



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



### Notice of Preparation and Public Scoping Meeting for a Draft Environmental Impact Report

**Date:** March 25, 2021  
**To:** Responsible/Trustee Agencies and Interested Parties  
**From:** California Department of Fish and Wildlife  
**Subject:** Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Operation and Maintenance of Pacific Gas & Electric's Pipelines in Southern California Deserts Project and Notice of Public Scoping Meeting

**NOP Public Review Period:** March 25, 2021, to April 24, 2021

#### Public Scoping Meeting (Online Webinar Format)

**Date:** April 7, 2021

**Time:** 1:00 p.m.

**Scoping Meeting Log-In:** [rebrand.ly/Scoping-PGE-CA-Desert-Gas-Pipeline-OM](https://rebrand.ly/Scoping-PGE-CA-Desert-Gas-Pipeline-OM)

#### A. Introduction

In accordance with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, the California Department of Fish and Wildlife (CDFW), as the CEQA lead agency, will prepare a Draft Environmental Impact Report (EIR) for the Operations and Maintenance (O&M) of Pacific Gas & Electric's Pipelines in Southern California Deserts Project (project). The project applicant, Pacific Gas & Electric Company (PG&E), has filed an application with CDFW for an Incidental Take Permit (ITP) under California Fish and Game Code Section 2081(b) and Title 14 of the California Code of Regulations, Sections 783.2–783.8, to authorize potential take of Mojave desert tortoise (*Gopherus agassizii*) and Mohave ground squirrel (*Xerospermophilus mohavensis*) associated with its ongoing O&M activities within the California Mojave Desert. CDFW's need to contemplate an ITP triggers the need to comply with CEQA. Therefore, CDFW is serving as the lead agency by preparing an EIR and meeting obligations required under its certified regulatory program in compliance with CEQA for the issuance of an ITP.

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

*Conserving California's Wildlife Since 1870*

This NOP includes background information on the project and the O&M program area (Section B), a description of the proposed project (Section C), a summary of potential project impacts (Section D), day and time of the virtual public scoping meeting (Section E), information on how to provide comments to CDFW (Section F), and where documents are available for public review (Section G).

In accordance with CEQA Guidelines Section 15082(b), there will be a 30-day comment period for this NOP, beginning on March 25, 2021, and ending on April 24, 2021. CDFW welcomes agency and public input during the public review period. In the event that no response or well-justified request for additional time is received from any responsible, federal, or trustee agency by the end of the review period, CDFW may presume that such agencies have no comments.

## **B. Background and Project Location**

### **B.1 Background**

PG&E operates an extensive system of interconnecting natural gas pipelines within the Mojave Desert region. The pipeline system in this region consists of high-pressure transmission pipelines, distribution pipelines, and associated facilities that transport natural gas throughout California. In this region, natural gas delivery is made almost exclusively to commercial, military, industrial, and electric generation, and residential customers. PG&E's Pipelines in Southern California Deserts O&M Program (program) involves approximately 645 miles of transmission pipeline and associated facilities, which encompass facilities in San Bernardino and Kern Counties.

Maintenance and repair of the system is required by California Public Utilities Commission (CPUC) General Order 112-F, which incorporates the U.S. Department of Transportation regulations provided by Title 49, Part 192 (Transportation of Natural and Other Gas by Pipeline) of the Code of Federal Regulations. In October 2011, the California legislature enacted Senate Bill (SB) 705, which declared "[i]t is the policy of the state that the commission and each gas corporation place safety of the public and gas corporation employees as the top priority." SB 705 was codified as Public Utilities Code (PUC) Sections 961 and 963(b)(3). Section 961 of the PUC mandates that gas operators must go beyond what is considered "adequate" to develop and implement gas safety plans that are "consistent with best practices in the gas industry." On April 20, 2012, the CPUC amended the scope of its Pipeline Safety Rulemaking to include compliance with the requirements of PUC Sections 961 and 963.4. The CPUC further directed each California natural gas corporation to develop and implement a plan for the safe and reliable operation of its gas pipeline facilities.

PG&E currently conducts O&M activities for the Pipelines in Southern California Deserts under an incidental take authorization (Biological Opinion for Maintenance Activities on the Pacific Gas and Electric Company Gas Pipeline System in the California Desert [6840, CA-063.50] [1-8-99-F-71]) for Mojave desert tortoise issued by the U.S. Fish and Wildlife Service (USFWS) through Section 7 consultation with the Bureau of Land Management in 2000. As part of Phase I of the Desert Renewable Energy Conservation Plan (DRECP), BLM adopted the Land Use Plan Amendment (LUPA) in September 2016. The BLM LUPA establishes management direction for the permitting of renewable energy and transmission facility development on approximately 10 million acres of BLM-managed lands in the DRECP area. In 2017, USFWS issued a programmatic Biological Opinion for Activities in the California Desert Conservation Area (CDCA), which requires implementation of the Conservation and Management Actions described in the LUPA for the CDCA.

PG&E proposes to complement its federal take coverage by pursuing a long-term state ITP from CDFW for its O&M activities in the Mojave Desert region. A state ITP would provide an enhanced conservation strategy while eliminating the time and expense involved in processing individual state ITPs.

An ITP application was submitted to CDFW on June 12, 2015, and was subsequently deemed complete on July 7, 2015. The ITP application included two threatened species – Mojave desert tortoise and Mohave ground squirrel. Issuance of an ITP is the discretionary action that has triggered the preparation of an EIR in accordance with CEQA. The ITP, if issued, would authorize project-related incidental take of Mojave desert tortoise and Mohave ground squirrel subject to certain conditions under the California Endangered Species Act.

## **B.2 O&M Program Area**

The O&M activities would cover approximately 645 miles of pipelines in the Mojave Desert region located in San Bernardino and Kern counties (refer to Figure 1: O&M Program Overview Map). The western extent of the O&M program area is located southwest of the City of Mojave, and the eastern terminus of the O&M program area is located adjacent to the Colorado River, approximately 11.5 miles southeast of the City of Needles. The majority of the area includes land within the CDCA, but a small portion of the area is located between the eastern boundary of the CDCA and the Colorado River.

Of the approximately 645 miles of pipeline in the O&M program area, approximately 347 miles are located on BLM-managed land; 48 miles are located on military land; 1 mile is located on USFWS-managed lands; less than 1 mile is located on CDFW-managed lands; 3 miles are located on lands managed by the California State Lands Commission (CSLC); 244 miles are located on private, non-government-owned land; and less than 1 mile is located on land owned by Kern County. The six natural gas pipelines in the system are Line 300 A, Line 300 B, Line 311, Line 372, Line 313, and Line 314. Lines 300 A and B are two parallel, 34- to 36-inch-diameter high-pressure natural gas pipelines that run from the California-Arizona border to the San Francisco Bay Area. Several transmission pipelines, compressor stations, and associated facilities that transport natural gas to commercial, private, military, industrial, and utility electric generating customers are also in the O&M program area.

Table 1 summarizes the location by County, jurisdictions the pipelines cross, length of pipeline within each jurisdiction, and diameter of the pipelines within the O&M program area. In addition, Table 1 provides the total length of each pipeline, as well as the total number of miles that cross each jurisdiction.

**Table 1. O&M Program Area – Pipeline Location and Overview**

Pipeline	County (Location)	Land Owner Type – Occupied Area (Miles)							Pipeline Diameter (Inches)
		BLM	Military	USFWS	CDFW	CSLC	Private/ Other	Total	
<i>Transmission, Distribution Feeder Mains, and Associated Facilities</i>									
Line 300 A	SBC and KC (eastern portion)	135.6	20.5	–	–	1.1	68.3	<b>225.5</b>	34 to 36
Line 300 B	SBC and KC (eastern portion)	130.9	0.8	1.3	–	–	93.2	<b>226.2</b>	34 to 36
Line 311	SBC (western portion – begins at Line 300 A at the intersection of SR 58 and U.S. Highway 395 near Kramer Junction)	41.4	1.5	–	0.1	1.1	10.5	<b>54.6</b>	10 to 12
Line 372	SBC (begins at Line 311 and extends northwest almost to highway 178 near Ridgecrest)	2.9	0.8	–	–	–	–	<b>3.7</b>	10 to 12
Line 313	SBC (begins at Line 300 A, approximately 2.5 miles east of the community of Daggett [milepost 0] along I-40)	19.6	–	–	–	–	14.9	<b>34.5</b>	8 to 10
Line 314	SBC (begins at Line 300 A, approximately 2.5 miles west of Barstow [milepost 0]).	5.6	–	–	–	–	38.4	<b>44</b>	8 to 12
Distribution Feeder Mains and	SBC (western portion) and KC (eastern portion) (many branch off of Lines 300 A	10.5	24.2	–	0.1	1.1	20	<b>55.9</b>	0.75 to 10

**Table 1. O&M Program Area – Pipeline Location and Overview**

Pipeline	County (Location)	Land Owner Type – Occupied Area (Miles)							Pipeline Diameter (Inches)
		BLM	Military	USFWS	CDFW	CSLC	Private/ Other	Total	
Associated Facilities	located near PG&E's Topock Compressor Station and the communities of Ridgecrest, Edwards, Boron, Kramer Junction, and Amboy).								
<b>Total</b>		<b>346.5</b>	<b>47.8</b>	<b>1.3</b>	<b>0.2</b>	<b>3.3</b>	<b>244.3</b>	<b>644.4</b>	N/A

**Notes:** O&M = operations and maintenance; BLM = Bureau of Land Management; USFWS = U.S. Fish and Wildlife Service; CDFW = California Department of Fish and Wildlife; CSLC = California State Lands Commission; SBC = San Bernardino County; KC = Kern County; SR = State Route; I = Interstate; N/A = not applicable.

### **C. Project Description**

The proposed project covers the O&M activities (collectively referred to as O&M program) for approximately 645 miles of pipelines in the Mojave Desert region, which encompasses high-pressure gas pipelines and facilities. The gas transmission system consists of gas pipelines; compressor stations; associated gas transmission and distribution facilities; rights-of-way (ROWs); areas up to 0.25 miles beyond the ROWs, where needed; and their related equipment and facilities. In general, routine O&M activities would result in temporary disturbance in areas already previously disturbed, such as along existing pipeline ROWs and existing access roads. The majority of the O&M activities in the O&M program area would result in temporary and short-term impacts to expose the pipeline for inspection or repair, or to access a given facility. The O&M activities proposed would not result in large new permanent disturbance areas.

The pipeline system has been in place for more than 70 years, and O&M activities have been conducted since the pipeline system was installed. Since 2001, PG&E has been gathering data on temporary and permanent disturbance resulting from O&M activities.

The amount of ground disturbance would vary each year depending on the type and number of O&M activities scheduled. During the period of 2001 to 2017, the annual amount of temporary disturbance resulting from O&M activities has ranged from 0.53 acres to 37.206 acres, and permanent disturbance has ranged from 0.01 acres to 2.72 acres, according to the annual reports PG&E submitted to BLM and USFWS. Annual averages were approximately 9.67 acres of temporary disturbance and 0.89 acres of permanent disturbance. Between 2018 and early 2021, PG&E completed hydrotest and in-line inspection activities for an unprecedented length of pipeline. This large hydrotesting area is unusual and inconsistent with the O&M work that has typically been required in the O&M program area since 2001. It is not anticipated that hydrotesting on segments this large would be required in the next 30 years; therefore, the amount of disturbance resulting from current hydrotesting is not accounted for in the disturbance projections for required O&M activities in the next 30 years. As such, PG&E anticipates that approximately 40 acres of disturbance to Mojave desert tortoise habitat and up to approximately 10 acres of disturbance to Mohave ground squirrel habitat would occur annually under the proposed project. These estimates are derived from examining the amount of disturbance that has occurred between 2001 and 2017 and anticipating future maintenance needs for the pipelines.

PG&E expects the same O&M activities would continue at a similar frequency as they did from 2001 through 2017, a period of 16 years. Therefore, the type, number, and frequency of ongoing O&M activities would continue to be a part of the baseline conditions in the O&M program area.

PG&E would perform all O&M activities in accordance with federal, state, and local environmental, safety, and construction regulations and standards. Where applicable, PG&E would also conduct the work in accordance with landowner agreements.

Typical O&M activities, as well as the typical area of disturbance, duration, and frequency of activities in the O&M program area, are presented in Table 2.

**Table 2. Typical O&M Activities**

O&M Activity	Type and Typical Area of Disturbance	Duration	Frequency
Pipeline Patrols	No additional disturbance	Approximately 30 days per year	Up to quarterly aerial patrols; quarterly to annual patrols on foot, all-terrain vehicles, and/or sport utility vehicles
Valve Inspections and Lubrication	No additional disturbance	Approximately 45 day per year	Several times per year
Telecommunication Site Inspections	No additional disturbance	Approximately 20 days per year	Monthly, but may be performed more frequently to maintain the system
Telecommunication Site Maintenance	Temporary staging areas are generally located within PG&E's ROWs or other disturbed areas, but may require additional workspace outside of disturbed area up to 0.25 acres	Approximately 20 days per year	Monthly
Road Surface Maintenance	No additional disturbance	Approximately 60 days per year	Yearly and as needed
ROW and Access Road Surface Repair	Temporary: 0-2 acres and/or Permanent: <0.1 acres	Varies depending on the type and length of repairs needed	Often required after heavy storms due to erosion and as a result of damage caused by off-road vehicles
Erosion Control	Temporary: 0.30 to 0.46 acres Permanent: <0.01 acres	Varies depending on the type of controls needed	Variable

**Table 2. Typical O&M Activities**

O&M Activity	Type and Typical Area of Disturbance	Duration	Frequency
Soil Stabilization	Temporary: 1 acres and/or Permanent: <0.1 acres	Typically, 7 days or less	Variable
Installation of Pig Launcher/Receiver Facilities	Temporary: 2.12 acres Permanent: 0.69 acres	6 to 8 weeks	4 to 6 installations
Installation of Deep-Well Anodes	Temporary: 0.02 to 0.32 acres	2 to 4 weeks	0 to 6 times per year
Thermoelectric Generators	Temporary: 0.06 to 0.14 acres Permanent: <0.01 acres	2 to 4 weeks	0 to 5 times per year
Installation of Magnesium Anodes	Temporary: <0.01 acres	1 to 3 days	0 to 10 times per year
Installation of Flex Anodes	Temporary: <0.01 to 0.02 acres	Approximately 4 weeks	<1 time per year
Installation or Replacement of Horizontal Anode Beds	Temporary: 0.02 to 0.32 acres	5 to 7 weeks	<1 time per year
Electronic Test System (ETS) Station and Cathodic Test Station (CTS) Installations	Temporary: 0.06 acres	ETS: 5 days CTS: 1 to 2 days	ETS: 5 to 10 times per year CTS: Up to 100 times per year
Hydrostatic Testing	Temporary: 0.23 acres	8 weeks	0 to 6 times per year for the duration of the permit
Internal Pipeline Inspection	Temporary: 0.11 to 0.23 acres	Inspections require 4 weeks of preparation, 24 hours for the inspection, and 2 weeks for demobilization; calibration tests take 5 to 10 days	Inspections: every 7 years Calibration tests: 5 to 10 required annually



**Table 2. Typical O&M Activities**

O&M Activity	Type and Typical Area of Disturbance	Duration	Frequency
Integrity Management	No additional disturbance	Surveys take approximately 10 days	Every 2 months or as indicated by the integrity management team
Water Diversion Channels	Permanent: <0.10 acres	2 days	Variable, but generally less than 2 times per year
Span Painting/Air-to-Soil Corrosion Protection	Temporary: <0.01 to 0.08 acres	Approximately 6 weeks	Variable
Below-Grade Pipe and Coating Inspection	Temporary: <0.01 to 0.57 acres	2 to 10 days	10 times per year
Valve/Pipeline Excavation and Recoating	Temporary: <0.01 to 0.28 acres	2 to 4 weeks	0 to 25 times per year
Valve Replacement/Automation	Temporary: 0.52 to 0.57 acres Permanent: 0.06 acres	4 to 5 weeks	0 to 10 times per year
Pipeline Segment Replacement	Temporary: 0.46 to 6.89 acres	Approximately 1 to 6 months	Frequency and length of pipeline segment replacement activities would vary annually
High-Pressure Regulator Deactivation	Temporary: <0.01 acres	Approximately 1 week	0 to 10 times per year
Activities that Could Extend Outside of Pipeline ROW Corridors	Temporary: 0.5 acre	N/A	N/A
Fire Response	Variable	Variable	Conducted on an as-needed basis

**Note:** O&M = operations and maintenance; PG&E = Pacific Gas & Electric Company; ROW = right-of-way; N/A = not applicable.

#### D. Potential Environmental Effects

Pursuant to CEQA Guidelines Section 15063(a), CDFW has elected to proceed directly to the preparation of a Draft EIR rather than preparing an Initial Study. Therefore, no determinations have yet been made as to the significance of the project's potential impacts. Determinations will be made in the environmental analysis conducted in the Draft EIR after the issues are considered thoroughly. The impacts analysis in the EIR will be conducted in accordance with the CEQA Guidelines and will provide

a response to each threshold question in Appendix G, Environmental Checklist Form, of the CEQA Guidelines. An example of the Environmental Checklist Form can be found at the following website: [https://califaep.org/docs/2019-Appendix\\_G\\_Checklist.pdf](https://califaep.org/docs/2019-Appendix_G_Checklist.pdf). This link is provided to assist the public and agencies in preparing written scoping comments.

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

- Aesthetics
- Agriculture and Forestry
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils (including Paleontological Resources)
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities /Service Systems
- Wildfire

The EIR will evaluate potential environmental effects of the proposed project, including PG&E's best management and standard practices, as well as applicant-proposed measures, during the environmental evaluation. Where needed, mitigation measures will be proposed to avoid and/or substantially lessen any significant adverse effects identified in the EIR's impact analysis.

The EIR will also address the cumulative environmental consequences of the proposed project in combination with other closely related past, present, and reasonably foreseeable future projects in the area. This will serve to satisfy CEQA requirements regarding regional cumulative effect concerns.

In compliance with CEQA Guidelines Section 15126.6, the EIR will describe and evaluate the comparative merits of a reasonable range of alternatives to the proposed project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain their reasoning. The EIR will provide an analysis of the no project alternative and will also identify the environmentally superior alternative. The alternatives to be analyzed in the EIR will be developed during the environmental review process and will consider input received during public scoping period.

#### **E. Public Scoping Meeting**

Rather than conducting an in-person meeting, the Governor's Executive Order N-25-20 allows state agencies to hold meetings via teleconferencing while still meeting state transparency requirements. Therefore, CDFW will conduct the public scoping meeting online, through a webinar-type format. The scoping meeting will involve a presentation about the proposed project and the environmental review process and schedule. The purpose of the meeting is to facilitate the receipt of written comments about the scope and content of the environmental analysis to be addressed in the Draft EIR. The scoping meeting is for information gathering; it is not a public hearing, and no public testimony will be

taken. No decisions about the project will be made at the public scoping meeting. The meeting date, time, and the online address for the project's scoping meeting are as follows:

**Date:** April 7, 2021

**Time:** 1:00 p.m.

**Scoping Meeting Login:** [rebrand.ly/Scoping-PGE-CA-Desert-Gas-Pipeline-OM](https://rebrand.ly/Scoping-PGE-CA-Desert-Gas-Pipeline-OM)

Everyone is encouraged to attend the teleconference online to express their concerns about the proposed project and to offer suggestions regarding the proposed project, including alternatives.

#### **F. Submitting Comments**

At this time, CDFW is soliciting comments on the NOP regarding your views on how the project may affect the environment. This information will be considered when preparing the Draft EIR's discussion of environmental topics, significant effects, mitigation measures, and alternatives. Because of time limits mandated by state law, comments should be provided no later than 5:00 p.m. on April 24, 2021 (the end of 30-day comment period, which starts on March 25, 2021).

You have several options for submitting comments: (1) online during the scoping meeting, (2) by U.S. mail, or (3) by email. Comments provided by email should include "PG&E O&M – NOP Scoping Comments" in the subject line, and the name and physical address of the commenter should be contained in the body of the email.

Please send all comments to:

**California Department of Fish and Wildlife**

**Attention:** Ashley Rosales, Project Coordinator

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

**OR via email:** [Ashley.Rosales@wildlife.ca.gov](mailto:Ashley.Rosales@wildlife.ca.gov); include "PG&E O&M – NOP Scoping Comments" in the subject line

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft EIR, which is anticipated to be available for public review in the fourth quarter of 2021.

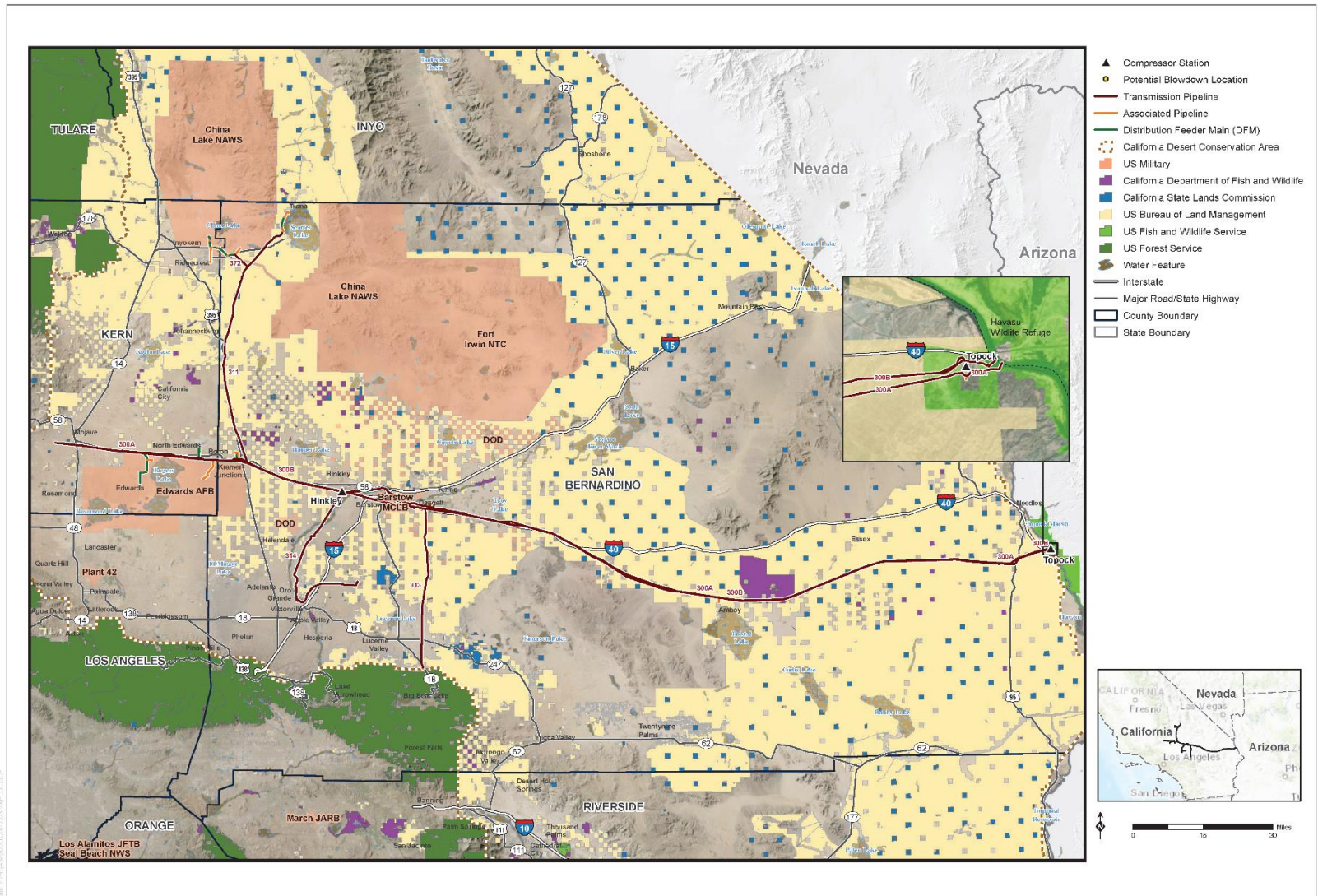
#### **G. Location of Documents Available for Public Review**

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

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

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

Notice of Preparation – Notice of Public Scoping Meeting  
 O&M of Pacific Gas & Electric’s Pipelines in Southern California Deserts Project



SOURCE: PG&E; Insignia Environmental



FIGURE 1

O&M Program Overview Map

Operation and Maintenance of Pacific Gas & Electric’s Pipelines in Southern California Deserts