually minor but collectively significant effects occurring over a period of time. The proposed project would result in less than significant impacts in all resource areas with implementation of APMs and MMs. The proposed project is located in a rural, agricultural area within San Benito County, and no development projects are proposed proximate to the proposed project. The Panoche Valley Solar Farm project is proposed approximately 4 miles east of Study Area 35. The Final EIR for the solar project identified potentially significant and unavoidable impacts to aesthetics, biological resources, and noise. Based on the analysis conducted during this Initial Study, the proposed vegetation management project would not result in significant impacts to resources identified in the Panoche Valley Solar Farm Final EIR, because the proposed project would be completed by October 2016 and it is unlikely that it would overlap with the con-

struction and operation of the Panoche Valley Solar Farm. Additionally, the proposed project would avoid or minimize impacts to special-status species, and no significant long-term habitat conversion would occur; therefore, with implementation of APMs and MMs, the proposed project would not result in a cumulatively considerable effect to any environmental resource or the environment.

(b) There are no significant environmental impacts resulting from the proposed project and no significant adverse effects on human beings, directly or indirectly, would result during project implementation.

Appendix A

Project Location Maps



Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

0 200 400 800 Feet

N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

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Project Location Maps 1 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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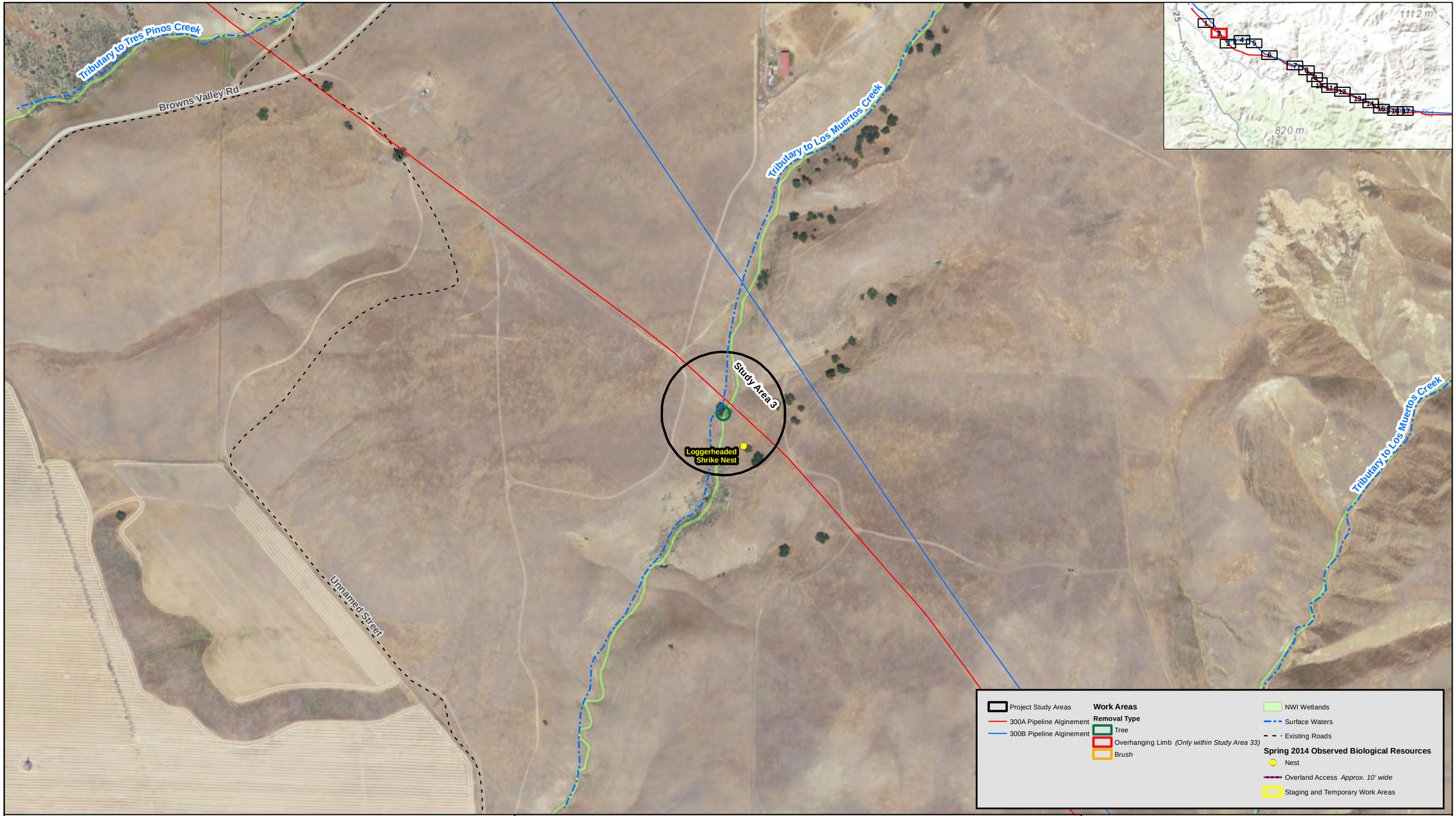

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USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 2 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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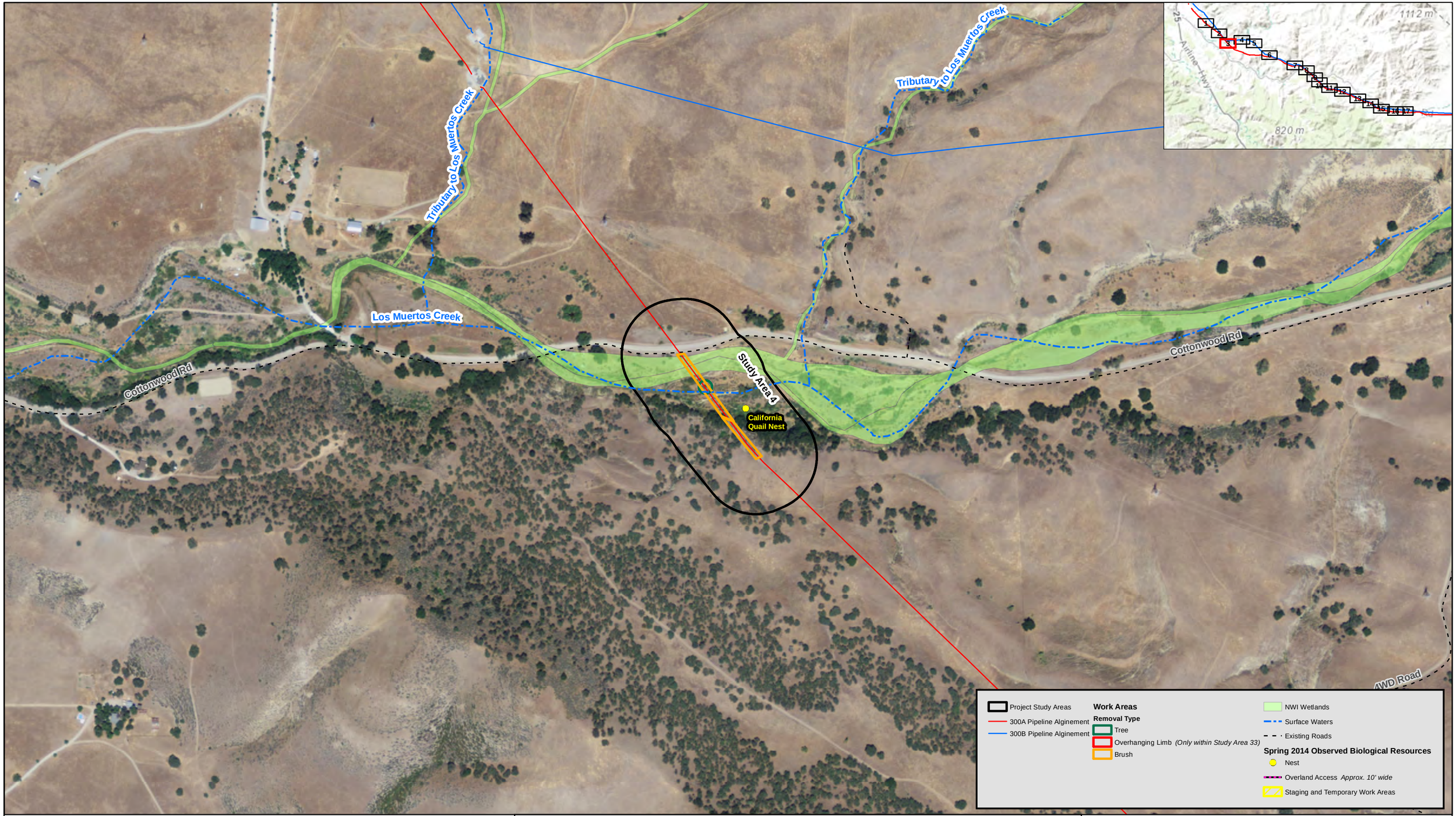

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USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

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Project Location Maps 3 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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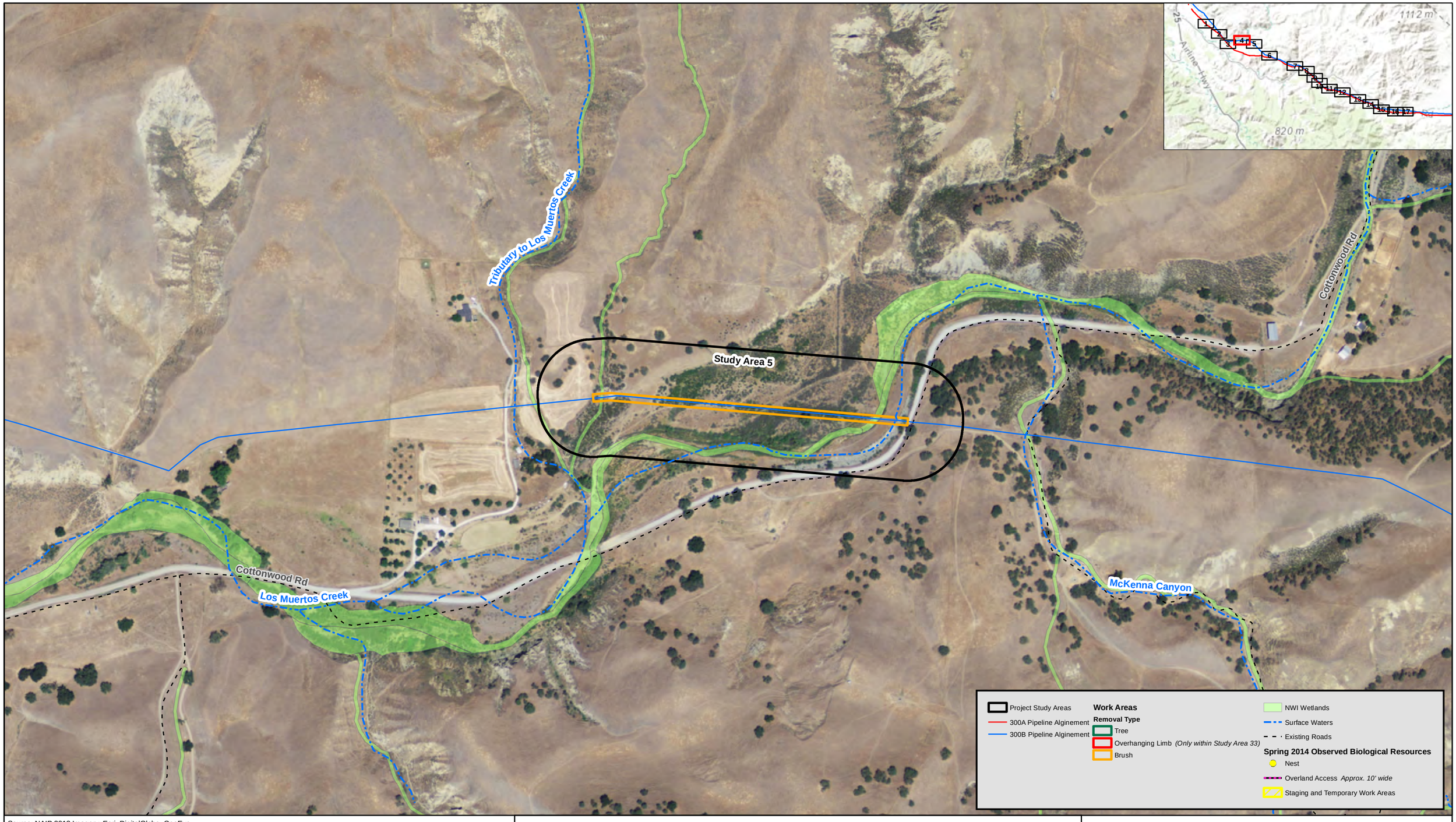

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USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

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Project Location Maps 4 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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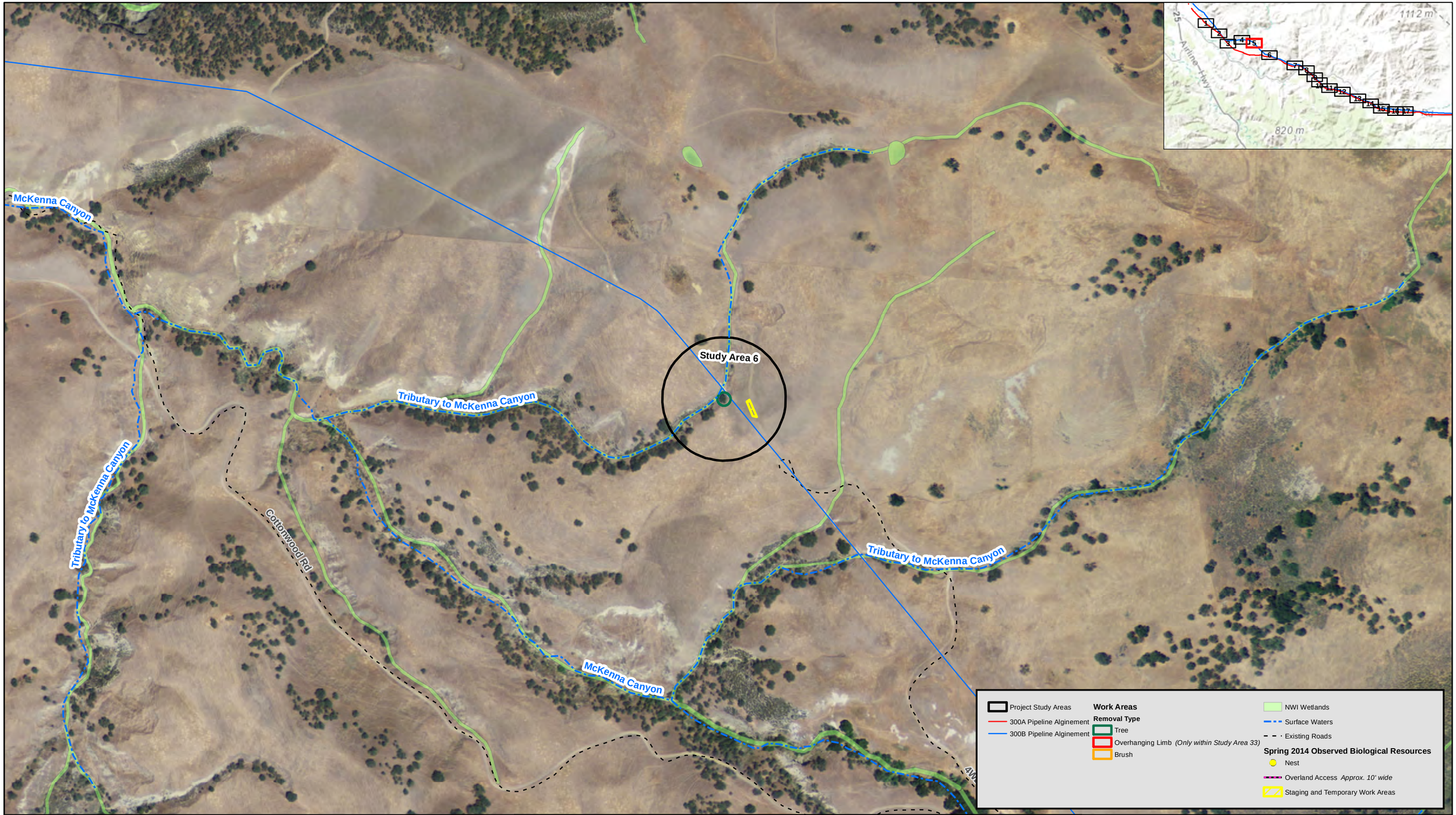

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

0 200 400 800 Feet

N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA ENVIRONMENTAL CONSULTANTS

Project Location Maps 5 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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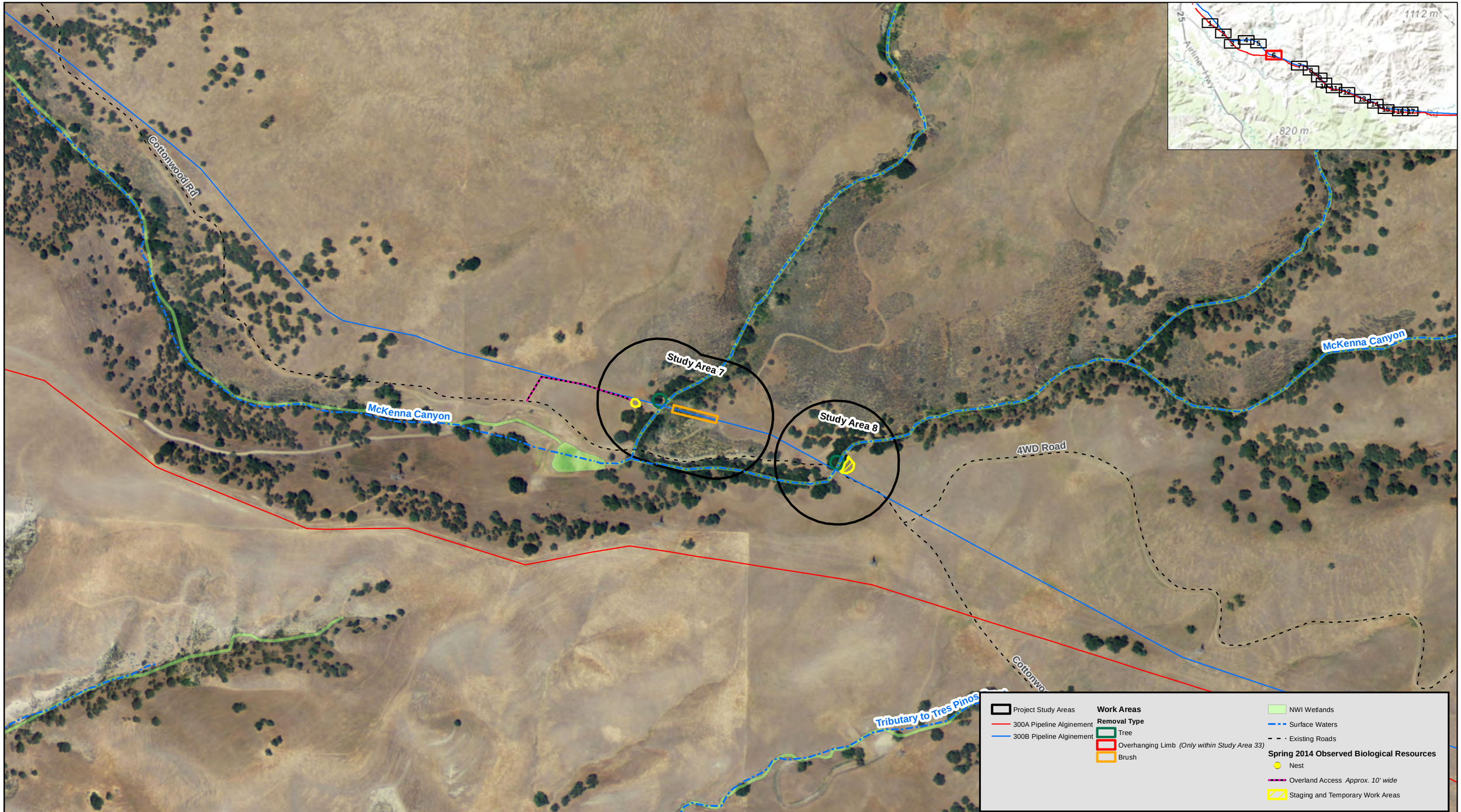

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

0 200 400 800 Feet

N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 6 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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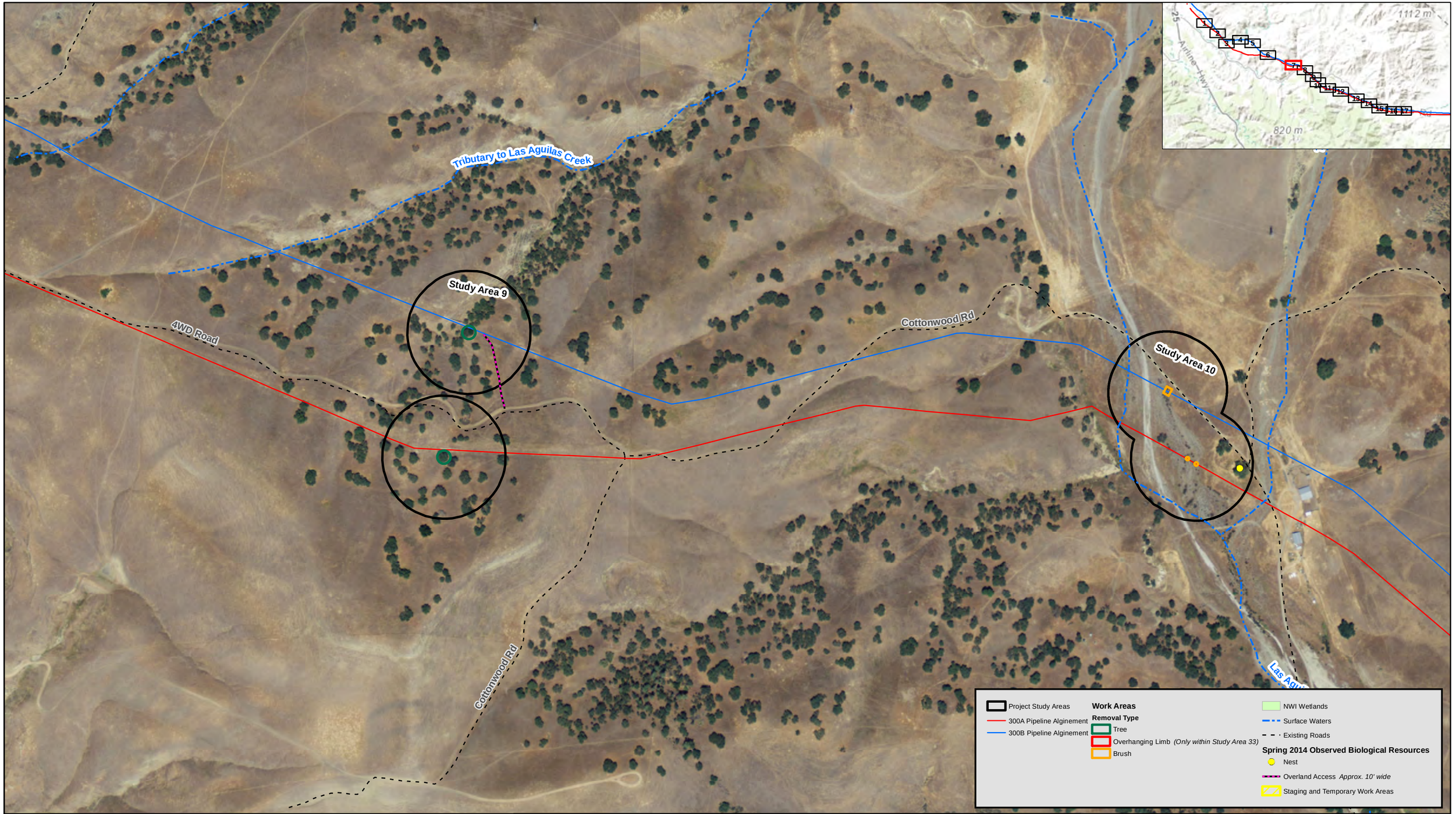

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

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SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 7 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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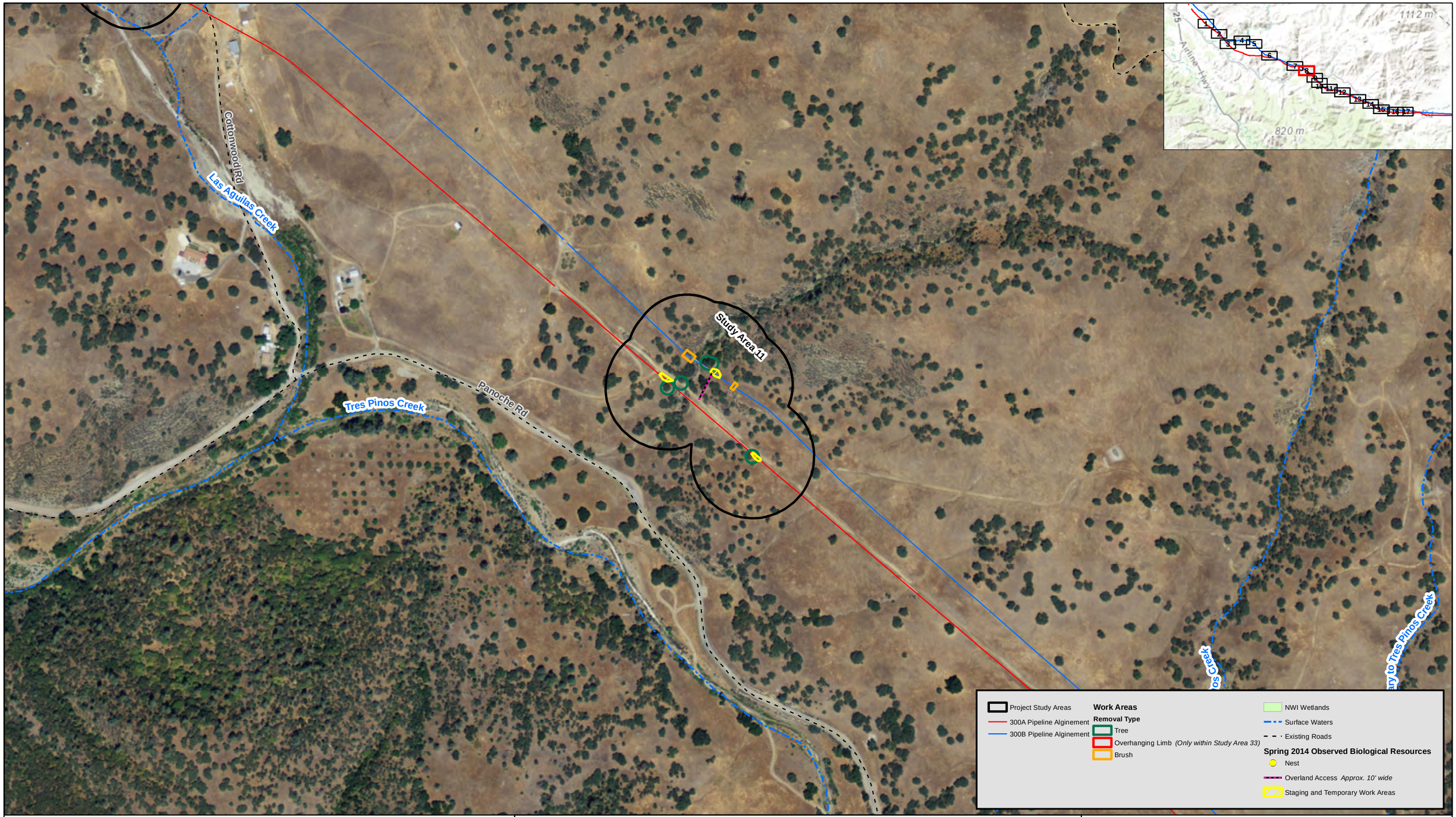

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 8 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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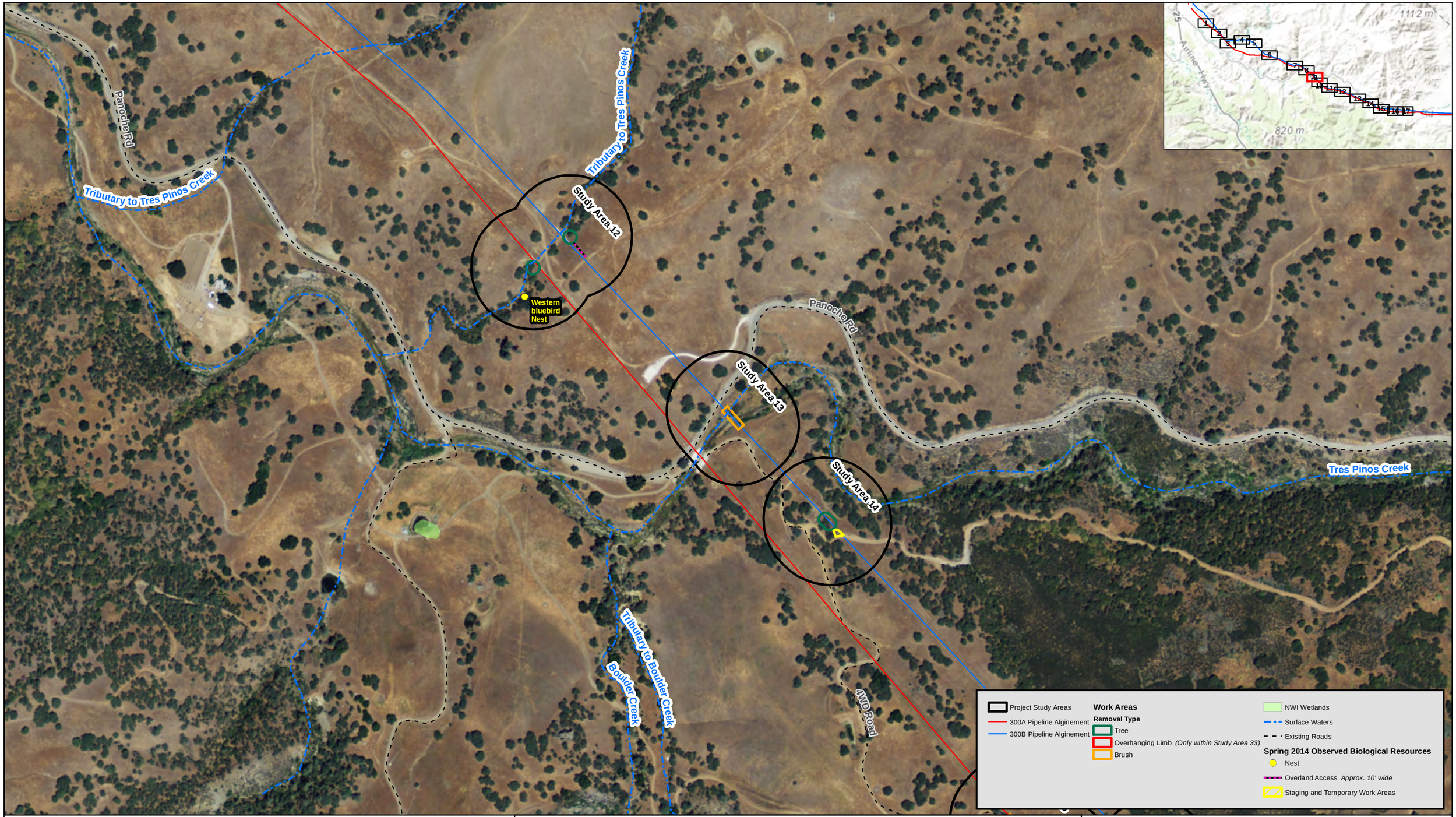

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community. USGS National Hydrography Dataset High Resolution, 2013. USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA ENVIRONMENTAL CONSULTANTS

Project Location Maps 9 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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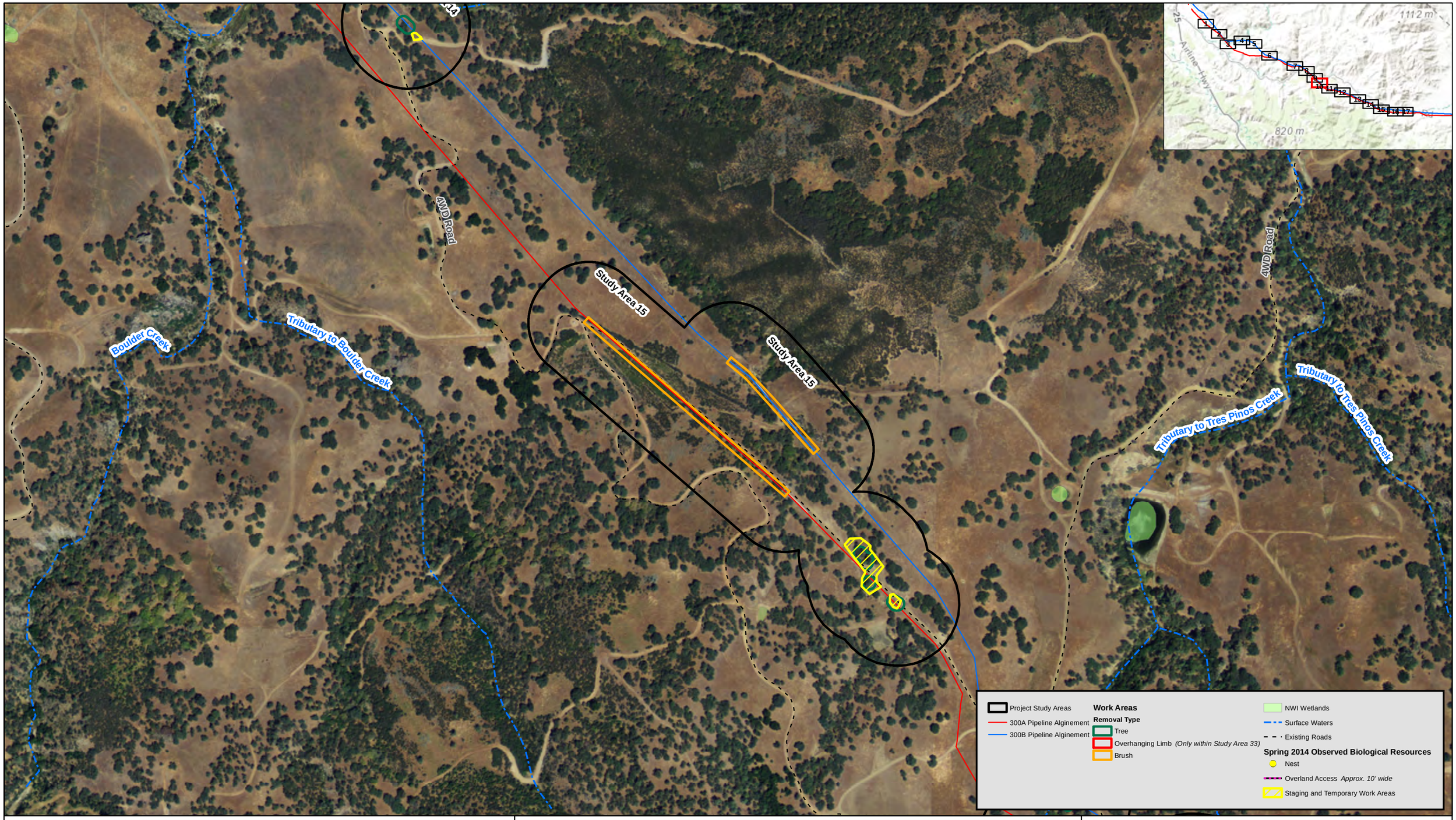

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USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA ENVIRONMENTAL CONSULTANTS

Project Location Maps 10 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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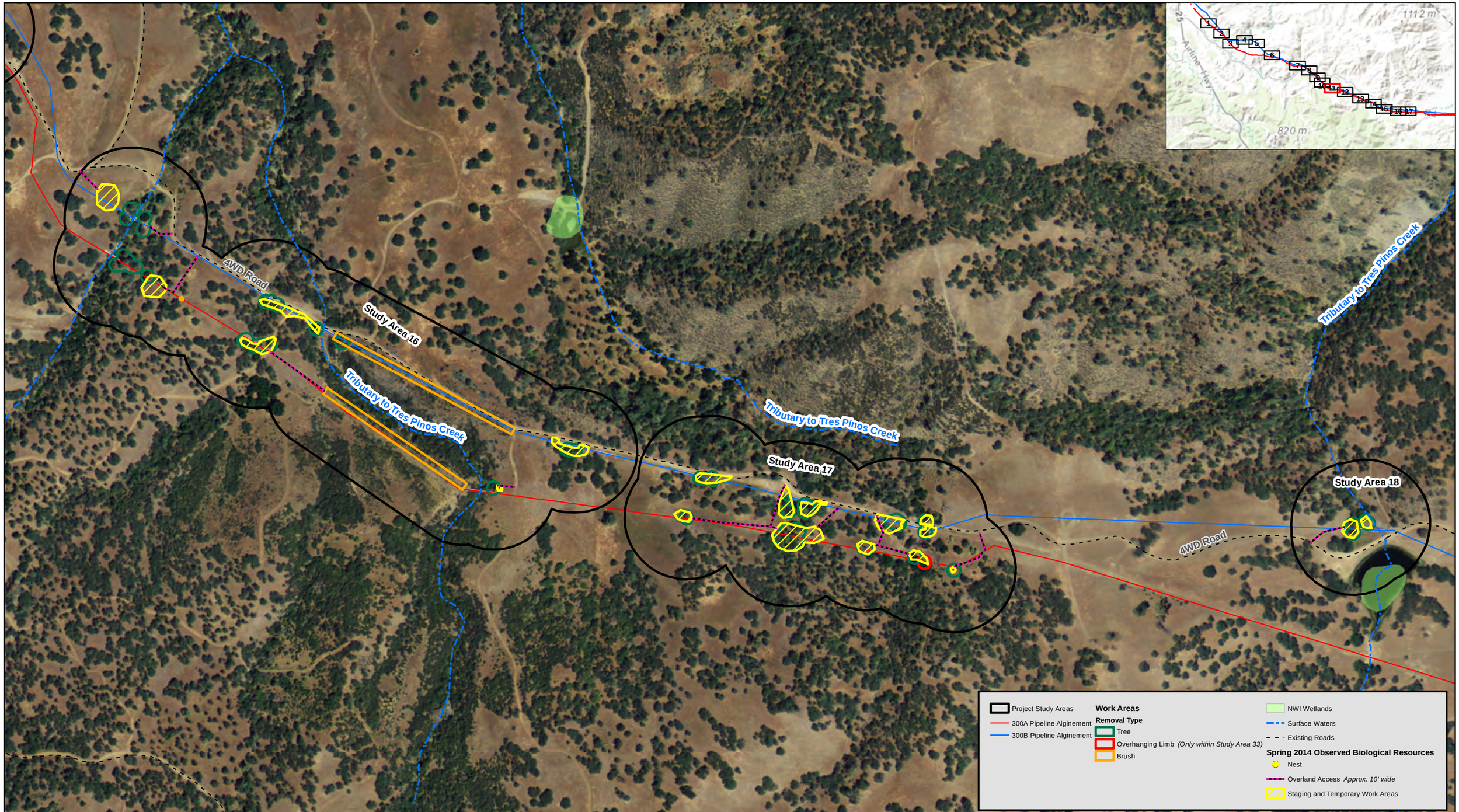

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USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA ENVIRONMENTAL CONSULTANTS

Project Location Maps 11 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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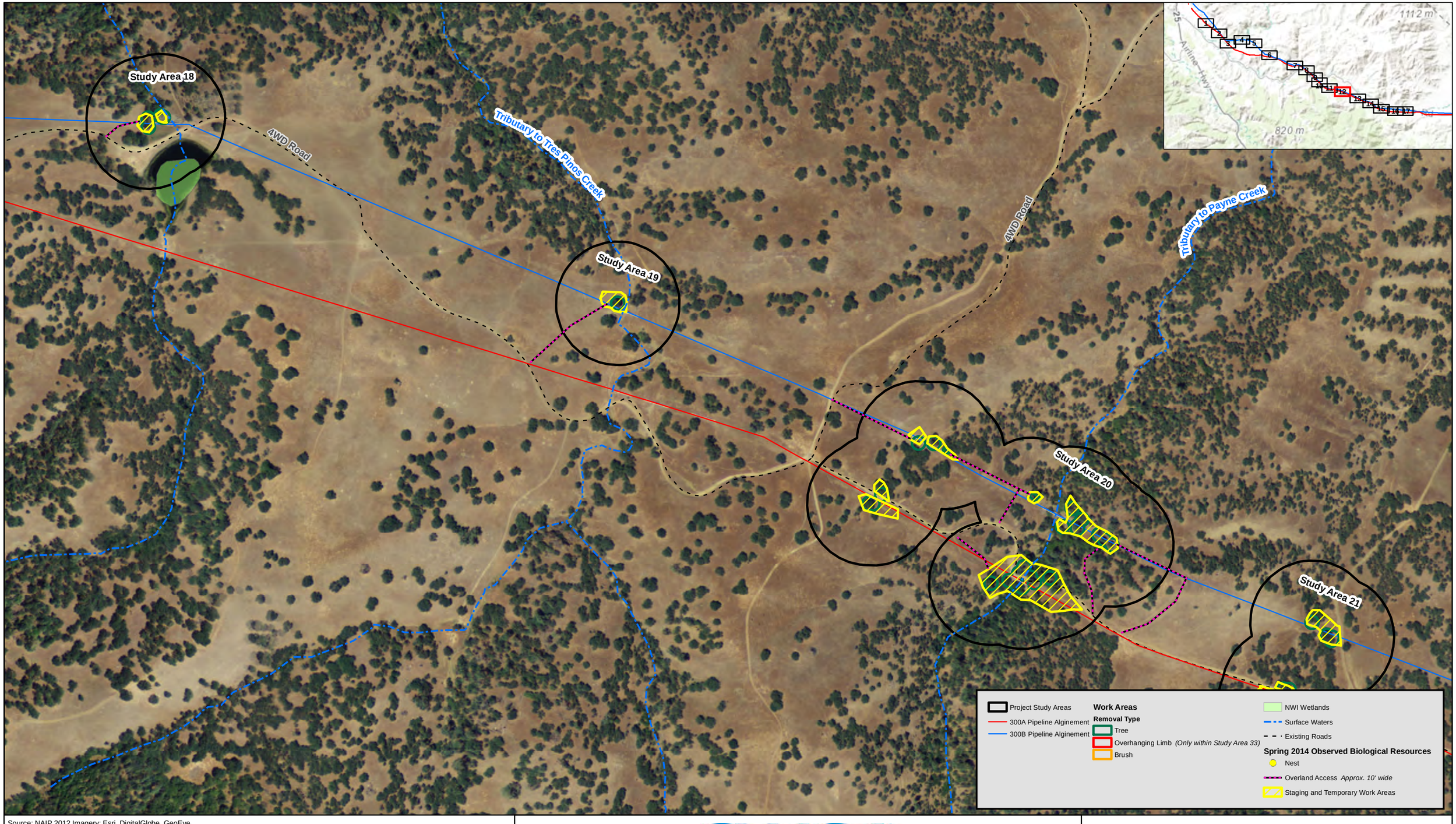

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N W E S

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Project Location Maps 12 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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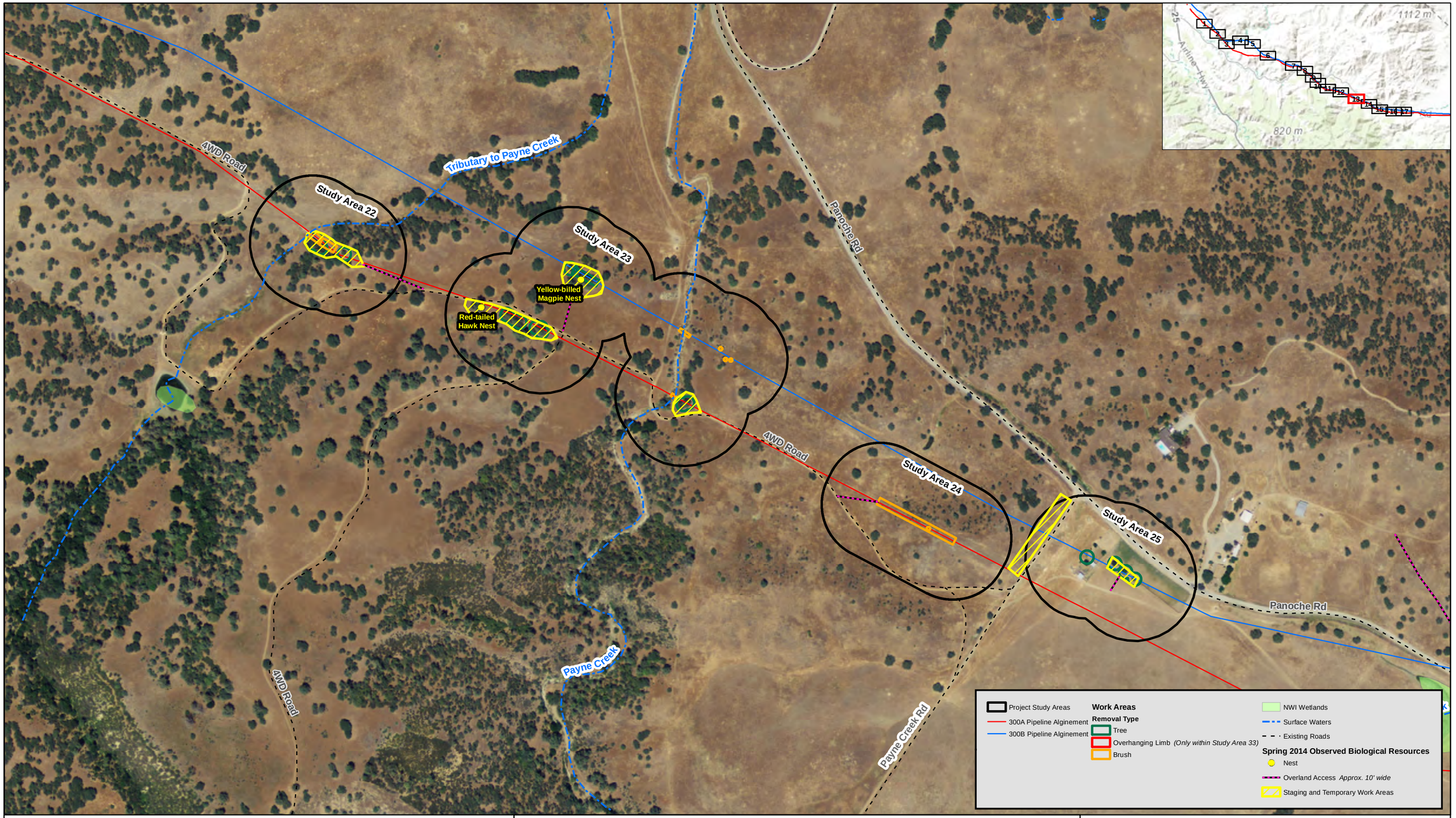

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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N W E S

Note: Unless otherwise depicted access to work areas will be via existing paved, gravel, dirt, or two-track roads or foot access only.

SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 13 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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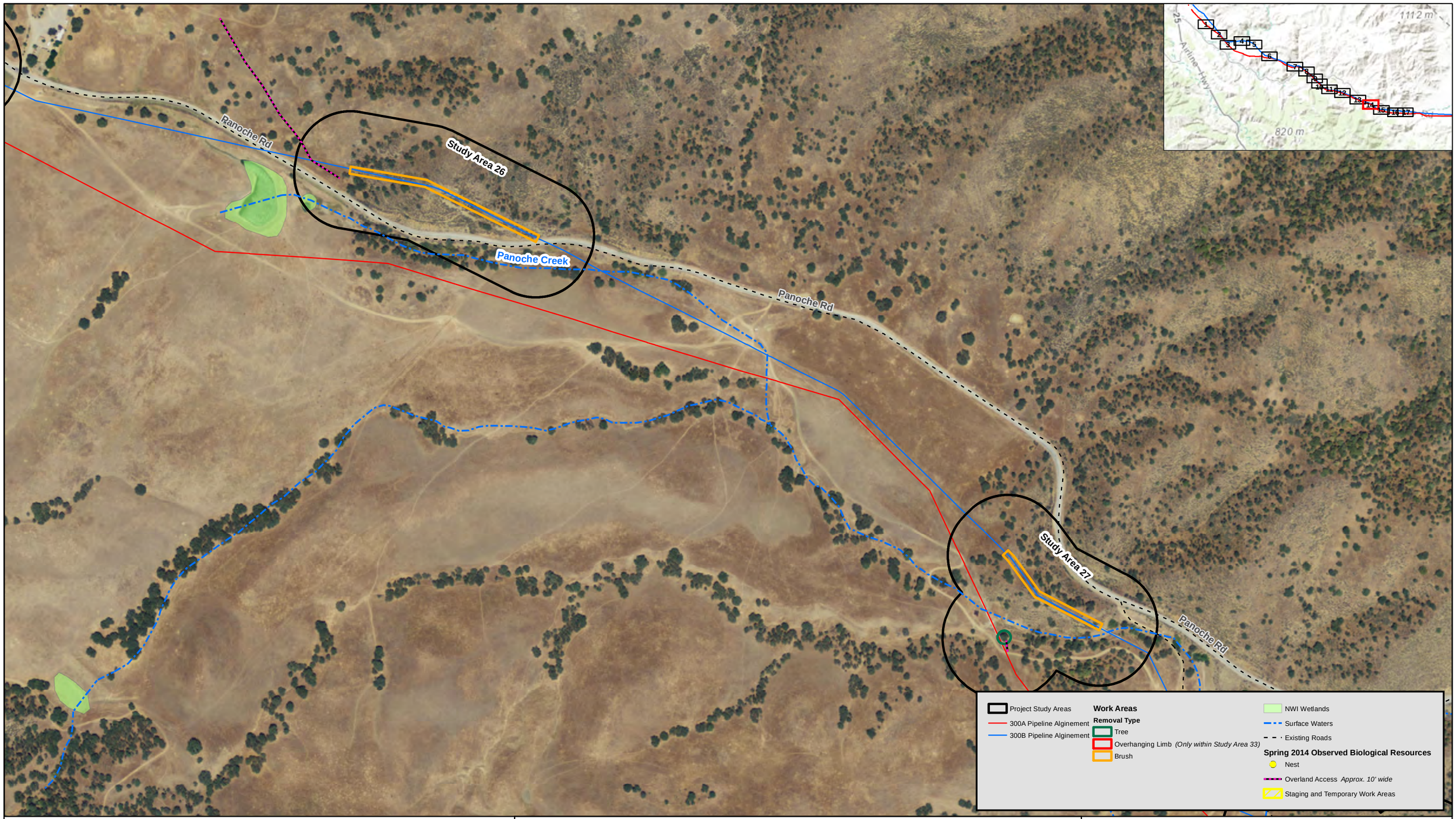

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
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N W E S

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SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 14 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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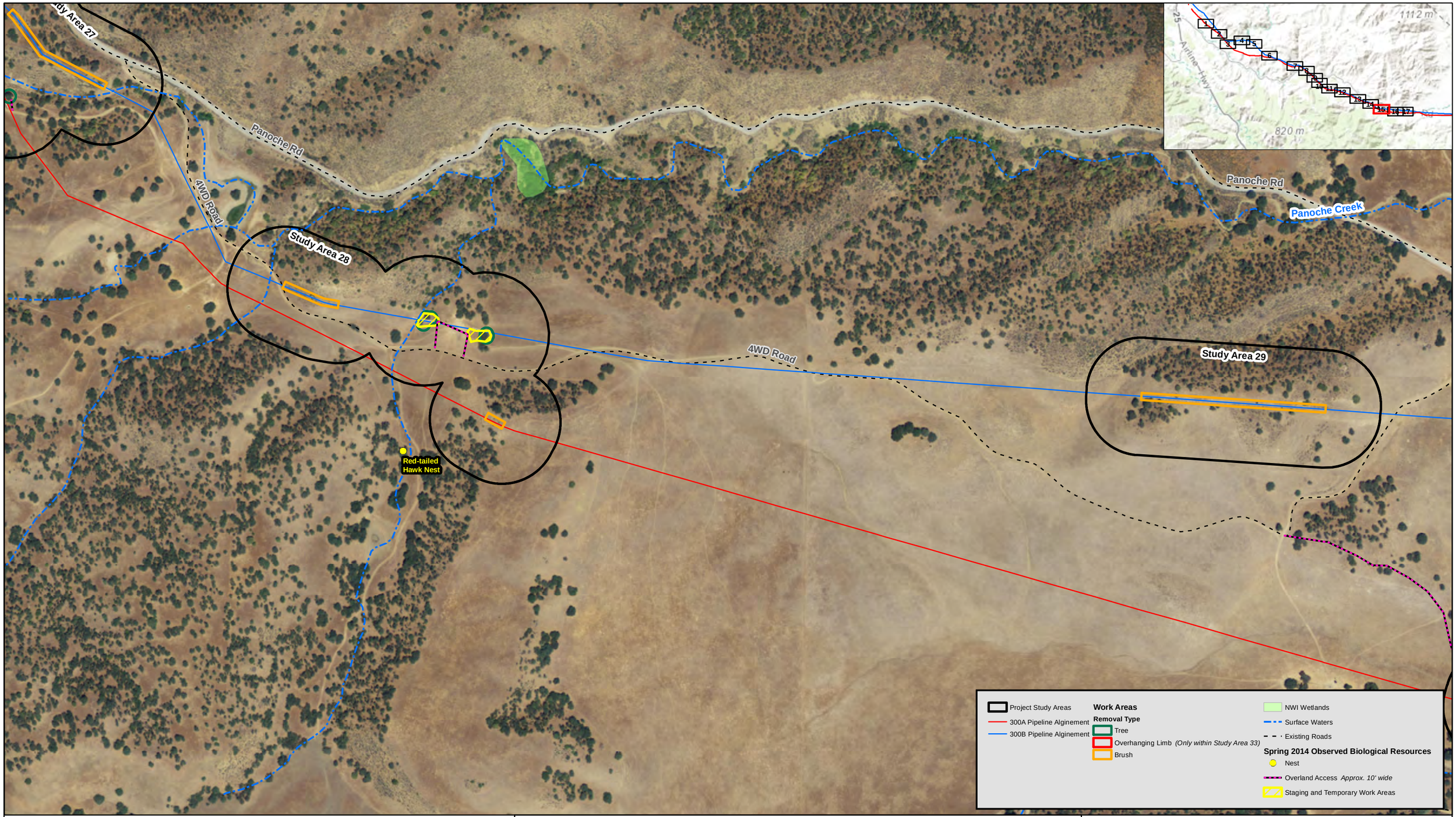

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community. USGS National Hydrography Dataset High Resolution, 2013. USFWS NWI Dataset, 2013.

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N W E S

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SWCA® ENVIRONMENTAL CONSULTANTS

Project Location Maps 15 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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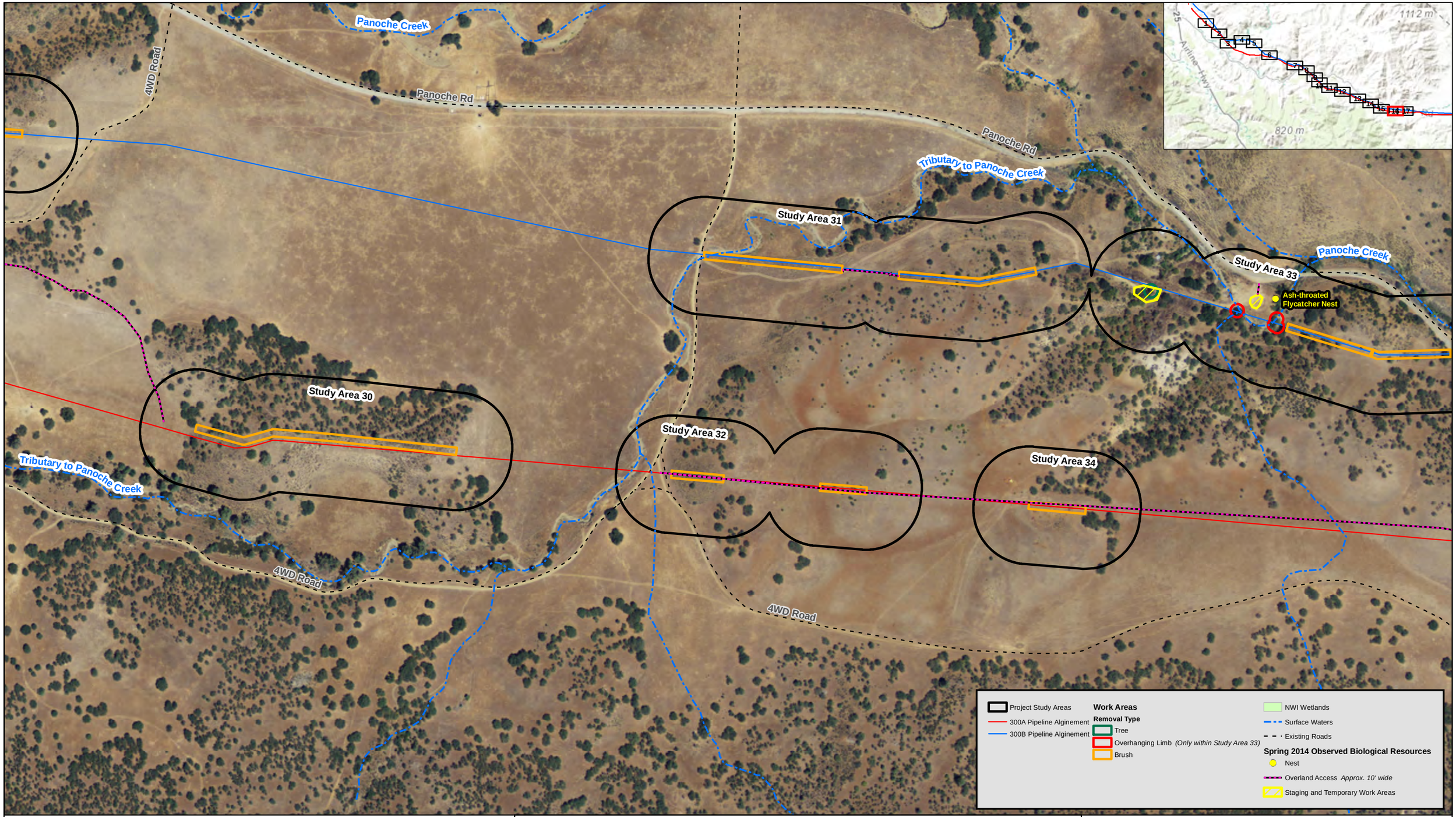

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N W E S

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Project Location Maps 16 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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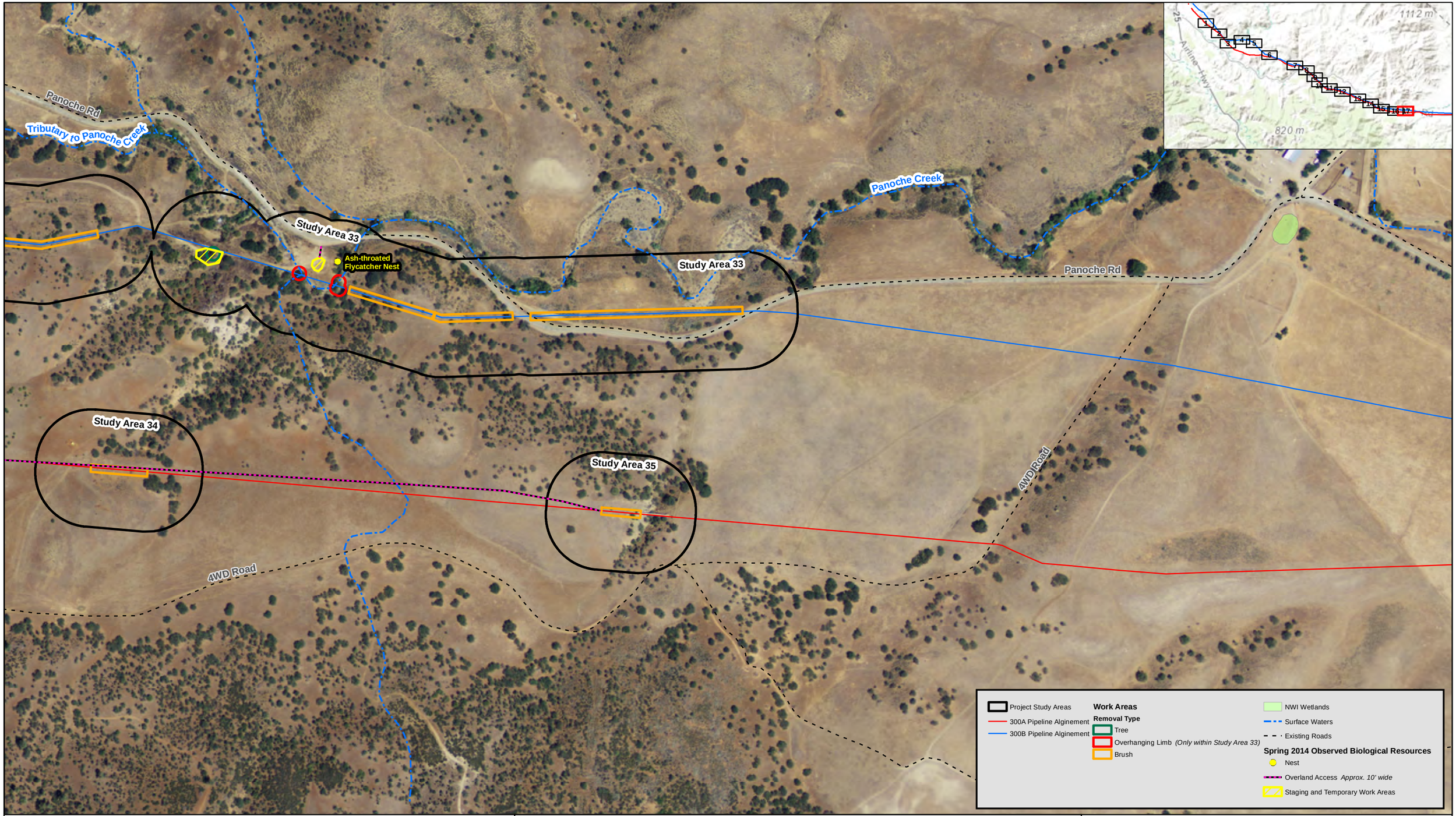

Source: NAIP 2012 Imagery; Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community.
USGS National Hydrography Dataset High Resolution, 2013.
USFWS NWI Dataset, 2013.

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SWCA ENVIRONMENTAL CONSULTANTS

Project Location Maps 17 of 17
Gas Pipeline - 300A/B

PG&E Vegetation Management
San Benito County, CA

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Appendix B

Native American Consultation Summary

Appendix B. Native American Consultation Summary

In response to letters sent to local Native American contacts previously described under Section 3.5.3.5, the following responses were received:

- Edward Ketchum of the Amah Mutsun Tribal Band responded to the letter via email on June 29, 2014, and requested initiation for consultation and to walk the project line. The PG&E cultural resources specialist (CRS) responded to Mr. Ketchum via email on July 7, 2014. No response has been received to date.

- Valentin Lopez of the Amah Mutsun Tribal Bank requested that the PG&E CRS call him to discuss the project, which she did on July 7, 2014. PG&E indicated, and Mr. Lopez concurred, that an Amah Mutsun Tribal Band representative would be notified if any cultural sites were encountered during project implementation and that an Amah Mutsun Tribal Band representative would be given the opportunity to comment and/or visit before continuing construction activities in the area if the discovery is unavoidable and/or appears to be significant.

- Irene Zwierlein of the Amah Mutsun Tribal band of Mission San Juan Bautista requested that an archaeologist and a Native American monitor be contacted if any sites were located during project implementation.

- Garcia and Associates was unable to leave a message with Michelle Zimmer of the Amah Mutsun Tribal band of Mission San Juan Bautista as her voicemail inbox was full. On July 8, 2014, R. Fies sent Ms. Zimmer a follow-up email and Ms. Zimmer called back later that day, requesting that that an archaeologist and a Native American monitor be contacted if any sites were located during project implementation.

- Ann Marie Sayers of the Indian Canyon Mutsun Band of Costanoan requested that a Native American monitor and an archaeologist be present on site in culturally sensitive sections and that the PG&E CRS contact her to further discuss details of the project. A.M. Sayers and The PG&E CRS spoke on the phone on July 7, 2014. PG&E indicated, and Ms. Sayers concurred, that a Native American tribal representative will be notified if any cultural resources are encountered during Project implementation and if the discovery is unavoidable and/or appears to be significant.

- A voice message was left with Linda G. Yamane of the Ohlone Indian Tribe and Ramona Garibay of the Trina Marine Ruano Family, but no response has been received to date.

- Garcia and Associates was unable to leave a voice message with Jakki Kehl of the Ohlone Indian Tribe due to her voicemail inbox being full and no follow-up email could be sent as an email address was not provided by the NAHC. No response has been received to date from Ms. Kehl.

Appendix C

List of Preparers/Reviewers

Appendix C. List of Preparers

A draft of the initial study and mitigated negative declaration was submitted by PG&E to CDFW and CDFW's consultant, Aspen Environmental Group, for review and revision. The Biological Resources evaluation was led by CDFW.

Lead Agency

California Department of Fish and Wildlife

Sarah Bahm, Environmental Scientist ..... Project Management, Biological Resources, Document Review

Craig Bailey, Sr. Environmental Scientist ..... Document Review

Julie Vance, Regional Manager ..... Document Review

Aspen Environmental Group (CDFW Consultant)

Fritts Golden, Senior Associate ..... Technical review and revision, all resource topics

Emily Capello, Associate ..... Technical review and revision, all resource topics

Elizabeth A. Bagwell, Senior Associate ..... Cultural Resources

PG&E Project Management and Draft Document Production

Pacific Gas and Electric Company

Vick Germany, AICP, Senior Land Planner ..... Project Management, Document Review

Dustin Joseph, AICP, Supervisor, GT Projects ..... Project Management, Document Review

SWCA Environmental Consultants (PG&E Consultant)

Shawna Scott, Senior Planner ..... Aesthetics, Agriculture and Forestry Resources, Air Quality and Greenhouse Gases, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Minerals, Noise, Population and Housing, Public Services, Recreation, Traffic and Transportation, Utilities and Service Systems

Seth Dallmann, Biologist ..... Biological Resources

Jason Weiner, Biologist ..... Biological Resources

Kristen Outten, Biologist ..... Biological Resources

Sara Dietler, Cultural Resources Specialist ..... Cultural Resources

Appendix D

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Appendix D. References

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